

# MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

## EFM Q47

### Introduction

EFM Global Holdings & its subsidiary companies are committed to acting ethically and with integrity in respect of all its business activities. The Company adopts a zero-tolerance approach to modern slavery and human trafficking throughout all of its business dealings and expects its suppliers and relevant stakeholders to adopt a similar approach. In doing so, the Company endorses full compliance with relevant laws through the implementation and promotion of ethical business practices to protect workers from being exploited both within EFM Global Holdings and its supply chains.

This statement, which is made pursuant to Section 54(1) of the Modern Slavery Act 2015 in the UK, the Modern Slavery Act 2018 in Australia & dedicated legislations within the USA & UAE for the financial year ending 2022, outlines the potential risks and significant steps adopted by the Company to ensure that modern slavery or human trafficking does not occur in EFM Global Holdings and/or any of its supply chains.

This statement applies to all employees, workers or any persons working for us on our behalf in any capacity, including agency workers, contractors, external consultants, third-party representatives, and business partners.

### Organisational Structure and Supply Chain

EFM Global Holdings specialises in global logistics for the live events industry with offices in the UK, Europe, USA, Australia, UAE and KSA.

This statement relates to our financial ending 31<sup>st</sup> December 2024, at which we had 79 employees globally and our revenue was **\$59.010 million**.

The Company currently provides its services globally, working with approved suppliers and agents globally to support the delivery of such services to our customers. Our supply chain comprises of the purchasing of goods and services that support the operation of our premises and the services we provide to our customers. Such purchases include office and warehouse supplies, transportation services and resources, marketing supplies, ICT equipment, cleaning products and waste/recycling services, office furnishings, security and catering supplies.

Therefore, pursuant to the Modern Slavery Act, EFM Global Holdings expects any suppliers/contractors with whom they conduct business with to adopt similar high standards in the pursuit to prevent modern slavery or human trafficking by having a Modern Slavery and



Human Trafficking statement or policy in place. The relationship with all our suppliers/contractors has been established over a number of years and is based on close links and contact with the owners, Directors and long-standing employees. As and when the Company engages in business dealings with new suppliers/contractors, the Company undertakes due diligence to ensure there is no modern slavery or human trafficking activity occurring both within the business or any of its supply chains through its Supplier Evaluation procedure.

### **Responsibility**

The Board of Directors has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all employees comply with the policy. The Group CFO has responsibility for implementing and reviewing this policy and monitoring its use and effectiveness.

### **Relevant Policies**

EFM Global Holdings has several policies in place, which outline the Company's approach towards the identification of modern slavery and human trafficking risks and any necessary steps to be taken to prevent slavery and human trafficking in its operations. These policies include:

Whistleblowing Policy – The Company encourages all its employees, workers or customers to report any concerns regarding any circumstances which may give rise to an enhanced risk of slavery or human trafficking. EFM Global Holdings Whistleblowing Policy enables workers to disclose information confidentially.

Recruitment and Selection Policy – The Company only uses specified, trustworthy employment agencies to source potential employees and always verifies the practices of any new agency used prior to accepting employees from that particular agency. EFM Global Holdings recruitment and selection procedures include appropriate pre-employment screening of all potential employees to determine their right to work in the UK.

Equal Opportunities Policy – The Company provides a fair and equal working environment that is free from all forms of discrimination in all areas of employment. All employees are treated fairly with, regard to protected characteristics; race, religion and belief, pregnancy and maternity, sex, marriage and civil partnership, disability, gender-reassignment, age, and sexual orientation.

### **Due Diligence**

EFM Global Holdings is actively undertaking due diligence when considering taking on new suppliers/contractors. The Company's due diligence approach includes the completion of a Supplier Evaluation Form and annual insurance information checks ensuring:

- Suppliers/contractors have considered their responsibility in relation to Modern Slavery and Human Trafficking through their immediate organisation and supply chain;

- Any form of child labour or exploitation is not present in any part of the business or its supply chain;
- Protection for whistle blowers;
- Employees are paid at least the National Minimum Wage or National Living Wage, depending on their eligibility;
- The absence of all forms of discrimination in any aspect of the business or its supply chain, including recruitment and selection procedures, access to training and promotions etc.
- The right to work and pre-employment checks of all staff are conducted appropriately;
- No harsh or inhumane treatment is allowed in any part of the business or its supply chain in line with the Company's Equal Opportunities Policy;
- Only specified, reputable employment agencies to source labour, and verifying the practices of any new agency prior to sourcing labour from that agency;
- Staff are aware of the procedure to follow, should they have concerns regarding any circumstances which may give rise to an enhanced risk of slavery or human trafficking in any part of the business or its supply chain;
- Working hours are not excessive and are fully compliant with the Working Time Regulations 1998.

### **Training and awareness**

Relevant information will be provided to all employees within the Company's Employee Handbook's available from Group HR Manager.

### **Continual Improvement**

The Company will regularly review and develop its policies, procedures, systems and controls to ensure it remains committed to preventing slavery and human trafficking in any part of its business or its supply chain.

EFM Global Holdings has not been informed of any incidents of slavery or human trafficking during the year, however, will investigate any allegations should they arise and take necessary action accordingly.

### **Director/ Board Member Approval**

This statement has been approved by Ben Silas, Group CCO, EFM Global Holdings on behalf of the Company's Board of Directors, who will review and update the statement annually.

Signed: \_\_\_\_\_

A handwritten signature in black ink, appearing to be 'Ben Silas', written over a horizontal line.



REVISIONS			
Issue Number	Date	Detail Revision to Procedure carried out	Signed
1	2023	Amendment to dates and figures	LH
2	Aug 23	Replaced COO this CFO	SW
3	June 24	Amended dates/figures.	LH
4	June 25	Amended dates and figures	LH