

# **Modern Slavery and Human Trafficking Statement**

**January 2017**

# Modern Slavery & Human Trafficking Statement

## Introduction

Efficio Global Limited (“Efficio”) and its subsidiary companies are committed to protecting our organisation and those people at risk from exposure to slavery or people trafficking in our supply chain, both via directly employed staff and staff working on our behalf via third party vendors.

This Statement sets out the steps Efficio has taken to review and address any risk of slavery and human trafficking related to its business. This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Efficio’s slavery and human trafficking statement for the financial year ending 30 June 2016.

## Organisational Structure and Background

Efficio, acting via its subsidiary companies, provide procurement services to our clients around the world.

Efficio operates its business through various subsidiaries, which are wholly owned by Efficio (or indirectly via other Efficio subsidiaries). It has a well-developed system of internal authorities, controls and policies within the group. Efficio and its subsidiaries employ approximately 300 people across three countries. Our three main trading regions are the UK, Europe and America. Our headquarters are in London and we have offices in Copenhagen, Düsseldorf, Geneva, Milan, New York, Paris, and Toronto.

## Our Employees

Our employees are all provided with a written contract of employment. Efficio has adopted various policies, including equal opportunities, whistleblowing and anti-bribery and corruption policies and takes its responsibility for implementing such policies seriously. Its equal opportunities and anti-bribery and corruption policies are applicable to all directors, officers, agency workers, seconded workers, agents, contractors, external consultants, third-party representatives and business partners, or any other person associated with Efficio.

Efficio employees play a key role in maintaining high standards and its existing policies give a clear understanding of Efficio’s approach to professional and ethical standards. Each employee and, where applicable, all other individuals covered by Efficio’s policies, has a personal responsibility to review Efficio’s policies and procedures, as well as to ensure that they fully understand our obligations and the consequences associated with any breach of those obligations.

## Our Third Party Supply Chains

Each year Efficio’s subsidiary companies contract with external vendors in respect of goods and services. The majority of such contracts are in relation to IT and professional services, mainly with corporations or contractors based in the UK, Europe or America. Spend commitments are made using written contracts. We do not use cash payments for services.

Most of our manufactured goods (such as IT equipment) are purchased from large corporations who have adopted their own supply chain principles and standards.

We are not currently aware of any forced labour or child labour within our supply chain. However, we will continue to review and address any such potential risks where appropriate.

Given the nature of Efficio’s business we believe the risk of modern slavery or trafficking in Efficio’s supply chain is low compared with businesses operating in other sectors.

## Next Steps

In light of the Modern Slavery Act, Efficio will continue to review the risk of modern slavery in our supply chain (both as regards supplying goods and provision of services). We will assess our interaction with suppliers and review our procedures and policies to identify any areas of risk and concern. In the event that a real or potential

risk is identified, we will seek to engage with any affected suppliers to address and eliminate any critical issues. Based upon the results of this review, where appropriate, any required risk-based monitoring or assurance programme will be developed and endorsed by the group's Board.

We will also keep under review how we communicate our ethical standards to our employees and other individuals associated with Efficio.



Jens Pedersen  
CEO  
Efficio

10 January 2017