

Vision

At EKFB we seek to embed a culture that eliminates discrimination and promotes inclusion. The Anti-Slavery (Modern Slavery) and Human Trafficking policy statement outlines EKFB's commitment to implement and enforce effective systems and controls to prevent modern slavery and human trafficking. EKFB does not in any way or form tolerate modern slavery or human trafficking in any section of the business or supply chain and commits to a "zero tolerance" approach.

This vision is supported by EKFB's Vision of "Shaping infrastructure for a better tomorrow", our Mission and our Values.

Scope

The risks relating to modern slavery and human trafficking can apply anywhere in our operations, whether through direct employment, sub-contracted employees, or the supply and/or provision of goods and materials. This policy statement covers all people working for the EKFB joint venture, including those on secondment, contractors, suppliers, consultants, temporary workers and job applicants, individuals working for EKFB via a third party and those that interface with us at any level.

Principles

We are committed to acting ethically and with integrity and to maintaining systems and controls which are designed to prevent modern slavery and human trafficking from taking place in our business or across our supply chain. Our expectation is that workers in our operations, joint ventures, and supply chains are not subject to abusive or inhumane practices, such as child labour, forced labour, trafficking, slavery or servitude, discrimination, or harassment. EKFB ensures adherence to this policy statement through commitment to the following:

- EKFB's Speak Up Programme and Confidential Reporting Line provide mechanisms for our employees and others working in our supply chain to report suspected breaches. This can be done anonymously and there will be no detriment to individuals for raising such concerns
- Sub-contractors and suppliers acknowledge their responsibility for adhering to our policies relating to modern slavery and human trafficking and submit their policies and statements during the bid and tender process. Continued adherence will regularly be audited.
- We undertake periodic risk assessments to identify the key risks in our business and supply chain and implement additional monitoring, including KPIs and audits of suppliers
- If issues are identified (including through our audit process) which are not resolved to our satisfaction, we review the relationship with the relevant organisation
- All labour providers must have a Gangmasters and Labour Abuse Authority (GLAA) licence to work with EKFB
- We undertake checks on new recruits to ensure that they are eligible to work in the relevant country of employment
- We will endeavour to directly employ our workforce and will work with our supply chain to do the same, with particular focus on non-utilisation of zero-hour contracts
- Workers are not required to work unreasonable hours, hours beyond legal limits, or without appropriate breaks and defined periods of leave.

These principles are further supported by the modern slavery annual statements from our parent companies that form the Joint Venture, as per section 54(1) of the UK Modern Slavery Act 2015. This policy statement is further supported by HS2 Employee and Industrial relations Code of Practice, EKFB Employee Relations standard and EKFB Equality, Diversity, and Inclusion policy statement.

Demonstrating our commitment

At EKFB, we will proactively increase awareness on the signs of modern slavery and human trafficking by delivering training in our sites and offices and reinforce the availability of the Speak Up and Confidential Reporting line channels to report suspected breaches.

Our zero-tolerance approach to modern slavery means that any employee who breaches this policy will be dealt with under the disciplinary procedures of the parent company. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Policy review

This policy has immediate effect and replaces all previous versions. The next review date is 27th January 2023.

Signed on behalf of the EKFB Board

Helen Samuels, EKFB Managing Director



Date: 27th January 2022

Olivier de Guinaumont, JV Board Chair



Date: 27th January 2022

