

# Modern Slavery and Human Trafficking Statement 2022

## for EEF Limited (trading as Make UK)

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to minimise the risk of modern slavery in our business and supply chains.

#### Introduction

Make UK is committed to preventing slavery and human trafficking occurring in any of its corporate activities. As a membership and professional services organisation, our services are delivered to our member companies and clients. Our commitment is to ensure that those organisations that we actually contract with to receive goods and services are aware of our policies in order to comply with the Modern Slavery Act.

This commitment is evident through our company policies, which aim to uphold the highest ethical and professional standards. We ensure the adherence to policy commitments and compliance of current Government legislation and regulations.

## Our organisational structure and operations

Make UK is a manufacturing support service provider, working across a range of services from industry leaders, managers and professionals, to young people, apprentices, policy-makers and the media.

Make UK is made up of a range of professional services, trade and sector organisation memberships, hospitality and conferencing and apprenticeship training, employing between them just over 330 staff nationally.

The vast majority of our suppliers and contractors are based in the UK.

### Our commitment to the principles of the Modern Slavery Act 2015

Make UK is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves and as such the company has an established whistleblowing policy which all staff can access alongside all other company policies on the staff intranet.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK, and where applicable subject to DBS checks in order to safeguard employees and apprentices from any abuse or coercion.



We do not enter into business with any organisation, in the UK or The Manufacturers' Organisation abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our contracts with our members & customers allow us to terminate for convenience under a wide ranging all encompassing reputational damage contract clause which covers those to be found in breach of the modern slavery act.

Much of the supply chain is engaged on their terms & conditions, although modern slavery and anti-bribery elements are incorporated into the award of new or renewing contracts.

### Policies relating to slavery and human trafficking

Our Anti-slavery policy is posted on the staff intranet together with all other company policies and procedures. It is an annual agenda item for discussion and consultation with our National Staff Forum. It reflects our commitment to implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations and acting ethically and with integrity in all our business activities and relationships.

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

#### Previous action

Anti-slavery considerations were factored into procurement activities. Notably during 2022 the Company consolidated a number of suppliers within its facilities management arena into a single outsourced supply arrangement, which was subject to a robust procurement process that included specific consideration of anti-slavery policies and practices.

In conjunction with the procurement approach a supplier code of conduct was introduced to cover, among many other elements, the company requirement for all suppliers to adhere to the Modern Slavery Act.

#### **Current action**

We aim to take the following further steps over the course of the next financial year ending December 2023:

- Sample check a number of smaller suppliers based on risk identification to ensure adherence to the Modern Slavery Act
- Run refresher training to ensure that relevant staff are up to speed with the latest on modern slavery and embed as part of induction processes
- Sample check a number of customers within our Apprentice training facility to ensure compliance to the Modern Slavery Act.



This statement has been approved by the Executive Board of Directors and the actions contained herein.

This statement has been approved by Richard Greenway, Chief Financial Officer for the financial year ending 31 December 2022.

This statement will be reviewed and updated every year.