

# UK MODERN SLAVERY ACT 2015

## Position on Human Trafficking and Slavery

### 1. Introduction

EDF Trading Limited (“EDFT”) is a 100% owned UK subsidiary of the EDF Group.

EDFT and its subsidiaries are committed to conducting business responsibly and have a zero-tolerance approach to all forms of modern slavery across operations and supply chains. EDFT is proud to be a member of the United Nations Global Compact (UNGC), via the membership of our parent company EDF SA, and supports the UNGC goals. These include supporting the International Declaration of Human Rights and the core conventions of the International Labour Organisation.

This is our fifth statement, published in accordance with the Modern Slavery Act 2015, setting out the steps we’ve taken during year ending 31 December 2020 to prevent modern slavery in our business and supply chains. The nature of the business has not materially changed, therefore the risk has been assessed to remain low.

### 2. Policies and Procedures on Modern Slavery

2020 has been a year of challenge and change. We have necessarily adapted our plans and implemented new ways of working in light of the impact of COVID-19, as well as identifying areas of potential risk, to continue to safeguard the fundamental rights and freedoms of those who work for us and with us.

We have updated company policies to raise awareness of the Act and to outline the process for flagging suppliers engaging in wrongful human trafficking or slavery acts.

Whilst 2020 has been a challenge, we continue to apply existing policies and procedures, including:

- a. EDF Group code of ethics, which upholds the Group’s ethical commitments and values
- b. Human resources guidelines, which include policies to support equal opportunities and protect against bullying and harassment
- c. To report any instances or suspicions of slavery, human trafficking, or other unethical behaviour etc a third party whistleblowing hotline is available to all employees and contractors,
- d. Procurement policy, which has a section specific to the Modern Slavery Act and requires all employees to consider the goals of the Act in all purchasing decisions, by investigating the labour practices and supply chains of potential suppliers
- e. Ensuring compliance of UK suppliers; standard contracts include confirmation of compliance with the Modern Slavery Act
- f. Ensuring compliance of non-UK suppliers; the majority of our IT purchases consist of branded products whose suppliers already publish anti-slavery statements in accordance with the California Transparency in Supply Chains Act of 2010
- g. Ethically responsible way of recycling obsolete IT equipment

As part of our ongoing commitment to combating modern slavery, EDFT will be taking the following steps:

- a. Updating the procurement policy to include, where appropriate, requiring written confirmation of compliance with the Modern Slavery Act from new suppliers and renewals of existing contracts

The board of directors of EDFT approved this statement at its meeting on 28 May 2021.



Béatrice Bigois  
Chief Executive Officer  
EDF Trading Limited