



ECOMMERCE FULFILMENT CENTRE LTD (EFCL)

MODERN SLAVERY, HUMAN TRAFFICKING, ETHICS, ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Policy Reference: EFCL-COM-001

Version: 1.0

Effective Date: 02/02/2026

Review Date: 02/02/2027

Approved By: Director

Review Frequency: Annual

COMPANY DETAILS

Ecommerce Fulfilment Centre Ltd (EFCL)

Platinum House
12 Bailey Road
Trafford Park
Manchester
M17 1SA

Company Registration Number: 14944665

VAT Registration Number: GB455908364

Telephone: 0161 624 0375

Website: www.efcluk.com

POLICY STATEMENT

Ecommerce Fulfilment Centre Ltd ("EFCL") is committed to conducting business ethically, responsibly, and transparently. We maintain a zero-tolerance approach to modern slavery, human trafficking, forced labour, child labour, bribery, corruption, fraud, and unethical business practices.

We are committed to ensuring that our employees, suppliers, contractors, subcontractors, and business partners operate in accordance with all applicable laws, regulations, and recognised ethical standards.

This policy demonstrates EFCL's commitment to compliance with the:

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- Modern Slavery Act 2015
- Bribery Act 2010
- Employment Rights Act 1996
- Equality Act 2010
- Health and Safety at Work Act 1974
- UK Data Protection Legislation

1. MODERN SLAVERY AND HUMAN TRAFFICKING

Commitment

EFCL opposes all forms of:

- Modern Slavery
- Human Trafficking
- Forced or Compulsory Labour
- Debt Bondage
- Child Labour
- Exploitative Employment Practices

We are committed to ensuring that modern slavery and human trafficking do not occur within our business operations or supply chain.

Employee Rights

All employees have the right to:

- Work freely and voluntarily
- Receive lawful pay and benefits
- Work in a safe and healthy environment

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- Be treated fairly and with dignity
- Retain possession of their own identification documents
- Leave employment in accordance with contractual obligations

EFCL does not tolerate any form of abuse, coercion, intimidation, discrimination, or exploitation.

2. SUPPLY CHAIN RESPONSIBILITY

EFCL expects all suppliers, contractors, and service providers to:

- Comply with applicable employment laws
- Prohibit forced labour and child labour
- Respect human rights
- Provide safe working conditions
- Operate ethically and lawfully
- Comply with anti-bribery and anti-corruption legislation

Where concerns arise, EFCL reserves the right to conduct due diligence reviews and terminate relationships with suppliers who fail to meet these standards.

3. ETHICS AND PROFESSIONAL CONDUCT

EFCL expects all employees and representatives to conduct themselves with honesty, integrity, and professionalism.

Employees are expected to:

- Act ethically in all business dealings
- Maintain confidentiality
- Avoid conflicts of interest

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- Respect colleagues, customers, and suppliers
- Protect company assets and information
- Follow company policies and procedures

Any behaviour that could damage the reputation of EFCL or compromise ethical standards will not be tolerated.

4. ANTI-BRIBERY AND ANTI-CORRUPTION

Zero-Tolerance Policy

EFCL has a strict zero-tolerance approach to bribery and corruption.

No employee, contractor, supplier, or representative may:

- Offer or accept bribes
- Offer or accept kickbacks
- Make facilitation payments
- Offer improper gifts or incentives
- Attempt to gain business advantage through unethical means

All business decisions must be based on merit, quality, service, compliance, and value.

Gifts and Hospitality

Reasonable and proportionate business hospitality may be accepted where:

- It is lawful
- It is transparent
- It does not influence business decisions
- It complies with company procedures

Cash gifts or personal financial benefits are strictly prohibited.

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5. EQUALITY, FAIRNESS AND RESPECT

EFCL is committed to maintaining a workplace free from:

- Discrimination
- Harassment
- Bullying
- Victimisation
- Intimidation

All individuals will be treated fairly and respectfully regardless of age, disability, gender, race, religion, sexual orientation, marital status, or any other protected characteristic.

6. REPORTING CONCERNS

Employees, suppliers, contractors, and stakeholders are encouraged to report concerns relating to:

- Modern Slavery
- Human Trafficking
- Forced Labour
- Child Labour
- Bribery
- Corruption
- Fraud
- Unethical Conduct

All concerns will be treated seriously and investigated appropriately.

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EFCL is committed to ensuring that individuals who raise genuine concerns in good faith are protected from retaliation.

7. MANAGEMENT RESPONSIBILITIES

Management is responsible for:

- Promoting ethical business practices
- Ensuring policy compliance
- Monitoring supplier relationships where appropriate
- Investigating concerns and complaints
- Taking corrective action when necessary
- Reviewing this policy annually

8. CLIENT AND SUPPLIER COMMITMENT

EFCL understands the importance of responsible procurement and ethical business practices when supporting:

- NHS Organisations
- Local Authorities
- Government Bodies
- Educational Institutions
- Corporate Clients
- Procurement Frameworks
- Commercial Supply Chains



This policy forms part of EFCL's commitment to responsible business operations, transparency, and corporate governance.

POLICY APPROVAL

This policy has been reviewed and approved by the Director of Ecommerce Fulfilment Centre Ltd.

Director Name: Adeel Ashraf

Date: 02/02/2026