



# MODERN SLAVERY REPORT

By EFC Group of Companies

EFC Group has a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking in our operations and supply chain.



# 2023 Modern Slavery Report

## 1. Introduction

This Report is produced by the EFC Group of Companies (“EFC” or “the Company” or “our” or “we”) for the financial year ending September 30, 2023 (the “Reporting Period”) and sets out the steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by the Company. This Report constitutes the first report prepared by the Company pursuant to Canada’s new Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”).

## 2. Steps to prevent and reduce risks of forced labour and child labour

EFC believes it is our responsibility to uphold the highest standards of ethical behaviour and personal integrity within our business operations. Wherever we do business, our colleagues are required to comply with all applicable laws, rules, and regulations.

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person’s liberty and dignity for another person’s gain. EFC has a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking in our operations and supply chain. As a company we are committed to protecting our organization and those people at risk from exposure to slavery or human trafficking in our supply chain, both via our direct employees and those working on our behalf via third party suppliers.

We consider the respect of human rights to be a fundamental corporate responsibility and a value governing all our activities. We place the highest importance on respecting human rights while conducting our business activities everywhere we operate. We expect the same of our business partners.

In general terms, we took the following step during the Reporting Period to prevent and reduce the risk of forced labour or child labour in our business and supply chains:

- Reviewed our material suppliers’ documentation and policies on modern slavery:
  - Shell’s website states: *“Shell is opposed to all forms of modern slavery. Such exploitation is against Shell’s commitment to respect human rights as set out in the Universal Declaration of Human Rights and the International Labour Organization’s 1998 Declaration on the Fundamental Principles of Rights at Work.”* Further, Shell states that: *“The Shell Supplier Principles further clarify the expectations we have from our suppliers and contractors on labour and human rights, including (but not limited to): no use of child labour; no use of forced, prison or compulsory labour; no payment of recruitment fees by workers; compliance with all*

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- applicable laws and regulations on freedom of association and collective bargaining; a safe, secure and healthy workplace and not tolerating discrimination, harassment or retaliation; ◦ compliance with all applicable laws and regulations on working hours; and ◦ providing wages and benefits that meet or exceed the national legal standards. All Shell companies and Shell-operated joint ventures must comply with local legislation and regulations and must conduct their activities in line with the Shell General Business Principles and our core values of honesty, integrity and respect for people.”*
- Suncor’s Human Rights Policy states: *“Suncor has a corporate responsibility to respect human rights and to ensure that we are not complicit in human rights abuses. We seek to avoid infringing on the rights of others and strive to remedy harms that occur as a result of our activities. Our responsibility to respect human rights applies to all of our activities and to our business relationships with others. Our commitment to respecting human rights is based on the Universal Declaration of Human Rights and is informed by the international law and standards that have developed in the ensuing six decades, including: The Voluntary Principles on Security and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, UN Declaration on the Rights of Indigenous Peoples, The Ten Principles of the UN Global Compact and the Guidance on Responsible Business in Conflict-Affected and High-Risk Areas, Guiding Principles on Business and Human Rights: Implementing the UN “Protect, Respect, and Remedy” Framework”*
  - AltaGas’ modern slavery statement states: *“AltaGas is committed to continuously assessing its human rights-related risks including forced labour and child labour. AltaGas updates our risk assessment tools on a regular basis to reflect significant changes in circumstances or high-risk categories of suppliers based on factors including, but not limited to, product type, country of origin and the suppliers’ policies and practices with respect to labour and human rights. In 2022, AltaGas engaged a third-party consultant who specializes in corporate social responsibility assessments including labour and human rights, to conduct an independent risk assessment of AltaGas’ suppliers. The third-party consultant assessed AltaGas’ supply chain as low risk for both forced labour and child labour based on our suppliers’ country-level risk to produce facility-level risk scores. The criteria used in the country-level risk assessment included: (i) a state’s acceptance, intent and commitment to implementing human rights obligations; (ii) a state’s ongoing efforts to transform their human rights commitments to the desired result; and (iii) the actual performance of a state in protecting the concerned human right based on reported violations and infringements by state and non-state*



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*actors. AltaGas has identified no forced labour or child labour incidents in our supply chain. We will continue to ensure that we understand our suppliers, particularly in regions and industries that are considered higher risk for forced labour and child labour.”*

### 3. Structure, activities and supply chains

EFC is a corporation based in Calgary, Alberta. Current ownership dates back to 1991. EFC currently operates out of 19 locations throughout Western Canada. EFC’s product offerings include aviation fuel, airport/aerodrome services, aviation ground service equipment maintenance services, custom-built fuel systems and real estate projects through EFC Developments Ltd.

EFC is a Canadian business, with 750 employees as of September 30, 2023. It strives to create a diverse and inclusive culture everywhere it operates.

EFC is committed to ensuring there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chains and expect the same high standards from all of our contractors, suppliers and other business partners. We establish a relationship of trust and integrity with all our suppliers, which is built on mutually beneficial factors.

### 4. Policies and due diligence processes

#### Code of Conduct

EFC’s Code of Conduct applies to all members of the EFC community, including the Board of Directors, management and employees at every level. It addresses ethical conduct in our work environment, business practices and relationships with external stakeholders. The principles set out in the Code reflect EFC’s belief that honesty and integrity foster a positive work environment that strengthens the confidence of all stakeholders. The Code details the standards of behaviour expected from everyone to whom it applies in their daily activities and in dealings with others.



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### Due Diligence

EFC continues to take its responsibilities seriously and whilst building on the actions already in place, we will continue to look for more ways to fortify our method of identifying and mitigating the risk of Modern Slavery.

### Our Approach:

- Continue to assess the risk of slavery and trafficking into our supplier due diligence process for areas of the business we deem to be higher risk.
- Continue to review our suppliers published modern slavery policies and codes of conduct that highlights the standards they hold themselves and their suppliers to.
- Continue to seek opportunities for training for Management to enable them to identify, assess, mitigate and report specifically on Modern Slavery.

Whilst ultimately the majority of risks within the business rest with our manufacturers and suppliers, we are not complacent and will continue as a Company to seek to identify and manage any potential risks associated with Modern Slavery. We have endeavoured to put safeguards in place to ensure, so far as is reasonably practicable, that the working practices of those employed directly by us and those with whom we have a direct contractual arrangement with also have a similar zero tolerance to Modern Slavery.

### **5. Assessing and managing our forced labour and child labour risks**

EFC uses a risk-based approach to assess and manage its risk of forced labour and child labour. Our approach helps us prioritize our efforts and adjust our actions. Our methodology to identify risks in our supply chain through our due diligence process combines country risk indicators, supplier's category and type of products/services offered by the supplier. The resulting risk score determines the level of additional due diligence to be performed, including with respect to forced and child labour, and the extent of ongoing monitoring and frequency of review required.

Our methodology to identify risks is notably based on 1) whether the supplier is headquartered or its manufacturing sites are located in countries that have a low score on the corruption perception index and/or that are at risk according to the global slavery index based on the products they supply to EFC, 2) whether the products/services come from or are delivered to one of the countries mentioned above, and 3) whether EFC is supplied with certain indirect goods and services.

### **6. Remediation measures**



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Our Employment Handbook includes a Code of Ethics and offers reporting, investigation and documentation mechanisms for our employees to report ethical or legal violations, among other concerns. If a situation of non-compliance is identified, EFC will work to develop and implement a corrective plan to improve and remedy the situation.

### 7. Training

In 2024, EFC intends to provide training to targeted audiences that will include child and forced labour.

### 8. Assessing effectiveness

EFC has in place a number of measures to prevent and reduce the risk that forced labour or child labour is used in our activities and supply chains. While we have not yet taken any actions to assess the effectiveness of those actions, the Company intends to assess its effectiveness in preventing and reducing risks of forced labour and child labour in its activities and supply chains at a later stage.

### 9. Approval and attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of EFC Group.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind EFC Group.

Per:  \_\_\_\_\_

Full Name: Dean Buckland  
Title: President of EFC Group of Companies  
Date: May 31, 2024