

Modern Slavery Policy

(June 2024)

Purpose

Echelon is committed to eliminating modern slavery from its operations and supply chains. We believe that all people have the right to be free from exploitation and that no one should be forced to work in conditions of slavery or servitude.

This policy sets out our commitment to preventing modern slavery and outlines the steps we will take to ensure that our operations and supply chains are free from modern slavery.

Scope

This policy applies to all Echelon employees, contractors, and suppliers. It also applies to all of our operations and supply chains, wherever they are located.

Definition of Modern Slavery

For the purposes of this policy, modern slavery is defined as:

- The exploitation of a person for personal gain, through the use of force, coercion, or deception, that results in the person being deprived of their liberty or fundamental rights.
- This includes forced labour, debt bondage, forced marriage, slavery, and human trafficking.

Commitments

Echelon is committed to the following:

- Complying with all applicable laws and regulations on modern slavery.
- Conducting due diligence to identify and assess the risks of modern slavery in our operations and supply chains.
- Taking steps to mitigate those risks, including working with suppliers to ensure they have adequate anti-slavery measures in place.
- Providing training to our employees on modern slavery.
- Responding to allegations of modern slavery in a timely and effective manner.

Due Diligence

Echelon will conduct due diligence to identify and assess the risks of modern slavery in our operations and supply chains. This due diligence will include:

- Identifying the countries and sectors where there is a high risk of modern slavery.
- Assessing our own operations and supply chains to identify potential risks.
- Conducting risk assessments of our suppliers.
- Monitoring our suppliers to ensure they are taking steps to prevent modern slavery.

Mitigation Measures

Echelon will take steps to mitigate the risks of modern slavery in our operations and supply chains. These mitigation measures will include:

- Working with suppliers to ensure they have adequate anti-slavery measures in place.
- Providing training to our employees on modern slavery.
- Implementing whistleblowing procedures to allow employees to report concerns about modern slavery.
- Conducting regular audits of our operations and supply chains to ensure that they are free from modern slavery.

Training

Echelon will provide training to all employees on modern slavery. This training will cover:

- The definition of modern slavery.
- The risks of modern slavery in our operations and supply chains.
- How to identify and report suspected cases of modern slavery.

Allegations of Modern Slavery

Echelon will investigate all allegations of modern slavery in a timely and effective manner. We will take all necessary steps to address any allegations of modern slavery, including:

- Investigating the allegations.
- Taking disciplinary action against employees who are found to have committed modern slavery.
- Severing ties with suppliers who are found to have committed modern slavery.
- Reporting the allegations to the appropriate authorities.

Reporting

Echelon will report on its progress in implementing this policy on an annual basis. This report will be made public.

Compliance

All employees, contractors, and suppliers are responsible for complying with this policy. Any breach of this policy may result in disciplinary action, up to and including termination of employment.

Review

This policy will be reviewed regularly to ensure that it is still effective.