



## MODERN SLAVERY STATEMENT

This statement is made on behalf of EXFO Europe Ltd pursuant to section 54 of the UK *Modern Slavery Act 2015* (the “Act”), and constitutes our slavery and human trafficking statement for the financial year ending August 31<sup>st</sup>, 2024.

This statement illustrates our commitment to ensure that all business is conducted according to ethical, professional and legal standards, and to challenge and confront the use of compulsory, trafficked, forced or child labour within our organizations and our supply chains. EXFO has a zero-tolerance approach to modern slavery and trafficking in persons within its organizations and supply chains and is committed to act ethically and in compliance with its statutory obligations.

### 1. STRUCTURE, BUSINESS AND SUPPLY CHAINS

EXFO Europe Ltd belongs to the international group EXFO, composed of the Canadian headquarters, EXFO Inc., and its subsidiaries (the “EXFO Group”) specializing in the development of intelligent solutions for testing, monitoring and analysing networks for the main suppliers. Our customers count on our unique blend of equipment, software, and services to accelerate digital transformations related to fibre, 4G/LTE and 5G deployments. Hereinafter EXFO Europe Ltd and the EXFO Group will be referred to conjointly as “EXFO” as the initiatives taken against Modern Slavery are applicable throughout the EXFO Group.

Our supply chain can be classified into two categories; (1) off-the-shelf components for which we buy in major part through our distributors and (2) custom-made components for which we buy directly from the manufacturers.

EXFO is committed to operating in a socially responsible way by respecting fundamental social principles, reducing the environmental impact of our economic activities, and applying strong ethical guidelines to our relationships, both with our employees and our partners. This is the reason why EXFO’s management and operations activities are guided by the *ISO 26000 – Guidance on social responsibility standard* and the *United Nations Global Compact Principles*.

EXFO selects business partners who share its values and principles related to business governance, ethics, social responsibility, environmental protection and occupational health and safety. This is embedded in our supply chain management and reflected in our Procurement policies, requirements and principles.

### 2. POLICIES

We have various policies in place to combat modern slavery within our supply chains and within our organization, which are available at <https://www.exfo.com/en/corporate/ethics-governance/>. These policies are summarized below:

#### Policy on Modern Slavery and Combating Trafficking in Persons, and its compliance plan

This policy illustrates our commitment to challenge and confront the use of compulsory, trafficked, Forced or Child Labour within our organizations and supply chains. It assists EXFO to comply with its obligations under the different Modern Slavery Acts and the U.S. Federal Acquisition Regulation (FAR) 52.222-50, Combating Trafficking in Persons.



### Conflict Minerals Policy

With our Conflict Minerals Policy, EXFO is committed to sourcing material from environmentally and socially responsible suppliers. It is our policy not to purchase from known conflict sources and we expect our suppliers to abide by the same standard.

### Agents Code of Conduct

Our Code of conduct reflects our commitment to a culture of honesty, integrity, and accountability, acting ethically and complying with applicable laws and regulations, including the different Modern Slavery Acts, of the countries in which EXFO does business or business is conducted on behalf of EXFO. Our suppliers, service providers, consultants, distributors, representatives, and any other sales partners are required to conform to our Code of conduct.

### ISO 26000 – Guidance on social responsibility

Management and operations at EXFO are guided by ISO 26000, a standard which provides the framework that companies worldwide can follow to act in an ethical and transparent way and contribute to the health and welfare of society. While the ISO 26000 standard doesn't provide a specific certification, it nevertheless offers recommendations about how companies can be more socially responsible.

## **3. RECRUITMENT**

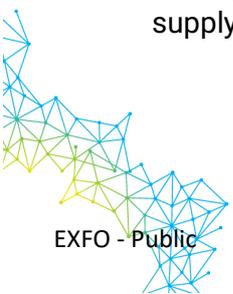
Our recruitment practices are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and confirm the details of any offer made. We have procedures in place for vetting new employees, confirming their identities, and that wherever possible they are paid directly into an appropriate, personal bank account. Recruiters are expected to respect the recruitment practices set out in our Policy on Modern Slavery and Trafficking in Persons (the "Policy"), as well as our Combating Trafficking in Persons Compliance Plan, both applicable to the entire EXFO Group.

## **4. AWARENESS AND TRAINING**

All EXFO employees have been informed about both the Policy, including prohibited conduct, consequences of violations, and mechanisms to report suspected violations, by its publication on our intranet and website. Every new EXFO employee is being informed of the Policy via a mandatory onboarding training provided upon arrival, in which the employee must read and confirm compliance by signing the Policy. EXFO also deployed a training campaign to raise awareness on modern slavery. The training was sent to a total of 207 employees, including all United Kingdom and the United States employees, as well as some targeted employees of Canada.

## **5. RISK ASSESSMENT AND DUE DILIGENCE**

EXFO expects that our suppliers and distributors will not tolerate any form of exploitation in any part of their supply chain and of their business. Our purchasing department evaluates and verifies our partner's compliance to our efforts to prevent modern slavery in our industry. All our distributors, sub-distributors, and suppliers before entering any business with EXFO must complete forms which includes to comply with our Agent Code of conduct and with the *United Nations Global Compact Principles*. Without such commitment, EXFO does not engage in a business relationship or permits that distributor, sub-distributor, or supplier to take part in the supply chain in any shape or form.





## 6. GOALS

Our efforts to confront and combat modern slavery are ongoing, evolving, and improving continually. EXFO's purchasing department is currently reviewing its processes to improve risk assessment, due diligence, and suppliers' monitoring.

A handwritten signature in black ink, appearing to read 'G. Lamonde', positioned above a horizontal line.

Germain Lamonde  
Director of EXFO Europe Ltd

A handwritten signature in blue ink, appearing to read 'P. Morin', positioned above a horizontal line.

Philippe Morin  
Director of EXFO Europe Ltd

