

# MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

**Financial year end April 2023**

Last update February 2024

## MODERN SLAVERY ACT 2015 ABOUT THIS POLICY

This statement has been published in accordance with the Modern Slavery Act 2015. Under section 54 (transparency in supply chain) of the Modern Slavery Act 2015, businesses are required to publish the steps they are taking to prevent modern slavery and human trafficking in their business and supply chain.

Elta recognises that it is a criminal offence to dehumanise, physically constrain or restrict anyone's freedom. Elta has zero tolerance for slavery and human trafficking and is committed to acting ethically and with integrity throughout our business dealings and relationships, whilst requiring the same commitment from our supply chain.

## ABOUT US

Elta Group Limited's UK Subsidiaries consist of Elta-UK which operates from Kingswinford, Fareham and Colchester, EG Agri which operates from Hereford, Norfolk, Salisbury and Yeovil, & Elta-NI which is based in Northern Ireland. Elta Group Limited's UK Head Office and its UK Subsidiaries (together 'Elta' or 'We') are international leaders in fans, air movement, filtration and distribution. The wider group has businesses across Europe, Australasia and Asia. Details of our brands can be found on our website along with links to our subsidiaries.

<https://eltagroup.com/oursubsidiaries/>

### Elta's values, underpin the ethos of the business;

- Doing the right thing
- Everyone's responsible
- Trust in each other
- Thinking beyond
- Making it happen

The company values people and ensures business relationships are nurtured to ensure fairness and remain ethical, holding not just its employees, but all that are associated with the business accountable to ensure modern slavery is not a part of our business.

Elta ensures all practicable checks are carried out with its employees and the same is expected from the supply chain. Right to Work checks are performed for all staff employed within the UK, including those engaged through labour agencies.

Elta Group Limited does not put undue pressure on its supply chain which could result in an increased risk of modern slavery being used to achieve an unrealistic time scale or cost to deliver a product/service to our businesses.

## SUPPLY CHAIN RISK ASSESSMENTS AND DUE DILIGENCE

Elta has a global supply chain. We are continually reviewing and improving our auditing process to assess any risk of modern slavery within our supply chain. We plan to actively report on this work and ensure that it is incorporated into new supply and service agreements and renewals of existing agreements. Supply chain measures include the implementation of due diligence processes and the review of terms and conditions to include obligations for suppliers to be compliant with our requirements to assess, identify and eliminate modern slavery.

Safeguarding our employees and supply chain is of paramount importance to the business, this is managed in addition to our due diligence checks on our supply chain by ensuring we fully comply with legal, financial and social obligations.

Action plans are in development, which will document the procedures that need to be followed should concerns be raised about our supply chain. A risk assessment matrix will be used to establish where the business should focus its attention on the potential of modern slavery within its supply chain, in a phased approach. The phases will be actioned on a high to low-risk basis.

We are in the process of updating our 'code of conduct' and we plan to introduce a more in-depth supplier audit procedure, which may include physical and desk-based audits in addition to the regular update meetings that are currently undertaken.

We adhere to all labour and employment laws in the Countries in which we operate and command the same of our supply chain. We also plan to introduce a pre-qualification process which ensures that the supply chain is assessed in line with pre-determined risk factors. Higher-risk suppliers will be subject to greater checks. This includes higher-risk territory activity, industry, employment mode and product type. Elta will define procedures for noncompliance and remedial action.

## POLICIES RELATING TO SLAVERY & HUMAN TRAFFICKING

Elta policies have been formed to address the standards expected by the business. We continually review and improve our auditing processes to assess any risk of modern slavery within our supply chain. We expect anyone working directly for our business and in partnership with our businesses to adhere to these policies.

Policies are currently available to UK employees in the latest version of the employee handbook, the company intranet, as well as a digital copy on the HR Portal. Separate copies of these policies will be provided at induction for temporary staff and as part of our onboarding process for suppliers (where appropriate). Additional policies will be developed in due course but currently comprise: -

- Code of Conduct
- Bullying, discrimination, and harassment policy
- Recruitment Policy (including Right to Work and Minimum Living Wage)
- Procurement Policy
- Whistle-Blowing Procedure (including process for supply chain & employees to raise concerns)
- Gender /Equal Opportunities Policy
- Data Protection Policy

These policies are taken seriously, and a breach could result in disciplinary action against employees or may result in other parties being removed from our supply chain.

## TRAINING ON MODERN SLAVERY & TRAFFICKING

Elta is in the process of introducing annual modern slavery and human trafficking e-learning awareness training to its employees. The inclusion of training is aimed at relevant decision-makers within the businesses, long with training for those employees for which awareness of the signs of modern slavery would be beneficial. The e-learning module is available in multiple languages to ensure it is accessible to all employees based in the UK.

## KEY PERFORMANCE INDICATORS

NO INSTANCES OF MODERN SLAVERY OR HUMAN TRAFFICKING HAVE BEEN IDENTIFIED WITHIN OUR SUPPLY CHAIN, DURING THE PAST FINANCIAL YEAR.

No instances of whistleblowing, complaints or concerns have been lodged in the past financial year.


KPI's for the next financial year (ending 2024)

- Implement/Evolve Risk Index
- Introduce 'Code of Conduct' for all suppliers along with other relevant policies.
- Further role out of training to employees/supply chain

I, the undersigned would like to confirm that the statement provided above has been confirmed by the principal governing bodies for Elta Group Limited. The review and subsequent approval were granted on the 25th of January 2024 upon a separate review to ensure our compliance to the Modern Slavery Act 2015.

The scope of this statement extends to the UK (and Ireland) operations of business within Elta Group Limited. For our businesses operating in other territories around the globe, refer to their websites to see their Modern Slavery Statements.

**Mark Rickard,**  
CEO, Elta Group



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