

Elite Aluminium Systems Ltd

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9. MODERN SLAVERY POLICY STATEMENT

Slavery and Human Trafficking Statement

Slavery and Human Trafficking Statement made on behalf of Elite Aluminium Systems (EASL) further to the provisions of the UK Modern Slavery Act 2015

Statement by Jamie Bayliss - Managing Director

We are proud of the conditions of employment for all employees.

Given the nature of our business, our Directors & management teams each consider that there is minimal risk approximating to no risk that, either within the company or the very limited supply chains which support our business activities, that are in any way involved in or even tangentially supportive of, or complicit in slavery and human trafficking.

The employment & procurement practices operated by the business ensures we are rightly viewed as an excellent and supportive employer and to the extent that when our company operates as a purchaser of goods or services we expect a high level of ethical conduct from those businesses with which we do business within our very limited supply chain.

Organisation's structure

EAS provides products and services to the construction Industry. EASL has its HQ in Walsall, West Midlands and has over just under 60 employees.

Our supply chains

EASL's supply chains are very limited. EASL offers contracting solutions. We do use routine services for the maintenance and support of our office operations, such as cleaning and technical support services for such things as air conditioning, IT, telephones and communications infrastructure.

Anti-slavery Policy statement:

"EASL has zero tolerance to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business."

This Anti-Slavery Policy Statement is the principal articulation of the company's policy on slavery and human trafficking. It is intended to inform and influence all the operational procedures within the business.

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Our stated Anti-Slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure (amongst our other priorities) that slavery and human trafficking is not taking place anywhere in our business or related supply chains.

Due diligence & implementation processes for slavery and human trafficking:

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies and procedures. These include the policies and procedures in the following areas:

- Third party provider and outsourcing;
- Whistleblowing; and
- Anti-money laundering, bribery and financial crime.

EASL also articulate a series of employee rights and benefits available to employees in the employee handbooks and individual contracts of employment for each member of staff.

EASL operates a HR department, a Legal and Compliance Department and an internal auditor.

Our Managing Director has reviewed and agreed to the terms of this statement. A combination of procedures and functions operates to help identify, assess and monitor potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking occurring in our supply chains.

This is the first articulation of a formal Anti-Slavery Policy Statement for EAS and in future we will seek to ensure when entering into material contracts that all those in our supply chain and contractors comply with our stated Anti-Slavery Policy in particular when seeking tenders for service or when auditing our suppliers.

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Training

We will communicate this statement to all our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business and in future will include references as part of the companies training and information materials.

Legal and regulatory purpose of this statement

This statement is made with regard to obligations arising under section 54(1) of the UK's Modern Slavery Act 2015 (the Act).

Although EASL itself is not formally subject to the requirements of the Act, it recognises the importance of these issues for all its stakeholders.

Accordingly, this statement should be considered to constitute the slavery and human trafficking statement for EASL for the 2018-2019 financial year and all future financial years until it may in future be modified or amended.