

ELTHERINGTON GROUP LTD

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

DATE: JANUARY 2023

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Eltherington Group ("the Company") slavery and human trafficking statement.

The Company recognises that the risks of modern slavery exist, and that modern slavery encompasses slavery, servitude, human trafficking and forced labour. We are committed to ensuring that there is none within our business or within our sub-contractor network, and as far as is practical that our suppliers are also committed to its eradication. This statement sets down the steps put in place and the Company's commitment to achieve this.

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1st April 2022 to 31st March 2023

Business

Eltherington Group is the leading supplier of architectural aluminium and bespoke manufacturing services to the architectural, construction, caravan, portable and modular building sectors.

All our products are manufactured in an ISO9001 quality assessed production facility. Based in Hull, Yorkshire, Eltherington Group supply to all areas of the UK.

Dedicated to remaining at the forefront of all the sectors in which we operate, Eltherington today is characterised by constant innovation and investment.

With headquarters strategically located in Hull with direct links to the M62 motorway, we operate from a 11 acre manufacturing facility, employing around 240 people.

By investing in our infrastructure, Eltherington has ensured that it is in a strong position to keep pace with the demands of its growing customer base and the rapidly changing UK market.

High risk areas

The Company assesses whether particular activities are high risk in relation to modern slavery or human trafficking by identifying, assessing and monitoring potential risk areas in supply chains.

Any activities considered to be at high risk of modern slavery or human trafficking will be assessed and monitored accordingly.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks

and steps to be taken to prevent slavery and human trafficking in our operations and are all set out in our Company Handbook and on our HR Toolkit system:

- **Whistleblowing policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- **Company Policy** - The Company Policy sets down the actions and behaviour expected of employees when representing the Company.
- **Ethics Policy** – The Ethics Policy summarises how the Company is committed to the practice of responsible corporate behaviour and how it seeks to protect and promote the human rights and basic freedoms of all its employees and agents.

Our suppliers

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners **AND/OR** evaluating the modern slavery and human trafficking risks of each new supplier **AND/OR** invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Training

Relevant personnel receive awareness training so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

Name (Director): Mr Antony M Eltherington

Signature: *Antony Eltherington*

Date: 03/01/23

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorses this policy statement and is fully committed to its implementation.