

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

1.0 INTRODUCTION

This statement is published in line with section 54(1) of the Modern Slavery Act 2015.

2.0 OUR BUSINESS

Elite Electronic Systems are the leading provider of Sub-Contract Electronic Manufacturing Services, to a diverse customer portfolio of innovative and successful companies in the UK, Ireland and internationally.

Elite Electronic Systems delivers an extensive range of high-quality electronic manufacturing services to multiple industry sectors including medical, power, industrial, telecommunications, internet of things and off-highway vehicles.

Our products are the unseen but key components that help deliver a lasting impact on the lives we touch and the world in which we live.

Many of these we see through from design to development and, to name just a few, these innovative products help save lives, help NASA locate new galaxies, help cure depression, help control diabetes, provide energy solutions, and help world-class athletes improve performance.

3.0 OUR COMMITMENT TO THE PRINCIPLES OF THE MODERN SLAVERY ACT 2015

Elite Electronic Systems is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. As an equal opportunities' employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff.

4.0 OUR SUPPLY CHAINS

Elite Electronic Systems have global supply chains. All suppliers are vetted prior to engagement.

5.0 POLICIES AND CONTROLS POLICIES RELATED TO THE MODERN SLAVERY ACT 2015

Elite Electronic Systems have the following policies in place to support and comply with the Modern Slavery Act 2015

- Anti-Slavery and Human Trafficking policy
- Anti-Bullying and Harassment policy
- Equal Opportunities policy
- Making a Protected Disclosure policy
- Recruitment and Selection policy

6.0 DUE DILIGENCE PROCESSES

Elite Electronic Systems has reviewed the supplier risks of slavery and human trafficking and have taken steps to identify such risks:

- Vetting suppliers prior to engagement

- Requiring suppliers to sign up to code of conduct, including payment of local minimum wage/living wage, working reasonable hours, having reasonable working conditions, conducting risk assessments, having procedures in place for dealing with any concerns of incidents of modern slavery or human trafficking.

7.0 RISK MANAGEMENT AND ASSESSMENT OF EFFECTIVENESS

To assess risk and effectiveness within the business we undertake the following activities.

- Review of policies and procedures
- Delivery and compliance of training
- Audits on recruitment, selection and pay, including right to work checks.

To assess risk and effectiveness of supplier we.

- Request policies and procedures are in place.
- Annual audits and inspections
- Confirmation of adherence to right to work checks and meeting minimum wage requirements.

8.0 TRAINING AND COMPLIANCE

We will continue to embed the principles through:

- Providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- Ensuring staff involved in procurement activity comply with the Modern Slavery Act 2015 and ensure that suppliers are fully vetted before engagement.
- Ensuring that consideration of the modern slavery risks and prevention are added to Elite Electronic Systems' policy review process as an employer and procurer of goods and services.
- Ensure Elite Electronic Systems procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.
- Continuing to take action to embed a zero-tolerance policy towards modern slavery.
- Ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.

9.0 MONITORING

Elite Electronic Systems will monitor and review the effectiveness of this policy on an annual basis.

POLICY APPROVED BY ELITE ELECTRONIC SYSTEMS BOARD:



SIGNED:

Head of HR/Talent

DATE: 01.08.2023