

ANTI-SLAVERY POLICY STATEMENT

Management Systems Manual

This statement sets out the commitment the Company and our employees make to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Staff are expected and encouraged to report concerns to management, where they are expected to be acted upon.

This policy takes into account, and supports, the policies, procedures and requirements documented in our Management Systems, compliant with the requirements of ISO 9001:2008, ISO 14001:2004 and OHSAS 18001:2007. The implementation and operation of this management system underlines our commitment to this policy statement. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities

Identifying and Mitigating Risks

As a Company, Eland Cables will achieve these aims by our initiative to identify and mitigate risk in the following ways (but not limited to):-

- Continued stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.). We operate a preferred supplier list and conduct due diligence on all suppliers prior to confirming them on this list, This includes an online search to ensure no convictions for offences relating to modern slavery and where applicable, onsite audits of working conditions. Our Anti-Slavery policy forms part of our contracts with suppliers and all are required to confirm that no part of their business contradicts these terms.
- Continual audit & review our practices for checking all employees are paid at least the minimum wage (and the Living Wage where possible) and have the right to work;
- Encouraging the reporting of concerns and the protection of whistle blowers.

The company will not knowingly support or deal with any business involved in slavery or human trafficking. We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to share and comply with our values.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject and the following ongoing activities identified:

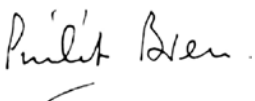
- Completion of Audits by Directors, Managers, and Safety Personnel, and training for our procurement/buying teams to help them identify areas for concern.
- Monitoring of payroll systems; and
- Strengthening of relationships, communication and personal contact with the next link in the supply chain to support their understanding of, and compliance with, our expectations.
- Re-evaluation of the risk of non-compliance as part of our cyclical Compliance Risk Register assessment.

Where an issue or compliance breach is identified we are committed to acting promptly to remedy the incident in it's fullest sense, including and not limited to legal recourse and the notification of applicable legal or governmental bodies where applicable.

There have been no reports of non-compliance received from employees, the public, or law enforcement agencies to indicate that our policy has been breached or that modern slavery practices have been identified

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes Eland Cables' slavery and human trafficking statement and applies to all staff and employees.

Signed for and on behalf of Eland Cables



Managing Director

Date: 04.01.2018