MODERN SLAVERY POLICY STATEMENT

Management Systems Manual

Eland Cables and its employees are committed to acting ethically and with integrity in all our business relationships. This includes implementing and enforcing effective systems and controls to prevent slavery and human trafficking from being present anywhere in our supply chain. Staff are expected and encouraged to report any concerns to management, and these concerns will be acted upon.

This Modern Slavery Policy Statement outlines the formal procedures as to how this issue will be monitored, mitigated and managed, including disciplinary procedures where they are breached, taking into account and supported by the policies, procedures and requirements documented in our Management Systems. This is compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. 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.

Identifying and Mitigating Risks

Eland Cables will ensure the prevention of slavery and human trafficking in our supply chain through the identification and mitigation of risks, not limited to the following ways :

- Continued stringent vetting and investigation of our supply chain, including contractors, sub-contractors, policies, and contracts. A preferred supplier list is in operation, where due diligence is conducted on all suppliers prior to confirming them on this list. This includes an online search to ensure there are no convictions for offences relating to modern slavery and, where applicable, undertaking onsite audits of working conditions. Our Modern Slavery Policy Statement forms part of our contracts with suppliers and they are all required to confirm that no part of their business contradicts these terms.
- Continual audit and review of our human resources practices confirming that every employee is paid at least the Living Wage – a figure in excess of the minimum wage - and have the right to work;
- Encouraging any concerns to be reported and offering protection to whistleblowers.

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

Training is provided to all relevant members of staff, and all Directors have been briefed, to ensure a high level of understanding of the risks of modern slavery and human trafficking whether in our supply chain or our business. As such, the following ongoing activities have been identified and actioned:

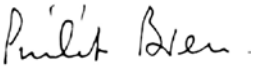
- Completion of Audits by Directors, Managers, and Safety Personnel, and training for our procurement/buying teams to help them identify areas for concern.
- Monitoring of payroll systems; and
- Strengthening of relationships, communication lines and personal contacts with the next link in the supply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

In the event that an issue or a compliance breach is identified, we are committed to acting promptly and to the fullest extent of our powers to remedy the incident. This includes but is not limited to legal recourse and the notification of applicable legal or governmental bodies.

To date, 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



CEO

Date: 15/11/2022