# Modern Slavery and Human Trafficking Statement 2023-2024

## Introduction

As part of the dry abrasive blast, spray, coatings inspection & ultrasonic NDT inspection equipment industry sectors, Elcometer Limited (Elcometer) recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Elcometer is absolutely committed to preventing slavery and human trafficking in all of its corporate activities, and is committed to ensuring that its supply chains are free from slavery and human trafficking.

This statement sets out Elcometer's actions to understand all potential modern slavery risks related to its business (in pursuant to s.54 of the Modern Slavery Act 2015). It puts in place steps that are aimed at ensuring that there is no slavery or human trafficking across Elcometer's business or its wider supply chain.

This statement relates to actions and activities during the financial year ending 31 March 2024.

## Countries of operation and supply

Elcometer is a world leader in the design, manufacture and supply of dry abrasive blast equipment, spray equipment, coating inspection equipment & ultrasonic NDT inspection equipment primarily into the automotive refinishing, industrial finishing and industrial protective coatings industries. Ever since the first Elcometer gauge was manufactured in 1947, our philosophy has been to provide industry leading, innovative, high-quality products, supported by a best-in-class customer experience, at competitive prices.

By concentrating on these core values, Elcometer has grown into a global organisation with representation worldwide.

Elcometer's head office is based in Manchester, UK and has manufacturing operations in the UK, Spain and the USA. Elcometer has direct sales, support and repair facilities in the UK, France, Germany, Japan, The Netherlands, Singapore, Spain, The UAE and USA. Elcometer has a comprehensive global distribution network, providing with sales and service capabilities to our customers in approximately 170 countries.

Elcometer works with approximately 950 suppliers with the majority based in the UK and across the European Union.

We do not source goods from high-risk countries where modern forms of slavery are prevalent.

## Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Ethical Procurement policy: this policy sets out our approach to conducting business with our suppliers together with the expectations that we have of our suppliers regarding the way that they conduct their business and applies to all Elcometer's purchases of goods and services.
2. Recruitment policy: we operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Open door policy: we operate an open-door policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Our company values: these values are core to our business and explain the manner in which we behave as an organisation and how we expect our employees and suppliers to act. These hold employees accountable for their actions and require them to act in an ethical manner.
5. Supplier assessments: we operate a supplier selection and appraisal programme and maintain an approved supplier list. This may include on-site audits dependent on risk associated with the nature of supply and supplier location.

For more information on Elcometer's company policies visit: **www.elcometer.com/en/company-policies**

## Responsibility

Responsibility for Elcometer's anti-slavery initiatives is as follows:

- **Policies:** All company policies are developed by Elcometer's Management Team and approved by the Board of Directors. Policies are audited and reviewed in line with our ISO 9001 procedures.
- **Risk assessments, investigations/due diligence:** All relevant assessments are made by the appropriate departmental head, including those in relation to human rights and modern slavery. Any concerns are raised with the Board of Directors.
- **Training:** Our procurement team has received 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.

## Due diligence

Elcometer undertakes due diligence during supplier selection and periodic reviews of our existing suppliers. Our processes include:

- A robust and proportionate approach to supplier assessment, considering the nature of the supply into our business and the associated risks;
- Evaluating the modern slavery and human trafficking risks of our suppliers of products, using information from the Global Slavery Index to identify higher risk industries and countries of supply;
- Conducting supplier audits and assessments to include Modern Slavery.

Any supplier who fails to meet our performance evaluations will be removed as a preferred supplier and we will terminate our business relationship with the supplier until such time as they can provide proof that they adhere to our policies and requirements as listed above.

## Performance indicators

Elcometer communicates with our supply chain to ensure that they are in compliance with our policies and to ensure that slavery and/or human trafficking is not taking place within our business or supply chain.

Any reports received from the public, employees or law enforcement agencies which indicate that modern slavery practices have been identified will also be acted upon in the appropriate manner.

## Awareness-raising programme

Elcometer has raised awareness of modern slavery issues by putting up posters across our premises, circulating this policy via email to all employees and advising staff how they can report any potential issues with regards to slavery and human trafficking.

## Board approval

This statement was approved on 3rd September 2024 by Elcometer's Board of Directors who review and update it annually.



**M C Sellars**
Managing Director