

# Elmdale Group

## MODERN SLAVERY STATEMENT

### ORGANISATION

This statement applies to all companies within and associated to Elmdale Maintenance Limited (referred to in this statement as 'The Group'). The information included in the statement refers to the financial year 2023/24.

### ORGANISATIONAL STRUCTURE

Elmdale Maintenance Limited has one centralised office from which all its employees are managed from. This office is located in Aldermaston Berkshire. The Organisation is controlled by a Board of Directors.

The Organisation provides and maintains Office Equipment and I.T. Solution Services to a wide range of commercial customers. The Organisation performs the sale of the aforementioned goods from its premises. Demand for our products is consistent throughout the year and it is therefore not seasonal.

The labour supplied to the Group in pursuance of its operation is carried out in the United Kingdom only and prominently in the Central South of England and London with operational capabilities across the UK.

### DEFINITIONS

The Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

### COMMITMENT

The Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the

minimum standards required in relation to its responsibilities under relevant employment legislation in England, and in many cases exceeds those minimums in relation to its employees.

### **SUPPLY CHAINS**

In order to fulfil its activities, the Group's main supply chains include those related to the supply of office equipment from various suppliers within the United Kingdom. We understand that some of the Group's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

### **POTENTIAL EXPOSURE**

The Group considers its main exposure to the risk of slavery and human trafficking to exist in the supply chain, of which is minimal in the United Kingdom so we ensure our suppliers have relevant procedures in place themselves if supplies are being sourced from another country.

In general, the Group considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

### **STEPS**

The Group carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Group has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Group has taken the following steps to ensure that modern slavery is not taking place:

- Identify inappropriate employment practices.
- Identify and assess other potential risk areas.
- Mitigate the risk of slavery and human trafficking occurring.
- Monitor potential risk areas.
- Protect whistle blowers
- We will continue to undertake training of employees, particularly those directly involved in engaging suppliers, to ensure they understand and comply with the supplier contract management framework when engaging and managing suppliers.

## **KEY PERFORMANCE INDICATORS**

The Group has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Group or its supply chains.

- 1) Completion of regular audits
- 2) Use of labour monitoring and payroll systems
- 3) Ensuring a high level of communication with next link in the supply chain and their understanding of our expectations regarding modern slavery.

## **POLICIES**

The Group has the following policies which further define its stance on modern slavery

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment 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.

## **TRAINING**

The Group provides the following training to staff to effectively implement its stance on modern slavery

Staff are our most valuable asset and we recognise that appropriate modern slavery and human trafficking training will increase awareness as well as mitigate risk within the business and supply chains.

We provide relevant training to all our staff

Employees are given refresher training covering our Code of Conduct and Human Trafficking Policy on an annual basis.

Training is also provided to new employees as part of their induction.

**SLAVERY COMPLIANCE OFFICER**

The Group has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval.....*4/5/23*.....

Signed..........

Director

Date.....*4/5/23*.....