## elserv

## **Modern Slavery Policy**

## MODERN SLAVERY ACT STATEMENT

This is a statement setting out the steps Elserv Limited has taken to ensure slavery and human trafficking is not taking place in any part of its own business or supply chain.

Elserv designs, manufactures, sells and installs a wide range of passenger lifts for residential and commercial buildings and infrastructure projects. In addition to new equipment, Elserv performs maintenance and repair services for both its products and those of other manufacturers and provides modernisation services to upgrade lifts. Elserv serves customers in the commercial, residential and infrastructure property sectors in the UK.

Elserv is committed to ensuring slavery and human trafficking are not taking place in its business or supply chains and, to this end, take the following actions:

Elserv respects and protects human rights by:

Ensuring safe and healthy working conditions for its employees based on whatever is most stringent: UK and European standards, or Elserv policies

Promoting responsible sourcing practices and setting expectations for our key suppliers through the Elserv supplier evaluation, including that suppliers must ensure safe and healthy work environments for their employees, avoid discrimination, ensure that child labour is not used, and avoid human trafficking.

Never using child labour or forced labour, and always seeking out business partners who share our commitment to fighting human trafficking and supporting human rights

When an actual or potential violation of law or Company policy is reported or detected, Elserv will conduct a timely and thorough investigation in compliance with the law. Every effort will be made to get all sides of the story, while also maintaining confidentiality to the greatest extent possible, as well as attorney-client privilege when the investigation is being done at the direction of legal counsel.

Elserv commits to treating all parties involved in an audit or investigation with respect. To protect confidentiality or address other concerns, there may be times when the details of issues being investigated are not shared with all parties. All employees and business partners must be truthful and fully cooperate with audits and investigations, except where applicable laws limit mandatory cooperation. Cooperation may include participating in interviews and providing documents.

If a violation has occurred or the subject of an audit or investigation has been untruthful or otherwise uncooperative, appropriate disciplinary measures will be taken. Such measures may include counselling, warnings, suspension, termination, reimbursement of losses, or even referral for criminal prosecution.

Each year, Elserv requires its employees to certify they have read and will comply with the Code. Employees are expected to report any violations of the Code of which they are aware and that have not otherwise been reported to management.



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Supply Chain Expectations and Assessment Processes

Our suppliers are critical to our success and, in order to provide superior products and services in a responsible manner, we require our suppliers to meet our expectations for ethics and compliance.

Contract Terms: Elserv standard contract terms and conditions of purchase require suppliers to comply with all applicable laws and regulations. In addition, our contract terms require suppliers to adopt and comply with a code of conduct or policy statement regarding business conduct, ethics and compliance. In addition, suppliers are required to have management systems, tools and processes in place that ensure compliance with applicable laws, regulations, and requirements of Elserv.

Supplier Code of Conduct: Among other things, the Supplier Code requires suppliers to ensure child labour is not used in the performance of their work, whether or not related to Elserv business. Suppliers must comply with laws and regulations prohibiting human trafficking. This includes prohibiting the use of forced, bonded or indentured labour, involuntary prison labour, slavery, or trafficking in persons.

Ryan Smith Director

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