

Emtelle Group

Modern Slavery Statement 2019

Introduction

The Emtelle Group is committed to protecting and respecting human rights and have a zero-tolerance approach to slavery and human trafficking in all its forms. This statement sets out the actions that we have taken to understand all potential modern slavery risks relating to our business and to implement steps to prevent slavery and human trafficking.

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

Our business and supply chains

The Emtelle Group consists of four manufacturing operations, two in the UK, one in Germany and one in Denmark. Emtelle is a leading global manufacturer of pre-connectorised, blown fibre cable and ducted network solutions. With over 400 employees worldwide that services a customer base across 67 countries.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

During 2019 we were not made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we had been, then we would have acted immediately against the supplier and reported it to the authorities.

We undertake due diligence when considering taking on new suppliers and review our existing suppliers on a periodic basis. Our due diligence and reviews include;

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risks of each new supplier by analysing responses to our questionnaire.



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We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour.
- Their employees work voluntarily and are entitled to leave work.
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment.
- They don't withhold employee salaries for any reasons.
- They don't require employees to surrender their passports or work permits as a condition of employment.

Policies and procedures

We operate a number of policies and procedures which reflect our commitment to acting properly in all of our business relationships and to implementing enforcing effective systems and controls.

The following policies and procedures contribute towards identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- Anti-harassment and bullying policy – which is designed to help ensure that all of our staff and anyone that we deal with are treated with both dignity and respect.
- Health, safety and environmental policy – ensure the wellbeing of all our employees and anyone else who may be affected by our activities.
- Anti-corruption and bribery policy – reminds our employees to take account of any improper or suspicious behavior or situations and how to report and deal with the risk of bribery and corruption.
- HR procedures – we check that all our staff has appropriate right to work documents and ensure they are paid fairly. We have procedures in place to safeguard the interests of young people and any unpaid work experience volunteers working at Emtelle.
- Procurement Policy – sets out a number of factors to be considered when selecting our suppliers, including supplier reputation and compliance with laws and ethical procedures.



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Awareness

We try to ensure that adequate information and training is provided to all our employees, contractors or visitors on all relevant matters. Some examples of the information and training we provide;

- All new starts attend an induction session which includes information and training on our policies.
- Our managers are provided with a range of training and are assisted by our HR department in HR related matters including in relation to recruitment, remuneration and employee wellbeing.
- Our procurement team routinely seek out information and training to help identify and address risks in both our organisation and supply chain.

Next steps

In 2020, in addition to continuing the work outlined above, we will focus in particular on the following;

- Continue to raise awareness of modern slavery amongst employees by introducing online training.
- Develop our Procurement procedures but in particular supplier selection, evaluation and monitoring.
- Emtelle uses a set of standard terms and conditions to trade with suppliers. These will be updated to have a statement which obliges the supplier to comply with the Modern Slavery Act and to submit evidence about how they take steps to mitigate this issue if Emtelle requires it.
- Introduce an online awareness course for employees and a further advance training course for those involved in the supply chain.
- Define a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain, e.g.;
 - ◆ How many employees have completed mandatory training?
 - ◆ How many suppliers have filled out our questionnaire?
 - ◆ How many suppliers have rolled out an awareness and training programme that is equivalent to ours?
- Conduct a risk assessment of our supply chain by taking into account;
 - ◆ The risk profile of individual countries based on the Global Slavery Index
 - ◆ The business services rendered by the suppliers
 - ◆ The presence of vulnerable demographic groups

This assessment will determine our response and the risk controls that we implement.



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This statement is made pursuant to Section 54, part 6 of the Modern Slavery Act 2015 and constitutes Emtelle's slavery and human trafficking statement for the financial year beginning 1st January 2019 and ending 31st December 2019.

Approved and signed on this date 17th February 2020



Tony Rodgers
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