

## *Modern Slavery Policy*

Eltherington Group is a family-owned company based in Hull, East Yorkshire.

We supply PVCu fenestration products, fabricated aluminium and steel products to the leisure home and modular building markets. We also manufacture rainscreen systems for the architectural and construction industries.

The Group employs over 200 people locally and, wherever possible, recruits staff and sources materials through local suppliers.

The UK Modern Slavery Act 2015 requires commercial organisations with an annual turnover of £36 million or more to prepare and publish an annual statement on the steps taken to ensure that slavery and human trafficking are not taking place in their operations or supply chains.

Although Eltherington Group's turnover is below this statutory threshold, we are fully committed to upholding the principles of the Act and to taking proactive measures to prevent modern slavery, human trafficking, forced labour, and child labour across all aspects of our business and supply chain.

Our policy reflects our commitment to acting ethically and with integrity in all our business dealings and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere within our organisation or those of our suppliers.

Eltherington Group complies with all relevant UK employment, labour, and human rights legislation, including:

- Modern Slavery Act 2015
- Employment Rights Act 1996
- National Minimum Wage Act 1998
- Equality Act 2010
- Home Office Statutory Guidance on Modern Slavery (2021)

We take reasonable and practical steps to ensure that all applicable legislation and regulations are complied with. The Group has zero tolerance for modern slavery, including forced labour, debt bondage, human trafficking, or the use of child labour.

To uphold this, we:

- Conduct due diligence on new and existing suppliers.
- Require suppliers and contractors to comply with our ethical trading standards.
- Review our procurement processes to include modern slavery considerations.
- Encourage transparency and accountability throughout our operations and supply chain.

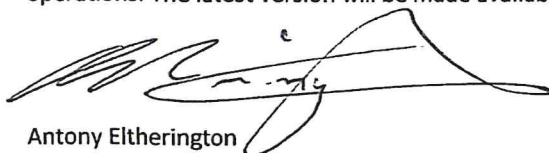
### **Risk Assessment and Due Diligence**

We aim to identify and mitigate risks by:

- Assessing and reviewing potential risk areas within our supply chains.
- Monitoring and auditing suppliers where appropriate.
- Taking immediate remedial action if any modern slavery concerns are identified.
- Protecting and supporting whistleblowers who raise genuine concerns in good faith.

Employees, suppliers, and third parties are encouraged to report any concerns or suspicions of unethical or unlawful behaviour. Reports can be made confidentially, and the company will ensure that no one suffers any detrimental treatment for reporting in good faith.

This policy will be reviewed annually or sooner if there are significant changes in legislation or company operations. The latest version will be made available on our website and to all employees and suppliers.



Antony Eltherington  
Managing Director