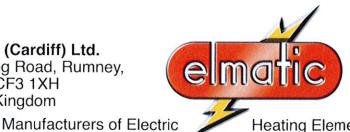
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Heating Elements for Industry

Code of Business Conduct

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Elmatic (Cardiff) Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

Elmatic (Cardiff) Ltd has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business

Since 1949, the company has grown steadily, supplying heating elements across the UK. Today, we are one of the leading British heating element manufacturers and suppliers of industrial & electric heaters, employing approximately 50 people.

Elmatic (Cardiff) Ltd is a family business started in 1949, it's currently owned by Mr. John Skalitzky. Based in Cardiff, South Wales, we produce our stock in a superbly equipped 45,000 sq. ft. factory. As a heating element manufacturers and suppliers company, our skilled and experienced technical staff are happy to answer any questions or to advise you on which type of heater would be most suitable for your application.

With an international reputation for excellence, we are the major suppliers to many of the leading OEM's in the UK and Europe- and our ties with the plastics and rubber industries are second to none. We are committed to continually developing our manufacturing methods, ensuring that our industrial and electric heating elements provide the best performance.

Elmatic Products

As well as heating elements, immersion heaters, cartridge heaters and many more, we also specialize in manufacturing for a large variety of engineering projects for, among others, the packaging, pharmaceutical and catering industries.

As we are one of the leading heating element manufacturers and suppliers, our ever-expanding product range includes mica bands / mica plates, cartridge heaters and ceramic knuckle heaters. Tubular rod / immersion heaters in Incoloy, Stainless Steel or Mild Steel, 3.2mm, 5.mm, 7mm SQ coiled heaters, not to mention a large selection of thermocouples.

> ECD 688 Rev 1 Date reviewed 07/2024





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. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- 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. Whistleblowing policy. We operate a whistleblowing 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. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our suppliers

- 1. Elmatic (Cardiff) Ltd carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its supply chains.
- 2. Elmatic (Cardiff) Ltd has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with slavery and/or human trafficking.
- 3. In accordance with section 54(4) of the Modern Slavery Act 2015, Elmatic (Cardiff) Ltd has contacted all first tier suppliers to set out our zero tolerance stance on modern slavery and to ensure that slavery and/or human trafficking is not taking place.
- 4. Elmatic (Cardiff) Ltd has taken action to monitor reports of modern slavery and will cross reference such reports such reports with our first tier supply chain. Elmatic (Cardiff) Ltd will seek to discontinue business with any first tier supplier found by the enforcement authorities to be involved in modern slavery.
- 5. Elmatic (Cardiff) Ltd encourages use of its whistleblowing policy to report any concerns regarding modern slavery and will investigate any complaints thoroughly.

Elmatic (Cardiff) Ltd operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery (and on site audits which include a review of working conditions.) Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- 1. They have taken steps to eradicate modern slavery within their business.
- 2. They hold their own suppliers to account over modern slavery.
- 3. (For UK based suppliers). They pay their employees at least the national minimum wage / national living wage (as appropriate).
- 4. (For International suppliers). They pay their employees and prevailing minimum wage applicable within their country of operation.
- 5. We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We regularly conduct training for our procurement/buying teams 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.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

 No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Director.

Mr. J. M. Skalitzky