

Eltronic Group
ENGINEERING IMPACT

Statement Modern Slavery act



1 Purpose

The purpose of this statement is to highlight the measures implemented by Eltronic Group A/S and its subsidiaries undertakings to combat modern slavery and human trafficking throughout all aspects of Eltronic Group A/S's business and supply chain.

2 Basis

The basis for this statement is in accordance with Section 54 (1) of the UK Modern Slavery Act 2015.

3 Scope

This statement is applicable to Eltronic Group A/S and its subsidiaries. Although some subsidiaries or branches of Eltronic Group A/S are not legally bound by the UK Modern Slavery Act, they acknowledge the significance of adopting a global approach that prioritizes transparency and promotes the prevention of modern slavery practices within their internal processes and associated supply chains. This statement applies to both Eltronic Group A/S and all its subsidiaries collectively, referred to as Eltronic Group A/S throughout this document. For further information on specific documentation of the UK Modern Slavery Act 2015 please visit the relevant company website.

4 Targets

The companies are regulated and requested to formulate and strategically perform targets in this area.

5 Ownership

The statement is owned and governed by the CEO and board of directors of Eltronic Group

6 Governance

Eltronic Group's Executive Board approves the statement regarding the UK Modern Slavery Act 2015 in cooperation with the appointed ESG Board with management representatives from the companies and relevant departments within Eltronic Group. The function of the ESG Board is to advise the Executive Board about the legal requirements and initiatives related to our employees. The ESG Board is on regular basis in contact with the relevant CEOs of the companies within Eltronic Group that must have a signed statement that clarify the legal binding of UK Modern Slavery Act 2015.

7 Evaluation

The statement must be evaluated at least once a year.

8 Statement

By releasing this statement, Eltronic Group A/S aims to reinforce its unwavering commitment to combatting modern slavery and human trafficking, and we are determined to continually improve our efforts in this regard. We firmly believe that through collaboration, transparency, and ongoing dedication, we can make a positive impact and contribute to eradicating modern slavery from our operations and supply chains.

8.1 Statements

8.1.1 Operations

Eltronic Group A/S's code of conduct applies to all locations and employees across the organization. If national laws in certain areas impose a different framework, those will take precedence. Eltronic Group A/S is strongly committed to ethical, social, and environmental principles, which are embodied in our code of conduct (CoC). All employees are required to adhere to the CoC, which serves as a set of guiding principles and minimum requirements for behavior, interactions, and expectations toward others.

Within the code of conduct, we acknowledge our commitment to uphold international conventions related to human rights and forced labor. Fair treatment of employees, with dignity and respect, is a shared responsibility that Eltronic Group A/S takes seriously. The international agreements concerning human rights are firmly upheld, ensuring to avoid of consicous employing forced or involuntary labor, including bonded, prison, or indentured labor, as well as debt servitude.

The employees' right to freely associate and choose whether to have collective bargaining representation are respected.

8.1.2 Suppliers

Eltronic Group A/S believes in conducting business with customers and suppliers who share our commitment. The suppliers are expected to comply with applicable employment laws and support fundamental human rights for all people. Therefore, significant efforts are invested in evaluation, selection, and collaboration with suppliers.

There are established and documented and controlled suppliser management processes along with monitoring and visits to suppliers as required.

A Supplier Code of Conduct is created to ensure that suppliers are informed of the requirements they must adhere to. Eltronic Group A/S and its subsidiaries strictly adhere to all local laws and expect suppliers to do the same. Suppliers are prohibited from paying bribes or engaging in corrupt practices to further Eltronic Group's business interests. This includes any direct or indirect offering, promising, or authorizing the payment of money or anything of value to local government officials, political parties, or candidates for political office to influence their decisions.

We expect that our suppliers and partners will, at the very least, comply with applicable wage and hourly laws and regulations, including those related to minimum wages.

8.2 Due Diligence

8.2.1 Employee

The company ensures that its employees have the necessary authorization to work in the country where they are employed.

Employees are provided with contracts that adhere to the national legislative requirements.

Compensation for employees corresponds to their respective roles and responsibilities, meeting or exceeding the minimum requirements set by statutory pay legislation.

Employees are encouraged to voice their concerns without the fear of facing any form of retaliation. We consistently advise employees to exercise caution and consideration in their actions and to seek guidance from their respective managers.

The employees are informed of the company's expectations, which include reading the comprehensive policies on anti-corruption and human rights among other requirements as ensuring the completion of all internal mandatory courses.

8.2.2 Supplier or Sub-contractors

The company communicates its company culture to approved suppliers through the Supplier code of conduct and Supplier assessment.

The Supplier Code of Conduct is centered on human rights (including Modern Slavery) as one of the main criteria. This code has been integrated into Eltronic Group's General Terms and Conditions of Purchase, ensuring that all suppliers are expected to comply with these requirements.

Before approving suppliers and subcontractors, the company conducts due-diligence activities.

The Supplier assessment is utilized to evaluate whether a company can meet Eltronic Group A/S's requirements for delivering products and services with the desired quality. One of the assessment factors includes evaluating the working environment and ethics, which encompasses suppliers' compliance with the UN guiding principles on Business and Human Rights.

In the event of suspicion of slavery activities or any other inappropriate activities or procedures within the supply chain, the matter is promptly reported to management or directors.

The company actively encourages whistleblowing and ensures protection for whistleblowers through whistleblower statement.

9 Communication & Training

By disseminating this statement, Eltronic Group A/S undertaking a proactive initiative to effectively convey its unwavering commitment to combat Modern Slavery and associated practices externally, primarily through our official website. Notably, the company purpose and its values are communicated to the public externally via our website Eltronic Group A/S.

Internally, Eltronic Group A/S utilizes its Intranet platform as a pivotal means to disseminate policies and processes among the Employees. There are regular meetings between managements conducted with a

structured and fixed agenda, which addresses various pertinent topics including work processes, quality, working environment, environmental concerns, and other relevant matters.

10 Risk Assessment and Management

Eltronic Group A/S is firmly committed that no individual should ever endure forced labour or exploitation. To uphold the principles outlined in the Modern-Slavery Act and other international conventions, we employ requisite measures of checks and controls.

Regular supplier assessments, audits, and transparent communication channels are diligently employed to actively monitor and mitigate potential risks with supply chain and internal operations.

Eltronic Group A/S acknowledges the limited exposure to modern slavery within our operations and maintains a dedication to continuous learning and improvement. Internally there are onboarding and exit interviews/surveys to gather valuable insights from the employees to identify areas for enhancement. These interviews/surveys are conducted confidentially between HR and employees.

Eltronic Group A/S has established a Whistleblower portal, with confidential access to express concerns regarding irregularities or violation of the Modern Slavery Act.

Eltronic Group A/S takes proactive measures to ensure that modern slavery practices do not exist in the supply chain. Supplier Collaboration Agreements, Supplier Codes of Conduct, and Supplier Assessment are used to ensure the safety and welfare of all employees engaged in outsourced tasks.

To the best of our knowledge, Eltronic Group A/S has not conducted business with organizations involved in slavery or human trafficking. Furthermore, there have been no reports suggesting any involvement of our suppliers in activities covered by the Modern Slavery Act. However, it is important to clarify that our acknowledgment of this fact does not constitute an endorsement of their compliance.