

Modern Slavery Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (though not obliged to do so as we are an Isle of Man company) and sets out the steps that Quelltex 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. Quelltex 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 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

Quelltex Ltd operates 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 offences relating to modern slavery [and on site audits which include a review of working conditions].

Quelltex have few suppliers and those that we must have in order to run our business, are background searched to ensure we have actively connected with legitimate suppliers only and are not in any way contributing to slavery.

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In addition to the above, as part of search into our suppliers, we require that they confirm to us that (we will accept their own policies displayed on their websites as confirmation):

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 any prevailing minimum wage applicable within their country of operations
5. We may terminate the connection with a supplier at any time should any instances of modern slavery come to light.

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.
- As our relationships become more longstanding, further questions can be asked by personnel we become familiar with and further searches will prove no investigation by authorities into our suppliers.

Approval for this statement:

This statement was approved by the Board of Directors on 1st April 2019

Name: Paul Quellan
Managing Director

Signature:



Date 12th April 2019

Next revision date:
No later than 11th April 2021

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Revised 2nd June 2021 by D McGhee

Revisions: Under 'Our Suppliers' a paragraph indicating few suppliers and background searched, has been added as it strengthens the policy document in plain language.

Same paragraph: '... As part of our search...' a small addition that the website documents of our suppliers will be taken as confirmation of the points laid out below that statement.

Performance Indicators: second bullet point stating longevity of relationship with suppliers allows us to prove they are diligent in their working practices against modern slavery in all its forms.

Next revision due: May 2023