

## **Lothian Electric Machines Limited Anti-slavery and Human Trafficking statement 2024**

**This statement is a response to Section 54 (1) part 6 of the Modern Slavery Act 2015 and relates to the actions and activities for the financial year ending 2024.**

Modern slavery is a crime and violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Lothian Electric Machines Limited is committed to preventing slavery and human trafficking violations in its own operations, supply chain and its products.

Lothian Electric Machines Limited is committed to upholding human rights, always treating people fairly, with dignity and respect and we expect the same high standards from our suppliers, contractors and business associates in our supply chain.

We respect the human rights of all our employees and those within our supply chain and have a zero-tolerance approach to slavery and human trafficking violations and require our supply chain to comply with these values.

### **Organisation and Supply Chain**

Lothian Electric Machines Limited manufactures carriages for stairlift applications from a single production site in Haddington, East Lothian, UK. The required support functions are also based in Haddington and include; Engineering, Procurement, Sales, Finance, Human Resources and Quality.

The workforce of circa 170 are all employees of Lothian Electric Machines Limited and are recruited by our Human Resources based in Haddington.

All the procurement activities for the business are managed and take place within the Haddington site. The suppliers and contractors to the business are mainly UK based (circa 85%).

### **Policies**

Lothian Electric Machines limited are committed in reviewing and further strengthening its internal policies where required to ensure business is conducted in a safe, ethical and transparent manner.

All our internal policies are endorsed and signed off by senior management and shared widely within the business. These include Health & Safety, Environmental and Energy.

The Managing Director has overall responsibility for ensuring these policies are implemented and operate in compliance with our legal and ethical obligations and that those under our control comply with them.

Management at all levels are responsible for ensuring those reporting to them understand and comply with policy and are given the required training, including awareness of and how to identify and counter issues of modern slavery in the supply chain.

We review and manage our recruitment processes to ensure they are transparent and robust in the vetting of potential employees.

### **Due Diligence**

We will work with our employees, suppliers and contractors in our supply chain to raise awareness, understanding and to utilise recommended resources of guidance and information to help prevent anti-slavery or human trafficking violations in our supply chain.

We will monitor and seek to identify potential risks in our supply chain and action accordingly. Taking into consideration high risk locations, industries, commodities or products.

### **Risk Assessment and Management**

Risk assessments of the supply chain are conducted by the Procurement team utilising current recommended guidance and available resources on combating modern slavery. These will include:

Mapping and categorising supplier locations, industries, commodities and products in terms of low, high or medium risk.

Consideration of spend value and complexity of goods or services.

The identification and prioritisation of higher risk areas to focus and concentrate activities and corrective actions.

The use of desk or site audits to follow up on any potential risks identified within the supply chain.

Mandatory compliance with the Modern Slavery Act 2015 is communicated to all new suppliers prior to any commencement of business with our Supplier Questionnaire and reinforced at order confirmation with our Purchase Specification and Terms and Conditions.

### **Key Performance Indicators**

The completion of selected annual audits of potential risk areas in the supply chain to ensure compliance and validate supplier responses. The recording of any recommended corrective actions required and taken.

To support ongoing management of risk, recording any suspected breaches of the Modern Slavery Act 2015 and the corrective actions taken.

On an annual basis, the identification, completion and recording of any required employee training to support the prevention of modern slavery in our supply chain.

Conducting an annual review of the current risk assessment and transparency within the supply chain.

### **Training**

The company is committed in providing awareness and training on modern slavery and human trafficking to all relevant employees and decision makers, with particular focus on senior management and employees working in supply chain functions.

Training needs will be identified, implemented and recorded on an annual and individual basis by Human Resources with ongoing evaluation of effectiveness following completion.

**This statement set out the steps that Lothian Electric Machines Limited have taken and commitment to help ensure that modern slavery and human trafficking is not taking place in any part of our business supply chains.**

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Lothian Electric Machines Limited

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