

McElwaine Technical Services Limited

MODERN SLAVERY POLICY

1. Policy Statement

McElwaine Technical Services Limited is committed to conducting business ethically, responsibly, and with integrity. We have a zero-tolerance approach to modern slavery, human trafficking, forced labour, servitude, and exploitation in all forms within our business operations and supply chains.

We are committed to ensuring that appropriate systems and controls are in place to safeguard against any form of modern slavery occurring within our organisation or amongst our suppliers, subcontractors, and business partners.

This policy supports our obligations under the UK Modern Slavery Act 2015 and reflects our commitment to ethical business practices and responsible procurement.

2. Scope

This policy applies to:

- All employees
 - Directors and management
 - Temporary and agency workers
 - Contractors and subcontractors
 - Suppliers and service providers
 - Any third parties acting on behalf of McElwaine Technical Services Limited
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3. Our Business

McElwaine Technical Services Limited is a UK-based technical services company operating primarily within the food processing, hygiene, and process plant sectors.

Our products and services include:

- Plate heat exchanger integrity testing
- Heat exchanger refurbishment
- Holding time verification
- Crack detection and process testing
- Pulsed light sterilisation systems
- Sustainable hygiene products based on hypochlorous acid

We operate primarily throughout the United Kingdom and work with a range of suppliers, manufacturers, logistics providers, and specialist service organisations.

4. Responsibilities

Responsibility for implementing and monitoring this policy sits with the Directors of McElwaine Technical Services Limited.

Management are responsible for:

- Promoting awareness of modern slavery risks
- Ensuring ethical procurement practices
- Monitoring supplier relationships
- Investigating concerns where appropriate
- Supporting a culture of openness and accountability

All employees and contractors are expected to:

- Comply with this policy
 - Remain vigilant to signs of modern slavery
 - Report concerns promptly
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5. Supplier Expectations

McElwaine Technical Services Limited expects all suppliers, subcontractors, and business partners to:

- Comply with all applicable employment laws
- Prohibit forced, bonded, or involuntary labour
- Ensure workers are treated fairly and lawfully
- Provide safe and appropriate working conditions
- Operate ethically and transparently

We reserve the right to review supplier compliance and request additional information where concerns are identified.

6. Due Diligence

We undertake proportionate due diligence procedures when engaging suppliers and subcontractors.

This may include:

- Supplier verification checks
- Assessment of operational and sector risks
- Review of ethical and compliance standards
- Ongoing supplier monitoring and engagement
- Investigation of concerns where appropriate

Where risks or concerns are identified, corrective actions may be requested or supplier relationships reviewed.

7. Employment Practices

McElwaine Technical Services Limited is committed to fair and lawful employment practices.

We:

- Operate lawful recruitment procedures
 - Verify eligibility to work
 - Do not tolerate forced or involuntary labour
 - Promote fair treatment and safe working conditions
 - Encourage employees to raise concerns openly
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8. Reporting Concerns

Employees, suppliers, contractors, and stakeholders are encouraged to report any concerns relating to suspected modern slavery or unethical conduct.

Concerns may be raised directly with management or Directors and will be treated seriously and investigated appropriately.

McElwaine Technical Services Limited will not tolerate retaliation against anyone raising genuine concerns in good faith.

9. Training and Awareness

Relevant personnel involved in procurement, supplier engagement, and operational management will be made aware of modern slavery risks and reporting expectations.

10. Monitoring and Review

This policy will be reviewed periodically to ensure it remains effective, appropriate, and aligned with current legislation and business operations.

Approval

Approved by:

Neville McElwaine



Managing Director

McElwaine Technical Services Limited

Next Review Date: May 2027