



Modern slavery statement

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This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Elite Mobile Limited has taken and is continuing to take to ensure that modern slavery and human trafficking are not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We have a zero tolerance approach to any form of modern slavery and are committed to acting ethically and with integrity and transparency in all business dealings. We are also committed 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

Elite Mobile is a leading UK distributor of pre-pay SIM cards, mobile handsets, OEM and own brand accessories. We employ over 100 staff in 2 offices (we also have a subsidiary company with a third office and over 150 staff) and our annual turnover is in excess of £36 million.

Our supply chain includes the major mobile networks, manufacturers that enable us to provide our customers with an innovative and extensive range of over 3000 products, some outsourced business process services, recruitment and employment agencies, cleaning services and the suppliers of goods including office furniture, office supplies and IT software and equipment.

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 company'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.

These policies have been developed and implemented by our Director of Operations, our Head of Legal and the HR Department and are intended to:

- Establish and assess areas of potential risk in our business and supply chains, with a preliminary assessment based on geography, the product or services being purchased, supplier quality performance and the nature of the business transaction.
- Monitor potential risk areas in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.

- Provide adequate protection for whistleblowers.

We conduct reviews of the nature and extent of our exposure to the risk of modern slavery occurring. We also seek to ensure that our suppliers are aware of our policies and adhere to the same high standards.

Our suppliers

Elite Mobile 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 online searches and requesting information on their policies for fair sourcing of goods and services and employment practices.

Our Anti-Slavery Policy forms part of our contract with our suppliers and they are required to confirm that no part of their business operations contradict this policy. We also seek to impose contractual terms asking them to warrant that they and their suppliers are in full compliance with our Anti-Slavery Policy and 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 any 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 conduct training for our procurement/buying teams so that they understand the signs of modern slavery and know 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 if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified within our business or supply chain.

Approval for this statement

This statement was approved by the Managing Director on behalf of the Board.



Name: Ketan Gokani

Date: 4th January 2021