

1. Introduction from the Orona Ltd Board of Directors

As an organisation within the engineering and construction sector, we recognise that we have a responsibility and are absolutely committed in taking a robust approach to prevent slavery and human trafficking in our activities, and to ensure that our supply chains are free from such activities.

This statement sets out the steps we have taken to understand potential modern slavery risks related to the business and to put in place actions that are aimed at ensuring that there is no slavery or human trafficking in our business and its supply chains.

This statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024.

2. Organisational Structure

Orona Group are a worldwide business focused on the design, manufacture, installation, maintenance, and modernization of lifts, escalators, and moving ramps and walkways in the manufacturing, engineering and service sectors. Two manufacturing facilities and a Head Office based in Spain support and supply product to the UK business. The UK business (Orona Ltd) employees 271 engineers, managers and support staff and has an annual turnover of £44m.

3. Our Business

Orona Ltd is organised into core business streams:

- Installation
- Service and Repairs
- Sales
- Technical (including HSEQ)
- Business Support (including Administration, Finance, HR)

The organisation (Orona Ltd) operates within the UK market only with offices in London, Verwood, Glasgow, Cannock, Warrington and Sheffield.

4. Our Supply Chain

Our supply chains include:

- 50% - Primary product and parts – manufactured and supplied direct from the two Orona Group manufacturing facilities in Spain
- 15% - Ancillary products – office supplies
- 35% - Sub-contractor resources

5. Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our approach to business is based on 4 core values:

- **Closeness** - We maintain close relationships with our Clients. We collaborate with the Client. We get to know their needs, and we help them achieve their goals. We check that our clients processes and practices reflect our expectations through sub contract terms and conditions and supplier questionnaires.
- **Community** - A brand that puts people first. An organisation that puts the customer at the centre of what we do.
- **Drive** – We don't wait for things to happen, we make them happen. We are tireless in our ambition and desire for constant improvement.

- **Meaningful Innovation** – We embrace innovation, continuously striving to improve our products and services for the benefit of our customers

We are committed to ensuring that our internal policies and approach demonstrate our commitment to prevent slavery and human trafficking in our activities:

- **Supplier/Procurement code of conduct** - Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. Serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment and Selection Policy** - The organisation sources labour directly as far as is practicable and as required. The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Recruitment activity is coordinated through the HR team who operate in line with best practice, UK law and the 2023 Recruitment and Selection Policy.
- **Anti-Bribery and Corruption Policy** – Our Company policy provides clear expectations and guidelines.
- **Induction** – Our induction process includes an overview of the policy statement and a copy is provided to all new employees.
- **Whistleblowing** – A Company policy provides clear steps outlining how concerns can be raised. A copy is provided at induction to all employees and is available publicly.
- **Employee handbook** – Our handbook references expectations so far as conduct, confidentiality and service to the Company in support of this policy statement.
- **Website** – This statement is available [via our website](#) homepage and on request.

6. Due Diligence Processes

As part of our initiative to identify and mitigate risk we undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence process includes:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier;
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationships;
- Identify and assessing potential risk areas in our supply chain;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitoring potential risk areas in our supply chains;
- Protecting whistle blowers

7. Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To ensure that all those in our supply chain and contractors comply with our values we require all suppliers to complete a supplier questionnaire and agree to our sub contract Terms and Conditions.

Any breach of this policy by an Employee will generally be treated as gross misconduct and may result in dismissal without notice. We may terminate our relationship with individuals and organisations working on our behalf who do not comply with this policy.

8. Training

We ensure all staff involved within the supply chain have an understanding of the risks of modern slavery and human trafficking in our supply chains and our business which will include:

- Our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

9. Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Sub contract cost review to ensure that costs agreed do not fall below an agreed minimum level
- Review of job costing exceptions report to check for any cost abnormalities.
- Sub-contractor Management information to ensure receipt of specific information before a job commences (ie safety policy receipt, insurance, signed contract)
- Director committee meetings to review all aspects of our supply chain suitability.

10. Further steps

Following a review of the effectiveness of the steps we have taken to date to ensure that there is no slavery or human trafficking in our supply chains, we are committed to further steps during 2023-2024:

- Policies review – ongoing review of associated Company policies and guidelines
- Constant monitoring on potential changes in right to work

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending March 2024.



Joao Ribeiro
Managing Director