

## **Modern Slavery Act Statement 2018**

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Space Engineer Services Limited and other group companies during the year ended 31 December 2018 to prevent modern slavery or human trafficking in our business and supply chain.

### **Introduction**

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We have 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 Business**

Space Engineering Services are one of the most dynamic refrigeration, heating, ventilation and air conditioning service providers in Europe. We're proud to offer innovative products and services, and market-leading refrigeration technology.

We offer a wide range of refrigeration, mechanical and electrical services to customers across multiple sectors. Our customers include big name retailers, pharmaceutical manufacturers, food processors, and commercial businesses.

We have several offices throughout the UK with our Head office, Factory and National Operations Centre in Bristol. We also have offices in Hungary, with a local service delivery team and in-country Project Managers.

### **Our policies**

We have several internal policies to ensure we are conducting business in an ethical manner. These include:

- Modern Slavery Policy. – This sets out our overall policy on modern slavery, expectations and procedure to follow if anyone identifies concerns
- Public Interest Disclosure Policy (Whistleblowing) – We have a whistleblowing policy in place so that employees know they can raise concerns about our business without fear of reprisals.
- Eligibility to work checks – these are carried out for all employees in accordance with UK law. These safeguard against human trafficking or individuals being forced to work against their will.
- Ethical Trading Initiative Base Code – we have incorporated the ETI base code into our business.

All our policies are available to employees on the company extranet and included in the induction of all new starters to ensure awareness.

### **Steps taken**

During the year we have carried out the following:-

- Maintained a centralised supplier database that includes requiring all suppliers covered by the Modern Slavery Act 2015 to confirm their compliance with the Act and provide a copy of their Modern Slavery Policy as a condition of trading with us.
- Issued our Modern Slavery Policy to all employees to raise awareness.
- Arranged training for certain members of staff on Modern Slavery and the areas of risk relating to their roles.
- Successful audit of our Manufacturing facility by independent external auditors reporting to Sedex and one of our key customers confirming our compliance with the Ethical Trading Initiative Base Code and other related matters including Modern Slavery.

### **Approval**

This statement was approved by the Board of Directors on 24 June 2019.

A handwritten signature in black ink, consisting of a stylized, cursive name followed by a long horizontal stroke.