

## **Modern slavery statement for financial year 2017/18**

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

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Epta UK has 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**

Epta UK are renowned throughout the UK for our wide knowledge and experience applied to the design and production of custom-made refrigerated units; our significant experience being best expressed in Product Management and System Design services deployed to offer clients the solutions best suited to their needs.

### **Our high risk areas**

The main direct supplier 'high risk area' is regarding our use of temporary agency workers in our Bradford factory, where some migrant workers may be contracted. We employ thorough due diligence to ensure that these suppliers uphold their code of conduct agreements. To that end we only use appropriately accredited suppliers, with membership of TEAM, Recruitment & Employment Confederation, British Institute of Recruiters and Association of Labour Providers. We also have documented audit procedures for these suppliers and conduct senior manager visits.

We are also taking steps to understand in more detail the other areas of our supply chains where there may be a risk. Our review of supplier terms and conditions / contracts has been the first step.

### **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. **Modern 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 reprisal.

### **Our suppliers**

Epta UK 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 an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery and specific on site audits for high risk suppliers which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us 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 the National Living Wage as a minimum
4. ( For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

### **Training**

We regularly conduct training for our procurement / buying / HR teams and other relevant employees, so that they understand the signs of modern slavery and 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 to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

### **Approval for this statement**

This statement was approved by the management team on 26<sup>th</sup> February 2019



David Wormald  
HR Director