

Modern slavery statement for financial year ending 2023

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 structure

As part of the multi-national Epta group, Epta UK are renowned throughout the UK for our wide knowledge and experience applied to the design, production, service and maintenance of commercial refrigeration systems. In January 2022 Epta UK Limited was formalised as a single legal entity, by the corporate merger of Epta George Barker Limited and Epta Cold Service Limited.

Our high risk areas

Our 'high risk areas' are within the supply chain and service functions.

One direct supplier high risk area involves our use of temporary agency workers in our Bradford factory, where some migrant workers could be contracted via employment agencies.

We carry out due diligence checks to ensure that our suppliers meet and maintain the standards that we expect. 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.

As part of the due diligence we would also initiate an online search to ensure that a particular organisation has never been convicted of offences relating to modern slavery and specific on site audits for high risk suppliers which includes 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. The above steps are also taken when selecting the use of a sub-contractor.

In 2023 we engaged a comparatively low number of temporary agency workers in the Bradford factory compared with our pre-Brexit workforce.

We continue to take steps to understand in more detail the other areas of our supply chains where there may be a risk.

Our suppliers

We have introduced a code of conduct document that forms a key part of our Supply Chain and Procurement strategy and is a fundamental part of our supplier selection and on-going evaluation processes.

Epta UK operates a supplier policy, maintains a preferred supplier list and requires suppliers to agree to our Code of Conduct. We conduct due diligence on all suppliers before allowing them to become a preferred supplier.

Our supplier questionnaire has recently been updated with additional questions under the Social Responsibility section.

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

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. There is also an Epta group Whistleblowing policy, which is accessible to all and is an anonymous and confidential route to raise issues independently of UK management.
4. Equality, Diversity & Human Rights Policy. This policy details how we support the UN guiding principles and accept corporate responsibility to respect human rights.

Training

We are reviewing our 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.

We have trained all our employees, including those in the factory, on our corporate Code of Ethics. A key part of this document is respect of every person's human rights whether they are directly employed or associated with Epta.

The Code of Ethics references a zero tolerance towards forced labour, trafficking and enslavement. The training also highlights warning signs of Modern Slavery: namely lack of language skills, being dropped at work by a third party, ill health or low mood.

Our performance indicators

The outcome of third party assessment. SMETA (Sedex Members Ethical Trade audit) is a widely recognized global social compliance scheme.

Based on the Ethical Trade Initiative, Smeta methodology incorporates working conditions in terms of labour, health and safety, environment and business ethics as well as the supply chain.

In addition, 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 Epta UK General Manager in February 2024.

David Wormald
HR Director – Epta UK