

## Modern Slavery Act Transparency Statement

This statement is made in compliance with section 54, clause 5 of the Modern Slavery Act of 2015 and relates to our financial year 1<sup>st</sup> February 2017 to 31<sup>st</sup> January 2018. It sets out the steps that Adcock Refrigeration and Air Conditioning Ltd has taken to ensure that modern slavery and human trafficking does not occur in our supply chain.

### Organisational structure, business and supply chains

Adcock Refrigeration and Air Conditioning Ltd are a leading Refrigeration and Air Conditioning company. We design, install, service and maintain refrigeration and air conditioning systems in commercial, industrial and residential premises across the UK.

We are a privately-owned business, managed by a board of directors and a senior management team. We have 12 centres across the UK and our business activities are conducted solely in the UK.

Our supply chain includes the following:

- ***Suppliers of materials, parts and services***

Some of our major suppliers source and manufacture parts and materials in other countries. The clear majority of these suppliers are large corporations with their own policies relating to ethical trading, human rights and the prevention of modern slavery and human trafficking.

- ***Sourcing of labour through sub-contractors***

All of our sub-contractors are local businesses, most of whom have less than 10 employees.

- ***Sourcing of labour through recruitment agencies***

99% of our recruitment through agencies is for permanent staff. Other than the occasional engagement of temporary administrative staff, we do not employ temporary or ad hoc labour.

### Responsibilities under the Act

Adcock Refrigeration and Air Conditioning Ltd. is committed to fair, ethical and transparent trading and has a zero tolerance to Modern Slavery and forced labour in any form, Human Trafficking, Human Rights Violations and child labour. The board of directors is committed to ensuring that such practices do not occur in our supply chain or in any other part of our business.

## Due Diligence

Based on an assessment of our business and our industry, we believe that there is a low risk of modern slavery in our supply chain. We recognise, however, that the eradication of modern slavery is the responsibility of all and we are committed to taking steps that are proportional to the size of our business and the resources available to us.

To ensure that modern slavery and human trafficking does not exist in our supply chain or our company, Adcock will:

- Ensure that all our employees are legally employed, are paid at least the minimum wage, have the right to work in the UK and are treated with dignity and respect.
- Ensure that all of our sub-contractors are aware of and compliant with UK employment law and practices through pre-qualification questionnaires.
- Ensure that all of our sub-contractors confirm that they will comply with our Anti-Slavery Policy and Code of Conduct through pre-qualification questionnaires.
- Include the requirement to comply with the Modern Slavery Act 2015 in our Supplier Terms and Conditions.
- Continuously monitor and assess the risk of Modern Slavery in our supply chain so that we can take necessary steps if anything changes.

## Training

All key employees have been trained on fundamental principles of the Modern Slavery Act 2015 and have a high level of understanding of the act and the risks present in our supply chain.

Our Anti- Slavery Policy has been communicated and is available to all staff to read. New staff are introduced to the policy as part of their induction.

We provide support, advice and training to our sub-contractors as needed to help them with compliance.

## Organisational Policies

Our Anti-Slavery Policy takes into account and complements the following organisational policies:

- Recruitment Policy
- Whistle-blowing procedures

- Migrant Labour policies
- Procurement policy
- Grievance policy
- Training and Induction policies

This statement has been approved by the board of directors for Adcock Refrigeration and Air Conditioning Ltd.



Nigel Claydon  
Managing Director



Paul Brant  
Deputy Managing Director