

MODERN SLAVERY & HUMAN TRAFFICKING

Beijer Ref UK & Ireland incorporates Dean & Wood Ltd, HRP Ltd, RW Refrigeration Wholesale Ltd, 3D Plus Ltd, DWG Refrigeration Wholesale Ltd

1. Introduction

This statement sets out Beijer Ref UK & Ireland's actions to understand all potential modern slavery risks relating to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the refrigeration and air conditioning industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

2. Organisation structure and supply chains

This statement covers the activities of Beijer Ref UK & Ireland:

- We are owned by the largest European refrigeration wholesaler, Beijer Ref AB, whose head office is in Malmo, Sweden
- Beijer Ref AB have operated for 153 years, have over 3,000 employees, operating out of 56 companies, 37 countries and 420 locations
- Beijer Ref UK & Ireland is a group of refrigeration and air conditioning wholesalers who supply equipment and spares to engineers who install, maintain and service refrigeration and air conditioning systems
- We operate out of 46 locations in the UK and Ireland
- The locations of our major suppliers are the UK and Ireland.

High Risk Activities

The following activities are considered to be a high risk of slavery or human trafficking:

- Recruitment – number of agency workers used in the organisation, particularly relating to lower skilled job roles

Responsibility

- **Policies** – put in place by HR and Supply Chain.
- **Investigations / due diligence** – HR in conjunction with Branch Managers who are responsible for sourcing appropriate recruitment agencies
- **Training** – Modern slavery video supplied by gov.uk covered at the new starter induction, briefing document to recognise signs of human trafficking

3. Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential email.
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. 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. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Agency workers policy** The organisation uses only reputable employment agencies to source labour and always verifies the practices of any new agency it intends to engage before accepting workers from this agency.

4. Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and review processes include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking;
- invoking sanctions against suppliers that seriously violate our supplier code of conduct, including the termination of the business relationship.

5. Training

The organisation requires all staff to read and confirm acceptance of our Ethical Guidelines and Employee Handbook policies.

The organisation's modern slavery training covers the following areas:

- 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 external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;

6. Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by circulating a briefing document to managers and playing a modern slavery video at the new starter induction.

7. Board approval

This statement was approved on 5 July 2019 by the organisation's board of directors, who review and update it annually.

Director's signature:



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Director's member's name:

David Campbell

Date: 5 July 2019