

## Modern Slavery Statement 2025

This Modern Slavery Statement outlines our commitment to be an ethically and socially responsible organisation, this statement has been published in accordance with the Modern Slavery Act 2015. It sets out the practices maintained and/ or steps taken by Space Engineering Services Limited and other group companies during the year ended 31 December 2025 to prevent modern slavery or human trafficking in our business and supply chain.

We are committed to making sure that all employees are treated with respect and dignity. We have a zero-tolerance approach to any form of modern slavery and are committed to acting 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 supply chain.

### Our Business

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

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

We have several offices throughout the UK, with our head office and manufacturing facility both based in Bristol, a satellite office in Plymouth and our design office in Ipswich. We also have an office in Hungary, with local service delivery teams and in-country project managers.

### Our Relevant Policies & Practices

At Space Engineering Services, we are committed to preventing modern slavery and human trafficking within our business and supply chain. We have implemented the following policies and practices to identify and mitigate modern slavery risks:

- **Modern Slavery Policy** – This policy outlines our approach to identifying, preventing, and addressing modern slavery risks. It provides guidance to all colleagues on what to do if they suspect any form of modern slavery within our business or supply chain. It applies to all individuals working for us in any capacity, including employees, agency workers, subcontractors, and suppliers.
- **Recruitment and Selection Policy** – We are committed to fair and transparent hiring practices. Our policy ensures that all potential employees undergo a thorough and equitable selection process, including Right to Work verification, in compliance with UK employment legislation. We only engage with reputable employment agencies and verify their practices before accepting workers.
- **Whistleblowing Policy** – We encourage all employees to report concerns about suspected wrongdoing, including modern slavery, as soon as possible. We have confidential reporting mechanisms, including QR codes and anonymous reporting forms on our company intranet, making it easier for employees to raise concerns securely. All reports are fully investigated, and we ensure that individuals raising concerns are protected from any form of retaliation.
- **Bullying, Harassment & Victimisation Policy** – We foster a workplace culture of respect and dignity. This policy ensures a work environment free from harassment, bullying, or victimisation, reinforcing our commitment to employee well-being.

- **Grievance Policy** – Employees have access to a clear and structured process to raise workplace concerns. This ensures fairness, consistency, and an open dialogue between employees and management.
- **Anti-Corruption & Bribery Policy** – We uphold a zero-tolerance approach to bribery and corruption. This policy sets clear expectations for ethical business conduct, integrity, and professionalism across all our operations.
- **Supply Chain Onboarding** is managed by our Supply Chain Assurance Advisor. Contractors are required to undergo vetting via an approved SSiP organisation. Those contractors who are not SSiP approved undergo internal vetting before their appointment.

In addition, we undertake audits on our supply chain on a variety of areas including safety, sustainability, modern slavery, pension provision and right to work. Any concerns relating to modern slavery are reported to the Board of Directors.

- **External Certifications** are maintained, such as a SEDEX, for several of our key clients
- We recognise the importance of **training, raising awareness and embedding knowledge and understanding** of human rights, ethical standards and risks across the business

#### Progress in 2025

During 2025, we delivered all commitments outlined in last year's statement:

- **Policy Review Completed:** We carried out a full review of our modern slavery-related policies to ensure they remained effective and aligned with best practice
- **E-Learning Rolled Out:** We introduced updated training and ensured employees received clear guidance on identifying and reporting modern slavery concerns

#### Planned Actions for 2026

Our focus for 2026 is on continuing to strengthen awareness and understanding across the organisation through HR-led activities:

- Embedding training through internal development programmes, including management training, to reinforce the importance of recognising and reporting concerns
- Ensuring all new joiners continue to receive modern-slavery awareness training and are signposted to key policies and reporting routes from day one
- Maintaining relevant reminders and communications to reinforce expectations and help sustain a culture of ethical practice

#### Approval

This statement was approved by the Board of Directors.

Date 30<sup>th</sup> March 2026

