

31 March 2018

MODERN SLAVERY ACT 2015

This policy applies to all officers and employees of Loop Air Conditioning Ltd.

TRANSPARENCY STATEMENT 31st March 2018

Introduction from the Managing Director of Loop Air Conditioning Ltd

We are committed to maintaining and continuously improving our practices to combat slavery and human trafficking. We are totally opposed to such abuses in our direct operations, our indirect operations and our supply chain as a whole.

We all have a responsibility to be alert to the risk of this in our business. Staff are expected to report concerns and management are expected to act upon them.

Our understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015. We recognise that slavery and human trafficking can occur in many forms such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse.

We are also aware that forced labour as a form of slavery includes debt bondage and the restriction of a person's freedom of movement whether that be physical or non-physical, for example, by the withholding of a workers identity papers. Throughout this statement we use the terms slavery and human trafficking to encompass all of these various forms of coerced labour.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Loop Air Conditioning Ltd's slavery and human trafficking statement for the financial year ending 31 March 2019.

Signed:



Jonathan Pike
Managing Director

Review Date: 30 March 2019

Our Business

Loop Air Conditioning was founded in 2004 and continues in the same family ownership. Loop Air Conditioning delivers a full range of Air Conditioning Services including Design, Installation and Maintenance. We operate nationally from our office in near Luton.

Our Supply Chain

Our supply chain encompasses a diverse range of goods, works and services and spans many industry sectors. It is broadly grouped into the following categories.

- Mechanical and Electrical Building Services
- Professional and Outsourced Services
- Facilities Management, Engineering and Maintenance

Our first tier suppliers are 100% UK based.

For the purposes of this statement we report on steps taken within our supply chain, by which we mean those suppliers to the group with whom our organisation deals directly.

Relevant Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to endeavour to ensure that slavery and human trafficking is not taking place anywhere in our supply chains.

Supplier Adherence to Our Values

We have zero tolerance to slavery and human trafficking. To ensure that all of these in our supply chain comply with our values we have in place a supply chain compliance programme. This consists of:

- Modern Slavery Act compliance is set as a condition of participation in our tender processes
- Our procurement documentation and our contract terms and conditions require adherence with the Modern Slavery Act and we have robust audit rights.
- Any convictions under the Modern Slavery Act will result in termination of contract
- Maintaining an approved supplier list for recruitment of contractor/temporary staff. All of whom comply with Loop Air Conditioning Ltd recruitment policies and practices via signed agreements.

Training and Communications

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we will provide training to our staff. We will also require our business partners provide training to their staff.

Our Effectiveness in Combating Slavery and Human Trafficking

We do not have key performance indicators specifically in relation to slavery or human trafficking as many instances would be expected to be a non-compliance and be in breach of employment laws, our direct employment practices, our Code of Professional Conduct and/or our wider policies.

However, the business practices that relate to the mitigation of slavery or human trafficking risk do have internal performance measures.

In relation to our own employment practices, we monitor and review:

- Employee engagement scores
- Grievances
- Issues raised through Public Interest Disclosure
- Eligibility to Work Procedures
- Vetting and Security Guidance