



SERVICE
THROUGH
INNOVATION

Modern Slavery & Human Trafficking Policy

Issue 4 – March 2026

Industrial Cleaning Equipment (Southampton) Ltd.

Policy Statement

Modern Slavery is a crime and a violation of fundamental human rights. It includes slavery, servitude, forced and compulsory labour, and human trafficking, all of which involve the deprivation of a person's liberty for personal or commercial gain.

Industrial Cleaning Equipment Ltd. (ICE) is committed to acting ethically, with integrity and in full compliance with all applicable laws and regulations. We are dedicated to ensuring that modern slavery and human trafficking do not take place in any part of our business or supply chains.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Scope

This policy applies to all individuals working for or on behalf of ICE in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners.

Responsibility for the Policy

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations.

The Head of People Development & HR has day-to-day responsibility for implementing this policy, monitoring its effectiveness, responding to queries and ensuring appropriate internal controls are in place.

Management at all levels are responsible for ensuring that their teams understand and comply with this policy.

All individuals working for or on behalf of ICE are responsible for reading, understanding and complying with this policy.

We encourage feedback on this policy. Any comments or suggestions should be directed to the HR Department.

Our Organisation and Supply Chains

ICE

Sauber House, Unit 3, Rushington Business Park, Chapel Lane, Totton, Hampshire, SO40 9AH.

T 023 8077 7000 | F 023 8042 8318 | E sales@ice-clean.com | www.ice-clean.com

Registered in England No. 2732684 VAT Registration No. GB 568 6984 63



Organisation Overview

ICE operates in the UK, specialising in the supply and servicing of industrial cleaning equipment. We are committed to ethical business practices and maintaining transparency within our operations.

Supply Chains

Our supply chains include manufacturers and suppliers based in the UK, the EU and in China.

We recognise that risks of modern slavery may be greater in certain regions and industries, particularly where labour protections may be less robust.

Risk Areas

We have identified the following areas as having a higher risk of modern slavery:

- Global suppliers based outside of Europe may not be subject to the same legal requirements as those within the UK and Europe. We provide these suppliers with our policy and conduct visits to ensure working conditions to mitigate risks.
- Hazardous Work including but not limited to using dangerous equipment, manual handling, transportation of heavy loads and manufacturing industrial equipment. These activities carry higher risks for exploitation and unsafe working conditions.

Policy Prohibitions

Freedom of Workers

- All workers must have the freedom to terminate their employment with reasonable notice, in accordance with their employment contracts and local laws.
- Workers must be free to move freely and not be subject to restrictions that prevent them from leaving their employment.

Freedom of Association

- Workers must have the right to freely join trade unions or other worker organisations and to participate in collective bargaining.

Prohibited Practices

- ICE strictly prohibits the use of threats, violence, harassment or intimidation against any worker.
- Compulsory overtime is not permitted.
- Child labour is strictly not permitted. We ensure that all workers meet the legal minimum age requirements.
- Discrimination based on race, gender, religion, disability or other protected characteristic is not tolerated.
- The confiscation of original identification documents or personal belonging is prohibited.

Training and Awareness

We provide training to relevant employees to ensure they understand:

- What modern slavery is and how it can occur
- How to identify warning signs



- How to report concerns

Reporting Concerns

All individuals are encouraged to raise concerns about any suspected modern slavery at the earliest possible stage.

Concerns should be reported to a line manager or the HR Department. Reports can also be made in accordance with our Whistleblowing Policy.

We are committed to fostering an open environment and will support anyone who raises genuine concerns in good faith, even if they are mistaken.

We will not tolerate retaliation against anyone who reports concerns. Any such behaviour should be reported immediately.

Compliance with the Policy

All individuals must comply with this policy and avoid any activity that could lead to or suggest a breach. Failure to comply may result in disciplinary action.

Breaches of this Policy

Any employee who breaches this policy may face disciplinary action, up to and including dismissal for misconduct or gross misconduct.

We may terminate our relationship with individuals or organisations working on our behalf if they breach this policy.

Review

This policy will be reviewed annually and updated as necessary to reflect changes in legislation, business operations or identified risks.

Issue No. 4

Issue Date: March 2026

Review Date: March 2027

Policy History

Issue No.	Date	Details
4	Mar 2026	Policy Updated