



28<sup>th</sup> February 2020

**AFE Group Ltd**  
**Slavery and Human Trafficking Statement**  
**Financial Year Ended 31<sup>st</sup> August 2019**

**Introduction:**

Modern day slavery and human trafficking is a complex problem. The Modern Slavery Act integrates human rights and transparency within our global supply chains into the UK corporate regulatory framework. We have a responsibility to be alert to the risks in our business and wider supply chain and take a committed and robust approach to preventing slavery and human trafficking.

**Our Policies:**

We operate under a code of conduct, anti bribery and other associated policies that govern the integrity of our business relationships. These policies recognise the values we set for of ethical trading and responsible sourcing, as well as commitments made under other aspects of our approach to corporate and social responsibility. Our colleagues and business partners are expected to adhere to these policies and report any concerns to our management who will act upon them.

AFE Group operates a whistle blowing policy that encourages all its workers, customers and other business partners to report any concerns related to its direct activities or supply chains that may give rise to an enhanced risk of slavery or human trafficking. The AFE Group whistle blowing policy is designed to make it easy for workers to make disclosures without fear of retribution.

**Our Organisation and Business Structure:**

The AFE Group Ltd has its head office in UK and is recognised as a leading international business specializing in the innovative design, manufacture and service support of professional cooking, bakery and refrigeration equipment for the global food service market.

We operate from 15 locations worldwide, including UK, France, UAE, China and Australia.

AFE Group Ltd is organised into five business units trading under the business and brand names of:-

<b>Brand Name</b>	<b>Description</b>	<b>Web Site Addresses</b>
Williams Refrigeration	Refrigeration Equipment	<a href="http://www.williams-refrigeration.com">www.williams-refrigeration.com</a>
Falcon Foodservice Equipment	Commercial cooking and catering equipment	<a href="http://www.falconfoodservice.com">www.falconfoodservice.com</a>
Mono Equipment	Bakery Equipment	<a href="http://www.monoequip.com">www.monoequip.com</a>
Millers Vanguard	Maintenance and service of bakery and foodservice equipment	<a href="http://www.millersvanguard.co.uk">www.millersvanguard.co.uk</a>
Serviceline	Maintenance and service of foodservice equipment	<a href="http://www.service-line.co.uk">www.service-line.co.uk</a>

AFE Group Ltd is a principal business unit within Ali Group Srl headquartered in Milan Italy.

**Our Supply chains:**

Our supply chains include the sourcing of raw materials and use of contractors for the principal activities of manufacturing, installation and service of professional foodservice equipment.

## **Recruitment and Agency Workers**

AFE Group operates a responsible recruitment policy and only engages with carefully pre-selected and reputable employment agencies to source labour. We verify the practices of any agency before accepting workers and ensure any fees arising in the search, selection and engagement of workers are paid by the employing company and not charged to workers as a condition to secure employment or a placement with us.

## **Due Diligence Processes:**

We adopt effective systems and controls to identify and mitigate risk, and to ensure that slavery and human trafficking is not taking place within our supply chains.

- We seek to build long standing relationships with both local and international suppliers. We make clear our expectations of business behaviour and require all suppliers to recognise the standards laid out in our ethical trading, health, safety environmental and responsible sourcing policies. We include a modern slavery act clause in our supply contracts.
- We have systems in place to encourage the reporting of concerns and the protection of Whistle blowers.
- It is not practical for us to have a direct relationship with all suppliers, sub contractors and other business partners within the supply chain. We expect every entity to adopt a minimum protocol of 'one up' due diligence within the next link of the supply chain.
- We periodically visit and audit our principal suppliers using Key Performance indicators to ensure the effectiveness in ensuring slavery and human trafficking is not taking place within any part of our business.

## **Supplier and Contractor adherence to our values:**

- We have zero tolerance to slavery and human trafficking.
- We expect all those in our supply chain and contractors to uphold our values.
- The directors of each of our business units are responsible for managing their supplier relations and compliance requirements.

## **Training:**

All Directors have been briefed on the requirements of the Modern Slavery Act. We have provided training to relevant members of our staff to ensure a high level understanding of the risks of modern slavery and human trafficking in our supply chains.

## **Our effectiveness in combating slavery and human trafficking:**

- We encourage communication and personal contact with suppliers to ensure their understanding of and compliance with our expectations
- We undertake periodic surveys and audits of our suppliers
- We review and audit our working time and payroll records
- Our China based operation is independently audited under the workplace conditions assessment program to ensure best practices and social compliance achievement

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes AFE Group Ltd's slavery and human trafficking statement for the financial year ended 31 August 2019.**

**T S Smith  
Chief Executive Officer  
AFE Group Ltd**