

**Statement Pursuant to the
Modern Slavery Act 2015 (UK) for the
Fiscal Year 1 January 2021 – 31 December 2021**

This Statement of SPX Cooling Technologies UK Limited (“Cooling”), Radiodetection Limited (“Radiodetection”), ULC Robotics International Limited (“ULC”), Sealite United Kingdom Limited (“Sealite”), and Enterprise Control Systems Limited (“ECS”) (the “Companies”) for the financial year commencing 1 January 2021 and ending 31 December 2021 (the “Fiscal Year”) is made pursuant to Section 54 of the Modern Slavery Act 2015 (the “Act”) of the United Kingdom and constitutes the Companies’ slavery and human trafficking statement in accordance with the Act.

Organisational Structure

The Companies are subsidiaries of SPX Technologies, Inc. (“SPX”), a supplier of highly-engineered products and technologies, holding leadership positions in the HVAC and detection and measurement markets. SPX is incorporated in the state of Delaware, USA and is based in Charlotte, North Carolina, USA. The ultimate United Kingdom-based parent (i) of Cooling is Marley Cooling Tower (Holdings) Limited, (ii) of Radiodetection is SPX European Holding Limited, and (iii) of Sealite and ECS is SPX Sabik Europe Holdings Limited and SPX European Holding Limited.

Overview

At SPX, principled business practices are integral to the SPX corporate Values. As a company, SPX conducts business in a way that respects human rights. SPX provides equal opportunity in employment practices and seeks to ensure that all persons are treated with fairness and dignity. SPX is committed to providing a working environment that is healthy, safe, and free from all forms of illegal discrimination or harassment, and seeks to comply with all applicable laws regulating the way products are manufactured. SPX requires that employees respect the rights, dignity, and self-esteem of all persons in any way involved with SPX's business and prohibits taking any unfair advantage of anyone through manipulation, concealment, misrepresentation of facts, or any other unfair practices.

SPX works to meet the needs of its global community in a responsible manner and fully supports the protection and advancement of basic human rights throughout its operations. The Companies are committed to the United Kingdom government's efforts to eliminate modern slavery (including slavery, servitude, forced or compulsory labour, and human trafficking) throughout their supply chains. A common standard of policies and procedures in support of this commitment are adopted and applied across the SPX group of companies, and therefore provide the basis for this Statement, as set out below.

Supply Chains

SPX procures a variety of products and services from suppliers around the world. Given the nature and geography of SPX's business, its supply chain is both extensive and diverse. SPX acknowledges the elevated risk of modern slavery in certain countries of the world.

SPX evaluates and addresses direct supply chain risks by requiring suppliers to abide by contractual terms and conditions, including the condition that they must comply with all applicable laws, which include human trafficking laws. SPX expects supply chain managers to engage with suppliers, to make assessments of any questionable activity and to ensure that supplier practices conform to contractual terms and conditions, and to SPX standards and expectations.

In addition, SPX maintains a compliance hotline, hosted by a third party, that enables any person to voice concerns and report potential violations of the SPX Code of Ethics and Business Conduct (the “Code”). The hotline is accessible online and via phone, and any person is able to submit concerns regarding human trafficking occurring within SPX's supply chains using this hotline. All reports to the hotline are investigated thoroughly at the direction of the SPX Compliance Director, with remedial action taken against suppliers if warranted.

Moreover, the contact information for the above-mentioned hotline is displayed at all sites globally (and in local language where applicable) to ensure that all employees and temporary workers have access to voice concerns and report potential violations of the Code.

Policies and Training

The Code includes a specific section dedicated to the company’s commitment to upholding human rights and sourcing responsibly, including its commitment to following all applicable labour and human rights laws and sourcing responsibly through the supply chain. As an additional indication of the importance of human rights to SPX and the Companies, SPX recently adopted a Human Rights Policy (<https://www.spx.com/wp-content/uploads/2022/04/Human-Rights-Policy-FINAL.pdf>). All SPX employees, officers, and directors are required to adhere to the Code (<https://www.spx.com/our-company/commitment-to-compliance/>), company Values (<https://www.spx.com/our-company/mission-and-values/>), SPX Policies and all applicable laws. Failure to do so results in disciplinary action, up to and including termination of employment. Periodic training of employees includes instruction that even conduct that is legal, or not legally restricted, is not permissible if it is not also ethical.

For employees with direct responsibility for supply chain management, we conduct mandatory training on forced labour, slavery, and human trafficking, including with respect to mitigation of risks within the supply chains of products. We conduct this training for the applicable employees at the time of hire (or shortly after an acquisition, as applicable) and we conduct refresher training periodically thereafter.

Next Steps


The management of SPX takes and will continue to take a zero-tolerance approach to modern slavery and human trafficking and will react accordingly to any transgression by its staff or suppliers.

SPX recognises that the risks from modern slavery and human trafficking are constantly evolving. SPX also recognises that efficient methods to identify and address modern slavery and human trafficking will be developed and enhanced. SPX remains focused on maintaining the highest standards of ethical and business integrity across their businesses and supply chains, and will continue to monitor and evaluate such developments. SPX is committed to its Code, Values and Policies and in the coming fiscal year will continue its practice of ensuring that its policies and procedures are fit-for-purpose.


Board Approvals and Signatures

This Statement has been approved by the boards of each Company and is signed below on their behalf by a director of each Company.


SPX Cooling Technologies UK Limited

By: 
Name: John W. Nurkin
Title: Director
Date: September 8, 2022


Radiodetection Limited

By: 
Name: John W. Nurkin
Title: Director
Date: September 8, 2022


ULC Robotics International Limited

By: 
Name: John W. Nurkin
Title: Director
Date: September 8, 2022

Sealite United Kingdom Limited

By: 
Name: John W. Nurkin
Title: Director
Date: September 8, 2022

Enterprise Control Systems Limited

By: 
Name: John W. Nurkin
Title: Director
Date: September 8, 2022