

Slavery and Human Trafficking Statement for ASSA ABLOY Limited and its subsidiary Companies (“ASSA ABLOY”) for the year ended 31 December 2022

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. ASSA ABLOY has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and 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 our supply chain.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that ASSA ABLOY has taken, and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Our business

The ASSA ABLOY AB Group is the global leader in access solutions and provides opening solutions, trusted identities, entrance automation and service for institutional and commercial customers, as well as for residential markets around the world.

ASSA ABLOY Limited (ASSA ABLOY Opening Solutions UK & Ireland) is the primary UK subsidiary of ASSA ABLOY AB and is the UK’s leading supplier of safety and security door and window solutions across a range of markets.

This statement covers ASSA ABLOY Limited and its UK and overseas subsidiary companies as set out below (“ASSA ABLOY”):

- Door and window opening solutions businesses in the United Kingdom:
 - ASSA ABLOY Limited (reg. no. 02096505)
 - P C Henderson Limited (reg. no. 01188468)
 - Heywood Williams Components Limited (reg. no. 02523354)
 - Carlisle Brass Limited (reg. no. 02022858)
 - Caldwell Hardware (UK) Limited (reg. no. 00517067)
- Group sourcing and manufacturing operations in Asia:
 - Heywood Williams Components Limited Ningbo Representative Office
 - Architectural Products and Components Ltd

ASSA ABLOY operates divisionally through a number of brands and local management teams who are governed by the ASSA ABLOY Group philosophy regarding modern slavery. Our vision is to be the most innovative supplier of total door opening solutions that deliver safe and convenient security solutions and add real value to customers. We have the most comprehensive product and solution offering of any manufacturer which covers all needs for door opening solutions and service for institutional and commercial customers, as well as for the residential market.

To our knowledge, there have been no instances of modern slavery within any ASSA ABLOY company.

Our policies

We operate a number of policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Code of Conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

ASSA ABLOY believes in responsible social and ethical behaviour and that it has a responsibility to the people serving the Group worldwide. People whose work contributes to the business' success should not be deprived of their basic human rights or be forced to suffer physically or mentally from their work.

ASSA ABLOY ensures all employees are paid in-line with the local Government minimum wage guidelines and ensures all employees are treated fairly and awarded appropriately for their endeavours and not exploited in any way. All employees undergo vetting, induction and training processes appropriate for their role within our business.

Furthermore, ASSA ABLOY, its employees and business partners have an obligation to all stakeholders to observe high standards of integrity and fair dealing. Unlawful and unethical business practices undermine employee and customer trust. This is the foundation for and the reason why ASSA ABLOY has created the ASSA ABLOY Code of Conduct, applicable not only to all ASSA ABLOY employees, but all suppliers and personnel working for and on behalf of ASSA ABLOY.

Our high risk areas

ASSA ABLOY sources goods and services directly from a global network of suppliers, including many based in low cost countries. Whilst we remain vigilant and keep our processes and controls under constant review, we recognise that exposure to modern slavery is likely to be more prevalent in low cost manufacturing regions and countries such as the Far East and India. We perform due diligence checks on external suppliers and, with the assistance of our China based sourcing centre operations team, perform a structured programme of vendor audits and compliance testing. In addition, our major preferred suppliers confirm to us that;

- they have read our supplier Code of Conduct;
- no part of their business operations contradicts the Code of Conduct or other modern slavery legislation and guidelines; and
- they treat workers fairly and pay at least the prevailing minimum wage.

There is a strong focus on trying to prevent modern slavery in any form and regular communication with suppliers, in addition to our processes outlined above, ensure the risk of non-compliance is minimised.

Our suppliers

ASSA ABLOY operates a preferred supplier policy and maintains a preferred supplier list. We conduct due diligence on suppliers before allowing them to become a preferred supplier. This due diligence can include online searches to ensure that particular organisations have never been convicted of offences relating to modern slavery and on-site audits which include a review of working conditions. Ongoing sustainability audits of our low cost country suppliers are performed throughout the term of our relationship with them. Suppliers are asked to confirm that no part of their operations contradicts our supplier Code of Conduct which includes appropriate conduct in respect of modern slavery and human trafficking. We will not take on any new suppliers unless we have confidence in their ethical standards.

In addition to the above, when putting in place contracts with suppliers, we require that they confirm to us that;

1. they have taken steps to eradicate modern slavery within their businesses;
2. they hold their own suppliers to account over modern slavery;
3. for international suppliers in low cost countries, they pay their employees any prevailing minimum wage applicable within their country of operations; and
4. we may terminate our contract with them at any time should any instances of modern slavery become apparent.

Training

ASSA ABLOY is committed to high standards of integrity and fair dealing, not only with our stakeholders, but also with our employees. All new employees receive on-boarding training within the first 3 months of their employment which includes modules on the ASSA ABLOY Code of Conduct and the risks around modern slavery. Regular mandatory update training is also provided to all employees on an annual basis. We have specialist procurement teams who are trained to identify the risks associated with modern slavery within our supply chain and who work alongside our China based sourcing centre operations team when engaging with our preferred suppliers.

Reporting

If an employee becomes aware of or suspects that there may be the possibility of any modern slavery occurring within ASSA ABLOY or any of its stakeholders, this must be reported immediately to the employee's line manager and the specific divisional Managing Director. If the employee does not feel comfortable reporting the matter via this route, they can report the matter using the ASSA ABLOY Whistleblowing Policy procedures which are widely publicised internally. All reports received are fully investigated and any findings acted upon immediately.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public or law enforcement agencies to indicate that modern slavery practices have been identified.

Responsibility for the statement

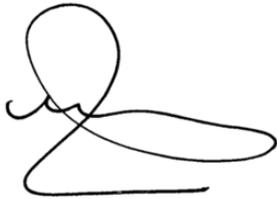
The ASSA ABLOY Executive Management team has overall responsibility for ensuring policies and procedures comply with the ASSA ABLOY AB Group's legal and ethical obligations and that all those under our control comply with them. The ASSA ABLOY Senior Vice President & Head of UKI has primary responsibility for overseeing the implementation of the Group's policies and procedures. This includes responsibility for the monitoring of their use and effectiveness and the updating of policies to reflect changes in legislation.

Management at all levels within ASSA ABLOY are responsible for ensuring that those reporting to them understand and comply with all relevant policies and procedures and are given adequate training on modern slavery.

ASSA ABLOY believes in social and environment responsibility and ethical conduct and expects its employees and business partners to do the same. We continually work to improve our policies and procedures to enable us to continue to grow and develop with long-term sustainability and ethical conduct in mind. This also includes building sustainable and ethical relationships with our business partners.

Approval

This statement was approved by the ASSA ABLOY Executive Management team and the board of Directors of ASSA ABLOY Limited at their meeting on 29 June 2023 and signed on its behalf by:



Harry Warrender
Senior Vice President & Head of UKI
ASSA ABLOY
29 June 2023