

Organisation

This statement applies to all companies within and associated to *ABCA Group Ltd* (referred to in this statement as 'The Group').

Organisational structure

Our company is made up of several limited company subsidiaries, all supported by ABCA Group Ltd. As a provider of information Fire and Security services we operate across largely regulated markets in the private and public sectors, primarily our employees work across our operations throughout the UK.

This policy has been published on behalf of the above parent company and its subsidiaries.

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The board of Directors have day-to-day responsibility for implementing this policy, monitoring its use, effectiveness, and for dealing with any queries about it, internal auditing and procedures to ensure they are effective in countering modern slavery however ultimate responsibility for the implementation and compliance with this policy firmly remains with the CEO and board of directors. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Definitions

The Organisation considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement.

Commitment

ABCA Group Ltd acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The *Group* does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

Supply chains

In order to fulfil its activities, the main supply chains of the Group include those related to the supply of fire and security goods from the United Kingdom. We understand that some suppliers are our first-tier suppliers however may have further contractual relationships with lower-tier suppliers.

Due Diligence and Risk Management

The Group carries out due diligence processes to ensure that slavery and/or human trafficking are not taking place within its own operations or its supply chains. This includes reviewing the controls and practices of our suppliers to assess and manage potential risks.

To the best of the Group's knowledge, it has not conducted business with any organisation that has been found to be involved in modern slavery or human trafficking.

Actions Taken Under the Modern Slavery Act 2015

In accordance with section 54(4) of the Modern Slavery Act 2015, the Group has taken (and will continue to take) the following steps to prevent modern slavery:

- Reviewing supplier contracts to ensure they include rights to terminate in the event that a supplier is, or is suspected to be, involved in modern slavery or human trafficking.
- Undertaking impact and risk assessments of our services and supply chains to identify potential areas of vulnerability.
- Embedding a zero-tolerance approach towards modern slavery across all business operations and supply chains, supported by clear policies and communication.
- Providing training and awareness to relevant staff to ensure they can identify and escalate concerns relating to modern slavery.

Policies

The *Group* has the following policies which further define its stance on modern slavery in the Group Company CRS Policy which can be found on the Group Intranet.

Training

The Group provides training to staff to effectively implement its stance on modern slavery as part of the induction process, and then at regular intervals. This is a requirement of all employees.

Slavery Compliance Officer

The *Group* has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Group's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.