

## Slavery and Human Trafficking Statement for ASSA ABLOY Global Solutions

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that ASSA ABLOY Global Solutions 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.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. ASSA ABLOY Global Solutions 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.

### Our business

ASSA ABLOY Global Solutions, a division of ASSA ABLOY AB, a company quoted on the Swedish Stock Exchange. The ASSA ABLOY 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 the residential market.

ASSA ABLOY Global Solutions ensure safety and security for the hospitality staff, marine guests, tenants, during transport, and while you keep track of the energy or petrol production. ASSA ABLOY Global Solutions is always there to make sure your workers and clients feel comfortable, safe and in control. We emphasize innovation and growth to offer you the most suitable and high-performing products and solutions.

Our supply chain spans worldwide.

### Our high-risk areas

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

ASSA ABLOY Global Solutions 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 Global Solutions, 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 Group has created the ASSA ABLOY Code of Conduct, applicable not only to all ASSA ABLOY Global Solutions employees, but all suppliers and personnel working for and on behalf of ASSA ABLOY Global Solutions.

ASSA ABLOY Global Solutions sources goods and services directly from a global network of suppliers, including many based in low-cost countries. Our due diligence checks on external suppliers together with written confirmation 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 minimise our risks of non-compliance.

## Our policies

We operate with a number of internal 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.

## Our suppliers

ASSA ABLOY Global Solutions 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.

In addition to the above, as part of our contract 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. 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.

## 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 Global Solutions Executive Management team has overall responsibility for ensuring policies and procedures comply with the ASSA ABLOY Global Solutions Groups legal and ethical obligations and that all those under our control comply with them. The ASSA ABLOY Global Solutions Business Area Managers has primary responsibility for overseeing the implementation of the Groups 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 Global Solutions 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 Global Solutions 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 Executive Management Team of ASSA ABLOY Global Solutions, and signed on its behalf by:

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09333CFE25384BD  
Stephanie Ordan  
Executive Vice President  
Head of ASSA ABLOY Global Solutions