

Date	Document Title		
1 <sup>st</sup> March 2024	Anti-Slavery and Human Trafficking Policy		
Division Function	Document Reference		
HR	POL-IDE-HR-035		
Author	Version		Page (of)
Katie Barnett	0		1 (4)

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that ASSA ABLOY Entrance Systems Ltd and its subsidiaries (including Industrial Door Engineering Limited - IDE) have taken and are 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. Industrial Door Engineering Limited 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 Entrance Systems are the world's most comprehensive supplier of entrance automation solutions. With a holistic approach to the flow of people, goods and vehicles, we create solutions with the best possible balance of cost, quality and lifetime performance. Today we have a strong portfolio of global brands like Besam, Crawford, Megadoor and Albany under a single umbrella and are market leaders in all the major construction segments including industrial, commercial, private and public sectors. Through our Preventive Maintenance programs, carried out by our trained service engineers, we ensure the continuous performance, safety and convenience of the customers' equipment throughout the operating lifetime. Our supply chain spans Europe and worldwide, all supporting local markets like the UK.

### **Our high risk areas**

Industrial Door Engineering ensures all employees and subcontract labour are paid above the local government minimum wage guidelines and ensure all employees are treated fairly and awarded appropriately for their endeavours and not exploited in any way. Working on air and sea ports comes with added risk, however employees have to undergo a strict vetting process to ensure they are competent and trustworthy. Random site audits are carried out to ensure compliance, including vehicle inspections prior to leaving site to minimize risks from illegal migrants. Our Service business supports customers with Industrial Door Engineering Limited's equipment as well as with third party equipment. Controls on parts and kits supplied through our own supply chain will ensure compliance. Our due diligence checks on our external suppliers as well as their written confirmation that they have read our anti-slavery policy and that no part of their business operations contradicts this policy as well as requiring their suppliers to comply with our policy on modern slavery, treating workers fairly and

paying at least the prevailing minimum wage, will minimise our risks of non-compliance.

## **Our policies**

We operate 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 in the UK 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**

Industrial Door Engineering Limited operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence can include an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery and on site audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

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 business
2. They hold their own suppliers to account over modern slavery
3. For suppliers based in the UK, they pay their employees at least the national minimum wage
4. For international suppliers, they pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

## **Training**

We conduct training so that employees understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

## **Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that 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 Policy**

The Industrial Door Engineering Limited Management Team has overall responsibility for ensuring this policy complies with IDE's legal and ethical obligations, and that all those under our control comply with it. The IDE General Manager has primary responsibility for implementing this policy. This includes responsibility for the monitoring of its use and effectiveness, auditing of internal control systems and procedures. The HR Country Manager is responsible for updating the policy to reflect any changes in legislation.

Management at all levels of Industrial Door Engineering Limited are responsible for ensuring those reporting to them understand and comply with this policy, and, where appropriate, are given adequate and regular training on Modern Slavery.

Industrial Door Engineering Limited's employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to your manager or HR department.

## **Compliance with the Policy**

All employees, contractors and suppliers must ensure that they read, understand and comply with this policy. All IDE employees are responsible for the prevention, detection and reporting of Modern Slavery in any part of our business or supply chains. Employees are required to avoid any activity that might lead to a breach of this policy, and the Modern Slavery Act 2015. You must notify your manager as soon as possible if you believe or suspect that, a conflict with, or breach of, this policy has occurred, or may occur, in the future. You can also report any suspected breach by following our Whistleblowing Policy. Employees are encouraged to raise concerns about suspicions of Modern Slavery in any parts of our business or supply chains at the earliest possible stage. If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any, or all of, the various forms of Modern Slavery please advise your manager or HR department.

## **Communication and awareness of this policy**

This policy is available on the Industrial Door Engineering website. Modern Slavery awareness forms part of the induction process for employees. Refresher training will also be provided as necessary. Our zero-tolerance approach to Modern Slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them. Suppliers are asked to comply with our Anti-Slavery and Human Trafficking policy from the onset of the relationship. Suppliers who are unwilling to comply will not be on boarded.


## **Breaches of this policy**

Any employee who breaches this policy will face disciplinary action. This could result in action up to dismissal in accordance with the Industrial Door Engineering Limited Disciplinary policy. We may terminate our relationship with other employees, suppliers and any other associates working with Industrial Door Engineering Limited if they breach this policy.

## **Approval for this statement**

This statement was approved by the General Manager in March 2024.

Name: Nichola Chapman

Signature: 

Date: March 2024