Modern Slavery Statement



Organisation

This statement applies to ABCA Systems Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2023.

Organisational structure

ABCA Systems Ltd is a UK-based company with offices in Newcastle, Manchester, St Ives and London. We are a medium size organisation with 250+ employees, working either in the field or the office. We operate in the Fire and Security sector providing a range of installation and maintenance services to our clients including, CCTV, Fire Alarm, Intruder, Gates and Barriers, Passive Fire, and much more.

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 of 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

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

The Organisation 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 Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to the supply of materials from various suppliers in the United Kingdom. We understand that the Organisation's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

Potential exposure

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, the organisation has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to us.

In the event of victims of modern slavery being identified in the provision of an ABCA Systems Contract, we will:

PO56 Page 1 of 3	V1 09/23	APPROVED: MD
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- Notify the appropriate law enforcement agency/ies.
- Work openly and proactively with suppliers to resolve issues and change working practices.
- Consider terminating the contract only as a last resort.

Impact of COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Organisation welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

The Organisation concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above.

During the pandemic, the Organisation's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewing your supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- measures in place to identify and assess the potential risks in its supply chains
- undertaking impact assessments of its services upon potential instances of slavery
- creating action plans to address risk to modern slavery
- any actions taken to embed a zero tolerance policy towards modern slavery
- any training provided to staff on modern slavery.

Key performance indicators

We recognise that the review and assessment of our actions to identify and address modern slavery risks across our operations and supply chain will be an ongoing and evolving process. We use Key Performance Indicators (KPIs) to better understand the effectiveness of our approach to managing modern slavery risks.

KPIs	Why these metrics are important

	PO56	Page 2 of 3	V1 09/23	APPROVED: MD
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Number of modern slavery incidents	Enables us to track incidents that occur as well as	
identified within our operations or supply	the effectiveness of our reporting and due	
chain	diligence mechanisms	
% Of colleagues receiving firm-wide training	Enables us to track and drive progress on our	
on modern slavery	awareness-raising activities across the firm	
% Of assessed suppliers that have a modern	This enables us to track our suppliers' compliance	
slavery statement and that meet the	with modern slavery legislation and develop an	
minimum legal requirements for a Modern	awareness of suppliers failing to meet their	
Slavery Statement set by the UK	modern slavery responsibilities	
Government		
% Of assessed suppliers that have a Whistle-	This enables us to develop an awareness of those	
blowing Mechanism	suppliers that have effective processes to manage	
	modern slavery risks and those that do not and	
	may therefore present a greater risk to people	

Policies

The Organisation has the following policies which further define its stance on modern slavery <u>ABCA Systems Ltd</u> <u>Modern Slavery Policy</u>

Slavery Compliance Officer

The Organisation 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 Organisation'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.

Date of approval:

Signed: Print name: Michael Dannell Job Title: Group Operations Manager Date: 15/09/23

PO56 Page 3 of 3 V1 09/23 APPROVED: MD	PO56	Page 3 of 3	V1 09/23	APPROVED: MD
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