

Anti-Slavery Policy

This policy does not form part of any employee's contract of employment and may be varied by the Company or replaced at any time.

This policy applies to all employees of SAS and its subsidiary companies, irrespective of position, employment status, or geographic location. It outlines the standards and expectations that support a consistent and compliant approach across the organisation and must be adhered to at all times.

1. Purpose

- 1.1. The purpose of this policy is to ensure that all suppliers to SAS are fully understanding, committed and compliant to the titled policy and in doing so confirm their acknowledgement and agreement to the requirements of the Act as well as confirming both receipt and acknowledgement of this policy.
- 1.2. SAS Holdings Limited has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships.
- 1.3. SAS Holdings Limited maintains relationships with many different organisations in its supply chain, as well as directly employing large numbers of people. In the light of the general law on employment and human rights and more specifically, the Modern Slavery Act 2015, will aim to enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.4. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.5. We expect all who have, or seek to have, a business relationship with SAS Holdings Limited and/or any member of our Group, to familiarise themselves with our anti- slavery policy and to always act in a way which is consistent with this policy.

1.6. Organisation Structure

- 1.6.1. The Group currently operates in the following countries: United Kingdom, Australia, UAE, USA, France, Spain and Republic of Ireland.
- 1.6.2. This Policy covers the following Group Companies: -
SAS International Limited (United Kingdom); SAS Building Factors Ireland Limited (Republic of Ireland); SAS International Australia Pty Limited (Australia); SAS International INC. (USA); Systèmes Acoustiques Spéciaux SAS (France).

2. Related Documents

- 2.1. **Whistleblowing Policy**
- 2.2. **Recruitment Policy**

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3. Definitions

- 3.1. KPI's – Key Performance Indicators – are the method of indicating and recording progress towards an intended result.
- 3.2. Whistleblowing – A defined method of highlighting breaches of unlawful or immoral activity.

4. Qualification

- 4.1. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located (collectively referred to as workers in this policy).

5. Responsibilities

- 5.1. To mitigate risks, the Procurement team engages all relevant due diligence checks when new suppliers are onboarded. The Procurement team will also review our supply chains in order to identify risk of slavery and human trafficking. The HR department will review people related activities to ensure that processes such as recruitment are free from human trafficking and slavery. The Head of Compliance will be responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- 5.2. To fully comply with this policy, all relevant employees are regularly trained on the issues concerning modern slavery.
- 5.3. **Organisation roles & responsibilities**
 - 5.3.1. Directors have overall responsibility for ensuring that SAS Holdings Limited policy complies with its legal and ethical obligations.
 - 5.3.2. The HR team have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it.
 - 5.3.3. Procurement Managers are responsible for auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
 - 5.3.4. 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.
 - 5.3.5. Below are the key staff members in relation to this policy

6. Contact SAS International

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6.1 Contact can be made with the above persons responsible for upholding this policy through the

Title	Company	Role & Responsibility
Chief Executive Officer (until Chief HR Officer Appointed)	SAS	All HR policies & procedures
Head of HR	SAS	Labour related recruitment control
HR Business Partner	SAS	Labour related recruitment control
Finance Director	SAS	Finance, governance strategy and objectives
Head of Quality & Procurement	SAS	Procurement & supply chain strategy and objectives
Procurement Manager (s)	SAS	Procurement & supply chain management

following address and telephone number: -

Head office address:

EMAC House
Unit 28
Suttons Business Park
Sutton Park Avenue
Earley
Reading
RG6 1AZ

Phone Reception: +44 (0) 118 929 0900

7. Escalation matrix responsibility

- 7.1. Should there be a need to escalate an issue for urgent resolve then the following matrix shows the agreed route for address especially whereby the dispute is threatening either party's ability to perform and/or receive satisfaction to terms: -

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Title
Head of HR
Head of Quality & Procurement
CEO

8. Relevant Policies & Practices

- 8.1. SAS operates the following policies and practices that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.
- 8.1.1. The Group's policy on whistleblowing encourages all its workers, customers and other business partners to report any concerns related to the direct activities of the organisation or its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- 8.1.1.1. The Company's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees who have concerns can refer to the Group.
- 8.1.1.2. The whistleblowing policy is available on the Company intranet. The nature of the complaint will determine the Group's next course of action.
- 8.1.2. We endeavour to carry out our own recruitment activities and/or to only use reputable employment agencies to source labour and we carry out appropriate background checks. Personnel responsible for the recruitment activities in any of the subsidiaries are advised to adhere to this policy by ensuring that strict verification of potential employee's right to work is carried out before any offer of employment is made.
- 8.1.2.1. SAS Holdings Limited expects its subsidiaries and all supply chain to adhere to recruitment practices that ensure that all terms of employment are voluntary. Where necessary and if required, we may request demonstration of compliance with this policy.

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9. Awareness & Performance Indicators

- 9.1. As well as training employees, SAS will raise awareness of modern slavery issues by emailing the Group's anti-slavery and human trafficking policy to all employees as well as it being made available on the Group's intranet. We expect employees to refer to this policy and understand what is required of them in relation to modern slavery.
- 9.2. SAS strongly believes it is essential that our procurement and supply chain is managed responsibly and in a way that is aligned to our core business values. This document sets out the principles in support of the Act and thereby ensure we have confidence that our suppliers share similar values to safeguard that they in turn are operating ethically and responsibly. We appreciate that this code of conduct will apply to suppliers in diverse ways depending upon the nature of their business. Collaboration between our suppliers and the SAS is essential to ensure that best practice in procurement is cascaded throughout our supply chain and we will work to develop that collaboration across all areas of our business.
- 9.3. SAS Holdings regularly reviews its key performance indicators (KPIs). As a result, relevant members of the Procurement team and the HR team have agreed annual objectives relating to the evaluation and review of our existing supply chain.

10. Looking After People

- 10.1. The Company recognises the United Nations Universal Declaration of Human Rights and, we expect suppliers to ensure the following requirements are observed:
 - 10.1.1. respect for their employees, ensuring that they can work safely, without risk of discrimination, harm, intimidation, harassment, or fear.
 - 10.1.2. apply high standards in connection with equality and diversity and where appropriate to the size of their organisation have a policy in this regard.
 - 10.1.3. minimise the use of agency staff at our properties; and
 - 10.1.4. ensure prompt payment for their subcontractors.

11. Preventing child labour

- 11.1. We expect our suppliers to comply with local laws regarding the minimum age of employees including:
 - 11.1.1. the minimum age for workers must not be less than the age of completion of compulsory schooling.

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- 11.1.2. compliance with all legal requirements for the work of authorised young workers; particularly those relating to hours of work, wages, and safe working conditions; and
- 11.1.3. the protection of young workers from performing any work that is likely to be hazardous or to interfere with their education or that may be harmful to their health, physical, mental, social, spiritual, or moral development.

12. Avoiding Forced Labour

- 12.1. Suppliers must not use any type of involuntary or forced labour, including indentured, bonded, slave or human trafficked labour. We expect that:
 - 12.1.1. employees must be free to terminate their employment in accordance with established laws, regulations, and rules.
 - 12.1.2. suppliers will not retain workers government-issued identification, passports or work permits as a condition of employment.
 - 12.1.3. suppliers will permit reasonable access to consultants employed by the Company to undertake spot checks of its policies and procedures; and
 - 12.1.4. suppliers on request, will provide such documentation as reasonably requested by the Company to demonstrate its processes to prevent forced labour in its supply chain.

13. Wages & Benefits

- 13.1. Suppliers must pay workers at least the minimum required by local law and provide all legally mandated benefits.
- 13.2. We expect that in addition to payment for regular hours of work, workers must be paid for overtime hours at such premium rate as is legally required.
- 13.3. We are a Living wage employer (UK) and as a result require all of our suppliers and contractors to abide by the rate set by the Living wage org which is reviewed annually.

14. Working Hours

- 14.1. We expect suppliers to monitor the working hours of their employees and ensure that they do not breach legal requirements and that the required rest days are provided.

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15. Freedom of Association & Collective Bargaining

- 15.1. The Company recognises the importance of open communication and direct engagement between workers and management.
- 15.2. We expect our suppliers to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference, or reprisal; and to recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing.
- 15.3. Suppliers also must respect any legal right of workers to bargain collectively.

16. Working in our community

- 16.1. We encourage our suppliers to:
 - 16.1.1. look to the local community to source services and labour where possible.
 - 16.1.2. support apprenticeship schemes and work with educational establishments to help address skills shortages.
 - 16.1.3. support local community causes; and
 - 16.1.4. develop positive relationships with our neighbours and tenants, on our developments and refurbishments.

17. Encouraging Apprenticeships

- 17.1. We encourage our suppliers to participate in appropriate workplace apprenticeship programmes that comply with applicable laws and regulations.

18. Responsibility for Ethical Working Practices

- 18.1. We expect our suppliers to:
 - 18.1.1. not enter into unfair practices to compete for our business and expects its suppliers will make purchasing decisions objectively based on price, delivery, and other relevant practices.
 - 18.1.2. ensure appropriate policies are put in place to ensure the prevention, detection, and reporting of bribery; and
 - 18.1.3. pay suppliers on a timely basis.

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19. Document Owner and Approval

The HR Department is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with International Standards and regulatory requirements.

This policy was approved by the Board of Directors and is issued on a version-controlled basis. The current version of this document is available to all members of staff via the company SharePoint and is published as required.



Alyn Gammon

Chief Executive Officer

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Review History

Version:	Description of change:	Date:	Approval:
A	Initial Release	25/05/20	TA
2.0	Format and minor Changes	22/04/21	T. Mason
3.0	Document Review and Updates	28/02/23	G Van Doormalen
B	Document Review and Contact Updates	01/05/23	A.Gammon
C	SAS role changes updates & main SAS contact address and telephone number included.	01/09/2023	A.Gammon
D	General review, Title update to Procurement	13/06/2024	B. G
	Yearly review no change	28/08/2025	B. G
1.0	Statement added	26/05/2026	Bethan Grant

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