

MODERN SLAVERY STATEMENT

This policy sets out SAS Holdings Limited approach to understand and mitigate all potential modern slavery risks relating to its business. SAS is committed to the abolishment of slavery and human trafficking – established business practices ensure SAS and its supply chain are free from both.

This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020.

Organisational Structure and Supply Chains

SAS Holdings Limited directly employs large numbers of people and maintains relationships with many different organisations in its supply chain.

This policy covers all of the activities of SAS Holdings Limited. It governs all business dealings and includes the conduct of employees, agents and contracted organisations acting on its behalf. Any entity that has or seeks to have a business relationship with SAS must be familiar with this anti-slavery policy.

SAS will only engage with individuals and organisations who act in full accord with the policy at all times.

The Company currently operates in the following countries: United Kingdom, Republic of Ireland, France, Spain, United Arab Emirates, Saudi Arabia, Oman, Hong Kong, Australia and the USA.

Entity	Country of Incorporation/Registered office	Portion of voting rights and share capital held	Principal Activity
SAS International Limited England and Wales	28 Suttons Business Park Reading Berkshire RG6 1AZ	100% ordinary	Design, manufacture and installation of suspended ceilings, partitioning and other building products. Providing project management services on construction projects.
SAS Building Factors Ireland Limited Republic of Ireland	21-22 The Hub Logistics Park Bracetown Park Clonee County Dublin D15 HC42	90% ordinary	Distribution of suspended ceilings, partitioning and other building products.
SAS International Australia Pty Limited *	Level 7 23-25 O'Connell Street Sydney NSW 2000 Australia	100% ordinary	Distribution of suspended ceilings, partitioning and other building products.
SAS International Hong Kong Limited *	Hong Kong Room 601 Yue Xiu Building 160-174 Lockhart Road Wanchai	100% ordinary	Distribution of suspended ceilings, partitioning and other building products.
SAS International INC.* USA	The Yard 246 5th Avenue New York 10001	100% ordinary	Distribution of suspended ceilings, partitioning and other building products.
Systèmes Acoustiques Spéciaux SAS	23 Rue de Renard Paris 75004 France	100% ordinary	Distribution of suspended ceilings, partitioning and other building products. Providing project management services on construction projects in France.

Responsibility

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

To fully comply with this policy, all relevant employees are regularly trained on the issues concerning modern slavery.

Relevant Policies and Practices

SAS Holdings Limited operates several policies and practices pertaining to modern slavery risks. These policies detail the steps to be taken to prevent slavery and human trafficking in its operations. (Details can be found by all employees via the HR section on the shared network drives.)

Principle Modern Slavery Policies

Anti-slavery Policy

This policy sets out the organisation's stance on modern slavery. Included is an explanation of how employees can identify any risks and where to seek further advice.

Whistleblowing Policy

SAS encourages all parties to report any concerns relating to the activities of the organisation and its supply chain. This includes modern slavery and human trafficking concerns. The Company's whistleblowing procedure is clear, easy to understand and avoids any risk of retaliation. The policy can be found via the company intranet. The nature of the complaint will determine the Company's next course of action.

Recruitment Policy

SAS operates a robust recruitment policy, recruiting direct or via reputable agencies offering robust candidate screening. All personnel responsible for recruitment are required to verify potential employees' rights to work prior to any offer of employment. Subsidiaries and connected organisations within the supply chain are expected to comply with this practice; all terms of employment are voluntary. SAS may insist on a demonstration of compliance with this policy.

Awareness

SAS Holdings Limited employee behaviours and code of conduct training makes clear to employees the actions and behaviour expected of them when representing the organisation. SAS Holdings Limited strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.


All staff will be trained in accordance with the Anti-Slavery Policy, which can be found at all times via the intranet. To raise further awareness, SAS will email its Anti-Slavery Policy to all staff at regular intervals. Full understanding of and compliance with the policy is mandatory for all staff. This policy on modern slavery will be communicated to all connected third parties at regular intervals and enforced as appropriate.

Performance Indicators

The organisation has reviewed its key performance indicators (KPIs). As a result, relevant members of staff and the HR team have agreed annual objectives relating to the evaluation and review of our existing supply chain.

Approval for this statement

This statement was approved by the Board of Directors.

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Signature:  Date: 26/03/20

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