

# Modern Slavery Statement



This statement sets out SAS Holdings Limited approach to understand and mitigate all potential modern slavery risks relating to its business.

## Our commitment

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 2026 to 31 March 2027.

## Governance

The Company's commitment to upholding human rights and labour rights is overseen at the highest level of governance. The HR Director and the Chief Finance Officer (CFO) hold joint responsibility for ensuring adherence to human rights and labour standards across all operations.

Both officers report directly to the Chief Executive Officer (CEO) and the Board of Directors, ensuring transparent and accountable oversight consistent with the principles outlined in the Company's HR Policies.

SAS governance structure supports the integration of human rights and labour rights considerations into strategic decision-making and operational management.

## Organisational Structure and Supply Chains

SAS Holdings Limited directly employs 800 people across the following countries UK, Ireland, Spain, Middle East, Australia and USA. This statement 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 Holdings maintains relationships with 315 suppliers in 15 different geographical locations. Supplier split as follows UK – 293; Spain – 3; Belgium – 1; Germany – 3; Sweden – 2; Finland – 1; Norway – 1; USA – 3; Ireland – 1; France – 1; Netherlands – 2; Portugal – 3 and Poland – 1

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.

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SAS Building Factors Ireland Limited Republic of Ireland	UNIT 252 BLOCK A BLANCHARDSTOWN CORPORATE PARK, Ireland	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 INC.* USA	60 E. 42nd Street Suite 1255 New York, NY 10165	100% ordinary	Distribution of suspended ceilings, partitioning and other building products.
Systèmes Acoustiques Spéciaux SAS	39 RUE DE LA GARE DE REUILLY 75012, PARIS, ILE DE FRANCE	100% ordinary	Distribution of suspended ceilings, partitioning and other building products. Providing project management services on construction projects in France.
Truline Systems Limited England and Wales	28 Suttons Business Park Reading Berkshire RG6 1AZ	100% ordinary	Design and manufacture of partitioning and door systems

## Risk & Due Diligence:

### Risk Assessment and Management

SAS is committed to identifying, assessing, and managing the risks of modern slavery and human trafficking across its operations and supply chain.

### Risk Identification Procedure

SAS follows a structured procedure for identifying modern slavery risks, which includes assessing geographical, sectoral, and supplier-specific risk factors. This process involves:

- Reviewing the nature of services or goods being procured.
- Analysing the origin and labour conditions associated with those goods or services.
- Identifying high-risk regions, industries, or suppliers based on third-party reports, internal data, and global human rights indices.

All identified risks are recorded in a central Risk Register, which is reviewed regularly by the senior leadership team and relevant stakeholders as part of our broader compliance and governance audit schedule.

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## Risk Processes and Responsibilities

The risk register is maintained as part of the Company's compliance framework and reviewed as a standing agenda item at compliance and governance meetings. The Chief Finance Officer, HR Director, and Procurement Manager are jointly responsible for the identification, escalation, and mitigation of modern slavery risks within their respective areas.

In addition, department heads and relevant functional leads are expected to ensure that identified risks are managed effectively and that any suspected cases of modern slavery are reported through the appropriate internal channels.

## Supplier Due Diligence

As part of the supplier onboarding process, the Procurement team undertakes rigorous due diligence checks before engaging with any new supplier. This includes:

- Completion of a modern slavery and ethical sourcing questionnaire.
- Review of the supplier's own modern slavery and human rights policies.
- Verification of third-party certifications or accreditations
- Risk profiling based on country of operation, industry, and workforce characteristics.

Suppliers identified as operating in higher-risk sectors or regions may be subject to further scrutiny, including further online assessments or third-party audits. Suppliers are required to commit to the SAS Supplier Code of Conduct and must demonstrate compliance with all applicable labour and human rights laws.

## HR Responsibilities and Oversight

The HR Department is responsible for regularly reviewing all people-related activities — including but not limited to recruitment, employment conditions, working hours, and onboarding processes — to ensure they remain free from risks associated with human trafficking and modern slavery. Special attention is given to recruitment and labour practices to prevent coercion, exploitation, or the use of forced or bonded labour.

## Investigation and Due Diligence

A Designated Officer has been appointed to oversee the investigation of any reported or suspected cases of modern slavery and human trafficking. This individual is also responsible for conducting due diligence and coordinating appropriate internal and external responses in the event that modern slavery risks are identified within SAS operations or its supply chain.

## Reporting Mechanisms

SAS provides multiple accessible channels for employees and external stakeholders to raise concerns confidentially and without fear of retaliation. A confidential, multilingual online reporting tool is available via the company website and intranet:

- [sasint.ethicspoint.co.uk](https://sasint.ethicspoint.co.uk)
- [sasintmobile.ethicspoint.com](https://sasintmobile.ethicspoint.com)

The Speak-Up hotline, operated independently by NAVEX, is advertised throughout SAS buildings via posters, QR codes, and digital screens.

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Reporting mechanisms are introduced during employee induction and regularly promoted through internal communications.

Should any issues arise during the reporting process, the external NAVEX team will respond within **24 hours** to provide support and guidance.

## Remediation and Corrective Action

If an incident of modern slavery or human trafficking is identified, SAS is committed to responding quickly and appropriately. Remediation may include:

- Formal internal investigations.
- Disciplinary action in line with SAS company policies.
- Escalation to relevant external authorities (e.g. financial regulators, environmental enforcement bodies, labour authorities).
- Engagement with affected individuals to provide support, protection, or redress, as appropriate.

All remediation efforts are undertaken in a manner that prioritises the safety, dignity, and rights of victims or at-risk individuals.

## Identified Risks and Impacts

Through our ongoing risk assessments, SAS has identified several areas where there is an elevated Human Rights risks, particularly:

- In indirect supply chains for goods sourced from regions with weaker labour protections.
- In contracted services, such as temporary labour.
- Among lower-tier suppliers, where visibility and control are more limited.
- No instances of modern slavery have been identified.

These areas are being addressed through strengthened procurement controls, increased supplier engagement, and targeted training for staff involved in procurement and supplier management.

No adverse impacts on human rights have been identified.

## 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 within our information management system).

## 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. You can visit the link on the SAS International web page.
- **Whistleblowing Policy**  
SAS encourages all parties to report any concerns relating to the activities of the organisation and its supply

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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. You can visit the link on the SAS International web page.

- **Human Rights Policy**  
Commits the company to respecting and protecting the fundamental rights of all individuals affected by its operations.
- **Grievance Policy**  
Provides a clear process for employees and stakeholders to raise concerns or complaints safely and confidentially.
- **Code of Conduct**  
Sets out the ethical standards and behaviours expected from all employees and representatives of the company.
- **Supplier Code of Conduct**  
Establishes the minimum social, environmental, and ethical standards required from all suppliers and business partners.
- **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.

## Training & 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 are trained at the appropriate level in accordance with the Anti-Slavery Policy on issues concerning modern slavery, which can be found at all times via the intranet. To raise further awareness, SAS will email and communicate 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.

## Key Performance Indicators

The organisation reviews and updates its Key Performance Indicators (KPIs) on an annual basis to ensure alignment with its evolving risk profile and ongoing improvement activities related to the prevention of modern slavery and human trafficking.

These KPIs are monitored and measured through a combination of internal audits, supplier assessments, risk reviews, and compliance reporting systems. Metrics may include the number of supplier audits conducted, training completion rates, remediation actions taken, and the frequency and resolution of reported concerns.

Management is responsible for implementing and tracking these KPIs within their respective areas and ensuring timely reporting and corrective actions where necessary. Suppliers are expected to cooperate fully with monitoring processes, provide transparent information, and take proactive steps to meet or exceed the standards set out in our Supplier Code of Conduct.

This process enables the organisation to assess the effectiveness of its controls, identify areas for improvement, and maintain accountability throughout its operations and supply chain.

## **Approval for this statement**

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This statement was approved by the Board of Directors on 01.10.25

Name (Director): Alyn Gammon

Signature:

Date: 01/10/2025

## Change History Record

ISSUE:	DESCRIPTION OF CHANGE:	DATE:	APPROVAL:
1.0	Yearly review, new issue numbering applied	23/04/2026	Bethan Grant

## 8 Training Needs

Function	Original Training Needs Analysis	Training Needs from the New Revision
All Employees	A	A
Senior Team	N/A	N/A
Purchasing	N/A	N/A
Finance	N/A	N/A
Design & Engineering	N/A	N/A
Planning	N/A	N/A
Manufacturing/ Shop Floor	N/A	N/A
Logistics	N/A	N/A
SOP	N/A	N/A
Inventory Management	N/A	N/A
Estimating	N/A	N/A
Quality	N/A	N/A
Costing	N/A	N/A
IT	N/A	N/A
Environment Health and Safety	N/A	N/A
<b>Applicable Sites:</b> (*Delete as needed)	BE/MB/RDG/USA/AUS/BFI/FRC/UAE/Truline/ALL	

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## Training Needs

- A** – Read and understand new or revised document
- B** – Off-job training delivery (+A)
- C** – On-job training delivery (+A)
- D** – On-job training delivery with competency assessed (+A)

**NOTE: if using B, C or D the document must still be read and understood.**

<b>Author</b>	<b>Owner</b>
Tracy Suff	Bethan Grant

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