

## Modern Slavery and Human Trafficking Policy 2021

### Introduction and Policy Statement

1. The Modern Slavery Act 2015 (the Act) mandates that Aico prepares a Slavery and Human Trafficking Statement each financial year.
2. Modern Slavery and Human Trafficking in all their various forms and guises are a crime in the UK and much of the world and a violation of fundamental Human Rights.
3. Aico will not tolerate or condone Human Trafficking or Slavery in any part of our organisation. Aico have a zero-tolerance approach to Modern Slavery and Human Trafficking and are committed to acting ethically and with integrity in all activities and business relationships and we expect our Supply Chain, Contractors, Employees and all other Business Partners to commit to the same, including implementing and enforcing effective systems and controls to detect and prevent Modern Slavery.

### Our Business

1. The Economic, Social and Environmental footprint of our business activity is a fundamental consideration of Aico's commitment to responsible and sustainable business growth.
2. Aico is the UK market leader in domestic Fire and Co detection with a UK network in excess of 2000 Wholesale customers.
3. By combining product excellence with unrivalled Technical Support, Aico is dedicated to remaining the UK's Electrical Contractors first choice Suppliers.

### Responsibility for the Policy

1. The Directors and Management team at Aico have overall responsibility for ensuring this Policy complies with our Legal and Ethical obligations, and that all persons working for us or on our behalf comply with it.
2. The prevention, detection and reporting of Modern Slavery in any part of our business or supply chain is the responsibility of all persons working for us or on behalf in any capacity (including our Employees, Suppliers, Workers, Directors, Agents, Distributors and all Third Party Business Partners)
3. Management at all levels are responsible for ensuring that those reporting to them understand and comply with this Policy and are given adequate Training on it and the issue of Modern Slavery.

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### Due Diligence

We undertake due diligence when considering new suppliers, and we regularly review our existing suppliers too.

Our due diligence and reviews include:

1. Conducting supplier Audits and/or Assessments
2. Regularly review all suppliers in our supply chain, to identify any supplier that due to the product, industry or geography potentially have an increased risk of Modern Slavery.
3. Take steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement Action Plans
4. Impose sanctions against suppliers that seriously violate our supplier Code of Conduct or fail to improve their performance in line with an Action Plan, including the Termination of the business relationship

### Commitment

1. Aico is committed to the implementation of the Modern Slavery and Human Trafficking throughout the organisation to ensure compliance with the requirements of the Modern Slavery Act 2015.
2. The Policy Statement is printed and prominently displayed on the company Notice Boards. All Employees are encouraged to read and understand this Policy.
3. Training on this Policy and the risk our business faces from Modern Slavery and Human Trafficking form part of the Induction process for all individuals joining the business. Refresher Training will be provided as required.

### Compliance

1. All persons working for us or on our behalf in any capacity must:
  - a. Read, understand and comply with this Policy, and avoid any activity that might lead to, or suggest a breach of this Policy.
  - b. Notify their immediate Manager as soon as possible if they believe or suspect that a conflict with this Policy has occurred or may occur in the future.
  - c. Raise concerns about any issue or suspicion of Modern Slavery in any part of our business or supply chain at the earliest possible stage.

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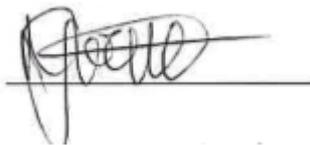
**Breaches of Policy**

1. Any Employee who breaches this Policy will face Disciplinary Action with could lead to Dismissal for Misconduct or Gross Misconduct.
2. We may Terminate our relationship with other individuals and organisations working on our behalf if they are in breach of this Policy.

**Ongoing Review**

1. Aico will review both its Supply Chain, its external operations and internal operations on an ongoing basis to check Compliance with the above Policy and to check that our Policy is being implemented effectively.
2. The Directors and Management team will review the company's Statement in response to any major business or organisation change, legislative change or any breach or concerns regarding Modern Slavery.
3. Although Aico has established strong business partnerships with its primary Supplier organisations, it has identified the need to further explore and understand the supply chain of the component parts of its business partnerships in more detail to ensure greater transparency. Aico will continue to work with its Partner Organisations to extend the use of its Auditing Processes. Aico will pay particular attention to any Organisations that are identified as working in countries with limited protection of Human Rights and where Contract or Agency Workers are used.

Signed:

A handwritten signature in black ink, appearing to read "Neal Hooper", written over a horizontal line.

Neal Hooper

Managing Director

Date: 29/04/2021