

# MSA Statement

## Introduction

Halma plc (Halma) supports the provisions set out in the Modern Slavery Act 2015 (the "Act") and has taken steps to prevent modern slavery occurring in its supply chain and within its own operations. This statement has been published in accordance with Section 54 of the Act and applies to Halma and its subsidiaries (the "Group") in respect of the financial year ended 31 March 2023. The individual companies which currently meet the requirement to report under the Act and those companies that do not currently meet the requirement to report under the Act, but have in prior years, have been specifically mentioned below.

## Business Structure and Supply Chains

Halma employs over 8,000 people in over 45 businesses operating in more than 25 countries. Each business is a separate legal entity and has its own board of directors with accountability for implementing controls set by Halma's group legal and compliance framework.

Our purpose - to grow a safer, cleaner, healthier future for everyone, every day - drives our strategy and culture. Our companies and products have a core focus on safety, health and environmental markets.

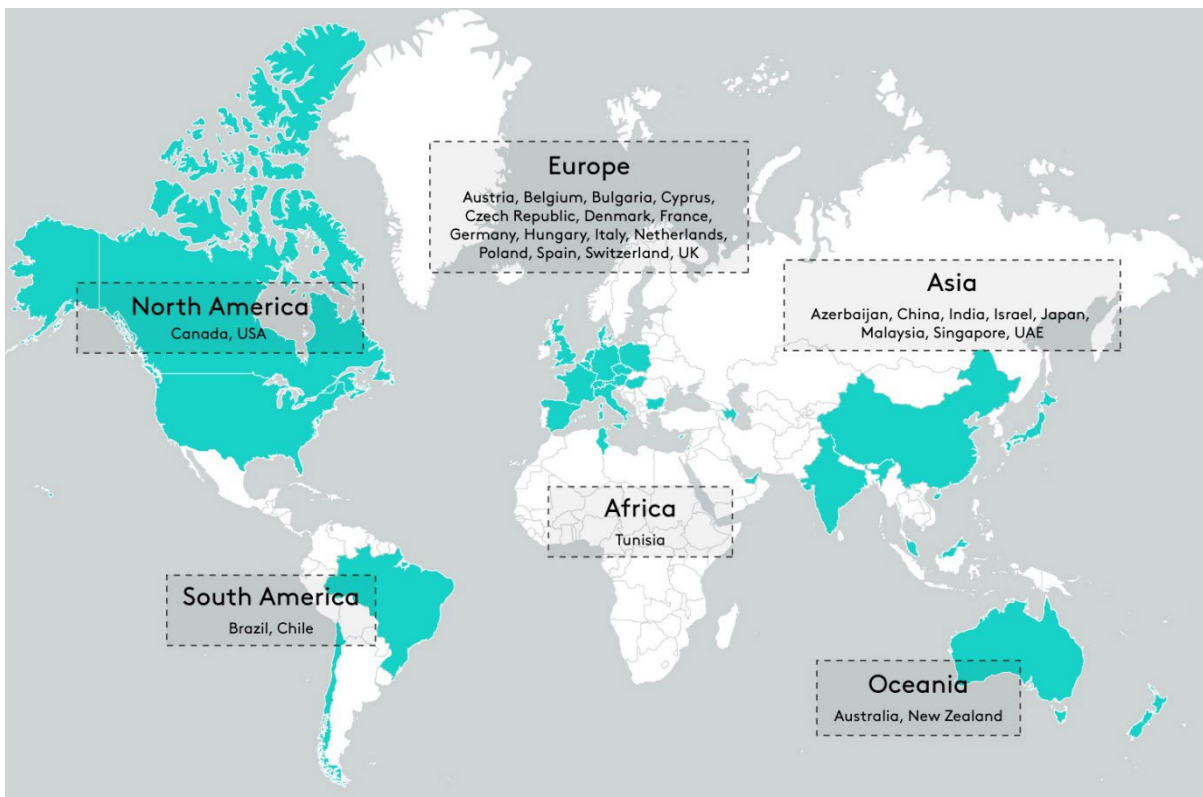


Figure 1: Distribution of Halma's production and office facilities as at 31 March 2023

Our businesses are grouped within three sectors:

1. Safety  
Technologies that save lives, protect infrastructure and enable safe movement, and also technologies that protect people and assets at work across a range of critical industrial and logistics operations.
2. Environmental & Analysis  
Technologies that monitor and protect the environment and ensure the quality and availability of life-critical resources.
3. Healthcare  
Technologies that enhance the quality of life for patients and improve the quality of care delivered by healthcare providers.

You can find out more about our companies and what they do in the [Our Companies](#) section. The location of our companies and corporate offices can be found in our [Group directory](#).

Halma is the parent company of the Group and the Group Executive Board set the framework under which our businesses operate. We have an autonomous organisational structure with each Halma company operating as a separate legal entity with its own board of directors with clear lines of accountability. As the directors and officers of their companies, local management are empowered to lead their business and are responsible for their own supply chains. All businesses are required to complete a semi-annual internal control certificate which confirms that they have complied with key areas of control and compliance mandated by Group's policies and procedures (see Policies and Procedure below for more information). This certificate includes a specific provision confirming that all employees have read and signed our Code of Conduct which communicates our approach to critical human rights, business conduct and ethical matters, including modern slavery.

The following Halma companies either currently meet the requirement to report under the Act, or do not currently meet the requirement to report under the Act, but have in prior years:

- [Apollo Fire Detectors Limited \(Apollo UK\)](#)  
Designs and manufactures fire detection solutions for commercial and industrial applications.
- [Apollo America Inc \(Apollo US\)](#)  
Designs and manufactures fire detection solutions for commercial and industrial applications.
- [Bureau d'Electronique Appliquée S.A. \(BEA\)](#)  
Designs and manufactures motion, presence and safety sensors.
- [CenTrak, Inc. \(CenTrak\)](#)  
Designs and manufactures real-time location services for healthcare facilities.
- [Crowcon Detection Instruments Limited \(Crowcon\)](#)  
Designs and manufactures gas detection instruments.
- [HWM-Water Ltd \(HWM\)](#)  
Designs and manufactures monitoring and telemetry equipment for water, wastewater and gas networks.
- [Medicel AG \(Medicel\)](#)  
Designs and manufactures specialist eye surgery instruments.
- [Microsurgical Technology, Inc \(MST\)](#)  
Designs and manufactures surgical devices and instruments used to improve sight.

- Avo Photonics, Inc (Avo Photonics)  
Designs, develops and manufactures private label photonics.
- Alicat Scientific Inc (Alicat)  
Designs and manufactures flow and pressure devices which are used in medical and scientific instrumentation and industrial applications.
- Fortress Interlocks Limited (Fortress)  
Fortress designs and manufactures safety equipment, protecting lives in hazardous workplaces.
- Keeler Limited (Keeler)  
Designs, manufactures and distributes equipment and solutions for the eye care industry.
- Accutome Inc (Accutome)  
Designs, manufactures and distributes equipment and solutions for the eye care industry.
- SunTech Medical Inc (SunTech)  
Designs and produces blood pressure technologies and solutions.
- Advanced Electronics Limited (Advanced)  
Designs and manufactures specialist fire safety systems.

## **Policies and Procedures**

Halma has a culture of openness, integrity and accountability. We require our employees to act fairly in their dealings with fellow employees, customers, suppliers and business partners. We are committed to preventing modern slavery and human trafficking in our operations and in our supply chains. The Group has a range of policies and procedures which mitigate the risk of modern slavery.

### **1. Modern Slavery Act Policy**

Halma has a Modern Slavery Act policy in place which applies to all businesses within the Group. This policy is important as it encourages a consistent approach to modern slavery prevention across our de-centralised company structure.

The policy outlines:

- What modern slavery is, which industries are at heightened vulnerability, which countries and sectors are known to be high-risk, and which indicators should raise concerns;
- The requirements of the Act; and
- Recommendations for best practice mitigation and methods for determining their operations and supply chain modern slavery risk.

All businesses are required to review and consider the areas set out within the policy.

### **2. Code of Conduct**

Our worldwide Code of Conduct (Code) sets out the ethical standards that govern the activities of the Group, our employees, and business partners. The Code includes a specific provision concerning the prevention of modern slavery and human trafficking, setting out:

- Our clear commitment to never tolerate, or engage with those who enable modern slavery, human trafficking, and other abuses of labour right; and
- An explanation of how modern slavery prevention falls within the remit of our Human Rights and Labour Conditions Policy.

The Code is available on our [website](#). It is a Group-wide requirement that all our new employees receive, and sign to acknowledge that they have read the Code. A refreshed Code of Conduct was approved in FY23 and will be rolled out in FY24.

### **3. Human Rights and Labour Conditions Policy**

Modern slavery prevention falls within Halma's human rights approach to sustainability. Halma's Human Rights and Labour Conditions policy endorses the dignity and rights of all individuals as established in the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. The policy commits Halma to integrate compliance with human rights throughout the Group's activities, ensuring that human rights are respected at all times and are protected within Halma's sphere of our influence.

The Policy includes several commitments which are key for modern slavery prevention:

- To never tolerate forced or bonded labour, and to never require employees to leave deposits or identity documents with their employer;
- To never tolerate child labour and to require all employees to be above the minimum legal working age;
- To respect any employee's right to form or join a trade union, and to never discriminate against members of trade unions; and
- To ensure that employees always have the freedom to leave their employer.

Our Human Rights and Labour Conditions Policy can be found [here](#).

### **4. Whistleblowing Policy**

The Group has a whistleblowing policy and an established third-party whistleblowing service, accessible both online and by telephone, which allows employees in any of our businesses to raise concerns in confidence, anonymously (where permitted by law) and independent of their company. Our third-party whistleblowing facility is not limited to employees and can be used by anyone, including our customers and suppliers.

In order to ensure that the mechanism remains accessible and trusted by our employees, the whistleblowing policy explains how the process works, how anonymity will be preserved, and an assurance that a whistleblower will not be treated negatively for raising an issue in good faith.

Halma's Board (and Audit Committee, where concerns relate to potential financial misconduct or fraud) reviews the nature of reports made through the whistleblowing channel in order to ensure that it remains an effective mechanism for raising concerns, that such reports are properly investigated under the direction of the Director of Risk and Compliance and that there are no recurring trends that would suggest underlying cultural or ethical issues in the Group.

No suspected or confirmed cases of modern slavery have been reported to date.

Our Whistleblowing Policy can be found [insert separate link].

### **5. Sale and Distribution Terms and Conditions**

Our UK businesses are asked to incorporate specific clauses on compliance with anti-slavery laws in their standard sale and distribution terms and conditions. These terms also require that distributors do not engage in any modern slavery practice.

### **Risk Assessment**

In 2019/20 Halma worked with STOP THE TRAFFIK to conduct a modern slavery risk map of our global supply chain.

STOP THE TRAFFIK's inherent risk mapping methodology consists of ranking each supplier on a scale of 1 to 5 based on their economic sector and country of operation, where 1 is the lowest risk of modern slavery and 5 is the highest. These rankings combine intelligence from multiple open-source datasets with analysis from STOP THE TRAFFIK's human trafficking Research and Intelligence Team. The inherent risk mapping is a theoretical modern slavery ranking which identifies where risks are most likely to be within our supply chain - it does not confirm their existence.

The risk-mapping project identified that our highest risk suppliers broadly fell into two risk areas:

1. Manufacturers in China producing electrical and metal components for our products.
2. Suppliers operating across Europe and North America in high-risk sectors, providing our company with services such as logistics, warehousing, labour provision, and construction.

Throughout 2022/23 we have continued to provide support and advice to our companies to enable them to conduct effective due diligence and mitigate their inherent supply chain risk. We have also continued to encourage our companies to utilise the supplier sustainability platform EcoVadis which reviews and rates suppliers on four key themes, including labour and human rights.

### **Due Diligence**

Supplier due diligence activities are conducted at the individual company level.

Below is a summary of the steps taken to prevent modern slavery by our companies which meet, or have met in the past, the Modern Slavery Act threshold.

#### **1. Apollo UK**

Apollo's commitment to respecting human rights and preventing modern slavery is outlined in its supplier handbook which is sent to all suppliers. This handbook clearly states that all Apollo suppliers are required to comply with modern slavery laws and respect human rights, and that failure to do so could void supplier agreements.

All suppliers are assessed annually for a variety of risk variables, including modern slavery prevention. Risk factors such as suppliers' country of operations, membership to the Responsible Business Alliance, and company Modern Slavery Statements are all assessed. When a supplier is perceived to be high-risk for modern slavery, full on-site audits are carried out. In addition, the Apollo board and relevant employees have undertaken Halma's Modern Slavery Act compliance training.

#### **2. Apollo US**

AAI is committed to respecting human rights and preventing modern slavery and endorses the core requirements of the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. AAI expects all suppliers to treat all individuals with respect and fairness and to comply with applicable national and international regulations in relation to modern slavery (including but not limited to never engaging in any indentured or forced labour, slavery or servitude, human trafficking, or compulsory labour). AAI is in the process of updating its Supplier Code of Conduct and Supplier Terms and Conditions to include a requirement in relation to compliance with the same. All suppliers are assessed for a variety of risk variables, including modern slavery.

All executives and key personnel have undertaken Halma's Modern Slavery Act compliance training. New employees sign the Halma Code of Conduct, confirming their understanding and commitment to the policy.

### **3. Avo Photonics**

Avo Photonics is committed to respecting human rights and preventing modern slavery.

Before partnering with each supplier, Avo Photonics evaluates the risk of modern slavery based upon the supplier's location, the type of commodity being purchased, and the supplier's commitment to preventing modern slavery. Avo Photonics does not have suppliers with locations in high-risk countries as identified by the Global Slavery Index. Part of Avo Photonics' purchasing terms and conditions requires that suppliers comply with all laws concerning slavery and human trafficking that they do business in.

In addition, the Avo Photonics board and all relevant personnel have completed Halma's Modern Slavery Act compliance training

### **4. BEA**

All of BEA's suppliers are audited before starting any new business. A specific question on compliance with the Modern Slavery Act is a key trigger before new business can commence with BEA. BEA purchasing terms and conditions include a specific requirement on all suppliers to adhere to the UK Modern Slavery Act. These purchasing terms and conditions can be viewed on the BEA website and are available in English, French and Chinese and a link to this web page is printed on every single purchase order.

For incumbent suppliers, BEA Quality and Purchasing teams visit and audit each supplier regularly (this can be as frequent as every four months or on a cycle of every two years, depending on vendor turnover with BEA). These audits review working conditions, the working environment, worker safety and labour conditions.

BEA do not have any business with any vendors that operate in high-risk countries. The COVID-19 pandemic has however reduced the opportunity to travel and carry out supplier on-site visits during this time.

The BEA board and relevant employees have undertaken Halma's Modern Slavery Act compliance training.

### **5. CenTrak**

CenTrak prioritises quality and ethical sourcing. To ensure this, CenTrak requires documentation from suppliers attesting to their compliance with the 2015 Modern Slavery Act. This documentation includes a questionnaire about modern slavery and human trafficking which CenTrak asks its new suppliers to complete. This helps CenTrak understand each supplier's operations and supply chain risk. The questionnaire includes questions about the following:

- the supplier's policies and procedures to mitigate modern slavery risk;
- how do they manage their own supply chain risk; and

- the awareness training they have conducted.

Additionally, all relevant CenTrak employees have completed Halma's Modern Slavery Act compliance training.

## **6. Crowcon**

Crowcon conducts a preliminary modern slavery risk assessment on all its new suppliers. This risk assessment is based upon geography, the commodity being purchased and the nature of the transaction.

Crowcon performs onsite quality assessments, or where geographical restrictions apply, a quality audit questionnaire is completed by all Class A suppliers which includes the Modern Slavery section and code of conduct. As part of Crowcon's commitment to its sustainability KSO's, the top 10 suppliers by spend will also be asked to complete the Ecovadis sustainability audit which includes Modern Slavery.

Crowcon refreshes the quality audits and agreements with its suppliers on an on-going basis. The Crowcon board and relevant employees have undertaken Halma's Modern Slavery Act compliance training.

## **7. HWM**

HWM is committed to respecting human rights and preventing modern slavery. All senior management and those involved in supply chain have undertaken Halma's Modern Slavery Act compliance training. New employees sign the Halma Code of Conduct, confirming their understanding and commitment to the policy. The supply chain has been reviewed to identify potential risk areas. New suppliers are required to complete a questionnaire supporting their adherence to the Modern Slavery Act and existing suppliers are subject to ongoing monitoring.

## **8. Medice**

Medice's supplier quality agreement includes a provision that requires suppliers to comply with the Modern Slavery Act. In addition, Medice uses a Supplier Labour Standard Assurance Questionnaire that requires suppliers to provide due diligence information such as the number of migrants they employ, if there is a workers' representative and a summary of the steps that have been taken to mitigate risk, such as labour standards policies and informing staff of their rights. During the year, Medice implemented a compliance clause in all supplier agreements and new customer agreements. Every new or existing supplier based in a country with a perceived high prevalence of modern slavery is being audited. The Medice board and relevant employees have undertaken Halma's Modern Slavery Act compliance training.

## **9. MST**

MST is committed to respecting human rights and preventing modern slavery. MST complies with Halma's Modern Slavery Act policy and highlights its commitment to the Modern Slavery Act by explicitly referencing it on its website. It expects all suppliers to comply with applicable national and

international regulations in relation to modern slavery. All MST board members have either undertaken or are in the process of undertaking the Halma-sponsored Modern Slavery Act training.

#### **10. Alicat**

Alicat is committed to respecting human rights and preventing modern slavery. All executives and key personnel have undertaken Halma's Modern Slavery Act compliance training. New employees sign the Halma Code of Conduct, confirming their understanding and commitment to the policy. The supply chain has been reviewed to identify potential risk areas keeping in mind what locations are in high-risk countries as identified by the Global Slavery Index.

#### **11. SunTech**

SunTech incorporates provisions into Terms and Conditions for all purchase orders requiring suppliers to be in compliance with the UK Modern Slavery Act 2015. All SunTech Board members and supply chain employees have undertaken the Halma-sponsored Modern Slavery Act training. All supplier audits will include a risk assessment of modern slavery.

#### **12. Fortress**

Fortress is committed to eliminating the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship.

The policy applies to all persons working for or on behalf of Fortress, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

Fortress expects all who have, or seek to have, a business relationship with it to familiarise themselves with this policy and to act in a way that is consistent with its values. To be clear, Fortress will only do business with organisations who fully comply with this policy.

Other forms of modern slavery, which will not be tolerated but are not specifically referenced in the Modern Slavery Act 2015 include, but are not limited to:

- Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development; and
- All forms of modern slavery which involve, the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires colleagues to play a part and remain vigilant to the risk in all aspect of the Fortress business and business relationships.

Fortress carries out 'on-boarding 'audits and regular self-assessments on all suppliers. As part of this process, Fortress assesses its suppliers on a variety of risk factors including location of operations, sub-supply assessment, supplier policy and document control assessments.

#### **13. Keeler**

Keeler is committed to ethical and sustainable business practices, including adherence to the Modern Slavery Act 2015.

As part of Keeler's supplier selection process, Keeler validates that all new suppliers adhere to the Modern Slavery Act, while its ongoing supplier evaluation program includes an assessment of a suppliers' ethical business practices, health and safety governance, welfare facilities and employee training and development opportunities.

The Keeler board and relevant employees all undertake Halma's Modern Slavery Act compliance training.

#### **14. Accutome**

Accutome is committed to ethical and sustainable business practices, including adherence to the Modern Slavery Act 2015.

As part of Accutome's supplier selection process, Accutome validates that all new suppliers adhere to the Modern Slavery Act, while its ongoing supplier evaluation program includes an assessment of a suppliers' ethical business practices, health and safety governance, welfare facilities and employee training and development opportunities.

The Accutome board and relevant employees all undertake Halma's Modern Slavery Act compliance training.

#### **15. Advanced**

Advanced is committed to protecting human rights and preventing modern slavery. All new supplier relationships are considered carefully prior to committing to working together; procedures include supplier questionnaires and audits. Further, Advanced also performs regular procedures on its existing suppliers to ensure they are acting in the right way, this includes at least biennially audits, depending on the nature of the supplier, and quarterly reviews. Advanced continues to challenge itself on how it can strengthen its controls and processes through regular review of policies, agreements, audit procedures and evaluations.

#### **Training**

Halma runs online modern slavery training in partnership with VinciWorks. This currently includes two main courses: (i) Modern Slavery Act: Preventing Exploitation ("Preventing Exploitation Training"); and (ii) Modern Slavery Act: Practical Steps for Procurement ("Procurement Training") (together the "Modern Slavery Training Courses"). To date, over 5,200 Modern Slavery Training Courses have been completed by Halma Employees. Senior management, subsidiary board directors and other key business personnel are automatically enrolled on the Preventing Exploitation and Procurement Training.

The Modern Slavery Training Courses cover a variety of topics including: (i) what modern slavery is, and which groups are at heightened vulnerability; (ii) how modern slavery affects UK companies and the legal implications; (iii) how to identify high-risk suppliers and operations; (iv) how to identify cases of modern slavery and report concerns; (v) which countries and products have higher risks of slavery and exploitation; and (vi) what questions to ask suppliers in order to uncover instances of slavery.

**Compliance Statement**

As the Group Chief Executive, I will lead this important agenda for Halma and our Group and will report annually on the steps that we have taken and will be taking to prevent modern slavery.

A copy of this Statement is available on the Company's website at [www.halma.com](http://www.halma.com) and also at the Modern Slavery Statement Registry.

This statement was approved by the Board of Halma and signed on its behalf by:

**Marc Ronchetti**

Group Chief Executive

**8 June 2023**