



# Modern Slavery Statement



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## Introduction

This statement is made pursuant to Section 54 (Transparency in supply chains) of the Modern Slavery Act 2015 and covers the financial year from 1st July 2024 to 30th June 2025. This statement has been signed and endorsed on 1 July 2024 by Justin Harling, CEO of CAE Technology Services Ltd, and sets out the steps that CAE Technology Services Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. CAE Technology Services Ltd (CAE) has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## Our Business

CAE is a trusted technology partner who makes people's lives more straightforward, productive, fulfilling and enjoyable by providing the intuitive IT services they need every day.

We specialise in providing technology that's on point by taking proven vendor solutions, combining them and tailoring them on request.

We understand how our customers use technology, and how it can transform what they do. Above all, we're their trusted advisors: the people they turn to for expert support and guidance, giving assistance when they are not having a good day, getting them back on track.

CAE operates in a fast paced highly competitive environment and for us to keep our edge we are always looking for the best the IT industry has to offer.

We provide full UK coverage through our:

- 24/7 Support Helpdesk Centres;
- Service Centres;
- Remote Engineers;
- Delivery centres.

We are technology solution experts, we have impeccable credentials, we achieve and maintain the highest accreditation with our partners.

## Our Promise

What you need is technology combined with human knowledge, passion and empathy. Technology that does exactly what you need. Proven solutions tailored to suit your specific needs, making everyone's days more straightforward, productive and enjoyable.

## Our Purpose

To transform people's experiences, and people's lives, through technology. Our Purpose is the reason we exist. What gets us out of bed in the morning. Our purpose can make a difference to every aspect of our business and have a positive impact on everyone who comes into contact with it.

## Our Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our company. Our commitment is to act ethically and with integrity in all our company relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. All internal documentation is held on our management system which is available to all employees.

These include for example:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our company or supply chain, without fear of reprisals.

3. Code of employee conduct. Our Employee Handbook makes it very clear to employees the actions and behaviour expected of them when representing CAE. We strive to maintain the highest standards of employee conduct and ethical behaviour during the employment of an employee.
4. Staff training and awareness. Employees working within identified areas of risk including recruitment, purchasing and supplier management are provided with training on modern slavery legislation and how to identify risks and signs of slavery activities.

## Our Suppliers

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics, CAE Technology Services operates an Ethical Sourcing policy and maintains a preferred supplier list, which helps ensure our suppliers and their supply chains are working to a high standard on key issues such as carbon tracking and reduction, ethical employment practices and anti-slavery processes. We conduct due diligence on all suppliers before allowing them to become a preferred supplier and then periodically afterwards. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offences relating to modern slavery. This policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts it.

We encourage anyone, including colleagues, subcontractors, suppliers, customers and clients to report in good faith any issue or concerns about potential unethical business practices, such as fraud and bribery or slavery and human trafficking.

In addition to the above, as part of our Supplier Questionnaire, we require that they detail to us that:

1. They have policies and procedures to prevent modern slavery activities both within their own business and their supply chain;
2. How these policies are communicated;
3. What steps they take and with what frequency do they monitor their supply chain;
4. What training is put in place for employees to identify modern slavery in practice;

5. What steps are being taken in the previous 12 months to improve efforts to combat modern slavery;
6. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate);
7. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations;
8. We may terminate the contract at any time should any instances of modern slavery come to light.

## Training

We ensure that all employees undergoing Modern Slavery Awareness training as part of their induction and that areas of the business that are identified to highlight greater risk in this area receive refresher training on an annual basis. This is to ensure that our employees understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

## Monitoring effectiveness:

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our company or supply chain by:

- Having zero reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- Regular internal training sessions with all employees.
- Regular reminders to employees via CAE company meetings, and newsletters.

## CAE Modern Slavery Policy

The following policy should be read in conjunction with our Modern Slavery Statement (above).

Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business relationships, consistent with our disclosure obligations under the Modern Slavery Act 2015. As part of this process, we have undertaken a review of our supply chain to identify and assess potential risk areas.

We expect high standards from all of our subcontractors, suppliers and other business partners and have made this a contractual term in our agreements with significant suppliers wherever possible.

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, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

## Responsibilities

The Senior Leadership Team of the organisation has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all of our people comply with it.

The HR & Purchasing departments have primary and day-to-day responsibility for implementing this policy, but those in other roles involved in procurement should assist with reviewing the risk profile of our supply chain to ensure that any procedures implemented are effective in countering modern slavery.

## Compliance

All employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or Human Resources as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our organisation or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or Human Resources, or report it in accordance with our Whistleblowing Policy as soon as possible.

CAE encourages openness and will support anyone who raises genuine concerns in good faith in accordance with the organisation's whistleblowing policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their knowledge, or suspicion, that modern slavery is taking place in any part of our organisation or in any of our supply chains.

## Communication and Awareness

Our zero-tolerance approach to modern slavery is communicated to all significant suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. We have an Ethical Sourcing Policy (ESP) which all our suppliers must agree to adhere to before we will work with them. The ESP covers topics such as Bribery & Corruption, Labour Rights, Freedom of Association, Working Conditions, Child Labour, Living Wage, Working Hours, Regular Employment, Inhuman Treatment, Entitlement to Work, Sub-contracting, Environmental Compliance, Conflicts/Sanctions, Personal Data and Product Safety.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our organisation, we provide training to all staff at point of induction and then annually thereafter.

## Breaches

Any employee who breaches this policy could be subject to disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



Transforming people's experiences,  
and people's lives, through technology.

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