

Modern Slavery

Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Automated Building and Energy Controls Ltd (ABEC) has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

This statement is made according to s.54 of the Modern Slavery Act 2015 and sets out the steps that ABEC 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. We do not meet the threshold expectations of reporting but voluntarily undertake to behave in a way which is ethical and in support of the requirements of the act.

ABEC is a leading independent Building and Energy Management System (BEMS) specialist. We are committed to creating smart solutions for the built environment. We integrate infrastructure, business, people, and services, making the world a more intelligent, economical, and greener place. We aim to harness innovation, connectivity, and emerging digital technologies to create more integrated, efficient, and sustainable buildings. We achieve this through the design, installation, commissioning, and maintaining of building management and energy management systems.

We commit to preventing slavery and human trafficking in our activities, and to ensure, as far as we are able, that supply chains are free from slavery and human trafficking. We commit to ensuring there is transparency in our business and in its approach to tackling modern slavery. We expect the same standards from our suppliers and their suppliers in turn. We will, through the way we work and behave show that we will:

- ✓ Take responsibility for the health and safety of employees and those affected by our works
- ✓ Promote equal opportunities for, and treatment of, its employees irrespective of skin colour, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age
- ✓ Respect the personal dignity, privacy and rights of each individual
- ✓ Not use slave labour, illegal child labour or forced labour
- ✓ Refuse to employ or make anyone work against their will
- ✓ Refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment, or discrimination
- ✓ Provide fair remuneration and guarantee the applicable national statutory minimum wage
- ✓ Comply with the working hours laid down in applicable laws

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, volunteers, contractors, external consultants, third-party representatives and business partners. We will challenge behaviour that falls short of expectations, identify issues, and report them without fear of reprisal.

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Our business

ABEC operates across UK, Ireland, Europe and the Middle East, in various business sectors using a mix of directly employed staff and various suppliers and subcontractors. Our labour is generally classed as highly skilled and as such require a level of expertise and experience. This minimises the risk of trafficked and forced labour. We have a limited supply chain in terms of goods and materials which we believe are low risk. We are committed to monitoring and understanding our risks and influencing any risk areas to ensure slavery and trafficking is minimised.

Some of the countries that we operate in have a high-risk profile for forced labour and slavery, however, the goods or services sourced by us (as described above, generally skilled, and specialised labour) are thought to be low risk. We do not employ seasonal or temporary workers.

Steps for the Prevention of Modern Slavery

Our working winning and planning processes include steps to identifying and assess potential legal, ethical, and regulatory matters which could affect our work. Identified risks are documented, managed, and escalated where appropriate. The company issues log is reviewed by the Senior Management Team weekly.

Our processes are intended to:

- Identify and assess potential risk areas in our business and supply chains
- Reduce the risk of unethical or illegal behaviour occurring in our business and supply chains
- Cascade the modern slavery requirements down our supply chain
- Provide adequate protection for whistle-blowers.

Our policies

We operate several policies and processes to ensure that we are conducting business in an ethical and transparent manner. These include:

- This statement. Which is available on our website and communicated to all employees via our internal intranet site.
- 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. We also operate due diligence checks and use authorised agencies only if local labour is required outside of the UK.
- 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 business or supply chain, without fear of reprisals.
- Business Ethics Policy. This code explains the way we behave as an organisation and how we expect our employees and suppliers to act.

Our suppliers

ABEC operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery approach forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

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- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
- (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
- We may terminate the contract at any time should any instances of modern slavery come to light

Communication and Awareness of this Policy

We have made training available for our work winning teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. We have included information about modern slavery, including this statement in materials provided to all employees on induction and by ensuring that the issue is raised with all suppliers and subcontractors before we carry out works with them.

Next Steps

We will publish our modern slavery statement via the government register and on our website. We will provide information to all employees about ways they can recognise modern slavery outside of their employment with ABEC and how they can raise their concerns to the appropriate authorities quickly and safely.

Our performance indicators

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 business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

This policy has immediate effect and replaces all previous versions. It will be reviewed annually and amended as necessary following any meaningful change or review. It will be communicated within ABEC and made available to interested parties.



Signature

Print name Matthew Morrall

Position Chief Executive Officer

Date 14th April 2026

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