



## **Modern Slavery Statement**

For the financial year ending 31 December 2020

This statement is made and published pursuant to section 54 of the UK Modern Slavery Act 2015 and constitutes the modern slavery statement for HID Corporation Limited and its relevant subsidiaries for the financial year ending 31 December 2020.

The following organizations are covered by this statement:

- HID Corporation Limited, a private limited company, registered in England and Wales (Company No. 03568985)
- HID CID Limited, a private limited company, registered in England and Wales (Company No. 12027509)
- Tovey Management Limited, a private limited company, registered in England and Wales (Company No. 09511012)
- AZIO Limited, a private limited company, registered in England and Wales (Company No. 02941460)
- Access Limited, a private limited company, registered in England and Wales (Company No. 01873263)
- Technology Solutions (UK) Limited, a private limited company, registered in England and Wales (Company No. 02777518)
- Technology Solutions (Holdings) Limited, a private limited company, registered in England and Wales (Company No. 08352304)

### **Introduction**

We are committed to ensuring that no form of modern slavery occurs in any part of our business or supply chain. For the purposes of this statement, the term 'modern slavery' encapsulates slavery, servitude, forced or compulsory labor and human trafficking in any form. This statement sets forth the steps we have taken to ensure modern slavery is not taking place in any part of our business or supply chains.

### **Our business structure**

HID Corporation Limited and its subsidiaries ("HID UK") are under the management of HID Global Corporation ("HID Global"), a part of the ASSA ABLOY Group ("ASSA ABLOY").

ASSA ABLOY is a global leader in access solutions. The ASSA ABLOY portfolio includes 190 brands, including HID Global. ASSA ABLOY's operations are decentralized and organizationally divided into five divisions. HID Global is part of the Global Technologies division. Each division is responsible for the management of its own business operations, while various functions at ASSA ABLOY Group center in Stockholm, Sweden are responsible for coordination, monitoring, policies and guidelines at an overall level.

HID Global is a global leader in trusted identity solutions, including physical access control products, identity & access management solutions, ID personalization systems, digital identity applications, and other identity-related technologies. HID Global products are sold through a network of integrators,

distributors, resellers and original equipment manufacturers. The primary markets for HID Global products are enterprise, education, healthcare, retail and government. HID Global is headquartered in Austin, Texas, has over 3,000 employees worldwide and operates international offices that support more than 100 countries.

HID Global primarily engages in the sale of HID Global's trusted identity solutions in Europe, the Middle East and Africa ("EMEA") through the HID UK entities. HID UK also operates a center in Cardiff that performs research and development in the field of electronic access control devices on a contract basis on behalf of its ultimate parent, ASSA ABLOY AB, a Swedish public limited company.

For additional information regarding our business structure or operations, please visit our websites at [www.assaabloy.com](http://www.assaabloy.com) and [www.higlobal.com](http://www.higlobal.com).

### **Our supply chains**

We are committed to providing best in class products and services. We source components and materials used to manufacture our products and other goods and services that support our operations from a mix of global, regional and local suppliers. We expect our suppliers to conduct their business ethically, sustainably and lawfully. Our suppliers must comply with our Business Partner Code of Conduct, which prohibits the use of forced, bonded, indentured, slave, child or illegal labor and requires compliance with labor and wage laws.

### **Our policies**

Our Code of Conduct is our behavior blueprint and provides the framework for our daily operations and how we lead our organization. We expect all our employees and contractors to follow it and we hold ourselves accountable to it. Our code is based on the following rigorous global standards:

- United Nations Universal Declaration of Human Rights
- ILO Tripartite Declaration of Principles concerning Multination Enterprises and Social Policy
- UN Global Compact
- OECD Guidelines for Multinational Enterprises
- ISO 14001

Our code includes policies and principles on business ethics, human rights and labor standards, working conditions, health and safety and the environment. It prohibits any form of forced, bonded, indentured, slave, child or illegal labor and requires compliance with labor and wage laws. Our code is published in multiple languages on the ASSA ABLOY website at <https://www.assaabloy.com/group/en/sustainability/code-of-conduct>.

We require all our business partners, including our suppliers, to operate in accordance with the principles in our Business Partner Code of Conduct, which is published in multiple languages on the ASSA ABLOY website at <https://www.assaabloy.com/group/en/sustainability/code-of-conduct/code-of-conduct-business-partners>.

Our Combating Human Trafficking Policy prohibits trafficking in persons, including the use of force, fraud or coercion to compel a person to provide labor or services, and prohibits various practices and activities that facilitate or support human trafficking.

Our background check and recruitment policies ensure all employees undergo employment eligibility verification and a background check.

We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted. We encourage our people to speak up when they need to raise concerns regarding questionable practices in our business or supply chain. We also inform them that they have an obligation to report what they observe, suspect or believe to be a violation of our code, policies or applicable law. Our Whistleblowing Policy describes how our people can raise concerns or report wrongdoing without fear of retaliation. Any form of retaliation is a violation of our code. The communication channels available to raise concerns and report wrongdoing are communicated on our intranet. All reported concerns are investigated promptly, and we will take steps to address problems that are identified.

### **Our due diligence processes**

In order to prevent any form of modern slavery or human trafficking from occurring in our supply chain, we have a due diligence process in place to screen our business partners and suppliers at the time of onboarding. Direct material suppliers must undergo pre-contract screening and complete a self-assessment survey.

We also have a robust supplier sustainability audit program designed to: (i) monitor and ensure compliance to our business partner code of conduct; (ii) identify and resolve problem areas; (iii) reduce risk in our supply chain; and (iv) provide a platform for supply chain continuous improvement. These audits also help us detect possible issues associated with modern slavery and human trafficking in our supply chain. These supplier audits are conducted throughout the term of our relationship. The audit frequency is determined by the supplier's risk score.

Additional information regarding our supplier sustainability audit program is available on ASSA ABLOY's website at <https://www.assaabloy.com/group/en/sustainability/supply-chain> and in ASSA ABLOY's Sustainability Report available at <https://www.assaabloy.com/group/en/sustainability/sustainability-reports>.

We also follow a detailed due diligence process comprised of outside legal counsel and internal staff from all areas of our business to thoroughly review all acquisition target companies, including their policies, practices and supply chains, to ensure, amongst other things, that no forms of modern slavery or human trafficking are occurring in their business or supply chain prior to acquisition. During the acquisition integration phase, we provide training to our newly acquired employees and ensure these acquired organizations are comply with our code of conduct and applicable policies and procedures, including our policies regarding whistleblowing and combating human trafficking. We also include their suppliers in our supplier sustainability audit program.

### **Assessing and managing risk**

We regularly identify, assess and monitor areas in our business and supply chains where there may be a risk of modern slavery and human trafficking taking place. We also take steps to mitigate and manage identified risks.

Our primary risk for exposure to modern slavery and human trafficking risks is in our supply chain. We utilize our supplier due diligence process and supplier sustainability audit process to mitigate these risks by evaluating our suppliers regularly, communicating and reinforcing our expectations, verifying their compliance with applicable laws and our Business Partner Code of Conduct and establishing a platform for corrective action or improvements.

Suppliers may also be subject to on-site audits, which could be announced or unannounced and which may be performed by our staff or a third party auditor. Corrective actions plans are required for issues identified.

We have clauses in our business partner and supplier contracts that enable us to terminate our contract with them at any time if they violate the law, our code or policies, including engaging in any form of modern slavery or human trafficking.

### **Measuring effectiveness**

We use various key performance indicators ("KPIs") to measure how effective we have been in ensuring that modern slavery and human trafficking is not taking place in any part of our business or supply chains. These include, without limitation:

- The percentage of direct material suppliers targeted for an audit and the number of audits completed during a specified period. For 2020, 50% were targeted and 69% were completed.
- The number, frequency, location and subject matter of whistleblowing reports regarding modern slavery or human trafficking concerns. For 2020, no reports regarding modern slavery or human trafficking concerns were received.
- Training KPIs regarding the assignment and completion of required employee and contractor training. For 2020, 98% of modern slavery and human trafficking training and 97% of code of conduct training was completed by applicable employees that were assigned training.

We continuously work to improve our supplier and sourcing policies and processes to ensure we are following best practices and following all applicable regulatory guidance.

### **Training**

We provide annual training to all employees and contractors on our code of conduct, which includes segments on business ethics, human rights and labor standards, working conditions, health and safety and the environment.

We also require all new and acquired employees to complete a training course on modern slavery and human trafficking within the first 3 months of joining our company and every 3 years thereafter. This course gives our employees an overview of modern slavery and human trafficking regulations and risks, while helping them to identify and report possible modern slavery and human trafficking issues within our business and supply chains.

### **Approval**

This statement was approved by the board of directors of HID Corporation Limited, on 20 September 2021, as the parent entity of the organizations covered by this statement, as listed above.

  
Björn Lidfeldt  
Director  
For and on behalf of HID Corporation Limited

Date: 23 September 2021