

Modern Slavery Act Statement

Introduction

Crowcon Detection Instruments Ltd follows the Halma policies which support the provisions set out in the Modern Slavery Act ("the Act") and, through our own Human Rights and Labour Conditions Policy, endorses the core requirements of the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work, including the conventions relating to forced labour, child labour, non-discrimination, freedom of association and right to collective bargaining. We do not tolerate practices which contravene these international standards. Regulatory demands upon us vary considerably around the world, so Halma establishes the core structure to ensure that Group companies fully comply with legislative and regulatory requirements while permitting them to tailor their approach to their particular needs.

The Act requires organisations to publish a slavery and human trafficking statement on an annual basis where they have a turnover of over £36 million, carry on business in the UK and are supplying goods or services. This statement sets out the steps we have taken to ensure that slavery and human trafficking is not taking place in our supply chains.

Crowcon's business and structure

Our products provide innovative solutions centered on improving the safety of process within industrial, environmental and commercial organisations. Crowcon employs over 240 people in businesses based in Europe, North America, India, China, Singapore & the Middle East. Our products & services have a core focus on gas detection enabling our customers to provide a safe environment for their employees and assets.

Crowcon's approach to the Act

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 do not believe that we operate in any high-risk industries and, based on the Global Slavery Index 2016, we do not have business operations in the highest risk countries. We adopt the worldwide <u>Code of Conduct</u> of our parent company Halma Plc which sets out the ethical standards that should govern the activities of Halma and its subsidiaries, and the activities of our employees and business partners. Our policies and procedures are being updated to specifically reference modem slavery and human trafficking.

Slavery and forced labour can take many forms, including human trafficking or child labour. Crowcon Detection Instruments Ltd will not tolerate forced labour (including human trafficking) or child labour in our operations and we will conduct internal audits of our manufacturing locations to ensure compliance. Our processes include actions to safeguard against human rights abuses (including forced labour and human trafficking) in our supply chain, including:

Our Terms and Conditions forbid the use of forced labour, child labour and physically abusive disciplinary practices: - Crowcon's purchase orders will require suppliers to certify compliance with our prohibition of forced labour, child labour and physical disciplinary abuse as part of our Terms and Conditions that govern the purchase by Crowcon Detection Instruments Ltd of goods and services from suppliers. We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies are discovered and/or noncompliance is not addressed in a timely manner.

We assess risk related to human trafficking and forced labour associated with our supply base. Our preliminary assessment is based upon geography, the commodity purchased, supplier quality performance and the nature of the business transaction. Crowcon Detection Instruments Ltd performs this risk assessment with input from external stakeholders. This can be in the form of a pre-audit questionnaire for a new supplier and as part of the regular management systems audits for existing suppliers.

The company has a clear whistle blowing policy which allows employees in any of our businesses to raise concerns confidentially, anonymously (where permitted by law) and independent of their company.

Crowcon regularly undertake audits of their major suppliers. Prior to engaging with major suppliers, due diligence and vetting procedures are in place to ensure that suppliers will meet our required standards.

As Managing Director of Crowcon, I will continue to ensure that complying to the MSA is regarded as a critical element to how we do business & choose partners.

This statement was approved by the Board of Crowcon Detection Instruments Ltd and signed on its behalf by:

James Gravestock

Managing Director

20th February 2019

