

# MODERN SLAVERY STATEMENT

Document Reference: CB/PC/LGL/012

Next Review: January 2023

This is a statement setting out the steps **Chubb Systems Limited** and its subsidiaries (“CHUBB”) has taken during the financial year ending 31 DECEMBER 2021 (the “Reporting Period”) to ensure slavery and human trafficking is not taking place in any part of its own business or supply chain.

CHUBB supplies, designs, installs, services & monitors Fire & Security systems.

CHUBB is part of API Group Corporation (“API”).

CHUBB is committed to ensuring slavery and human trafficking are not taking place in our business or supply chains and, to this end, took or continued to take the following actions during the Reporting Period.

## **API’s Code of Ethics**

APIs *Code of Ethics* (the “Code”) is the foundation of our culture. The *Code* sets forth values and commitments that guide ethical decision making everywhere we do business. The *Code* applies to API and its controlled entities, worldwide. Among other things, the *Code* is adopted to encourage:

*(i) honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships; (ii) fair dealing; (iii) the protection and proper use of Company assets; (iv) compliance with applicable governmental laws, rules and regulations; and (v) the reporting of any illegal or unethical behaviour.*

Each year, CHUBB requires its employees to certify they have read and will comply with the *Code*. Compliance with the requirements of the *Code* is expected behaviour for all Chubb employees. Violations of these requirements will result in appropriate corrective action.

## **CHUBB Anonymous Reporting Program**

Employees who observe or suspect a violation of the *Code* may ask a question or raise concerns in complete confidence through Chubb/API’s Anonymous Reporting Program.

## **Internal Training**

CHUBB made and continues to make training available to company management and employees on recognising and mitigating the risk of human trafficking and slavery in supply chains. Employees with direct responsibility for supply chain management are assigned this training during their induction.

## **Supply Chain Expectations**

To produce superior products in a responsible manner, we need suppliers who meet high standards for business practices, environmental responsibility and operational excellence. Accordingly, our suppliers are subjected to robust selection processes and criteria including verification against government denied party lists.

CHUBB’s standard contract terms and conditions of purchase require suppliers to comply with all applicable laws and regulations.

Further, CHUBB’s standard contract terms require suppliers to have management systems, tools and processes in place that (a) ensure compliance with applicable laws, regulations, (b) promote an awareness of and commitment to ethical business practices; (c) facilitate the timely discovery, investigation, disclosure and implementation of corrective actions for violations; and (d) provide training to employees on compliance requirements.

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In the event a supplier commits any material violation of law relating to basic working conditions and human rights in their performance of work of their subcontracts with CHUBB, CHUBB has the right to terminate those subcontracts for default.

This statement has been approved by our Board of Directors on 10 March 2022.

A handwritten signature in black ink, appearing to read "BMcNulty".

Brendan McNulty  
Director  
**Chubb Systems Limited**  
**10 March 2022**