



Modern Slavery Statement 2021

Air Sentry Limited is a business with has had a clear social commitment since it's founding as a research partnership 21 years ago. This commitment has shaped us ever since and that is why we're doing everything we can to make sure modern slavery has no part in the way we conduct business.

Being responsible continues to be embedded through our values and behaviours, our leadership, management and operations. We have an ongoing commitment to fully support the principles of the Modern Slavery Act, and we find any violation of human rights unacceptable. We are also committed to promoting inclusive and rewarding experiences of employment for everyone.

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Air Sentry since the introduction of the Modern Slavery Act, and during the financial year ending 16th September 2020, to prevent modern slavery from occurring in our business operations and supply chains.

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About Air Sentry

Air Sentry, a UK-based innovator and manufacturer of systems to protect life from air related disease and issues. Air Sentry has a consistent track record of delivering operational transformation to the the health sector, principally the NHS. Air Sentry delivers outstanding customer services and supports its clients both through operational service delivery and in launching new products and propositions. Our aim is to utilise our skills in operational excellence and our in-depth knowledge of air related issues and systems has helped us deliver safer working areas for our clients in a competitive market place.

Assessment of Effectiveness in Preventing Modern Slavery

We are aware of the complex nature of modern slavery and acknowledge that it remains difficult to find and effectively remedy without addressing root causes. Air Sentry is therefore committed to protecting and promoting the fundamental right of freedom of association within our business operations and supply chains. We recognise the role that freedom of association plays in protecting vulnerable people against modern slavery and other human rights abuses.

Air Sentry has robust on-boarding (background checking) procedures for all our employees. We are confident that the provision of bonded, forced or human trafficked labour would therefore be found as part of these processes. To-date Air Sentry has had no concerns, suspected or otherwise, to call into question the validity and/or success of such checks. It continues to be the case that no incidents of potential bonded, forced or human trafficked labour have been brought to light in our organisation.

Our risk profile of eradicating modern slavery continues, therefore, to be focused predominantly on our Supply Chain.

There have been no breaches or suspected breaches of this policy in either our business operations or supply chain reported in 2020.

Our Suppliers

Air Sentry has a supplier population of circa 121. We manage suppliers across the business within several functions: design, fabrication, software, filtration, electronic components and shipping. Whilst Air Sentry manages these suppliers separately, we use a Board approved Supplier Management Policy, including an oversight framework to ensure that regulatory requirements, for example the Modern Slavery Act, are managed holistically within the Supplier Management Team.

All Air Sentry suppliers are categorised using a tiered framework. This classification model forms the basis for the way in which suppliers are governed and overseen. Air Sentry ensures that identified high risk suppliers adhere to the Modern Slavery Act by requesting a copy of their Modern Slavery Statements and periodic checks are undertaken for validity, confirmation and establishment purposes.

Our 4 tier Supplier Management oversight framework is as follows:

Category

Definition

Tier 1

A supplier that is fundamental to the continuation of Air Sentry's business operations and/or...

An extensive set of terms and conditions, in addition to a structured governance framework which enables proactive regular oversight and has access to personal or policy data as part of the Service provision and/or...

A failure of the supplier would pose a significant risk to Air Sentry's operations.

Tier 2

A supplier that provides goods or services but if the relationship failed without warning Air Sentry will continue to operate effectively and/or...

It has a skeletal governance framework to enable oversight when required and/or...

A failure of the supplier would pose a limited risk to Air Sentry's operations.

Tier 3

A compulsory supplier to Air Sentry, which it requires to operate its business effectively, and, although key, it has a reactive risk framework due to the nature of the obligatory relationship and/or...

It has a skeletal governance framework to enable oversight when required and/or...

A failure of the supplier would pose a limited risk to Air Sentry's operations and/or...

Has direct or indirect access to Customer or Client data.

Tier 4

All other third party expenditure.

Policies and Contractual Controls For our Employees

We are governed by our Code of Conduct ('the Code') which represents the values and core principles that guide the conduct of every aspect of our business. The Code makes it clear that as an organisation, we quote: "respect the human rights and dignity of all our stakeholders. We do not employ children at any of our workplaces and do not use forced labour in any form. We do not confiscate personal documents of our employees, or force them to make any payment to us or anyone else in order to secure employment with us, or to work with us".

Our employment policies comply, as a minimum but for the majority, are significantly enhanced, with all statutory employment rights which apply in the United Kingdom. They reflect our commitment for example to pay employees fairly and properly for their work and we continue to align our minimum pay rates to the Real Living Wage, set by the Living Wage Foundation, rather than the set National Minimum Pay rates.

The principle policies that we have in place, including our robust on-boarding background checking procedures severely limit the risk of slavery and human trafficking in the workplace from coming about and encourage all employees to work and act ethically and with integrity at all times. The following key policies (this list is by no means defined as being exclusive) which assist us in achieving this are:

I The Air Sentry Code of Conduct Statement;

I Whistleblowing Policy and Confidential Disclosure; I Modern Slavery Act Statement;

I Contracts of Employment;

I Health & Safety Policies; and

I Working Time Policy.

During 2020 and continuing into 2021, we understand that some employees may be more vulnerable to Modern Slavery during the coronavirus pandemic. To address this important potential risk, we adopted the UK Government's social distancing guidelines by developing an infrastructure whereby those employees not deemed as key/essential workers are, wherever practically possible, able to work from home and also created a Covid-19 IT security secure borderless workplace in order to, amongst other things, prevent the opportunity for Modern Slavery exploitation malpractice to co-exist.

As a responsible employer and regardless of any worker's role, status or contractual entitlement to receive enhanced company sick pay, if an employee was incapacitated to perform their duties, throughout the pandemic we continued to pay enhanced (full) company sick pay to those who were

either found to have contracted the virus or had developed symptoms which required them to self-isolate. We took this approach to do our bit to help all employees balance their financial responsibilities and to prevent the spread of Coronavirus by not making anyone feel the need to attend the workplace with the fear of a reduction in pay when faced with a contracted or symptomatic case of Covid-19.

For our Suppliers

We only seek to work with suppliers and service providers who can demonstrate that they share similar values to our own, and we expect them to adopt ethical standards comparable with our own at all times.

We will not knowingly engage with a supplier involved in any form, suspected or otherwise, of modern slavery or human trafficking.

Since the Act came into force we have:

I Carried out a full risk-based review of all of our suppliers to identify those that may be impacted by any form of modern slavery or human trafficking in our direct supply chain, which is reviewed annually;

I Embedded modern slavery into the ongoing due diligence framework within Air Sentry to ensure Modern Slavery Statements are in place, where applicable with the requirements of the Act;

I Engaged with Air Sentry low risk contracted suppliers to establish if a Modern Slavery Statement is in existence and, where not, ask that in order to maintain their supply to our organisation our Modern Slavery Statement is adopted;

I All new contracted suppliers are asked to provide a copy of their Modern Slavery Statement (if applicable) or indicate that they are aware of the requirements of the Act.

I Carried out a full appraisal of our entire supplier base to ensure that modern slavery and human trafficking does not take place. This requirement is fully embedded in our processes and is evidenced by appropriate due diligence checks throughout the lifecycle of each contract, depending on the classification tier of the supplier.

We have a zero tolerance approach to modern slavery or human trafficking in any form. If a supplier is seen to breach this policy, or is found to have any form of slavery or human trafficking in their business, or knowingly in their supply chain, we hold the right to terminate the product or services with immediate effect.

Where such information becomes known, we will not hesitate to blow the whistle on such illicit acts to the relevant authorities and will support any forthcoming prosecution this may entail.

No breaches of the Modern Slavery Act by Air Sentry suppliers were reported during 2020.

Modern Slavery Training

Since the introduction of the Modern Slavery Act, we have completed the following activities:

I Used it as an opportunity to embed greater understanding of human rights within our supply chains;

I Published our Modern Slavery Statement on our intranet for all employees, agency and third party workers to be able to view;

I Updated our Business Ethics training and test materials to include reference to modern slavery as well as ensuring employees understand how to report any concerns. All employees are required to complete this training on an annual basis;

I Added a new section in the 2019 Statement to provide details of the mechanisms which can be used to report any concerns regarding modern slavery.

Further Developments

1. Increase Public Awareness

In addition to the actions detailed above to further prevent modern slavery in our business, we have also:

I Improved our public awareness and, in accordance with Home Office guidance, published our Modern Slavery Statement 2019 on the Modern Slavery Registry and TISCreport.org websites.

I Registered on the Home Office's Modern Slavery Database.

2. Legislation & Guidance

We make a commitment to monitor the outcome of the independent Review of the Modern Slavery Act 2015, which was due to be presented to the Home Secretary by the end of March 2019, and assess any impact on our existing policy, practices and procedures.

The Review was published in May 2019 and made 80 recommendations on how to strengthen elements of the existing legislation and its implementation. The government subsequently published its response and whilst accepting many of the recommendations, it also stated that further consultation was required on how to deliver some of them. To inform this work, the government subsequently published a public consultation on transparency in supply chains. This consultation was completed in 2020 and the government has since confirmed that it will be making significant changes to the transparency supply provisions in the Modern Slavery Act 2015. There is no timeframe for these reforms as yet with the government stating only that it will introduce the necessary changes to the Act "when parliamentary time allows".

We await the outcome of any changes to the Act and fully commit to address and implement all requirements therein.

Reporting Mechanisms

Employees, agency workers, third party workers and suppliers with any concerns regarding modern slavery can report them through the following mechanisms:

Reporting service: Telephone: 01666 818087 24 hour

On-line incident report: antislavery@airsentry.co.uk

Further Steps Planned During 2021

We will continue to review and improve our approach in order to fulfil our commitment that modern slavery is not taking place in our supply chains or in our business. As part of this approach we will: Modern Slavery Act adherence will continue to be a fundamental part of the Air Sentry supplier engagement and continual assessment process.

Await confirmation of any amendments made to the Modern Slavery Act 2015 and updated government guidance. Necessary action will be taken, where required, to ensure we continue to comply with any changes to legislative requirements.

Review and, if necessary, update our mandatory training and test materials to ensure the information and guidance provided to our employees is up to date and informs them of any key legislative changes they need to be aware of.

Approval of this Statement

As a fast growing and changing organisation, we continue to be particularly aware of emerging risks and be alert to the dynamic nature of both modern slavery and the impacts leading from our own operations. We continue to reflect on, develop and extend our approach to modern slavery across all of our supply chains and in the depth of all procurement and supplier management work.

Air Sentry's Modern Slavery Statement 2021 is approved for and on behalf of the Board of Directors on 31st March 2021.

Signed

Andrew Carnegie
Managing Director