

# Chubb Fire & Security Modern Slavery and Human Trafficking Policy Statement

7<sup>th</sup> March 2017

In light of our responsibilities under the Modern Slavery Act 2015, and more generally our obligations under employment and human rights legislation, Chubb continues to undertake a review of our internal compliance and ethics policies and procedures. The goal of the review is to confirm what measures already exist and highlight additional measures that may be required in order to prevent any form of slavery or human trafficking occurring in any part of our organisation or supply chain partners.

The directors and management team of Chubb will strive to ensure that slavery and human trafficking does not exist within our workforce or in any part of our supply chain. We are committed to acting ethically and with integrity in all our business relationships.

## **Organisation's Structure**

Chubb supplies, designs, installs, services & monitors Fire & Security systems. We are a part of the UTC Climate Controls and Security Group of companies.

## **Our Supply Chains**

Chubb retains relationships with numerous organisations in our supply chain. The scope of our operations creates responsibilities for us and those with whom we work. To supply superior products in a responsible manner, we need suppliers who meet high standards for business practices, environmental responsibility and operational excellence. Accordingly, we require our suppliers to meet our expectations for ethics and compliance as set forth in the UTC Supplier Code of Conduct (the "Supplier Code").

The Supplier Code sets forth our expectations for each of our product and service suppliers, and aligns with the expectations we maintain for our own directors, officers, employees and representatives. Chubb understands and expects that our product and service suppliers will have their own internal codes of ethics and conduct that, at a minimum, incorporate the requirements from the Supplier Code. The Supplier Code confirms suppliers must ensure that child labour is not used in the performance of their work, whether or not related to Chubb business.

The code requires suppliers to comply with laws and regulations prohibiting human trafficking. This includes not engaging in the use of forced labour, bonded labour, indentured labour, involuntary prison labour, slavery or trafficking in persons. To assist our suppliers in achieving this we are in the process of providing additional support material and online ethics training to our key / strategic suppliers specifically around this subject. Each new supplier will be required to commit to these principles. All suppliers to Chubb will have the code of conduct re-issued to them during 2016/17 and will be required to provide an acceptance statement to this code.

## **Anonymous Reporting and Reporting Misconduct**

Suppliers are required to provide their employees and business partners with access to adequate reporting channels to raise legal or ethical issues or concerns, including, without limitation, reports of a violation of the Supplier Code by the supplier or their business partners, without fear of retaliation, including opportunities for anonymous reporting. In addition, in the event that a supplier become aware of misconduct related to Chubb business undertaken by any Chubb employee, any of the supplier's employees, or any employees of their business partners, Chubb expects to be promptly

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notified by contacting UTC's Global Ethics & Compliance Office at [bpo@corphq.utc.com](mailto:bpo@corphq.utc.com), or, if preferred to contact Chubb anonymously, by using our Ombudsman program (details regarding the Ombudsman programme can be accessed [here](#)). Chubb also provides its own employees with similar mechanisms to report issues of concern or non-compliance anonymously.

## Code Compliance

Suppliers are required to permit Chubb and/or its representatives to assess their compliance with the expectations set forth in the Supplier Code in performing work for Chubb, including on-site inspection of facilities and review of associated books, records and other documentation. Suppliers must also provide Chubb upon request with additional information and certifications evidencing compliance.

Suppliers must ensure that Chubb has the right to assess their business partners' compliance with the expectations set forth in the Supplier Code in performing work for Chubb, including on-site inspection of facilities and review of associated books, records and other documentation. They must ensure that their business partners will provide Chubb upon request with additional information and certifications evidencing compliance

## Internal Recruitment

We have robust internal recruitment procedures in place for the vetting of new employees which ensure that our own workforce comply. Our core values towards our employees are enshrined in the way we do business and are set out in Code of Ethics. We will treat employees fairly and use employment practices based on equal opportunity for all employees. We will respect the interests of employees in privacy and treat employees with dignity and respect. We are committed to providing safe and healthy working conditions and an atmosphere of open communication for all our employees.

## Further Steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Conduct risk assessments to determine which parts of our supply chain are at risk of modern slavery and undertake audits where necessary
- Introduce standard contractual provisions with our supply chain partners requiring them to certify their compliance with the Modern Slavery Act

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2017.

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

Craig Forbes, Finance Director  
**Chubb Fire & Security**