

MODERN SLAVERY STATEMENT



SAS Holdings Limited is absolutely committed to preventing slavery and human trafficking in its corporate activities. The Company's operations ensure full accordance with the Modern Slavery Act 2015, UK general employment law and human rights.

This policy sets out SAS Holdings actions to understanding and mitigating all potential modern slavery risks related to its business and supply chain.

Organisational Structure & Supply Chains

SAS Holdings Limited directly employs large numbers of people and maintains relationships with many different organisations in its supply chain.

This policy covers all of the activities of SAS Holdings. It governs all business dealings and includes the conduct of employees, agents and contracted organisations acting on its behalf. Any entity that has or seeks to have a business relationship with SAS must be familiar with this anti-slavery policy. SAS will only engage with individuals and organisations who act in full accord with the policy at all times.

The Company currently operates in the following countries: United Kingdom, Republic of Ireland, France, Spain, United Arab Emirates, USA, Saudi Arabia, Oman, Hong Kong, Australia.

Responsibility

To mitigate risks, the HR team engages all relevant departments and regions when new working relationships are discussed. This ensures the required risk analysis, investigations and due diligence are carried out in relation to human trafficking and slavery.

To fully comply with this policy, all relevant employees are regularly trained on the issues concerning modern slavery.

Relevant Policies & Practices

SAS Holdings operates several policies and practices pertaining to modern slavery risks. These policies detail the steps to be taken to prevent slavery and human trafficking in its operations. (Details can be found by all employees via the HR section on the shared network drive).

Entity	Country of Incorporation/ Registered Office	Proportion of voting rights and share capital held	Principal Activity
SAS International Limited	England and Wales 31 Suttons Business Park Reading Berkshire RG6 1AZ	100% ordinary	Design, manufacture and installation of suspended ceilings, partitioning and other building products. Providing project management services on construction projects.
SAS Building Factors Ireland Limited	Republic of Ireland Century House Harold's Cross Road Dublin 6 W	90% ordinary	Providing project management services on construction projects in Ireland.
SAS International Australia Pty Limited *	Australia Level 2 93 Bathurst Street Sydney NSW 2000	100% ordinary	Distribution of suspended ceilings, partitioning and other building products.
SAS International Hong Kong Limited *	Hong Kong Room 601 Yue Xiu Building 160-174 Lockhart Road Wanchai	100% ordinary	Distribution of suspended ceilings, partitioning and other building products.
SAS International INC.*	USA	100% ordinary	Dormant

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Anti-slavery Policy

This policy sets out the organisation's stance on modern slavery. Included is an explanation of how employees can identify any risks and where to seek further advice.

Whistleblowing Policy

SAS encourages all parties to report any concerns related to the activities of the organisation and its supply chain. This includes modern slavery and human trafficking concerns.

The Company's whistleblowing procedure is clear, easy to understand and avoids any risk of retaliation. The policy can be found via the HR section on the shared network drive. The nature of the complaint will determine the Company's next course of action.

Recruitment Policy

SAS operates a robust recruitment policy, recruiting direct or via reputable agencies offering robust candidate screening. All personnel responsible for recruitment are required to verify potential employees' right to work prior to any offer of employment.


Subsidiaries and connected organisations within the supply chain are expected to comply with this recruitment practice; all terms of employment are voluntary. SAS may insist on a demonstration of compliance with this policy.

Awareness & Performance Indicators

All staff will be trained in accordance with the policy. This can be found at all times via the HR section on the shared network drive. To raise awareness, SAS will email its Anti-Slavery Policy to all staff at regular intervals. Full understanding of and compliance with the policy is mandatory for all staff.

Approval for this statement

This statement was approved by the Board of Directors on:

Signed: 

Date: 21ST MARCH 2019.