

## **Modern Slavery Act Statement**

### **Slavery and Human Trafficking Transparency Statement for Financial Year 1st January 2018 to 31st December 2018.**

This Statement is made pursuant to Section 54 (Part 6) of the Modern Slavery Act 2015 ('Act') and sets out the steps that Abaco UK Holdco Limited, including its subsidiaries Abaco Systems Limited and Foundation Technology Limited and branch offices ('Abaco') has taken during the previous financial year to ensure that slavery and human trafficking is not operating within either its own business or its supply chains.

This Statement has been approved by the Board of Directors and signed by Andy MacCaig, Managing Director.

#### **Company Overview**

Abaco is a UK based designer and supplier of ruggedized computing and networking products, systems and services that is wholly owned by Abaco Systems, Inc., a US based corporation. Abaco has several subsidiaries and branch offices that are controlled by Abaco and comply with Abaco principles, policies and procedures.

Abaco has a centralised sourcing function based in Towcester, UK and works in alliance with an independent network of suppliers and distributors throughout the world. Whilst these distributors are neither owned nor controlled by Abaco, it nevertheless remains an important requirement that they operate to the same anti-slavery and anti- human trafficking principles applied by Abaco in relation to its own business and to that of its supply chain.

#### **Abaco's Philosophies and Principles**

Abaco's Code of Conduct and Business Ethics Policy provides a set of rules based on both national and international standards to ensure Abaco's employees, suppliers, agents and associates are upholding the highest level of ethical conduct in their day-to-day business.

Abaco strives to ensure that it does not contribute towards adverse human rights impacts through its supply chains. There is an ongoing commitment to engage only those suppliers that uphold the same principles as Abaco and where necessary ensure the implementation of corrective action measures. In the event that suppliers fail to take steps to cease or prevent adverse human rights impacts, Abaco will reconsider its business relationships with those suppliers. Abaco will never knowingly do business with suppliers who break the law. All Abaco suppliers are required to sign up to Abaco's Code of Conduct and Business Ethics Policy when doing business with or on behalf of Abaco.

**Abaco's activities during Financial Year 1st January 2018 to 31st December 2018 relating to the prevention of slavery and human trafficking.**

**Supply Chain Management**

Abaco source a wide range of goods and services from suppliers based in the United Kingdom and overseas. In all of its dealings with those suppliers it strives to ensure that the highest ethical standards are reached at all times. As part of this ongoing requirement, there has been increased focus on the requirement for a long-term commitment by those suppliers to eradicate slavery and human trafficking in their own businesses and supply chains. All Abaco suppliers are required to sign up to Abaco's Code of Conduct and Business Ethics Policy when doing business with or on behalf of Abaco.

**Amendment of internal policies**

A review of Abaco's Code of Conduct and Business Ethics Policy was conducted to ensure its relevance and compliance with the Act. A copy of the Code of Conduct and Business Ethics Policy can be found on the Abaco website, [www.abaco.com](http://www.abaco.com), or upon request by writing to Abaco at the address provided at the start of this statement.

**Abaco's continued commitment**

Abaco recognises the importance of maintaining constant vigilance to identify and address any impacts associated with slavery and human trafficking throughout its supply chains. In recognition of the salience of these issues, Abaco is committed to continuing to enhance its capacity to identify, prevent and mitigate any actual or potential issues in this area.

Continued internal monitoring of its supply chains remains a priority for Abaco. Those suppliers which have been identified as high risk due to their territorial location and reach are more heavily monitored to ensure that their working practices (and those of their supply chain) are compliant.

Abaco employees who work in those areas of the business more exposed to supply chain risk are appropriately trained to ensure that such risks are contained. Annual training is also provided to all staff to help them understand and comply with Abaco's Code of Conduct and Business Ethics Policy. Abaco also has a confidential and anonymous employee concern reporting system in place that allows employees to report any concerns they have regarding conduct and legal compliance.

**Approval by Abaco's Board of Directors**

I, Andy MacCaig, hereby certify that the information contained in the above FY2018 Slavery and Human Trafficking Transparency Statement is factual and has been approved by Abaco's Board of Directors.

**Signed:**

A handwritten signature in blue ink, appearing to read "Andy MacCaig", written over a horizontal line.

**Name: Andy MacCaig**

**Position: Managing Director**

**Date: 9th April 2019**