



## UK Modern Slavery Act Statement for the financial year ended 31 March 2023

### Group Structure

Acal BFi Holdings Limited (**ABHL**) is the parent company of a group of businesses that operate in the electronics and photonic products industry. Its registered office is in Wokingham, UK. The group includes the following businesses: Acal BFi Holdings Limited, Acal BFi UK Limited, Acal BFi Central Procurement UK Limited, Acal BFi Netherlands BV, Acal BFi Holdings GmbH, Acal BFi Germany GmbH, Acal BFi Italy Srl, Acal BFi France SAS, Acal BFi Belgium NV/SA and Acal BFi Nordic AB (together the **Acal BFi Group**). The Group has c. 360 employees (based in the UK and Europe).

It continues to be a priority of the Acal BFi Group to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our business and supply chain. We are committed to improving our practices to combat slavery and human trafficking in our business operations and supply chains. We do not tolerate modern slavery or human trafficking in any part of our business, and we expect the same high standards from our third-party suppliers and contractors.

### About Acal BFi

The Acal BFi Group provides electronic and photonic products and customised solutions for technically demanding applications in industrial, renewable, communications, medical and aerospace markets. The business works with third party manufacturers and suppliers and has operating facilities in the following jurisdictions: Belgium, Finland, France, Germany, Italy, the Netherlands, Denmark, Norway, Spain, Sweden and UK. It also has central operational facilities in Germany and the UK, the primary UK central entity being Acal BFi Central Procurement UK Limited.

In the last year, we have developed further, and refined, our risk management and environmental, social and governance ("ESG") programmes. We will continue to develop and refine these over the coming years to deliver on our commitment by implementing the steps described below.

### Supply Chains

The Group's supply chains are diverse, both geographically (Europe, North America and Asia), and in the nature of the suppliers we work with (size and products supplied).

Typically, the Acal BFi Group has long and well established working relationships with our suppliers, from whom we source electronic and photonic products.

We continue to work on the identification of any potential modern slavery risks in our supply chains and how we might improve our policies and support direct industry action to cause remediation if ever needed. We welcome customer or other stakeholder dialogue toward ensuring the high standards to which we strive.

We are aware that some of the geographical areas in which the company operates present higher modern slavery risks than others. We seek to mitigate this risk by carrying out due diligence as well as putting in place appropriate procedures and processes.

We are committed to ensuring that there is transparency in our own business and to addressing modern slavery issues should they ever arise. We expect the same high standards in our supply chains.

The Acal BFi Group promotes ESG policies and procedures which take into account the interests of the Group's employees, the need to foster responsible business relationships with suppliers, customers and others, the impact of operations on workers, the community and the environment, and the maintenance of high

standards of business conduct. These ESG policies are part of the Acal BFi Group framework for ensuring that our businesses operate transparently and with integrity and enable mitigation of risk, including potential modern slavery risks.

Our policies and procedures include the following:

- Anti-Bribery and Corruption Programme
- Business ethics
- Whistleblowing
- Health and Safety

## **RISK ASSESSMENT PROCESSES**

We have a zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have a risk management and due diligence process in place to support the identification, assessment and management of risks associated with both existing and new suppliers.

The Acal BFi Group maintains a risk register, which includes an evaluation of the risks associated with supply chains and labour practices, such as modern slavery risks. As with all policies and procedures, due diligence processes on existing and new suppliers are regularly reviewed to ensure they remain appropriate and fit-for-purpose.

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we expect our employees to fully observe the Acal BFi Group policies and procedures, including those on modern slavery, anti-bribery and corruption, whistleblowing, health and safety and business ethics.

## **OUR EFFECTIVENESS IN ELIMINATING MODERN SLAVERY**

We will continue to review our internal processes to ensure that our own operations are free from modern slavery, so far as possible, and that we have robust systems in place to identify and manage such issues within our supply chains and businesses.

This statement has been published in accordance with section 54 (1) of the UK Modern Slavery Act 2015 and constitutes the Acal BFi Group's slavery and human trafficking statement for the financial year ended 31 March 2023. It was approved by the board on 27 September 2023.

Signed:



Paul Webster

Group Chief Executive Officer.

Date: 30<sup>th</sup> October 2023