



# Chubb

## **Modern Slavery and Human Trafficking Statement 2020**

Chubb Fire & Security Pty Ltd  
ABN 47 000 067 541

We are diverse and united by a common purpose and shared values.

We create and develop new and better ways to keep people safe, comfortable, and on the move.



For more than 200 years, Chubb's mission has been to make the world a safer place by protecting our customers with essential systems, equipment and services.

We cultivate strength through Inclusion, deliver with Performance, grow through Innovation, treat others with Respect, and act with Integrity in everything we do.

**Chubb**

This Modern Slavery and Human Trafficking Statement is made pursuant to the Modern Slavery Act 2018 (Cth) by Chubb Fire & Security Pty Ltd (ABN 47 000 067 541) ("Chubb"), in respect of Chubb and its related bodies corporate, to address modern slavery and human trafficking risks in our business and supply chain, and relates to the financial year ending 30 November 2019 ("the reporting period").

## About us

The Chubb group of companies ("Chubb Group") has been protecting people and assets worldwide for over 200 years. As a global fire safety and security solutions provider, the Chubb Group works to make the world a safer place by providing end-to-end service to ensure customers' peace of mind. Through our portfolio of world-class brands, Chubb offers high quality service, and innovative, technology-enabled solutions for business and home – from design and installation to service and monitoring.

The Chubb group of companies is part of Carrier Global Corporation (NYSE: CARR), a leading global provider of innovative HVAC, refrigeration, fire, security and building automation technologies that enable modern life, deliver efficiency, safety, security, comfort, productivity and sustainability across a wide range of residential, commercial and industrial applications.

## Ethics and Business Conduct

Chubb is committed to maintaining the highest standards of corporate responsibility, ethics and business conduct. As stated in our Code of Ethics, Chubb employees must comply with the law, honour their commitments, act in good faith, uphold Chubb's values – Respect, Integrity, Inclusion, Excellence and Innovation – seek to advance the interests of stakeholders, communicate openly and effectively, and hold themselves accountable.

Chubb's suppliers are critical to our success, and in order for Chubb to provide products and services that exceed our customers' expectations in a responsible manner, our suppliers are also required to meet our expectations for ethics and compliance.

Chubb is committed to strong corporate governance practices that are designed to maintain high standards of oversight, accountability, integrity and ethics, while promoting long-term growth in shareowner value. These standards are reflected in our Code of Ethics, Governance Guidelines, risk management processes, and in our commitment to transparent financial reporting and strong internal controls. Additionally, our governance structure enables experienced and accomplished directors to provide oversight of our business.

## Chubb's policies and procedures

- [Carrier Code of Ethics – The Carrier Way](#)
- [Carrier Supplier Code of Conduct](#)
- [Carrier Supplier Quality Manual](#)
- [Corporate Governance Guidelines](#)
- [Chubb Whistleblower Policy](#)
- Enterprise Risk Management
- Supply Chain Playbook



# Respecting and Protecting Human Rights

## Why it Matters

### RESPECT

We treat others the way we want to be treated.

### INTEGRITY

We put honesty, accountability, and ethics first.

### INCLUSION

We strive to create an environment where all feel included, regardless of our differences.

### INNOVATION

We constantly seek to develop, improve and sustainably grow.

### PERFORMANCE

We deliver on the merits of our products and services, with urgency and flawless execution.

Chubb is committed to good and responsible citizenship and engaging with others to promote better working conditions for all. Our parent company, Carrier Global Corporation's vast global footprint enables us to make our mark in the fight for safer working conditions and equal opportunity around the world. Chubb takes robust and thorough measures to protect workers at our own facilities. But we can also promote positive change by encouraging our business partners and communities to respect human rights as well. Therefore, we honour our core values by engaging with those who share our commitment to helping keep workers safe, comfortable, and productive.

## How we make it possible

Our company respects and protects human rights by:

- Ensuring safe and healthy working conditions for its employees, based on whatever is most stringent: Australian laws and regulations, or company policies;
- Never using child labour or forced labour, and always seeking out business partners who share our commitment to fighting human or sex trafficking and supporting human rights;
- Prohibiting discrimination based on any unlawful basis, including: race, colour, religion, national origin, gender, age, disability, veteran status, marital status, citizenship status, creed, sexual orientation, and other protected categories as provided by applicable law;
- Delivering compensation and benefits to attract and retain strong talent for our businesses, while complying with all applicable regulations pertaining to wages, hours, and legally mandated benefits;
- Recognizing the principle of freedom of association and the right to collective bargaining as they exist under applicable laws in the countries where we operate;
- Promoting responsible sourcing practices and setting expectations for our key suppliers through the Supplier Code of Conduct, including that suppliers must ensure safe and healthy work environments for their employees, avoid discrimination, ensure that child labour is not used, and avoid human trafficking.



# Structure, operations and supply chains

Chubb's Supply Chain is comprised of 30 employees who manage and liaise with 3000 suppliers, four (4) distribution centres and 1 (one) major manufacturing plant. The mission of Chubb's Supply Chain Management is to obtain product, equipment and services for its customers while ensuring complete compliance with corporate policies, national and local rules and regulations. The goal is to:

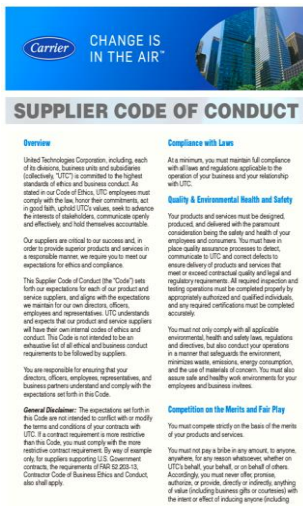
Our suppliers are critical business partners that meet our expectations for business practices, environmental responsibility and operational excellence.

- Procure goods and services for the most competitive price while assuring highest quality and timely availability without risk or harm to Chubb employees, contractors, the community or the environment.
- Ensure goods and services purchased conform to specified requirements and that all documentation contains clear information
- Make all purchases on the basis of fair and equitable competition
- Conduct the entire process of purchasing in an impeccable and transparent manner without conflict of interest or bias
- Eliminate any possibility or appearance of improper business relationships.

As a provider of fire and security services in Australia, Chubb considers its risk of direct exposure to modern slavery risks to be low, however it recognizes that it can be indirectly exposed through its supply chain. As a result, Chubb takes a targeted, risk based approach to the engagement and monitoring of its supply chain to ensure that the risks of modern slavery are regularly assessed and addressed.

We recognize that modern slavery is challenging and complex, and that risk levels associated with modern slavery are intrinsically linked to vulnerable populations, minorities and socially excluded groups.

As a part of our risk based approach, we consider information and resources from [Transparency International Corruption Perceptions Index](#), the [International Labour Organization](#) and the [Modern Slavery Registry](#).



We count on them to meet the same high standards for quality, delivery, cost and customer satisfaction that we place on ourselves.



## Potential risks of modern slavery practices in operations and supply chain

We seek out business partners who share our unyielding commitment to performance and our commitment to meet or exceed our customers' needs.

We choose our business partners based on merit and shared values, and we treat them fairly.

We treat our partners with respect and integrity and cultivate an environment of inclusion, protecting their rights while also holding them to high ethical standards as part of a world-class supply chain.

As with most large global companies, we cannot exclude the possibility that modern slavery practices may occur within Chubb's Supply Chain. Therefore, it is important that we be able to detect any modern slavery occurrence by fostering collaborative relationships with our external partners to identify and address risks, and generate transparency throughout the Supply Chain.

Chubb's Supplier Code of Conduct requires our suppliers not to engage in the use of forced labour, bonded labour, indentured labour, involuntary prison labour, child labour, slavery or trafficking in persons. Chubb's supply agreements require our suppliers to sign their commitment to this. Chubb's Supply Chain personnel regularly complete online training to ensure compliance.

Chubb Supply Chain personnel have risk assessed our supplier base using resources available from [Transparency International Corruption Perceptions Index](#), the [International Labour Organization](#) and the [Modern Slavery Registry](#).

Chubb's major offshore third party manufacturer is located in a region identified as high risk and as a result, is inspected annually by a qualified third party. The qualified third party thoroughly inspects the site and provides a documented assessment on our manufacturer's social compliance performance against the following performance areas:

- Social management system and cascade effect;
- Workers Involvement and Protection;
- The rights of freedom of association and collective bargaining;
- No discrimination;
- Fair remuneration;
- Decent working hours
- Occupational health and safety;
- No child labour;
- Special protection for young workers;
- No precarious employment
- No bonded labour;
- Protection of the environment; and
- Ethical business behaviour.

Over the years the annual reports have identified several risk mitigation opportunities for improvement from the performance areas above and provided relevant remedial actions for our manufacturer to complete and for Chubb to monitor and ensure compliance. The reports track, score and rank their improvement performance.

We have recently increased our requests for social compliance information from key suppliers, such as confirmation that they have policies in place to identify and adequately address issues relating to modern slavery and human trafficking in their supply chains.



# Selecting the Right Partners

## Why it matters

We seek out business partners who can help us achieve our business goals by providing expertise, resources, efficiency, and innovation to help us deliver reliable products on schedule. We also seek partners who share our high ethical standards and our passion for making the world a better place.

## How we make it possible

We select our business partners through a competitive but fair process. This means we:

- Look for partners who meet our standards of safety, integrity, and performance while delivering what they promise, on time and on budget
- Conduct due diligence to ensure potential key business partners are qualified and reputable before we bring them on-board, and monitor their performance afterward
- Set up clear, specific performance requirements with measurable results
- Formalize relationships in writing so all transactions are transparent and properly recorded, and business partners are accountable to perform in accordance with our safety, ethics, and compliance requirements
- Seek opportunities for small, disadvantaged, minority-owned, woman-owned, veteran-owned, historically underutilized businesses

Supplier performance is an essential element of Chubb's strategy for developing a world-class, integrated supply chain.



**Overview**  
United Technologies Corporation, including each of its divisions, business units and subsidiaries (collectively, "UTC") is committed to the highest standards of ethics and business conduct. As stated in our Code of Ethics, UTC employees must comply with the law, honor their commitments, act in good faith, spend UTC's assets, seek to enhance the interests of stakeholders, communicate openly and effectively and hold themselves accountable.

Our suppliers are critical to our success and, in order to provide superior products and services on a reasonable manner, we require you to meet our expectations for ethics and compliance.

The Supplier Code of Conduct (the "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. UTC understands and respects that our product and service suppliers will have their own internal codes of ethics and conduct. This Code is not intended to be an exhaustive list of all ethical and business conduct requirements to be followed by suppliers.

You are responsible for ensuring that your directors, officers, employees, representatives, and business partners understand and comply with the expectations set forth in this Code.

**General Disclaimer:** The expectations set forth in this Code are not intended to conflict with or modify the terms and conditions of your contracts with UTC. If a contract requirement is more restrictive than this Code, you must comply with the more restrictive contract requirement. By way of example only, for suppliers supporting U.S. Government contracts, the requirements of FAR 52.205-15, Contractor Code of Business Ethics and Conduct, also shall apply.

**Compliance with Laws**  
As a minimum, you must maintain full compliance with all laws and regulations applicable to the operations of your business and your relationship with UTC.

**Quality & Environmental Health and Safety**  
Your products and services must be designed, produced, and delivered with the paramount consideration being the safety and health of your employees and customers. You must have in place quality assurance processes to detect, communicate to UTC and correct defects to ensure delivery of products and services that meet or exceed contractual quality and legal and regulatory requirements. All required inspection and testing operations must be completed properly by appropriately authorized and qualified individuals, and any required certifications must be completed accurately.

You must not only comply with all applicable environmental, health and safety laws, regulations and directives, but also conduct your operations in a manner that safeguards the environment: minimize waste, emissions, energy consumption, and the use of materials of concern. You must also assure safe and healthy work environments for your employees and business partners.

**Competition on the Merits and Fair Play**  
You must compete strictly on the basis of the merits of your products and services.

You must not pay a bribe in any amount, in any form, for any reason whatsoever, whether on UTC's behalf, or on behalf of others. Accordingly, you must never offer, promise, authorize, or provide, directly or indirectly, anything of value (including business gifts or courtesies) with the intent or effect of inducing anyone (including

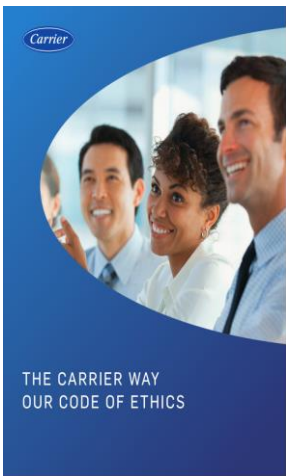
We provide our suppliers with the resources to ensure excellence, including access to our operating system for quality and continuous improvement

## Supplier Compliance Programs

Chubb's standard contract terms require suppliers to have management systems, tools and processes in place that (a) ensure compliance with applicable laws, regulations, and requirements set forth in the Supplier Code; (b) promote an awareness of and commitment to ethical business practices; (c) facilitate the timely discovery, investigation, disclosure and implementation of corrective actions for violations; and (d) provide training to employees on compliance requirements, including the expectations set forth in the Supplier Code.



At Chubb, we are committed to setting clear expectations for each of our product and service suppliers.



We review our own operations on a regular basis to ensure compliance and continuous improvement. All reports of violations are investigated thoroughly, fairly, and impartially with the objective of identifying actions for continuous improvement.

**Chubb**

## What is Chubb doing?

Chubb is committed to ensuring that slavery and human trafficking are not taking place in our businesses or supply chains and, to this end, takes the following actions.

### 1 Commitment to Good Citizenship

Chubb is committed to good citizenship and believes that engagement with others improves the human condition. For its employees worldwide, Chubb ensures safe and healthy work environments, based on the more stringent of Australian laws and regulations, or company policies. Chubb does not use child labour or forced labour. For our communities worldwide, Chubb works to protect the environment, maximize the efficiencies of our products and reduce wastes, emissions, energy consumption and the use of materials of concern. Chubb obeys the law, does not discriminate in personnel practices and does not engage in corrupt practices. In addition to its own commitments, Chubb expects direct suppliers to adopt suitable codes of business conduct.

### 2 Supply Chain Expectations

Chubb's suppliers are critical to its success and, in order to provide superior products and services in a responsible manner, Chubb engages suppliers who meet high standards for business practices, environmental responsibility and operational excellence. We insist that our suppliers meet our expectations for ethics and compliance.

#### Supplier Code of Conduct.

The Supplier Code sets forth Chubb's expectations for our suppliers and aligns with the expectations we maintain for our own directors, officers, employees and representatives. Among other things, the Supplier Code requires suppliers to ensure child labour is not used in the performance of their work, whether or not related to Chubb business. It also requires suppliers to fully comply with laws and regulations prohibiting human trafficking. This includes prohibiting the use of forced, bonded or indentured labour, involuntary prison labour, slavery, or trafficking in persons.

#### Standard terms and conditions.

Chubb's standard contract terms and conditions of purchase require suppliers to comply with all applicable laws and regulations. In addition, Chubb's standard contract terms require suppliers to adopt, and comply with, the Supplier Code of Conduct regarding business conduct, and ethics and compliance that satisfies, at a minimum, the principles of the Supplier Code of Conduct.



We believe we have a responsibility to change the world for the better. This means solving big global challenges, making modern life possible in ways that do good for the planet and creating opportunities in the communities in which we live and work.

We are committed to improving the quality of life everywhere we do business. We are committed to doing big things in good ways.

Through civic, cultural, economic and social welfare organizations, we are creating opportunities in the communities where we live and work, and helping to change the world for the better.



### 3 Verification of Supply Chain.

Chubb engages in verification of product supply chains to evaluate and address the risk of human trafficking and modern slavery. Suppliers are subject to robust selection processes and criteria, including for example, verification against government denied party lists. Periodically Chubb may conduct a site inspection with a supplier. However, Chubb does not in the ordinary course of business conduct site visits or otherwise evaluate suppliers specifically for the purpose of verifying the eradication of slavery and human trafficking in their supply chains.

### 4 Supply Chain Audits

Chubb does not, in the normal course of business, conduct audits (independent, unannounced or otherwise) of suppliers specifically to evaluate their compliance with company standards for trafficking and slavery in supply chains.

Chubb's suppliers, however are contractually required to allow Chubb and / or its representatives to assess their compliance upon request, as well as the compliance of the suppliers' business partners, with the expectations set forth in the Supplier Code in performing work for Chubb, including on-site inspection of facilities. Suppliers must also provide additional information and certifications evidencing compliance upon request.

Chubb's major offshore third party manufacturer is located in a region identified as high risk and as a result, is inspected annually by a qualified third party.

### 5 Supplier Certifications

Chubb requires suppliers to submit certifications where required by law.

### 6 Internal Accountability Standards

Chubb maintains internal accountability standards and procedures for employees and contractors failing to meet company standards regarding slavery and trafficking. These include, as described above, Carrier's Code of Ethics and Carrier's Supplier Code of Conduct. Chubb requires its employees to annually certify that they will honour the Code of Ethics. Compliance with the requirements of the Code of Ethics is expected behaviour for all Chubb employees. Violation of these requirements will result in appropriate disciplinary action. Anyone who observes or suspects a violation of Carrier's Code of Ethics may ask a question or raise concerns in complete confidence through Carrier's anonymous reporting program.

#### Our Vision

CREATING SOLUTIONS THAT MATTER FOR PEOPLE AND OUR PLANET.

*"At Carrier, we demand high performance and high integrity from all of our employees as well as everyone with whom we do business. It is never acceptable to compromise our values or integrity to achieve our business objectives. We are a company committed to always doing the right thing. No exceptions."*

Dave Gitlin  
President & CEO  
Carrier Global Corporation



## 7 Internal Training and Awareness of Modern Slavery and Human Trafficking Risks

Chubb has a comprehensive ethics and compliance training program for all employees. In recognizing and mitigating the risk of human trafficking and slavery in supply chains, Chubb provides human trafficking and modern slavery training to employees and management who have direct responsibility for supply chain management, particularly with respect to mitigation risks within the supply chains of products.

### ANONYMOUS REPORTING

**Child Labour.** Chubb's suppliers must ensure, and are contractually required to comply with child labour laws. Suppliers must not use child labour in the performance of their work, whether or not related to Chubb business. The term "child" refers to any person under the minimum legal age for employment where the work is performed.

**Human Trafficking.** Chubb's suppliers must comply with all laws and regulations prohibiting human trafficking and modern slavery and they must not engage in the use of forced labour, bonded labour, indentured labour, involuntary prison labour, slavery or trafficking in persons.

## 8 Confidential channels for reporting

To ensure robust reporting of allegations of wrongdoing, Chubb provides safe and confidential channels for employees and third parties (including suppliers) to seek guidance, ask questions, make comments, and report suspected misconduct. The company's anonymous reporting program, allows employees and others to ask a question or raise concerns via telephone and via a web-based application. The program provides local calling phone lines available in 57 countries and reporting is possible in 35 languages.

Chubb also expects suppliers 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 its business partners, without fear of retaliation, including opportunities for anonymous reporting.

## 9 Termination for non-compliance

In the event that a supplier commits any material violation of law relating to basic working conditions and human rights in their performance of work of their subcontracts with Chubb, Chubb has the right to terminate those contracts for default.

## 10 International Trade Compliance

Chubb's suppliers are subjected to robust selection processes and criteria including verification against government denied and restricted party lists. Suppliers must conduct their business in strict compliance with all applicable laws and regulations governing (a) the export, re-export and retransfer of goods, technical data, software and services; (b) import of goods; (c) economic sanctions and embargoes; and (d) U.S. anti-boycott requirements.



## Going Forward / Improvement Actions

During 2021, Chubb will continue its actions demonstrating its commitment to ensuring that slavery and human trafficking are not taking place in its businesses or supply chains but will enhance its due diligence and ongoing monitoring of its suppliers. Chubb is committed to collaborating with its suppliers to identify risks of modern slavery and implement effective corrective actions where non-compliance is identified.

### Enhanced engagement with, and enhanced due diligence of, suppliers

Chubb will risk rate its supply chain based on geographical location, Corruption Perception Index (CPI) score and other key criteria. Chubb will commence issuing its Modern Slavery Questionnaire to all existing suppliers on a timeframe determined by their risk rating, and to all new suppliers. Modern Slavery Act compliance clauses will be included in supplier contracts.

Chubb has created a tracker which will be managed by key supply chain management and personnel. This tracker will:

- track risk ratings of suppliers;
- track completion of Modern Slavery Questionnaires by suppliers;
- track review of Modern Slavery Questionnaires and record compliance / non-compliance;
- by new and existing suppliers, and to track any risks identified or remediation of those risks.
- Facilitate actions based on, responses provided by suppliers, if questionnaires are not returned and if risks of modern slavery practices are identified.

### Remediation

Where Chubb identifies risk of modern slavery practices in its supply chain from information provided by suppliers or from its own enquiries, trading with the supplier will be suspended until it is satisfied that the supplier has addressed and / or eliminated the risk.

### Program Review

Chubb's assessment of the effectiveness of its Modern Slavery and Human Trafficking Program will require ongoing collaboration with its suppliers and key stakeholders, including supply chain, legal and compliance departments.

### Statement Approval

This statement was approved by the board of Chubb Fire & Security Pty Ltd on 4 July 2021.

Signed



Dave Marven, Managing Director  
4 July 2021

