

resideo

MODERN SLAVERY REPORT

2023

Ademco III LTD.
20 Meteor Drive, Toronto M9W 1A4,
Canada





The statement below is made in accordance with Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (also known as the “Modern Slavery Act” or the “Act”), effective as of January 1, 2024. It covers the reporting period January 1, 2023, to December 31, 2023.

The statement below covers Resideo Technologies, Inc. (Resideo) and its subsidiaries.

Organization, Activities and Supply Chain Structure

Resideo is committed to integrity and compliance in everything we do. Resideo is a leading global manufacturer and developer of technology-driven products and components that provide critical comfort, energy management, water, and safety and security solutions to homes and businesses. Through our ADI Global Distribution business, we are also a leading wholesale distributor of low voltage security products, including security and life safety, access control and video and serve a variety of adjacent categories.

We are present in more than 150 million homes globally and approximately 15 million new systems are installed each year. Resideo is headquartered in the United States in Scottsdale, Arizona and employs over 13,000 employees globally. We work with more than 110,000 professional contractors, more than 3,000 distributors, and 1,200 original equipment manufacturers, major retailers, and online merchants.

In Canada the company is present through the ADI Global Distribution business and has approximately 200 employees. In our distribution segment we work with many suppliers both in and outside of Canada. The relationships with our suppliers are critical to the success of our company and therefore the performance of the initial evaluation and due diligence is an important part of the process.

The verification of supply chain is performed through various methods and may include supplier facility visits, discussions, tracking sanctions lists or other means. We emphasize to our suppliers the importance of complying with applicable laws and regulations.

In 2022, ADI initiated the implementation of the EcoVadis solution to oversee the ESG initiatives integrated throughout our supply chain, and we continued this progress in 2023. Our EcoVadis implementation was with our top 136 vendors in each business unit, which is approximately 79% of our total supply chain spend annually. To date, 84 vendors of ADI have responded to our EcoVadis request.

Policies on Modern Slavery and Human Trafficking

Resideo has a zero tolerance policy for forced labor and human trafficking. We strive to operate responsibly and ethically in all aspects of our business. Resideo’s Code of Business Conduct, the Supplier Code of Conduct, and the Combatting Human Trafficking Policy set forth our expectations of our employees, agents, suppliers, and vendors regarding slavery and human trafficking.

Our global Combatting Human Trafficking Policy states, among other things, that Resideo employees, agents and suppliers shall not:

- Engage in human trafficking
- Use forced labour
- Destroy, conceal, confiscate, or otherwise deny an employee access to their identity or immigration documents
- Misrepresent important information during the recruiting process, such as the key terms and conditions of employment like wages and fringe benefits, the location of work or any significant cost to be charged to the employee
- Use recruiters who do not comply with local labor laws of the country in which the recruiting takes place



- Charge employees with recruitment fees

Resideo's Supplier Code of Conduct requires suppliers to, among other things, commit to no involuntary labour, human trafficking, or child labour, as well as to fair treatment and payment of at least minimum wage and legally required benefits. Our Supplier Code also requires suppliers to treat subcontractors at their facilities in line with our Supplier Code, and to have policies in place to avoid the use of conflict minerals. We expect our suppliers to abide by and meet the requirements set forth in our Supplier Code. Resideo will not continue to do business with any supplier who breaches our Supplier Code. Complete copies of these policies are available on our website at www.resideo.com under our Investor Relations section.

Whistleblowing Helpline

Resideo also requires its employees to follow Resideo's Code of Business Conduct and Combatting Human Trafficking Policy which set forth clear expectations regarding employee behaviours and compliance with laws in those countries where we operate. We provide multiple avenues for employees, customers, suppliers, vendors, etc. to report any concerns they have, including modern slavery. An Integrity Helpline is always available to raise a concern anonymously if they choose. We promote these many reporting avenues via our internal policies, communications, and trainings. Resideo also has a policy of strictly prohibiting retaliation for raising concerns.

Due Diligence Processes

By implementing the EcoVadis solution we carry out key steps of due diligence processes, namely identifying/assessing risks in the supply chain, prevention, and mitigation of the impact through capacity building and improvement actions, and monitoring and reporting through our reporting dashboard capabilities. Preventive and mitigative actions are facilitated through the Corrective Action Plan, EcoVadis Academy, and buyer trainings with dedicated courses on forced labour and/or child labour for capacity building. Dashboards and customized KPIs ultimately enable performance tracking while facilitating reporting.

Forced labour and child labour risks

We are aware of the heightened risk of forced labour and trafficking in certain regions and industries where we conduct business or source materials/services through our supply chain. To assist with mitigation of potential breaches of the relevant legislation, we expect our suppliers to comply with our Supplier Code of Conduct which addresses forced labour/human trafficking/child labour/fair wage and treatment.

Remediation measures

At Resideo we assess our activities and supply chains and as of the date of this Report we believe that our activities and supply chain carry a low risk of forced labour or child labour being used. In case any non-compliance situation occurs, we will work on the development and implementation of a corrective plan that will help us to improve and remedy the situation.

On the date of this Report, Resideo has not undertaken any measures to remediate the loss of income or specific activities for vulnerable families to remediate slavery and human trafficking in the supply chain.

Trainings



Resideo provides employees with training on the Code of Business Conduct and other policies. Employees in managerial, professional and decision-making roles as appropriate, on an annual basis, are required to read and acknowledge their understanding of the Code of Business Conduct and report any concerns regarding potential violations.

Assessing effectiveness

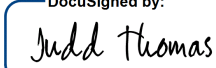
The key measures Resideo uses to assess the effectiveness of the approach include:

- regular review and update internal policies and procedures
- annual testing of the Integrity Helpline
- screening of the suppliers on labour rights and modern slavery issues
- supplier common assessment
- rising the awareness of modern slavery topic on Regional Council meetings

Report Approval and Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signatures:


DocuSigned by:

32B8E43FC907410...
Full name: Judd Thomas

Title: Director

Date: November 6, 2024




I have the authority to bind Ademco III LTD.

DocuSigned by:

B928D73017044DD...
Full name: Jeannine Lane

Title: Director

Date: November 12, 2024

I have the authority to bind Ademco III LTD.

Signed by:

743EC9EC144C402...
Full name: Darryl Stolth

Title: Director

Date: November 6, 2024

I have the authority to bind Ademco III LTD.