

# Hettich UK LP

## Modern Slavery Act

### Transparency Statement

Technik für Möbel



#### 0. Introduction

The Modern Slavery Act 2015 came into effect on 29th October 2015. This UK law requires manufacturers and retailers doing business in the UK which supply goods or services and have an annual turnover exceeding £36 million to disclose information regarding their policies tackling slavery, servitude, forced or compulsory labour and human trafficking from their supply chain and within their business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2021.

#### 1. Our Business, Organisation's Structure and Supply Chain

Hettich is one of the world's largest manufacturers for furniture fittings. Every day, over 7400 members take up the challenge of developing and producing intelligent technology for furniture. The home of the family-owned business is Kirchleingern, Germany.

Hettich UK is one of our 43 subsidiaries and partner agencies as well as production sites in America, Europe and Asia. Our goal is to be never far from our customers wherever they are in the world. Hettich UK is preoccupied with marketing and sales of Hettich products within the United Kingdom and is entirely supplied by the global Hettich production and sourcing network.

#### 2. Our Policies

As a family business, our strategies are always aimed at sustained existence and not short term success. We understand lawful and ethical conduct at home and abroad to be the key to real, sustainable success. We set priorities in ecology, social and civic responsibility as fields of action in which we aim to define a sustainable way forward that will give the company economic prosperity. Whoever does not conform to these obvious virtues, would tarnish the company principles and the success of the entire organisation. We will continue to update our policies and procedures as required to ensure maintenance of appropriate safeguards against any mistreatment of persons involved in our supply chains or own businesses.

#### 3. Due diligence to eradicate slavery and human trafficking in our own businesses

##### 3.1 Worldwide Code of Conduct

The „Hettich Code of Conduct“, which has been in place since 2014 for all Hettich companies worldwide, defines as a binding guideline for legally compliant and responsible action a standard for collaboration throughout our company and all our business partners. For instance, it covers information on responsibility and conduct in business life regarding applicable laws and ethical principles, trust and appreciation, product safety and monitoring, occupational health and safety, protecting the environment, bribery and money laundering, conflicts of interest and decision making as well as fair working conditions. We have explicitly defined that we categorically reject any form of forced, compulsory or child labour, exploitation or discrimination, not having any business with partners that do not comply with these principles.

##### 3.2 Training

Trainings for all employees are realised to emphasise the importance of acting with integrity and in line with our internal Code of Conduct. We have developed an e-learning system to support the initial and regular follow-up training of the Hettich Code of Conduct for all Hettich employees worldwide.

##### 3.3 Violations

By means of our Compliance Management System we secure compliance with laws, policies and contractual obligations to avoid regulatory risks. At each of our locations around the world, there are designated persons responsible for compliance aspects that ensure every Hettich employee knows the importance of compliant behaviour. We have implemented a compliance violation reporting process in order to react appropriately to (suspected or confirmed) non-compliance with laws, official standards and Hettich standards (processes, guidelines), in particular the "Hettich Code of Conduct". In case of a violation against prevailing laws or our ethical principles defined in the "Hettich Code of Conduct", every Hettich employee is subjected to disciplinary consequences for the violation of contractual obligations, notwithstanding the penalties specified by law.

#### 4. Due diligence to eradicate slavery and human trafficking in our supply chains

##### 4.1 Supplier adherence to our values

The Hettich Group combines entrepreneurial action with social responsibility. Compliance with minimum standards in the areas of working conditions, social affairs and the environment is a key corporate objective and shapes the entrepreneurial activities of the Hettich Group. We expect the suppliers and service providers of the Hettich Group to be equally committed to this corporate objective and to confirm this by signing our "Code of Conduct for Suppliers". Furthermore, we have tightened our requirements and procedures for selection and approval of suppliers with regard to social responsibility.

Once suppliers have provided basic information about themselves, a pre-audit is carried out in which the supplier's production facilities undergo a first assessment. After passing the pre-audit, the supplier signs up a commitment statement of the Hettich "Code of Conduct for Suppliers" with defined ethic, social and environmental standards. These standards apply across the globe to Hettich Group suppliers, and, among other aspects, include a ban on use of any form of forced or involuntary labour, either by psychological or physical violence or by exploiting dependencies which includes but is not limited to serfdom and forced prison labour. The participation in human trafficking or slave labour is prohibited. The supplier shall communicate the content of this statement of commitment to the employees and the business partners to the required and most reasonable extent.

##### 4.2 Supplier Assessment and Certifications

Verification of supplier's compliance with the social and environmental standards is part of a certification audit. The supplier is only granted certification for supplying the Hettich Group if this audit is passed successfully. The frequency of later audits is determined on the one hand by the risk presented by the segment in which the supplier operates and, on the other, by problems occurring at the supplier. Special attention is turned to those suppliers who carry out labour-intensive activities regarding adherence to the working conditions, working time directives and the minimum wages

##### 4.3 Training

Our suppliers are obliged to provide trainings for employees and managers who are involved in implementation of the "Code of Conduct for Suppliers" commitment statement requirements. Ideally, the supplier maintains an own business policy documented in writing, which includes the content of this statement of commitment. Hettich auditors and purchasers are trained to verify compliance to ethical, environmental and occupational safety standards within our supply chain.

##### 4.4 Violations

Compliance with prevailing laws and our ethical principles constitutes a primary duty within the meaning of all contractual agreements concluded with the supplier. Supplier's culpable violation entitles Hettich to terminate all business contracts without notice.

#### 5. German Supply Chain Due Diligence Act

In July 2021, a project was launched in the Hettich Group to meet the requirements for responsible supply chain management defined in the Supply Chain Due Diligence Act coming into force in Germany on 01 January 2023. This multi-disciplinary project affects all Hettich subsidiaries and will be completed by Dec 31, 2022.

Signed in March 2022 on behalf of  
Hettich UK Limited Partnership

A handwritten signature in black ink that reads "Tim Leedham".

Tim Leedham  
Managing Director