Hettich UK LP  
Modern Slavery Act  
Transparency Statement

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 Dec. 2017.

1. Our Business, Organisation’s Structure and Supply Chain
Hettich is one of the world’s largest manufacturers for furniture fittings. Every day, over 6,600 members take up the challenge of developing and producing intelligent technology for furniture. The home of the family-owned business is Kirchlengern, Germany.

Hettich UK is one of our 38 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 „Responsible Management at Hettich“ code of conduct, which has been in place since 2014 for all Hettich companies worldwide, provides information on key areas of responsibility and conduct in business life. For instance, it covers applicable laws and ethical principles, product safety and monitoring, occupational safety, protecting the environment, antitrust law, personal gain, money laundering as well as avoiding conflicts between personal and corporate interests.

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.

3.3 Violations
In case of a violation against prevailing laws or our ethical principles, 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
We expect our suppliers and service providers to make a similar commitment. 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 Supplier-Commitment Statement 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 Supplier-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.

Signed in March 2018 on behalf of Hettich UK Limited Partnership

Tim Leedham, Managing Director