

# 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 December 2022. It includes actions already implemented or begun, in line with the statutory guidance to the Modern Slavery Act 2015.

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

Hettich is one of the world's largest manufacturers for furniture fittings. Every day, about 8000 co-workers take up the challenge of developing and producing intelligent technology for furniture. The home of the family-owned business is Kirchlengern, Germany.

With more than 40 subsidiaries all around the world, partner agencies in 24 and production sites in the US, Europe and Asia, we are never far from our customers wherever they are in the world. Hettich UK is one of these subsidiaries, entirely supplied by the global Hettich production and sourcing network, and therefore preoccupied with marketing and sales of Hettich products within the United Kingdom.

### 2. Our Policies related to slavery and human trafficking

Slavery and human trafficking are gross violations of a person's human rights and dignity – something that we do not tolerate at Hettich. We have committed ourselves to respect international human rights standards and expect all our partners in our supply chain to do the same.

This is outlined in our company's Sustainability Guidelines and Code of Conduct (valid for our co-workers) as well as in any agreement that we are concluding with a supplier or service provider, as reflected in our Supplier Code of Conduct. We do not conduct business with a partner that does not adhere to these principles. We are expecting our business partners also to communicate the content of our Code of Conduct to their employees as well as further down into their supply chain.

### 3. Due diligence processes, risk assessment & management

We are currently reforming our human rights due diligence approach and procedures, both within our company as well as within our supply chain – all measures and activities described below will be gradually implemented within 2023. Among other things, a corporate Human Rights officer has been appointed and a whistleblowing tool has been set up.

#### 3.1 Within our own operations

Today, we are regularly conducting internal audits and assessments with regards to Health & Safety, which also include aspects like recruitment and age verification processes, practices around wages and working hours, on- and off-boarding procedures as well as routines on how we are cooperating with agencies or third-party labour force providers, to ensure that we are always acting legally compliant. Within a company-wide network of compliance experts, we are learning from each other and share best practices.

Every co-worker is trained on our Code of Conduct when starting new into the company and receives regular refresher trainings. Any confirmed violation of our Code of Conduct leads to disciplinary measures, up to dismissal, on top of any legal proceedings or penalties if applicable.

We are currently developing a comprehensive risk assessment methodology for our own operations, including scores and KPIs, to gradually any risks that we may have identified in our own business.

#### 3.2 Within our supply chain

Within 2022 and 2023, we will be gradually implementing a risk-based way of working with new and existing partners – using both external and internal information when on-boarding and handling business partners within our supply chain.

##### New partners

From 2023, new suppliers or service providers will be subject to an initial risk assessment in the form of a self-assessment concerning human rights related topics including working conditions, remuneration practices and age verification procedures. The partner's input is carefully evaluated by specifically trained persons within the purchasing department, if needed with support of the corporate Human Rights officer and/or other specialists like legal advisors. Depending on the outcome of the assessment, the new partner is either not started, approved preliminarily and has to implement an action plan to reduce their risk level during a specified timeline or is approved unconditionally.

##### Existing supplier base

Our business partners are continuously monitored by our internal risk information tool, which is alerting us of any incident that becomes public and has a connection to any of our business partners. Furthermore, we are conducting regular risk assessments resulting in a specific risk level for each of our partners. The score is the outcome of an abstract risk assessment based on branch and regional risks as well as concrete information that we are gaining from our risk information tool based on alerts or results of audits, which are conducted by specifically trained Hettich co-workers.

We have defined thresholds of risk scores and a corresponding set of actions to be taken, including defined roles and responsibilities. These actions range from additional training offers, critical hearings, focussed audits on site up to phasing out of the partner.

In any case, we are expecting our business partners to provide trainings for employees and managers who are involved implementing our supplier Code of Conduct at their end.

Gradually, we are aiming to reduce human rights-related risks in our supply chain by setting up action plans and targets both locally and internationally.

### 4. Whistleblowing portal

We have set up a whistleblowing portal where potential non-compliance to legal requirements or our Code of Conducts (co-worker CoC or supplier CoC) can be reported. It is open for any person potentially being concerned, available in multiple languages and can also be used anonymously. The corporate Human Rights officer will then review any input from the system, investigate and verify the received information, if necessary with a clearly designated and trained group of specialists, and coordinate any corrective and preventive measures to be taken. This includes improvements of risk management procedures and routines as well. Always strictly protecting personal data and other sensitive information in connection with the specific case is of highest priority.

Signed in June 2023

Hettich UK Limited Partnership

A handwritten signature in black ink, appearing to read "Simeon Gabriel". The signature is fluid and cursive, with a long horizontal stroke at the end.

Simeon Gabriel  
Managing Director