



hemmersbach

FOR FINANCIAL YEAR 2024

Modern Slavery Act Transparency Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the measures Hemmersbach GmbH & Co. KG ("Hemmersbach") has implemented and continues to implement to prevent modern slavery and human trafficking within our business and supply chain.

Our dedication to making the world a better place through our direct actions and programs remains unwavering. As a social purpose corporation, our work transcends traditional business objectives, providing deeper meaning and purpose to our daily operations. Our commitment to transparency, fairness, and integrity not only fortifies our operations and business in the long term but also significantly contributes to impactful sustainability initiatives.

Our business

We are global IT infrastructure experts. As process experts with 20+ years of experience, we empower IT industry leaders to provide Global Field Services and Global Device Lifecycle Services everywhere. We are their delivery engine. Our global reach, can-do attitude, 50+ subsidiaries worldwide and more than 5000 colleagues ensure that we are achieving our customers' quality goals.

A sustainable and resilient supply chain is crucial for our business. Our supply chain primarily consists of hardware suppliers and service providers. Whenever possible, we provide our services through our own permanent technicians. When this is not feasible, we engage with Hemmersbach Authorized Partners (HAPs) with whom we have direct contractual relationships. We prioritize long-term supplier relationships and promote ethical labor practices through our rigorous supplier onboarding and compliance procedures. To build supplier awareness and meet our standards, we focus on long-term agreements that address the risks of modern slavery, including debt bondage, forced labor, and human trafficking.

The suppliers from whom we purchase hardware are usually Original Equipment Manufacturers (OEMs) with high standards. By focusing on these suppliers, we ensure a low risk of modern slavery, as they are tightly controlled.

Policies and governance

Our colleagues are our most valuable resource and our goal is to provide a work environment where everyone has equal opportunities to develop and succeed.

We implement various internal policies to ensure ethical and transparent business practices. This includes our **Hemmersbach Policy for Social, Ethical, and Environmental Responsibility**, which is based on the Responsible Business Alliance Code of Conduct, ILO Declaration on Fundamental Principles and Rights at Work and the United Nations Declaration of Human Rights. These principles and commitments are reinforced in our global employment standards.

Our **Supplier Code of Conduct** aligns with our policies and serves as the foundation for our contractual partnerships. This code ensures that our suppliers adhere to the same high standards of social, ethical, and environmental responsibility that we uphold.

Our **Labour Policy** ensures that work is performed under an officially recognized employment relationship, established in compliance with applicable laws, regulations, and international labor standards.

Our **Sustainable Procurement Policy** reflects our commitment to responsible sourcing. These guidelines ensure that procurement activities minimize environmental impact, promote social responsibility, and uphold ethical standards. All procurement processes are carried out in compliance with international frameworks and Hemmersbach's internal policies. Procurement decisions also consider customer-specific requirements and contractual obligations, supporting our broader sustainability goals and long-term business success.

Our **Whistleblowing Policy** is designed to ensure that reports are handled effectively, confidentially, and in accordance with the EU Whistle-blower Protection Directive as well as any relevant local legislation, so that all stakeholders feel safe and supported in raising legitimate concerns regarding misconduct within our organization.

We maintain a robust **Recruitment Policy**, which includes verifying the eligibility to work in the UK and all other countries for all colleagues to safeguard against human trafficking and forced labor. Additionally, the effective abolition of child labor is a key priority for our Human Resources department, which ensures compliance with global standards and regulations.

Our **governance framework** for anti-slavery initiatives involves multiple levels of responsibility, ensuring comprehensive oversight and accountability.

Human Resources: The Human Resources department plays a crucial role in our anti-slavery efforts. They are responsible for developing, implementing, and maintaining our policies related to modern slavery. This includes regular reviews and updates to ensure alignment with best practices and legal requirements.

Sustainability Team: Our Sustainability team provides additional support as needed. They work closely with Human Resources to address any issues and ensure our initiatives are effectively integrated into our broader sustainability efforts.

Management Board: Ultimate responsibility for anti-slavery initiatives lies with our Management Board. Decisions related to these initiatives are made at the highest level, demonstrating our commitment to transparency, fairness, and integrity in all our business dealings. This top-down approach ensures that our anti-slavery policies are prioritized and enforced throughout the organization. standards, we focus on long-term agreements that address the risks of modern slavery, including debt bondage, forced labor, and human trafficking.

The suppliers from whom we purchase hardware are usually Original Equipment Manufacturers (OEMs) with high standards. By focusing on these suppliers, we ensure a low risk of modern slavery, as they are tightly controlled.

Risk assessment and due diligence

Our **risk assessment** process for identifying and addressing modern slavery risks in our operations and supply chains is thorough and systematic. This process follows a strict timeline with clearly defined due dates and responsibilities.

We conduct assessments on a regular basis, involving all relevant stakeholders within our organization. This ensures that we capture a comprehensive view of potential risks across all areas of our business. We evaluate our partners based on risk factors from global databases, such as the Corruption Perception Index, the Child Labour Index, the Global Peace Index and the Global Slavery Index, allowing us to make informed, data-driven decisions about potential vulnerabilities. Additionally, identified risks are reviewed periodically to ensure ongoing vigilance and responsiveness to any changes in our operating environment.

Regular updates and reports are provided to our management board, keeping them informed about the identified risks and the actions being taken to mitigate them. This ensures that our management is actively engaged in overseeing our anti-slavery initiatives and making informed decisions to uphold our commitment to ethical and responsible business practices.

We conduct rigorous **due diligence** to prevent and mitigate the risk of modern slavery in our operations and supply chains. Before establishing contractual relationships, we ensure compliance through a standardized onboarding process that guarantees consistent service quality globally.

We reserve the right to audit our supplier to verify compliance with our Code and local laws, either on demand or as per our annual schedule. Our audits are thorough, aiming to maintain control and consistent quality across our supply chain. Any deviations or non-compliance found prompt immediate corrective actions. To date, no major deviations related to modern slavery have been identified through our audits or other sources. We promptly address any minor issues or areas for improvement identified. We also give our stakeholders and third parties the opportunity to provide us feedback, which helps us continuously improve our practices and enhance transparency. Our proactive due diligence approach underscores our commitment to ethical standards and ensures effective mitigation of modern slavery risks.

Training and capacity building

To **raise awareness** of modern slavery and ensure compliance with our Social, Ethical, and Environmental Policy, we provide comprehensive training through our internal platform. This training is mandatory for all new colleagues and must be refreshed annually by every colleague. Additionally, ethical and social topics related to modern slavery are regularly featured in our internal newsletter and employee handbook. We also conduct onsite trainings at our facilities and customer sites when necessary.

We are committed to supporting our suppliers in understanding and complying with our anti-slavery policies. Currently, we provide newsletters to our suppliers and are in the process of planning learning sessions. These initiatives are designed to educate suppliers about our expectations and help them integrate anti-slavery practices into their operations.

Reporting and accountability

We have established robust mechanisms for employees, suppliers, and stakeholders to **report** concerns related to modern slavery within our organization. Grievances can be directed to either our Human Resources department or our Partner Management. For individuals preferring anonymity, reports can be submitted through our whistleblowing tool, accessible both internally and externally. This ensures that concerns can be raised securely and without fear of reprisal.

Upon receiving a report, we adhere to a stringent investigative process outlined in our whistleblowing policy. This process is designed to ensure confidentiality and impartiality throughout the investigation. If instances of non-compliance with our anti-slavery policies are confirmed, appropriate disciplinary actions are promptly taken in accordance with our internal policies and legal requirements. We are committed to addressing reported concerns swiftly and transparently, reinforcing our commitment to eradicating modern slavery from all aspects of our operations and supply chains.

Effectiveness and performance indicators

We measure the **effectiveness** of our anti-slavery efforts using several key metrics. These include the number of supplier audits conducted annually, compliance rates with our Service Provider Code of Conduct, and the number of reported grievances related to modern slavery. Additionally, we track the implementation of corrective actions following audits and monitor our overall supply chain transparency and accountability.

Our approach to reviewing and improving policies and practices related to modern slavery is proactive and ongoing. We conduct regular reviews of our policies and procedures to ensure they remain robust and aligned with best practices and legal requirements. Feedback from audits, stakeholder engagement, and internal assessments informs our continuous improvement efforts. We set targets for supplier audits and improvements, aiming to enhance our anti-slavery measures systematically. This commitment underscores our dedication to eradicating modern slavery from our operations and supply chains.

This statement was approved by the Chief Executive Officer on 04.06.2025



Ralph Koczvara
Nuremberg, 04.06.2025