

MODERN SLAVERY STATEMENT

FOR FINANCIAL YEAR 2017

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Hemmersbach GmbH & Co. KG ("Hemmersbach") has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labor. Hemmersbach has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

OUR BUSINESS

As a service provider for the IT industry, we do our best every day to offer our customers excellent performance – everywhere. Hemmersbach covers all possible actions on a global scale for both manufacturers and outsourcers.

Global Services for Manufacturers

Onsite:

Onsite support for the leading manufacturers including spare parts management.

Repair Shops:

Nearshore repair facilities for electronic devices with international pickup and return.

Service Desk:

Nearshore and offshore remote support in 48 different languages.

Global Services for Outsourcers

Workplace:

End to end delivery solution for the complete workplace environment.

Data Centre & Network:

On time deployment and operational availability for server, storage and network infrastructure guaranteed worldwide.

We are supported worldwide by more than 2,800 permanent employees in 35 subsidiaries and offer our services in more than 190 countries. In countries where we do not have legal entities we have Hemmersbach Authorized Partners (HAPs) that carry out the business for us.

OUR HIGH-RISK AREAS

As we are operating in the service sector, we have identified our biggest risk in the employment procedure and working conditions of our HAPs that are part of our supply chain. Therefore, we have developed our Service Provider Code of Conduct.

The Hemmersbach Service Provider Code of Conduct contains key principles and requirements for our Service Providers, contractors and other providers with respect to responsible social, environmental and ethical practices and captures a zero tolerance approach to exploitation.

All Service Providers – and all their sub-Service Providers – must comply with this Code and Hemmersbach expects all Service Providers to communicate the obligations and ensure compliance with the code throughout their organizations and supply chains.

In order to verify compliance with the Code, we deserve the right to conduct onsite audits at our Service Providers' premises. The Audit selection is based on various criteria such as the Global Slavery Index, the Corruption Perceptions Index or the Child Labor Index.

If we identify non-compliance, we work with our Service Provider together to implement corrective actions. However, if the Service Provider is not willing to work with us we will terminate the business partnership.

OUR POLICIES

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Hemmersbach's Policy for Social, Ethical and Environmental Responsibility

We are a global IT service provider dealing with businesses in numerous countries around the world. Therefore, Hemmersbach not only fully complies but expects all associated parties to comply with all local, regional, national, international laws, and regulations as well.

Moreover, Hemmersbach is committed to adhering to the highest standards of social, ethical and environmental responsibility and a constant improvement in these areas.

The objective of Hemmersbach's Policy for Social, Ethical and Environmental Responsibility is defined by demanding an ethical, responsible and professional conduct based on:

- The Electronic Industry Citizenship Coalition (EICC) Code of Conduct
- The ILO Declaration of Fundamental Principles and Rights at Work
- The UN Universal Declaration of Human Rights

The labor section of our Policy ensures that work performed shall be based on an officially recognized employment relationship established in compliance with applicable laws, regulations and practices as well as international labor standards. It includes a zero tolerance of forced, bonded, indentured or involuntary prison labor, slavery or trafficking of persons as well as child labor.

Recruitment Policy

We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

OUR SUPPLIERS

Hemmersbach operates according to principles of good corporate governance and acts as a good corporate citizen in all societies. This is why we expect our Service Providers and any other third party to do the same. As a result, all Service Providers must comply with our Service Provider Code of Conduct. We expect all Service Providers to communicate the stipulated obligations.

Further, we conduct due diligence on all Service Provider before allowing them to become a Hemmersbach Authorized Partner. This standardized onboarding process ensures that our service has the same quality worldwide.

TRAINING / AWARENESS-RAISING PROGRAM

In order to raise awareness of modern slavery, mandatory online training for all employees about our Social, Ethical and Environmental Policy was implemented. We also include ethical and social topics in our internal newsletter as well as in our employee handbook.

OUR PERFORMANCE INDICATORS

In order to know the effectiveness of the measures we are taking and to ensure that slavery and/or human trafficking is not taking place we use the following key performance indicators (KPIs):

- Internal audits reports as well as Service Provider audit reports
- No reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified
- Continuous sensitizing of our employees and the whole supply chain through open communication, training modules and policies

APPROVAL FOR THIS STATEMENT

This statement was approved by the Chief Executive Officer on January 12th, 2018.

Ralph Koczwaro



Nürnberg, 12.01.2018