

EMPOWERING DEVICE AS A SERVICE EVERYWHERE



hemmersbach

MODERN SLAVERY ACT TRANSPARENCY STATEMENT FOR FINANCIAL YEAR 2019

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.

Our commitment to transparency, fairness and integrity enables us to strengthen our operations and business in the long term, while also contributing to the creation of impactful sustainability.

OUR BUSINESS

We empower IT industry leaders to offer Device as a Service (DaaS) everywhere. We are acting as a supplier for IT system integrators and manufacturers globally – we are their delivery engine. DaaS is an agreement in which procurement, deployment, device management, services, and lifecycle management are all handled by one supplier.

With our 20+ years of experience, our global reach, can-do attitude, 50+ subsidiaries worldwide and more than 4000 colleagues in more than 190 countries, we are the ones who get it done.

A sustainable supply chain and maintaining its resilience are key factors for our business. We focus on engagement with Authorized Partners (HAPs) with whom we have a direct contractual relationship. To build supplier awareness and in order to meet our expectations we focus on long term agreements to address the risks of modern slavery such as debt bondage, forced labour and human trafficking.

OUR GOVERNANCE

We believe that our colleagues are the most valuable resource. Our goal is to provide a work environment where everyone has the same opportunities to develop and succeed.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. This includes our [Hemmersbach Policy for Social, Ethical and Environmental Responsibility](#). Our policy is based on the Responsible Business Alliance Code of Conduct. The Codes principles and commitment are reinforced in our global employment standards.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Hemmersbach has a zero tolerance approach to any form of modern slavery. We are committed to act with fairness, transparency, integrity and accountability in all business dealings as we see them as fundamental principles.

The labour 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 labour standards.

Sustainable development is more than just a phrase, for us it is an obligation to work hard towards the achievement of our goals. Our actions are already aligned with the 10 principles of the [United Nations Global Compact](#). Over the past year, we have focused on integrating the Sustainable Development Goals (SDGs) through a culture of integrity and corporate sustainability into our business model.

Further, we live an open and honest communication philosophy across Hemmersbach paired with flat hierarchies. We encourage every colleague to speak up without hesitation and inhibition and use multiple communication channels to raise any type of concern. Any concern raised is taken seriously by the supervisor and Human Resources Department.

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. Also, the effective abolition of child labour is a key element of our Human Resource department whose procedures ensure global compliance.

Internal audit reports as well as Service Provider audit reports have shown no major deviations in the area of modern slavery. Minor issues have been followed up and corrective measures and actions implemented. We are confident that no relevant malpractices have been identified neither through employee reports, the public, nor the law enforcement agencies.

OUR SUPPLY CHAIN

As global company in the IT service sector, our main identified risks are in the employment procedures, working conditions as well as excessive working hours of our Authorized Partners (HAPs). Before establishing a contractual relationship, we conduct due diligence. The standardized onboarding process ensures that our service has the same quality worldwide.

All of our HAPs and their sub-partners have to comply with our dedicated Service Provider Code of Conduct which contains key principles and requirements with respect to responsible social, environmental and ethical practices.

To verify compliance with our Code and applicable laws in the corresponding countries, we reserve the right to audit our HAPs as necessary. Thus, we try to ensure that we control our processes and ensure the same quality across the whole supply chain. Those audits can be either on demand or based on our yearly audit schedule. We follow a stringent audit process and require corrective actions to be implemented for every deviation and noncompliance.

Our HAPs are also ranked in importance by their turnover. The Top 50 are being evaluated based on various criteria from the responsible managers either locally or centrally in cooperation with the project manager. The Service Provider has the possibility to influence the ranking by improving their performance in one of the criteria. Thus, we have an agile process in place which can be extended to prospective services.

AWARENESS-RAISING PROGRAM

In order to raise awareness of modern slavery, online training for all employees about our Social, Ethical and Environmental Policy is available on our internal training platform. This training is mandatory for every new joiner and has to be refreshed on a yearly basis by every colleague.

We also include ethical and social topics in our internal newsletter as well as in our employee handbook. Furthermore, we conduct onsite trainings within our own facilities but also on customer sites if necessary.

APPROVAL FOR THIS STATEMENT

This statement was approved by the Chief Executive Officer on March 5th, 2020.

Ralph Koczwaro



Nuremberg, 05.03.2020