

A city skyline at sunset with a laptop icon overlaid.

# EMPOWERING DEVICE AS A SERVICE EVERYWHERE

**hemmersbach**

## MODERN SLAVERY ACT TRANSPARENCY STATEMENT FOR FINANCIAL YEAR 2022

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 efforts for making the world a better place through our direct actions and programs did not stop in the past year. Hemmersbach is now a social purpose corporation. This gives our work meaning beyond business and is the reason why we get up every day. 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 are 4,900+ permanent colleagues in 50 subsidiaries and empower IT industry leaders to provide Device as a Service (DaaS) and Field Services everywhere. DaaS combines hardware, software, all lifecycle services including financing into a single contract with a usage-based fee.

A sustainable supply chain and maintaining its resilience are key factors for our business. Wherever possible we are providing our services with own technicians. If not possible we focus on engagement with Hemmersbach 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**. 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**. We have integrated 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.

Any concern, internally and externally, can be shared via our Whistleblowing Tool in an anonymous way as well. Our compliance team ensures that every case is treated effectively, securely appropriately and in accordance with local legislation.

We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all colleagues 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.

## 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 Hemmersbach 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 non-compliance. So far, no major deviations in the area of modern slavery have been disclosed. Any other minor issues or improvements are followed up and corrective actions implemented. No relevant malpractices have been identified neither through reports, the public, nor the law enforcement agencies.

Our HAPs are also evaluated in our yearly Service Provider Evaluation. They 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 trainings for all colleagues 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. The training content is updated on a regular basis.

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 26.06.2023.



Ralph Koczvara  
Nuremberg, 26.06.2023