

Statement to the UK Modern Slavery Act 2015

With respect to §54 (Transparency in the supply chain)

The following statement of **seele** (UK) Ltd. refers to §54 of the Modern Slavery Act 2015. As specified, an organisation is obligated to issue an official statement per business year pertaining to their measures taken against slavery, servitude and/or forced compulsory labour as well as human trafficking. These measures must apply to the full supply chain of the company and create transparency there.

seele (UK) Ltd. is aware of the fact that modern slavery is a serious, global concern and takes zero tolerance approach to it within its operations and supply chain.

seele (UK) Ltd. herewith declares to apply and implement the following measures against the above stated offences:

1 Code of Conduct

The **seele** group of companies applies its Code of Conduct both to employees as well as customers and business partners, such as suppliers. Reference is made therein concerning the integrity of the business partners as well as acceptance of the Code of Conduct and, among other things, adherence to the following principles:

- Observing the human rights of all employees and subcontractors
- Observing of all and any laws pertaining to children's labour
- Implementation of the Code of Conduct throughout the supply chain

These items already indirectly indicate that **seele** requires their business partners to ensure that no crimes stated in §54 of the Modern Slavery Act 2015 are committed within their respective organisations and supply chains.

2 Supplier self-assessment

In the event that a prospective supplier is interested in cooperation with **seele** or should a contract require conclusion the supplier is obligated to issue a supplier self-assessment. In this self-assessment the prospective supplier must declare to uphold the transparency requirements pursuant to the Modern Slavery Act and adhere to the basic principles of the Code of Conduct.

3 Supplier audit

seele conducts audits of their suppliers. The question for ensuring above stated transparency obligations pursuant to §54 of the Modern Slavery Act has already been included in the audit.

4 Suspicion of non-conformance

In the case of suspicion that one link in the supply chain is no longer capable of upholding and meeting the requirements as listed in §54 of the Modern Slavery Act, said link shall issue a statement regarding this issue. **seele** will also engage independent organisations (NGOs, such as e.g. Oxfam) to ensure that transparency requirements and the fundamental principles of Paragraph 1 of the Code of Conduct are maintained. Furthermore **seele** has provisions in place for terminating its cooperation with suppliers who cannot disprove such suspicion.

5 Risk analysis

seele is aware of the fact that slavery, servitude and/or forced and compulsory labour as well as human trafficking commonly occurs in particular countries. It is part of our vetting process that we look at our suppliers' country of origin.

Statement authorized by

London, 28 January 2025

City, Date



Michael Seele, Managing Director

Schoerfling 10.02.2025

City, Date



Thomas Spitzer, Managing Director