

## statement to the UK modern slavery act 2015

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

The following statement of seele GmbH 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, bondage and/or forced and compulsory labour as well as human trafficking. These measures must apply to the full delivery chain of the company and create transparency there.

seele GmbH 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 GmbH herewith declares to currently 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. Therein reference is made concerning the integrity of the business partners as well as acceptance of the Code of Conduct and among others adherence to the following principles is referred to:

- 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 – among others – seele obligates 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 into the audit.

## 4 Suspicion of non-conformance


In the case of suspicion that one link in the supply chain is no longer capable to uphold and meet the requirements as listed in §54 of the Modern Slavery Act said party shall issue a statement regarding this issue. Similarly the involvement of independent organisations (NGOs, such as e.g. Oxfam) to ensure maintenance of the transparency requirements and the fundamental principles of the Code of Conduct, as stated in Paragraph 1, counts into the measures to be taken by seele in case of doubt. Furthermore seele has provisions for terminating cooperation with suppliers who cannot disprove such suspicion.

### Risk analysis

seele is aware of the fact that slavery, bondage and/or forced and compulsory labour as well as human trafficking is commonly occurring in particular countries. Consequently, we regard our suppliers also concerning their country of origin.

GERSTHOFEN, 05.05.2017

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City, Date



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Andreas Hafner, Managing Director

Statement authorized by

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City, Date



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Siegfried Gossner, Shareholder