



HEITKAMP & THUMANN
GROUP

H&T Group

Modern Slavery Statement 2024



This statement describes the measures taken by the Heitkamp & Thumann Group (“H&T”) to prevent forms of modern slavery and human trafficking for the financial year 2024. H&T hereby fulfils its obligations under section 54 (1) of the UK Modern Slavery Act. The statement includes the measures taken by all companies of the H&T Group.



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H&T Compliance Statement

H&T places the highest value on the integrity of its companies and each of its directors, officers, employees, and representatives. The countries in which H&T operates have different laws, customs, and social norms. It is H&T's commitment to follow the national and local laws in each country and community in which it does business, and to conduct business in an ethical manner.

H&T has been in business successfully since 1978 and has developed a culture of excellence for its customers, its employees, and its stakeholders. H&T sees living its values as a vital component for its continuing commercial success.

Scope

This statement applies to all employees, contractors, suppliers, and business partners associated with H&T. It covers all operations, facilities, and activities conducted by the H&T Group, both domestically and internationally. H&T expects all suppliers and business partners to adhere to similar standards and address modern slavery risks within H&T's supply chains.

Respecting Human Rights

H&T is committed to prevent modern slavery and human trafficking within its operations and supply chain. H&T and its subsidiary companies respect internationally recognized human rights. It provides fair working conditions in compliance with all legal requirements. H&T condemns all forms of modern slavery, including forced labor, child labor, human trafficking, and other forms of exploitation and it will not obstruct lawful employee representation. H&T will not tolerate any form of exploitation, abuse, or coercion of individuals, whether directly employed by H&T or working on H&T's behalf.

H&T Code of Conduct

The H&T Code of Conduct sets out the framework of legal, ethical and integrity standards which H&T wants to live and states the company philosophy and values. The Code of Conduct applies across the Group, in all its businesses and in all countries where H&T operates. The purpose of this Code is to help H&T's employees and managers to recognize and properly resolve the most common legal, ethical and reputational challenges that may encounter in conducting business.

H&T Group Compliance

The H&T Group Compliance department is responsible for the Compliance Management System within H&T including policies, processes and controls. It supports all H&T Group companies in fulfilling their duties, conducts compliance investigations and makes suggestions for necessary improvements to the integrity program.

H&T Compliance Training

Through group-wide communication and training measures on the H&T Code of Conduct, which are conducted both web-based and in classroom, H&T ensures that all relevant H&T employees of functions at risk¹ are informed about their rights, key legal provisions and internal company guidelines, including those relating to respect for human rights. To sustain existing knowledge, employees have to refresh the training every two years. Training participation is documented by Group Compliance.

¹ H&T Group Management Executives, Senior Leaders & employees with regular external communication [e.g., employees with IT equipment and / or team leads in production]



H&T Whistleblower System

H&T has established comprehensive communication and whistleblower channel through which compliance violations, such as human rights violations, can be reported. The reporting channel is available to both employees and third parties to report violations of the ban on forms of modern slavery or other suspected violations at any time: <https://ht-group.vispato.com/>. Reports made anonymously will be accepted and can be submitted in all languages.

The H&T Group Compliance department is responsible for providing the whistleblower reporting channel, receiving reports and coordinating investigations and follow-up measures. All reports are acknowledged, wherever possible, within 48 hours, processed and investigated independently and confidentially by Group Compliance as part of defined processes. Where Group Compliance requires further information, it will aim to contact the sender via the “Vispato” tool.

Further Responsibilities

- Senior Management Senior management is responsible for establishing a culture of zero tolerance towards modern slavery and providing leadership in the implementation of compliance.

- Employees All employees are required to familiarize themselves with H&T policies and report any concerns or suspicions. Employee’s reporting obligations include among others the reporting on the violation of human rights, sexual harassment and violations of discrimination laws as material compliance violations.

- Supply Chain Partners H&T, as a global market player, recognizes its responsibility for the integrity of the Group’s supply chain and business partners. Therefore, the H&T Supplier Code of Conduct summarizes H&T’s core integrity standards. H&T expects its suppliers and business partners to comply with the H&T Supplier Code of Conduct and actively engage in efforts to eradicate modern slavery from their operations and supply chains.

Due Diligence

H&T takes reasonable steps to avoid doing business with companies which or individuals who break the law, do not respect human rights, or engage in corrupt practices. H&T will not knowingly do business with business partners who violate human rights. If employees or managers have reason to believe that any third party is engaging in human rights violations, the misconduct must be reported immediately.

Monitoring

H&T is committed to continuously monitor and improve its efforts to combat modern slavery. H&T will regularly review and update measures (incl. this statement) to ensure effectiveness and compliance with evolving legal and ethical standards.

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Dietmar Schmitz
 CEO H&T Group
 President H&T Battery Components

DocuSigned by:

A24676354A4345A...
Christian Krätzig
 COO H&T Group
 President H&T Presspart