

# Slavery and Human Trafficking Statement for Year Ending 31 December 2019 Our Policy

SFS Group is opposed to slavery and human trafficking in any part of our business or supply chain. We are committed to ensuring that we have adequate procedures in place to identify and prevent these practices throughout our supply chain.

#### **Our Business**

The SFS Group is a global market leader in mechanical fastening systems and precision formed components and serves several industries including the automotive, construction, electrical/electronics, aerospace and medical components industry.

In addition to the development and manufacture of products under the <u>SFS, GESIPA</u>, <u>Unisteel</u> and <u>Tegra Medical</u> brands, the SFS Group offers distribution and logistics solutions under the <u>SFS</u> brand.

The SFS Group is headquartered in Heerbrugg, Switzerland with more than 80 sales offices and manufacturing sites in Europe, North America and Asia. Around 10,000 employees worldwide generated sales of CHF 1,781 million in 2019.

More information about our business at group level is available at <u>www.sfs.com</u> and information about SFS in Estonia is available <u>www.ee.sfs.com</u>

#### **Our Structure**

Our business operates in Estonia:

Allika tee 2, Peetri alevik, Harjumaa, 75312
Our Supply Chains

The majority of SFS branded products are sourced within the SFS Group and products supplied in the UK are predominantly made at our Headquarters in Heerbrugg, Switzerland, France, Italy, Turkey and Germany.

## Our Supply Chain and HR Policies regarding the Modern Slavery Act

The SFS Group is committed to acting ethically and with integrity towards our employees and in all our business relationships. Our <u>Corporate Principles</u> and <u>Code of Conduct</u> (including a whistleblowing procedure) set out essential guidelines for the management and employees of SFS in their working environment. These policies are based on the principles of integrity as well as fair and ethical behaviour. They are an important element for the sustained positive development of SFS in a constantly changing international environment.

SFS is also a member of the UN Global Compact and is committed to adhere to their 10 Principles. Please find the report "Communication on progress (COP)" of the SFS Group as well as detailed information on the website of United Global Compact.

Our General Terms and Conditions of Purchasing sets out guidelines for our suppliers.

These group-wide guidelines have been implemented and are binding for every employee and supplier. The Group Compliance Officer ensures compliance together with the Compliance Officers at the local sites. Regular trainings are conducted group wide with regard to the Code of Conduct.

#### Risk audit and assessment

As part of our compliance with the policies referred to above, we assess and monitor potential risk areas in our supply chains on a periodic basis.

## **Assurance and Key Performance Indicators**

We report quarterly on compliance and track feedback from employees, customers and suppliers on non-compliance with our policies.

### **Further Steps**

We will continue to review the effectiveness of our policies and ensure compliance with the law. Within Estonia, our suppliers will be requested to complete an annual Supplier Assessment Form that requests whether the company has a Modern-Day Slavery and Human Trafficking Policy and if it abides by the 2015 Act.

## Nature of this Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2018 and has been approved by the board of directors of SFS Group Fastening Technology Ltd.

David Wigglesworth Managing Director in UK Diana Scholefield Managing Director

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Allika tee 2, Peetri alevik 75312, Harjumaa, Estonia

16 July 2020