

## Policy Human Rights & Labour - Practices Supplier

### **Principle**

Gütermann GmbH ("Gütermann"), strongly support[s] the aims of the California Transparency in Supply Chains Act of 2010 (S.B 657) and expects its associates, contractors, suppliers and business partners to comply with all applicable legal requirements regarding human rights and labour practices.

The United Nations Geneva Convention (1926), defines slavery as "the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised. The slave trade includes all acts involved in the capture, acquisition or disposal of a person with intent to reduce him to slavery; all acts involved in the acquisition of a slave with a view to selling or exchanging him; all acts of disposal by sale or exchange of a slave acquired with a view to being sold or exchanged, and, in general, every act of trade or transport in slaves."

The United Nations in the 2000 Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, defines human trafficking as "the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, or deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs."

### **Scope**

Gütermann associates and management who have direct responsibility for supply chain management.

### **Policy**

Gütermann is committed to preventing slavery and human trafficking throughout its supply chain, which includes its global manufacturing and distribution facilities. Specifically, Gütermann's policies are as follows:

**Verification of Supply Chain:** Gütermann relies on its vendors and suppliers, many of whom it has done business with for decades, to comply with applicable laws in the jurisdiction in which they operate. For significant suppliers, Gütermann requires annual written confirmation to verify that the suppliers are meeting Gütermann's expectations and requirements. Suppliers are also periodically visited by Gütermann personnel on a scheduled basis.

**Audits:** At its larger suppliers' facilities, Gütermann conducts periodic scheduled on-site visits to verify that the suppliers are meeting Gütermann's expectations and requirements, including its commitment to anti-slavery and anti-human trafficking. Smaller suppliers are also periodically visited by Gütermann personnel for scheduled on-site reviews. Our on-site reviews are pre-announced and are performed by Gütermann personnel.

**Certification from Direct Suppliers:** Gütermann's direct suppliers are expected and required to comply with the laws regarding slavery and human trafficking in the countries in which they are doing business and provide written certification of compliance to Gütermann.

**Accountability:** Gütermann maintains the right to investigate and discipline or terminate business relationships with any associate, contractor or vendor failing to meet Gütermann's expectations or any legal requirements related to slavery and human trafficking.

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