

# MODERN SLAVERY STATEMENT 2022-2023

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Pursuant to Section 54 of the UK Modern Slavery Act 2015

**Gabriel**<sup>®</sup>

## **Introduction**

This Modern Slavery Statement is made in accordance with Section 54 of the UK Modern Slavery Act 2015 and sets out the steps taken by Gabriel Holding A/S (CVR no. 58 86 87 28) and its subsidiaries Screen Solutions Ltd. (UK) and Gabriel (2017) Ltd. (UK) in this regard during the financial year ending 30 September 2023 and further sets out priorities going forward.

The statement should be regarded as complementary to the annual Statutory Statement on CSR (Sustainability Report) and provides an overview of Gabriel's policies and framework of measures to prevent modern slavery, including forced labour, bonded labour, child slavery and human trafficking, from occurring within any part of our business and supply chain.

## **Key Actions 2022/23**

The Code of Conduct on Group level implemented 2020/21, whereby we formally split-up our previous Code into a Code of Conduct and a Supplier Code of Conduct, as well as the formalized policies on Anti-Bribery and Human Rights are maintained.

In 2022/23 we initiated the following action relevant to the Modern Slavery Act:

- The roll-out of our new program in Compliance Training, focusing on anti-bribery, fair competition and GDPR was completed, and is now integrated into our onboarding program.
- We are reporting according to UN Global Compact for the financial year 2022/23.

You can find more information on our business and conduct in our Annual Report 2022/23 and in our Statutory Statement on CSR (Sustainability Report) 2022/23.

## **Our Business and Supply Chain**

Gabriel is a global company with more than 170 years of experience of developing and manufacturing upholstery fabrics for furniture, components, upholstered surfaces and related products and services as well as being an innovative and value-adding partner to our customers in the entire value chain from concept to furniture, specialising in cutting, sewing, and upholstering of furniture and furniture components.

Our core products are manufactured at our Gabriel facilities in Lithuania, Poland, USA, UK and Mexico, and our main suppliers are predominantly located in Europe and China. All outsourcing to main suppliers of fabrics is followed closely and monitored daily as with our own manufacturing units.

We employ above 1,100 people in more than 17 countries globally and an estimated 2,000 people through our suppliers.

## **Our Policies on Modern Slavery**

Our policies supporting our efforts on modern slavery and human trafficking are an integral part of our Supplier Code of Conduct. These policies cover topics such as human rights, labour standards and anticorruption.

Publishing the first Supplier Code of Conduct over a decade ago, Gabriel has long been aware of the issue of forced labour and human trafficking occurring across the world.

As stated in our Supplier Code of Conduct Gabriel supports and respects internationally recognised human rights including labour rights by adhering and reporting according to the 10 UN Global Compact principles. As we expand our global presence through organic growth and acquisitions, we want our employees and business partners to act responsibly guided by our Code of Conduct and Supplier Code of Conduct.

To support our efforts on modern slavery and human trafficking we have implemented our Whistle-Blower Policy and our Whistle-Blower Hotline giving Gabriel employees and business partners the opportunity to report criminal offences and other serious violations of laws and regulations conducted by Gabriel employees or third parties interacting with Gabriel. The Whistle-Blower Hotline is administered by an external law firm.

Other policies and procedures supporting our efforts - all fully integrated into our group management system (Gabriel AZ):

- Anti-Bribery Policy
- Human Rights Policy
- Diversity Policy
- Sustainability Policy (CSR)
- Recruitment processes

## **Risk Assessment and Due Diligence**

Gabriel has successfully standardised monitoring and compliance for all suppliers through the group management system thereby securing full due diligence and compliance.

Through our own organisation and supply chains we source raw materials, components, and services for the production of Gabriel products, with manufacturing in 6 countries. We always strive to find and work with business partners who conduct themselves in ways consistent with Gabriel's own values and high ethical standards.

As a part of our supplier assessment programme and our Supplier Code of Conduct we are explicitly expecting our business partners not to use forced or compulsory labour nor child labour in any of their operations. At the same time, it is the responsibility of the business partner to ensure that their sub-suppliers also adhere to the same principles. To ensure that slavery and human trafficking risks are identified, assessed, and addressed, we have implemented several processes and procedures, dependent on which Gabriel business unit the supplier is connected to.

Our efforts regarding modern slavery and human trafficking form part of Gabriel's overall integrated approach to sustainability and corporate social responsibility.

## **Audits**

As a part of the Gabriel group management system, we have audit programmes where audits of key suppliers are carried out by Gabriel, in addition to the close daily cooperation. In 2022/23 physical audits were again possible in Europe. In China, physical supplier visits and audits were difficult due to travel restrictions brought on by the corona pandemic and these have been carried out through on-line meetings.

Our biggest exposure to modern slavery is identified as our supply chain, where we are constantly working with our suppliers to minimize the risk of modern slavery. The areas we have identified as the most likely form of slavery and human trafficking within our supply chain are specifically forced labour, child labour and exploitative labour practices in various countries.

During 2022/23 there has been no reports through the Whistle-Blower Hotline or any other reports on slavery or human trafficking.

## **Training**

At Gabriel, all the purchase managers receive instructions on how to apply our purchasing standards, including the Supplier Code of Conduct, in the selection and evaluation of Gabriel's suppliers, including the group management system structuring the supplier assessment programme and audits.

Gabriel provides compliance training as a part of our on-boarding process for new employees, as well as yearly compliance training in the areas of Anti-Bribery, Fair Competition and GDPR for existing employees if working within areas of Gabriel which are identified as potential risk areas.

This statement was approved by the Board of Directors in Gabriel Holding A/S on 16 November 2023 and has been signed by the CEO on behalf of the Board of Directors.



Anders Hedegaard Petersen, CEO  
16 November 2023