

ADA INTERNATIONAL: SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction from the CEO of ADA International, Wilhelm B. Könning

We are committed to improving our practices to combat slavery and human trafficking. We have a code of ethics that focuses upon our respect for human dignity. The ADA group is present in many countries of the world and we are committed to respecting and promoting internationally recognised standards of human rights, standards for those that work for us and are part of our supply chains, and to up keeping social standards.

We recognise the regrettable fact that many people throughout the world – including children – are forced to work against their will and/or are subject to human trafficking. The ADA group does not tolerate forced or involuntary labour or human trafficking in any of its businesses or supply chains and particularly recognises the need to keep children free from exploitation, abuse and neglect. The ADA group regards the use of child labour as unacceptable in any circumstances.

Organisation's structure

We are a manufacturer and supplier in the hotel cosmetics sector. The Group has over 700 employees worldwide and our group companies operate in over 70 countries throughout the world.

The Group has a global annual turnover of 101,172,000 EUR

Our business

Our business is organised into 4 primary business units that serve markets in:

- Europe;
- Africa and the Middle East;
- Asia and the Pacific; and
- North America

Our supply chains

Our supply chains are headed by our Chief Supply Chain Officer based in Kehl, Germany. Our supply chain offices are in UK, USA, China and Czech Republic, these offices manage all of the Global Supply Chain function working and co-ordinating alongside our Germany office.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Code of Ethics reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

In order to give effect to our ethical beliefs, we have 'purchasing guidelines' which set out the ethical considerations our staff will constantly have in mind when making decisions as to entering into business relationships with third parties.

VAT-No.: GB 927 219417 Chief Executive Officer: Wilhelm B. Könning Registration number: 2850917





All of our employees are employed under sound employment contracts. We will observe the principles of the ILO (International Labour Organization) and any relevant local laws. This means in particularly that no type of child labour, forced labour or exploitation is tolerated anywhere within the group. The ADA group will never directly or indirectly become involved in violating human rights.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have implemented standard procedures in our operational business processes as well as rules and regulations to provide our employees and management with strict guidelines.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. The mandatory procurement guidelines of ADA state the detailed commitment for the sourcing and purchasing department and our contractors, to adhere to ethical, social and environmental principles and international law. Compliance with these guidelines is regularly reviewed during internal and external audits.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Number of supplier audits in 2017: 14 audits in Europe, India and China
- Number of internal and external audits at ADA in the relevant departments in 2017: 6

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 of the United Kingdom and constitutes our Group's slavery and human trafficking statement for our financial year which ended on 31 December 2017

Signed:

Date: 21 4 May & 2018

Wilhelm B. Könning CEO ADAInternational

ADA Pacific Direct Ltd. Dombey Court · Pilgrim Centre Brickhill Drive · Bedford MK41 7PZ · UK

Tel. +44 (0) 1234 347140 Fax +44 (0) 1234 346480 sales@pacificdirect.co.uk www.ada-international.com

VAT-No.: GB 927 219417 Chief Executive Officer: Wilhelm B. Könning Registration number: 2850917