

## **Modern Slavery Statement 2022**

Pursuant to Section 54 of the UK Modern Slavery Act 2015 (the “Act”), we wish to state and explain procedures and efforts on minimizing the risk on modern slavery, human trafficking, exploitation and other offences as described by the Act. This statement is applicable to our company’s financial year ending on 31/03/2022, audited accounts of which were officially published in the National Bank of Belgium Balance Sheet on 23/12/2022.

### **1. Organisation structure and supply chain**

Founded in 1908 by Arthur M. Seynaeve, our company has been making protective clothing and specialized textiles for over a century (a public limited company since 1982 under Belgian Law). The Seynaeve family is still running Seyntex in the fourth generation. The head office is in Belgium. Seyntex also owns production facilities in Eastern Europe and the Far East. These two locations serve as production facilities for the headquarters in Belgium. To support our own production capacity, we often work with subcontractors and suppliers ranging from all parts of the world.

From our headquarters in Belgium, we provide to customers over one million pieces of equipment, amongst which the below range of products:

- o Rain wear, coated and laminated fabrics, welded seams, taped seams
- o Combat clothing, with IRR properties, oil-and water repellent, permethrin
- o Bullet proof vests
- o Hot weather clothing
- o Flame-retardant clothing (coveralls, jackets and trousers, UBAC shirts)
- o Backpacks and rucksacks
- o CBRN suits
- o Tentage
- o Sleeping bags
- o Camouflage nets

### **2. Commitment to compliance**

Our commitment is upheld by our Internal Compliance Program (“ICP”), which is validated and approved by the management and the leadership team. We are committed to growing our business and conducting ourselves with integrity, in accordance with the highest ethical standards and in compliance with all applicable laws. We have zero tolerance for law violating conduct.

We believe in responsible social and ethical behaviour and have a responsibility to the employees serving the company worldwide. Our core values such as empowerment,



innovation and integrity guide us in our actions and daily business decisions. Furthermore, we and our business partners have an obligation to all stakeholders to observe high standards of integrity and fair dealing.

Seyntex's ICP is based on:

- UN Universal Declaration of Human Rights and connected UN Conventions
- ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- OECD Guidelines for Multinational Enterprises
- OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data
- ISO standard 9001 & 14001

We respect the laws and regulations in the countries in which we operate and require that our business partners do the same. We do not accept any law violating activities, including but not limited to any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4, of the Act.

All of our employees must comply with the ICP and all applicable laws with regards to corruption, labour, environment, sustainability, safety regulations, data protection and export control, amongst others. Additionally, we expect all companies and individuals engaged in a Seyntex supply chain to comply with the ICP.

### **3. Due diligence**

We do not employ or accept any form of forced or bonded labour, human trafficking, exploitation and other offences as described by the Act, although we acknowledge that it exists and realize that it cannot be eradicated by simply setting up rules or inspections. We, however, strive in our everyday operations to eradicate the offences to the utmost extent and will do everything in our power thereto.

We have implemented a company-wide ICP and although we do not currently hold SA8000 accreditation, we operate in full compliance with its principles as part of taking a structured approach to social accountability and fair treatment of employees. Compliance is monitored and our team are empowered to report issues during their daily roles, frequent visits to our wholly owned factories and site visits to suppliers. Our people do audits in manufacturing facilities, where they mainly focus on interviews with workers.

We manage supply chain partner performance proactively, through site visits reporting and monitoring against specific KPIs, such as ethical and CSR policies. Such information is communicated in the bi-annual Supply Chain Assurance reports.

All our policies are endorsed at leadership level and performance is reviewed annually. Our policies, procedures and processes are clearly communicated to all employees and supply chain partners, with ongoing monitoring and management to drive performance. All employees



are expected to actively contribute to meeting our objectives and we ensure they have the appropriate knowledge, awareness and skills to perform their tasks in a socially and ethically responsible manner.

#### **4. Risk management and steps taken to minimize Act offences**

We take a proactive, forward-looking and business-wide approach to risk management. Following supply chain specific risk analysis that includes, we develop, ratify and clearly communicate the risk management plans that inform the activities of our workforce and suppliers. We use circular procedures that are aligned to ISO 31000 and monitor and record performance and any risk development in our real-time ERP system.

The selection of supplier and subcontractors in our supply chain is one of key concern. It is our highest priority to select suitable suppliers, subcontractors and manufacturing partners. During the on-boarding stage, parallel to a visit by the Seyntex management, suppliers and subcontractors are obliged to provide some necessary business and operational documents that are required to fulfil the on-boarding criteria with regards to ethical and social accountability. This reflects ISO 9001:2015 clause 8.4. Such business and operational documents include, but are not limited to:

- Supplier has certifications for SA and other regulatory & sustainability certifications
- Supplier has commitment for improvement through KPIs for SA on yearly basis
- Supplier purchases materials from certified Tier-2 Suppliers
- Supplier produces in compliance with all applicable local laws

In case the evaluations are positive, the supplier or subcontractor is given the status of approved supplier or subcontractor and is registered in the Approved Supplier Register, qualifying them for contract award consideration. When approved, a vendor file is completed and archived by our purchasing department.

Based on inputs from monitoring and observations during audits, the supplier is scored and ranked, during a yearly supplier evaluation. The supplier is informed on the outcome of this evaluation and requested to take the necessary actions in order to rectify deficiencies. During audits the implementation of these actions is verified. Corrective actions are verified during subsequent audits. In case a supplier fails to obtain the minimum score during the supplier evaluation, he is removed from the list of approved suppliers.

#### **5. Training**

Our compliance to the Act, SA8000 and other CSR policies is based on the fact that skilfulness, commitment and training of the personnel are key factors to ensure a high level of adherence. Therefore personnel is selected, based on minimum required competences for the job and is continuously trained.

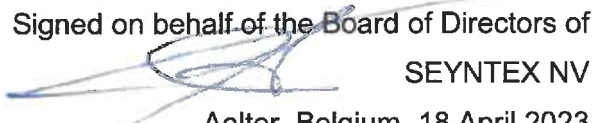
As to compliance to our ICP, we provide appropriate trainings to our employees, as needed, on the ICP and on applicable laws. At a minimum, the trainings will:

- Provide sufficient knowledge of the ICP
- Raise awareness of situations in which a manager or a compliance officer should or must be consulted and how to do so
- Emphasize that violations of ICP or of applicable law may result in disciplinary action up to and including termination of employment
- Be repeated as needed to remind individuals of their responsibilities and inform them of relevant developments

A timetable of trainings and other ICP related events is included in Chapter 5.1 of the ICP.

## **6. Endorsement**

This statement is approved by the Board of Directors on 18/04/2023.

Signed on behalf of the Board of Directors of  
  
SEYNTEX NV  
Aalter, Belgium, 18 April 2023  
Agar Daelemans  
CEO