

Slavery and Human Trafficking Statement



UK Modern Slavery Act 2015

“Slavery and Human Trafficking Statement” of NORMA Group (FY 2015/2016)

NORMA Group is a global market and technology leader for engineered joining technology and is headquartered in Germany. As we are aware of the associated responsibilities to our global business activities, these are built on the commitment to conduct business in an ethically and socially responsible way.

With its 27 production sites and numerous sales offices, NORMA Group has a global network through which it supplies more than 10,000 customers in more than 100 countries with a supply base of approx. 8,000 suppliers for direct and indirect materials. Respecting human rights and social standards as well as ensuring appropriate working conditions are of central importance – not just with respect to our employees but also within our value chain.

NORMA Group categorically rejects and does not accept any form of violation of human rights. We are not only committed to prevent slavery and human trafficking in our own corporate activities but also require all our business partners to not undertake any violation of an individual’s human rights. If we become aware of any violations, the business relationship is terminated immediately. NORMA Group fully supports the provisions set out in the “The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015”.

NORMA Group’s existing compliance and risk management systems are used to monitor compliance with relevant laws, regulations and internal requirements and to ensure that contractual obligations are adhered to by our business partners. NORMA Group regularly performs in-depth risk analysis, also covering potential risks of human rights’ violations, in order to determine and monitor the risk profile of countries, subsidiaries and functions.

In addition and as part of NORMA Group’s Corporate Responsibility activities, we are regularly conducting stakeholder roundtables in order to discuss stakeholders’ expectations and potential risks as well as assessing NORMA Group’s efforts in addressing these risks and expectations. This year’s stakeholder roundtable focused on sustainability within the supply chain.

NORMA Group has published various policies in order to provide proper guidance to our employees and business partners. One of these is NORMA Group’s Code of Conduct that includes commitments with regard to the rejection of forced, compulsory and child labor. All employees are trained on the basic compliance rules, paying particular attention to NORMA Group’s Code of Conduct. Dedicated training on the requirements concerning purchasing activities is given to selected, relevant employees.

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With a clear focus on our suppliers, a globally applying Supplier Code of Conduct was introduced in 2015. It clearly states NORMA Group's expectations towards its suppliers' behavior. It requires, amongst other topics, to adhere to the following principles:

- Observance of and respect for human rights
- Exclusion of forced or compulsory labor
- Prohibition of child labor

To date, 100 percent of our most strategically important suppliers have signed our Supplier Code of Conduct. This consideration of human and employee rights as part of our contractual arrangements will help to ensure that all parties act responsibly throughout the entire supply chain.

NORMA Group also applies sustainability criteria to the selection as well as to the continuous monitoring of suppliers. A detailed supplier evaluation process is used by our production plants each year. It measures the performance of the most important production material suppliers, monitors their development, and ensures that new business is awarded on a solid, transparent and reliable basis.

We are constantly reviewing the effectiveness of our efforts in preventing any violations with regard to our defined requirements. In addition, we also use our stakeholder roundtables to discuss the effectiveness of our sustainability efforts. NORMA Group sites are regularly subject to on-site inspections by NORMA Group's Internal Audit Department in order to verify the adherence to laws, regulations and internal requirements. Suppliers are regularly visited by NORMA Group personnel.

NORMA Group has implemented a group-wide Compliance organization with Local Compliance Officers serving as direct contact persons at every NORMA Group entity. In addition, a whistleblower hotline is in place that is available worldwide and can be used – internally and externally – for reporting suspected illegal, unethical or improper conduct.

To date, there is no information or evidence of cases indicating that NORMA Group has been involved in human rights abuses. Further, we did not gain knowledge of any complaints or grievances against any of our suppliers due to human rights abuses.

This statement is made pursuant of section 54 of "The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015". It constitutes NORMA Group's "Slavery and Human Trafficking Statement" for the financial year ending 31 December 2016. It has been approved by the Board of NORMA Group SE and will be reviewed and updated annually.

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