

Mehler Vario System GmbH

MODERN SLAVERY STATEMENT 2022

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This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Mehler Vario System GmbH (MVS) and other relevant group companies during year ending 31 December 2022 to prevent modern slavery and human trafficking in its business and supply chains.

This statement has been approved by the Board of Directors.

1. Introduction

This is Mehler Vario System GmbH's (MVS) Modern Slavery statement for the financial year ending 31 December 2022 and is issued under the UK Modern Slavery Act 2015. It is made by MVS and on behalf of the MVS' subsidiaries as described in section 2, and it outlines the steps we have taken (and continue to take) as a business to prevent slavery and human trafficking in our own operations and supply chains.

We recognise that modern slavery is a growing global issue, and we understand our responsibility to prevent and mitigate the risks of human trafficking, forced, bonded and child labour in our business and supply chains (and remediate where necessary).

This year has again been exceptional. The continued Covid-19 pandemic and Russia's invasion of Ukraine have caused unprecedented disruption and change on a global scale. The impact has been greatly felt by employees, suppliers, and the thousands of workers within our supply chains, and we have had to adapt to the challenges it has presented.

This year we also acknowledged the important role the German Act on Corporate Due Diligence in Supply Chains and the EU Draft Corporate Sustainability Due Diligence Directive will take going forward.

Our commitment to our customers and stakeholders is very clear; we will always treat people in our business and supply chain fairly. This means we will continually review and improve our policies, practices, and procedures so that we can fulfil this commitment.

2. Our Business and Supply Chains

The MVS-Group is a broadly based and globally active group of companies comprised of Mehler Vario System GmbH as parent company.

Together with our subsidiaries we form a strong and competent group of companies offering integrated solutions for professional users and specialists in the areas of protection and carrying systems, safety equipment, platform and vehicle protection as well as tactical equipment and clothing.

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This statement covers the activities of [Mehler Vario System GmbH](#), [Lindnerhof Taktik GmbH](#), [Mehler Engineered Defence GmbH](#) and [UF PRO](#).

3. Governance and Leadership

The Director leading each of our businesses is responsible for managing any modern slavery risk within their operations, with overall accountability held by the Board of MVS.

The MVS Code of Conduct commitments focus on key policy areas affecting MVS, ensuring that we act in line with relevant laws and regulations, industry standards and that we give stakeholders confidence.

Our expectations for suppliers to provide good working conditions, comply with our sourcing principles and identify modern slavery risks, are set out in our supply chain and responsible sourcing commitment.

Risk analysis is carried out on an annual basis. The independent certifying body Worldwide Responsible Accredited Production (**WRAP**) conducts annual social compliance audits for us at our key tier 1 facilities.

4. Policies and Contractual Controls

We have continued to develop our policies with input from in-house experts, suppliers and external stakeholders.

We have several groupwide policies in place relevant to modern slavery:

- Mehler Ethical Code of Conduct for all MVS Group staff
- Mehler Ethical Code of Conduct for all sourcing agents and third-party inspectors
- Principles of Worldwide responsible Accredited production
- OEKO-TEX or Blue Sign certification requirement for textile material suppliers

All our purchasing contracts prohibit subcontracting without written approval of MVS and all of our suppliers sign our Code of Conduct. Breach of this contractual term may lead to immediate termination of our business relationship with the factory/supplier.

Protecting the most vulnerable workers across the supply chain and reducing the risk of modern slavery is an ongoing key focus.

5. Assessment of Modern Slavery Risk in our Supply Chain

The MVS Group is aware of its own responsibilities and applies responsible purchasing practices. Over the last year, notwithstanding severe COVID related limitations on in-person monitoring of supplier sites, we nonetheless managed, with the help of our local agents and independent certifying body WRAP, to monitor social compliance. We currently investigate extending the third-party monitoring program.

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6. Due Diligence and Assessment of Suppliers and Supply

In 2022 we have intensified working with WRAP to identify potential areas of increased supply chain risks.

We conduct due diligence within our supply chains and operations to understand where there is greatest risk of modern slavery and human trafficking. The impact of Covid-19 has been significant, and we have had to adapt quickly to respond effectively to the constantly changing situation. We have scheduled regular video calls with suppliers, to understand how they are managing labour, health and safety and working hours on site.

We extended our cooperations by appointing independent third-party organizations to conduct supplier audits and visits; at tier 1 and tier 2 of parts of our supply chains.

7. Modern Slavery Awareness Raising

The MVS Group strives to create long term partnerships with suppliers. This allows us to deepen our understanding and oversight. Regular on-site visits by our own- and third-party staff takes place at tier 1 and more recently tier 2 supplier levels.

Awareness-raising remains a key priority during training of all our staff working with factories, including technicians and inspectors.

8. Partnerships and Collaborations

The role of partnerships in tackling modern slavery is crucial, particularly when confronting some of the global challenges we face within the industry. Those partnerships are especially important where our commercial leverage to influence suppliers is weaker. We have continued to work within our long-standing collaborators, and we have also created some new partnerships. MVS Group is a member of SEDEX in the UK and, since 2021, has worked with WRAP to understand local sourcing challenges.

9. Next Steps

The MVS Group has made progress this year, particularly through our introduction of independent social compliance certification for Asia sewing facilities. We will keep strengthening and developing our governance and risk assessment of our supply chains. Going forward the MVS Group will also align with the requirements of the German Act on Corporate Due Diligence in Supply Chains.

Fulda, May 22nd, 2023

For and on behalf of MVS GROUP


Thomas Homberg, CEO


Dr. Mario Amschlinger, CFO & COO