



Winterbach, March 2022

## PETER HAHN

### Slavery and Human Trafficking Statement [Financial year 2020/ 2021]

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and is the slavery and human trafficking statement of the PETER HAHN Limited for the financial year 2020/2021.

#### 1. INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as forced and compulsory labour. Modern slavery is a global issue and companies have to take their responsibilities along their supply chains in cooperation with partners to operate in an ethical manner. For the PETER HAHN Limited responsibility means taking preventive actions, complying with social standards and performing fair treatment of partners and suppliers.

#### 2. CORPORATE STRUCTURE OF PETER HAHN

The PETER HAHN Limited is a sales company of various goods, especially apparel, footwear and textiles for end consumers. PETER HAHN Limited is a 100% subsidiary of the PETER HAHN Beteiligungs GmbH which is holding participations in other companies that distribute goods.

The PETER HAHN Beteiligungs GmbH is a subsidiary of PETER HAHN GmbH. PETER HAHN GmbH is wholly owned by the TriStyle Mode GmbH.

PETER HAHN GmbH is a Europe-wide successful, omnichannel company with about 1000 employees, mainly based in Winterbach, Germany. PETER HAHN GmbH has furthermore the mainly business purpose of manufacturing of textiles and trade of goods as well as holding and administration of participations in other companies. In the fiscal year 2020/2021 PETER HAHN GmbH had a global annual turnover of 446 Mio €.

**Supply chain:** As a mail order company offering private brands and brands, PETER HAHN GmbH has about 320 suppliers worldwide. The organisation does not own any production sites, but work with long-term, trusted suppliers. For the private brands, PETER HAHN GmbH works with about 140 suppliers, especially with suppliers in Europe as well as suppliers in Turkey and Asia. The TriStyle Mode GmbH has its own Sourcing Offices, the TriStyle Sourcing Limited, in Hong Kong, Istanbul and Porto which supports the PETER HAHN GmbH in sourcing and handling of suppliers.

**Sustainability Management:** PETER HAHN GmbH established a sustainability department in 2012 which works with the suppliers on sustainability aspects as well as the compliance to good working conditions and the respect of human rights.

Peter Hahn Limited · c/o Francis Clark LLP · North Quay House · Sutton Harbour, Plymouth Devon · PL4 0RA  
Tel.No.0800 054 2120 · Fax.No.0844 557 3234 · e-mail: service@peterhahn.co.uk · www.peterhahn.co.uk  
Directors: Stefan Kober, Dr. Daniel Gutting · Registered in England and Wales No.3341321

---

Bank:	Sort-Code	Account No.	Swift-Code	IBAN-No.
Commerzbank Corporates & Markets	40-62-01	30066080	COBAGB2X	GB 67 COBA 4062 0130 0660 80



### 3. POLICIES

PETER HAHN GmbH defined internal processes in consideration with several policies to ensure trustful business relationships in an ethical manner.

#### **amfori BSCI Membership**

Since 01.01.2013, PETER HAHN GmbH has been and currently is an active member of **amfori BSCI (Business Social Compliance Initiative)** through the membership of the TriStyle Mode GmbH. For more information, see: [www.amfori.org](http://www.amfori.org).

amfori is the leading global business association for open and sustainable trade. PETER HAHN GmbH improves the social performance of the supply chain via amfori BSCI. Therefore, PETER HAHN GmbH does not tolerate any form of slavery, servitude, forced, compulsory labour and human trafficking and commits strongly to the early detection, monitoring and remediation of such issues in its supply chains.

#### **Internal policies**

Furthermore, a Child Labour Policy and a Forced Labour Policy was established for the TriStyle Mode GmbH, its subsidiaries and its partners. The policies emphasise and publish the position of the PETER HAHN companies that child and forced or compulsory labour are prohibited. In addition, it clarifies the in case of the violation of these policies, like protection and remediation for the affected person and even the termination of the relationship with the supplier.

### 4. DUE DILIGENCE IN THE OWN BUSINESS AND SUPPLY CHAIN

As an amfori BSCI Participant, PETER HAHN GmbH has developed the necessary management system and procedures to effectively prevent and address any adverse human rights' impact that may be detected in its supply chains.

PETER HAHN GmbH requests from its business partners to follow social standards and ethical business behaviour. Therefore, the contractual commitment to social standards and human rights is mandatory before a business cooperation is initiated. The private brand suppliers and the respective factories in risk-countries have to acknowledge the amfori BSCI Code of Conduct (CoC) and the principles of amfori BSCI. The partners of PETER HAHN companies are asked to pass this information on to their own partners, creating a positive cascade effect.

PETER HAHN GmbH also evaluates potential new suppliers in terms of social standards by conducting a factory evaluation (FE). During the business cooperation, the own employees from buying, quality and sustainability departments, including the managing director of buying, visit the production sites regularly. The responsible departments also have contact and visit the indirect partners along the supply chain, for example spinners or fabric suppliers as well as raw material suppliers.

Due diligence to PETER HAHN GmbH also means to perform a risk evaluation of the production countries of the partners based on the amfori BSCI risk classification. Based on the risk index, the amfori audit requirements are defined. In countries with a high risk, the BSCI audit system is applied and audits are conducted. It is the goal to have all production sites in risk countries audited in accordance with the amfori BSCI CoC.

Peter Hahn Limited · c/o Francis Clark LLP · North Quay House · Sutton Harbour, Plymouth Devon · PL4 0RA  
Tel.No.0800 054 2120 · Fax.No.0844 557 3234 · e-mail: [service@peterhahn.co.uk](mailto:service@peterhahn.co.uk) · [www.peterhahn.co.uk](http://www.peterhahn.co.uk)  
Directors: Stefan Kober, Dr. Daniel Gutting · Registered in England and Wales No.3341321

---

Bank:	Sort-Code	Account No.	Swift-Code	IBAN-No.
Commerzbank Corporates & Markets	40-62-01	30066080	COBAGB2X	GB 67 COBA 4062 0130 0660 80

# Peter Hahn

If any non-compliances are identified, the supplier must create a corrective action plan and follow it. It is also the goal to always have valid audits and see improvement in the performance. In case of a violation of the BSCI Code of Conduct regarding child labour or forced labour, the supplier has to react and improve the situation immediately. If a supplier is not willing to improve or fails to make long-term progress, the business relationship may even be terminated.

In addition, PETER HAHN GmbH also conducts a thorough risk analysis annually, based on the strict rules of the German government-run certification label "Green Button", see <https://www.gruener-knopf.de/en>.

## Grievance mechanism

Being an amfori BSCI participant, any party can lodge a grievance through the amfori Grievance Mechanism at [grievance@amfori.org](mailto:grievance@amfori.org) which leads to a possibility to identify incidents, ensure human rights and good working conditions as well as to engage in the remediation, if necessary.

In addition, PETER HAHN GmbH has introduced a new grievance mechanism <https://peterhahn.whistleblowing-software.com/> which can also be used by its suppliers and their employees to enable any complaints, hints or discover hidden risks in the factories. These grievances are handled confidentially, investigated and followed regarding solution and remediation.

PETER HAHN GmbH, as part of the TriStyle Mode GmbH, also is a project member of the pilot "Speak for Change" – an amfori supply chain grievance mechanism.

## 5. PERFORMANCE MONITORING AND MEASURING EFFECTIVENESS

The supplier audits conducted by amfori BSCI are rated based on the amfori BSCI methodology. This enables PETER HAHN GmbH to monitor the performance of the suppliers by the audit grading and evaluate their improvements.

The approach consists of follow-up audits, in addition with a regular exchange with the business partners, analysis of the improvement measures and monitoring the realisation of changes and effectiveness.

A continuous tracking with key figures is followed internally.

For an overview of the PETER HAHN activities in various sustainability aspects, please refer to the PETER HAHN corporate website at: <https://www.peterhahn.com/en/sustainability/>

## 6. TRAINING AND CAPACITY BUILDING

Capacity building and trainings on social compliance as well as on modern slavery are regularly offered to the suppliers by the amfori BSCI academy. In addition, a series of supplier trainings has taken place regarding working conditions and human rights, including child labour and forced or compulsory labour.

The employees of the TriStyle Sourcing Offices and the Buying departments as well as Quality departments of PETER HAHN GmbH are also regularly trained on social compliance and are informed about the amfori auditing program and the suppliers' performances.

Peter Hahn Limited · c/o Francis Clark LLP · North Quay House · Sutton Harbour, Plymouth Devon · PL4 0RA  
Tel.No.0800 054 2120 · Fax.No.0844 557 3234 · e-mail: [service@peterhahn.co.uk](mailto:service@peterhahn.co.uk) · [www.peterhahn.co.uk](http://www.peterhahn.co.uk)  
Directors: Stefan Kober, Dr. Daniel Gutting · Registered in England and Wales No.3341321

---

Bank:	Sort-Code	Account No.	Swift-Code	IBAN-No.
Commerzbank Corporates & Markets	40-62-01	30066080	COBAGB2X	GB 67 COBA 4062 0130 0660 80

# Peter Hahn

## 7. APPROVAL OF THIS STATEMENT

This statement was approved by the Management Board of PETER HAHN Limited.

Stefan Kober  
Managing Director  
Management Board

Dr. Daniel Gutting  
Managing Director  
Management Board

Peter Hahn Limited · c/o Francis Clark LLP · North Quay House · Sutton Harbour, Plymouth Devon · PL4 0RA  
Tel.No.0800 054 2120 · Fax.No.0844 557 3234 · e-mail: [service@peterhahn.co.uk](mailto:service@peterhahn.co.uk) · [www.peterhahn.co.uk](http://www.peterhahn.co.uk)  
Directors: Stefan Kober, Dr. Daniel Gutting · Registered in England and Wales No.3341321

---

Bank:	Sort-Code	Account No.	Swift-Code	IBAN-No.
Commerzbank Corporates & Markets	40-62-01	30066080	COBAGB2X	GB 67 COBA 4062 0130 0660 80