

## Anti-Slavery Policy

Sasse AG and its subsidiaries have a zero tolerance approach in all forms of modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships.

### Aims of this Policy

This policy explains Sasse AG's commitment to limiting the risk of modern slavery occurring within our business or infiltrating our supply chains or any other forms of business relationships.

This policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, volunteers, interns, contractors, consultants and any other third party representative.

We expect all who have, or seek a business relationship with Sasse AG to familiarise themselves with this policy and to act at all times in a way that is consistent with its values. We only do business with organisations who fully comply or are taking steps towards compliance.

This policy will be used to underpin and inform any statement on Slavery and Human Trafficking that we produce further to the transparency in supply chain requirements of section 54 of the Modern Slavery Act (MAS) 2015.

### What do we mean by modern slavery?

Modern slavery can take many forms. It is a complex and multi-faceted crime. The MSA 2015 covers four key activities:

- Slavery: ownership is exercised over an individual
- Servitude: involves the obligation to provide services imposed by coercion
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty (inclusive of debted / bonded service)
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploit them

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's human rights. Tackling modern slavery requires us to play a part and remain vigilant to the risk in all aspects of our business and business relationships.

### How we seek to embed our anti-slavery policy in practice

To underpin our policy commitments we aim to implement the following measures over the course of the 2016 / 2017 financial year:

- We will conduct risk assessments to determine which parts of our business and which part of our supply chains are most at risk from modern slavery so that we can focus our efforts on those areas most "at risk".

- Ensure our contractual documentation includes specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour in line with this policy.

### **Responsibility for this policy**

The company Directors have overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations. The compliance officer for the parent company and the compliance officer for Sasse Limited (in the UK) will have primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate to ensure it can operate effectively.

All levels of management are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day-to-day performance of their roles.

### **Communication and employee awareness Training**

All staff will receive adequate training on this policy and any supporting processes applicable to their role. Such training will form part of the induction process. In addition staff will receive training on the broader issues of modern slavery so as to assist them in appreciating the extent of the problem of modern slavery and identify individuals / areas of the business that may be at risk from practices of modern slavery.

### **Breaches of this policy**

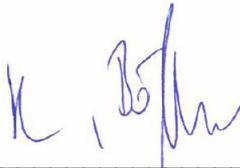
Any breaches of this policy will be taken seriously and dealt with on a case by case basis. The breach of this policy by an employee, director or officer may lead to disciplinary action being taken. Serious breaches will be regarded as gross misconduct and may lead to immediate dismissal in accordance with our disciplinary procedures.

Everybody to whom this policy applied will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

### **Status of this policy**

The anti-slavery policy will be reviewed on an annual basis. The policy does not give contractual rights to company employees, the company reserves the right to alter any of its terms at any times. We will notify applicable parties in writing of any changes that may affect them.

Munich, 01.04.2016

  
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Katja Böhmer, ppa.  
Director Operations, Dr. Sasse AG