



## *Modern Slavery and Human Trafficking Statement* *in our Business & Supply Chains*

At S.E.C. Accessories Ltd., S.E.C. Hong Kong Factory Ltd., P P S E C Company Ltd., S.E.C. (Dongguan) Accessories Ltd. refer as (S.E.C. Group), we acknowledge and embrace our responsibility to respect human rights across our own business operations, our relationships with other businesses and the communities in which we operate. This statement is produced under the provisions of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018. It explains the steps we take as a company to prevent modern slavery in our business and supply chains. Modern slavery includes slavery, servitude, forced labor and human trafficking.

### Introduction

S.E.C. Group is committed to respecting internationally recognized human rights as set out in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

S.E.C. Group engages with stakeholders to identify and address human rights concerns. Special attention is given to certain stakeholder groups such as S.E.C. Group employees, S.E.C. Group business relations (and their employees) and the local communities in which S.E.C. Group operates.

### Our Business

S.E.C. Group is a pioneering, worldwide manufacturer of garment accessories products & health care products.

We keep expanding over the years and set up our own factories in China and Cambodia to make mass production to the complete range of high-quality trim products and serve global and local brands. The S.E.C. network is growing rapidly worldwide. Sales offices have been established in the Asia region – Hong Kong, Shenzhen, Shanghai, Indonesia, Japan, Vietnam and Cambodia; in Europe we have offices in Holland, Italy, Turkey and the USA. S.E.C. has a large-scaled showroom in Hong Kong which welcome all the customers to come and comprehend our products identify by our customers as the leader in the industry for high-quality heat transfers and other health care products, we aim to bring innovative new products, finishes, and techniques to the garment & health care industries and create “brand value”. Besides, we have a professional technical team for proving technical supports to our customers.

S.E.C. Group have approximately 400+ employees. The company was founded in 2007.



## Our Commitment to Combatting Modern Slavery

S.E.C. Group is committed to acting ethically and maintaining a fair and honest business environment for employees, customers, suppliers and communities.

- Our [Code of Business Conduct](#) ('the Code') lays out the principles that guide us in everything we do and serves as an umbrella for several other S.E.C. Group regulations. Respect for people, recognition of their fundamental rights and a belief in the power of their diversity are part of the key principles underlying S.E.C.'s Group policies and operations. The Code explicitly mentions that we do not use forced labor or child labor, or demand that our employees work excessive hours. In cases where employees are asked to work overtime, their extra work is compensated in line with local legislation.

The Managing Board holds S.E.C.'s unit management accountable for compliance and the Company applies zero-tolerance consequence management to violations of the Code. Under our whistle-blower procedure, incidents are reported and dealt with by local line management or the S.E.C. Compliance Officers when appropriate. The whistleblower procedure is available to all stakeholders.

- Our [Supplier Code of Conduct](#) reflects our commitment to acting ethically and with integrity in our business relationships and the commitment we expect from our suppliers to do the same. As part of our initiative to identify and mitigate risks of slavery, forced labor and human trafficking occurring in our supply chains each of our suppliers is required to sign up to our Supplier Code of Conduct in order to work with us and is contractually obliged to comply with its terms and S.E.C.'s Group business and ethical standards. Our Supplier Code of Conduct expressly prohibits involvement in human trafficking and the use of slavery, forced labor or child labor. We encourage our suppliers to provide their stakeholders with a mechanism to raise concerns relating to a breach of the Code, or legislation.

## Risk assessment, due diligence and audit of own operations and suppliers

### Own Operations

Within our own operations, S.E.C. Group focuses on 2 elements – policy and practice. From a policy perspective, we believe that Modern Slavery is well covered. In terms of practice, all regions have performed their own investigations and confirm that they believe they are followed S.E.C.'s Group codes and policy as it applies to Modern Slavery.

S.E.C. Group we are audited on our compliance by our customers which annually arrange third party audit firm to come check at the areas of Labor Standards, Health and Safety, environment and Business Integrity. This will ensure our factories are full compliance with the local regulations and we are closely monitored, and non-compliance rapidly remediated through the introduction of appropriate corrective actions.



## Supply Chain

We actively monitor our supply base via supplier contacts/visits, sustainability assessments, and quality and sustainability audits on site. In any case where human rights abuses are observed measures are taken. S.E.C. Group expects suppliers to have processes in place to remediate those human rights abuses they cause or contribute to.

Besides monitoring compliance with the above, we are working to identify where the greatest risks of slavery, forced labor and human trafficking arise with our business and supply chains, and are reviewing our procedures for combatting slavery and human trafficking, including assessing the needs to revise our internal processes and enhance the due diligence we conduct on our suppliers.

## Training

All S.E.C. employees are expected to follow the Employee Code of Conduct. They receive regular training on values and business principles per the framework requirements. Purchasers are also trained on how to educate suppliers on Supplier Code of Conduct and how to act when suppliers are not compliant.

This statement was approved and signed on 15<sup>th</sup> December 2020 by:

A handwritten signature in black ink, appearing to read 'Victor Cheung', is written over a horizontal line.

Mr. Victor Cheung  
Director of QA & Compliance