# Modern Day Slavery Statement

# **MODERN DAY SLAVERY STATEMENT**

Samsonite International S.A. (the "Company"), together with its consolidated subsidiaries (the "Group"), is the world's largest travel luggage company, with a heritage dating back more than 100 years. The Group is committed to conducting business in a way that is consistent with its traditional values - acting responsibly, honestly and ethically at all times and complying with the laws of the various countries where we do business.

This statement is made pursuant to Section 54 of the UK Modern Day Slavery Act of 2015 and the California Transparency in Supply Chains Act of 2010 (SB 657), and constitutes the Group's modern day slavery statement for the financial year ended December 31, 2016.

This statement sets out our commitment to prevent the use of modern day slavery within the Group and in our supply chain, and the steps we are taking to implement our commitment.

# **Business Structure, Activities & Supply Chain**

The Group is principally engaged in the design, manufacture, sourcing and distribution of luggage, business and computer bags, outdoor and casual bags, travel accessories and slim protective cases for personal electronic devices throughout the world. The Group sells its products primarily under the Samsonite<sup>®</sup>, Tumi<sup>®</sup>, American Tourister<sup>®</sup>, Hartmann<sup>®</sup>, High Sierra<sup>®</sup>, Gregory<sup>®</sup>, Speck<sup>®</sup>, Lipault<sup>®</sup>, and Kamiliant<sup>®</sup> brand names, as well as under other owned and licensed brand names.

As of December 31, 2016, the Group's products were sold in more than 100 countries.

The Company operates using a largely decentralized structure across four key regions: Asia, Europe, Latin America and North America. The Group sells its products through a variety of wholesale distribution channels, through its company-operated retail stores, and through e- commerce. Its principal wholesale distribution customers are department and specialty retail stores, mass merchants, catalog showrooms, and warehouse clubs.

The Company owns and operates manufacturing facilities in Oudenaarde, Belgium; Szekszárd, Hungary; and Nashik, India. The majority of our products are manufactured by independently owned and operated facilities, which are mostly located in China.

Modern day slavery in any of its forms—whether forced, bonded, compulsory or labor, human trafficking —represents some of the gravest forms of human rights abuse. The Group has a zero-tolerance approach to such activities, strictly forbidding slavery in our operations and in our supply chain.

We are also committed to maintaining systems that are designed to reduce the possibility of modern day slavery occurring in our operations and supply chain. We uphold this commitment through our policies and governance process, supported by our leadership team.

The Company's employee Code of Conduct is mandatory and extends to every person working at the Group. Included in it is the Company's corporate commitment to legal compliance, ethical behavior, and support for labor standards enshrined by the International Labor Organization (ILO). The Code of Conduct acknowledges the Company's support for the ILO's central tenant: that people throughout the world should be able to undertake decent and productive work in conditions of freedom, equality, security and human dignity. The Company's policies were recently updated to explicitly include a prohibition on the use of forced or other compulsory labor across its business, as well as its supply chain. Employees who fail to abide by the Group's policies are subject to discipline and dismissal, if warranted.

The Group works to ensure that its global supply chain partners follow socially and ethically acceptable manufacturing procedures. It was our concern for workers' well-being that led us to establish our Ethical Charter, setting forth our vision for decent conditions of work and reinforcing our commitment to making continuous improvements to workplace conditions. The Ethical Charter covers requirements related to workers' rights, working conditions, and terms of employment, among others. The Ethical Charter provisions are consistent with those established by the ILO, such as prohibitions against forced labor and child labor.

# **Due Diligence Processes & Steps to Manage Risk**

The Group does not support or knowingly maintain relationships with any business involved or connected in any way with modern day slavery. Nevertheless, the Group understands that its greatest risk of modern day slavery is in our product supply chain; as such, we have undertaken activities to identify and minimize those risks with our direct and indirect final assembly suppliers, and with raw material or component suppliers with whom we have a direct contract. Monitoring and verification activities are carried out by a team of trained professionals based in China and in India.

Compliance with the Ethical Charter is a requirement for doing business with the Group. The Group's manufacturing agreement with suppliers obligates suppliers to adhere to the Ethical Charter and its process for monitoring and verification.

#### **Training**

The Company's employees are introduced to the Code of Conduct during their induction orientation. The Company educates its suppliers about the prohibition on human trafficking, child labor, and other violations of our Ethical Charter through the process of requiring adherence to the Charter and through our on-site monitoring and verification processes.

# **Accountability**

The Group maintains and enforces internal accountability procedures for employees and suppliers who fail to meet the Group's standards to prevent the incidence of modern day slavery in our operations and/or supply chain.

We provide the opportunity for everyone who works in the Group to report suspected breaches of the Employee Code of Conduct, including via an anonymous confidential hotline and website reporting service. Members of the Group's management team in the finance, legal, human resources and internal audit departments review any information that is submitted via the hotline. The hotline is available toll-

free and is publicized to employees electronically, in our Code of Conduct, and through posters and in worker handbooks throughout our operations.

Employees may use this hotline, anonymously if desired, if they have any workplace concern that they wish to report. Employees using the hotline are protected against retaliation. All legitimate reports are investigated and appropriate remedial actions taken as needed.

The Group's social compliance team conducts monitoring site visits and evaluates suppliers' activities that promote workplace improvements. If evidence of modern day slavery is found, the Group will examine the circumstances and develop the best possible strategy for resolution. The Group may act against those suppliers that do not demonstrate sufficient commitment to the Ethical Charter, or are in breach of it; subsequent actions can include terminating the supplier.

# **Program Evaluation**

Evaluation of the effectiveness of our efforts to ensure that no human trafficking or modern day slavery is present in the Company or in its supply chain rests with the country and regional management for employees, and with sourcing and production staff in the supply chain; this process is reviewed periodically by the internal audit team.

Approved by the Board on March 15, 2017.

Signed on behalf of the Board of SAMSONITE INTERNATIONAL S.A. Timothy Charles Parker Chairman