

## INTERNAL MEMO

MAHLE Industries Ltd.  
United Kingdom  
Dept. HR

## SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR MAHLE FOR THE FINANCIAL YEAR ENDING DECEMBER 2020

### Distribution

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**Date**  
30.06.2021

**Pages**  
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This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (“MSA”) and applies to the MAHLE Group companies operating in the United Kingdom (UK):

- MAHLE Industries UK Ltd.
- MAHLE Aftermarket Ltd.
- MAHLE Powertrain Ltd.
- MAHLE Engine Systems UK Ltd.

(hereinafter defined as “MAHLE UK”)

This statement defines the potential risks of modern slavery related to MAHLE UK business and the measures put in place to prevent slavery, forced labour, and human trafficking within its own business as well as its supply chains during the financial year ending 31 December 2020.

MAHLE UK is absolutely committed to preventing slavery, forced labour, and human trafficking in its corporate activities, as well as ensuring that no slavery, forced labour, or human trafficking occurs in its supply chains.

## ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

The MAHLE Group is part of the global automotive industry that supplies components to original equipment manufacturers and other supply chain companies.

The MAHLE Group is headquartered in Stuttgart/Germany and currently operates through its affiliated companies on five continents at some 160 production locations and 12 major research and development centres.

MAHLE UK operates at four production locations.

MAHLE UK has approximately 2,000 direct suppliers, each of which in turn has its own supply chain.

## **RESPONDING TO THE MSA**

A cross-functional working group sponsored by the UK Head of Human Resources has been formed in MAHLE UK to assess and respond to the requirements of the MSA. The group includes representation from Corporate Compliance, Purchasing, and Human Resources. We have an ongoing programme to continually review our response to and risk of slavery, forced labour, and human trafficking.

## **MAHLE UK POLICIES REGARDING SLAVERY AND HUMAN TRAFFICKING**

Following the MSA, MAHLE UK has reviewed and, where appropriate, updated the contents of key policies and supplier agreements to more explicitly prohibit slavery, forced labour, and human trafficking.

### MAHLE Business Code

The Business Code explains the type of actions and behaviour expected of all MAHLE Group employees—including directors and executives—when representing the organisation. The purpose of the Business Code is to provide a legal and ethical framework for operating abroad and managing its supply chain. The code is available to all employees on the intranet. All managers and staff in key positions must undergo compulsory compliance training, which is provided regularly.

*["COMPLIANCE WITH THE LAW AND RESPONSIBILITY—All employees must comply with the laws and regulations as well as internal guidelines that apply to their area of work. Violations of the law and breaches of internal rules are to be avoided under all circumstances."]*

The code is available on the MAHLE Group website and on the intranet. Board members and executives of the MAHLE Group must confirm in writing that they comply with the MAHLE Business Code.

## MAHLE Group Supplier Code of Conduct

MAHLE Group entities are committed to ensuring that its suppliers uphold human rights:

**[“Respect for the *Basic Human Rights of Employees*—**The supplier respects and supports compliance of internationally recognised human rights. The supplier rejects every form of forced labour and may not employ any person under the statutory minimum age as stated in the applicable laws. The supplier does not participate in and rejects all forms of slavery and human trafficking. In particular, the supplier ensures that no exploitative child labor within the meaning of ILO Convention no. 182 is or was involved in producing or processing the products to be delivered, as well as that these products do not violate any obligations resulting from the implementation of this Convention.”]

### Recruitment policy

MAHLE UK only uses specified, reputable employment agencies to source labour and always verifies the practices of any new agency to determine its compliance with the MSA and other applicable laws before accepting employees from that agency.

### Trade unions and other bodies representing workers

Through its employment practices, the MAHLE Group recognises and is bound by the laws relating to freedom of association.

## **SLAVERY AND HUMAN TRAFFICKING RISKS WITHIN MAHLE OPERATIONS**

MAHLE UK has undertaken an assessment of the organisation to determine its risk of slavery, forced labour, and human trafficking. The following were reviewed as part of this assessment: recruitment policies and practices, roles performed, and existing contractual agreements with employees, as well as the results of regular internal and external audits. MAHLE UK has also considered the processes that are in place to protect human rights.

Based on our assessment, we consider the risk of slavery, forced labour, and human trafficking within MAHLE UK during the financial year ending 31 December 2020 to be low.

## **AWARENESS AND TRAINING ON SLAVERY AND HUMAN TRAFFICKING**

Information on modern slavery in the form of an overview document and posters have been made available to all MAHLE UK employees.

MAHLE UK requires all staff working in Purchasing, Human Resources, and Supplier Quality within the UK organisation to complete training on modern slavery as they are in the best position to identify and address potential risks in this area.

### Remedial action

If MAHLE UK employees identify any potential signs of slavery, forced labour, human trafficking, or other human rights abuses within both its workforce and its supply chain, they are encouraged to report the matter to their line manager or through employee/union representative bodies. Employees wishing to report potential violations of compliance rules can do so normally first to their supervisor. Furthermore employees can contact the corporate compliance office or their regional compliance office. Additionally, in case of serious compliance violations or an increased need of confidentiality, employees may also contact the external ombudsman responsible for their region or use the web-based whistleblower system

To date, MAHLE UK has received no reports of concerns regarding slavery, forced labour, or human trafficking in its operations. If such an issue was reported, MAHLE would have undertaken an urgent, thorough investigation of the matter. If the investigation confirmed the concerns, MAHLE would have put robust action plans in place to address the issue and protect the victims.

## **SLAVERY AND HUMAN TRAFFICKING RISK ASSESSMENT IN MAHLE SUPPLY CHAINS**

MAHLE UK expects its suppliers to meet the standards set out in the global MAHLE Supplier Code of Conduct.

A supplier risk assessment has been undertaken based on the nature/value of the business transaction. MAHLE UK has identified no high-priority countries. The MAHLE Group uses desktop auditing to determine supplier compliance with the MSA by means of regular supplier questionnaires. In the last 12 months 100% of new suppliers added to our database have been assessed.

Steps will be made to improve substandard supplier practices if high-risk suppliers are identified. Such steps include providing advice to suppliers and requiring them to implement action plans. Sanctions may be brought against suppliers who fail to improve their performance according to an action plan or who seriously violate our supplier code of conduct.

Termination of the business relationship as per the supplier agreement may result. To date no high risk suppliers have been identified.

Where possible, the MAHLE Group will introduce terms in new contracts that require suppliers to comply with MSA obligations, which will be audited across a broad range of issues, including human rights and MSA issues. Supplier MSA obligations have been included in the MAHLE Group's standard terms and conditions.

In the financial year ending 31 December 2020, MAHLE UK did not discover any breaches of the MSA in its supply chains.

## PERFORMANCE INDICATORS

MAHLE UK has reviewed its key performance indicators (KPIs) upon the introduction of the Modern Slavery Act 2015:

- Number of staff working in Purchasing, Human Resources, and Supplier Quality that completed training on modern slavery
- Number of supplier questionnaires completed
- Number of complaints relating to slavery and human trafficking

## BOARD APPROVAL

This statement will be reviewed and updated annually and has been approved by the Board of Directors of:

- MAHLE Industries UK Ltd.
- MAHLE Aftermarket Ltd.
- MAHLE Powertrain Ltd.
- MAHLE Engine Systems UK Ltd.

**MAHLE Industries UK Ltd.**



**Toni Snell**

Dated: 30.06.2021

**MAHLE Aftermarket Ltd.**



**Jonathan Walker**

Dated: 30.06.2021

**MAHLE Powertrain Ltd.**



**Simon Reader**

Dated: 30.06.2021

**MAHLE Engine Systems UK Ltd.**



**Philipp Tallafuss**

Dated: 30.06.2021