
APPROVAL

FUNCTION	NAME
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Introduction

This statement sets out Faltec Europe Ltd.'s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1st January 2024 to 31st December 2024.

As part of the automotive manufacturing sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Faltec Europe Ltd (FEL).

We are a manufacturer of automotive trim parts in the automotive sector and are part of the Faltec Group. Our parent company is Faltec Co. Limited, with a head office in Japan and a global workforce of over 2,500. FEL employs just over 200 workers at the IAMP site in Sunderland.

We supply a number of OEM manufacturers throughout the UK and Europe and are IATF16949/ISO9001 accredited.

Generally, the automotive supply chain can be complex in that there are many levels of suppliers between a Tier 1 supplier and the source of raw materials that enter the manufacturing process.

Countries of operation and supply

FEL sources products from a number of global locations, mainly for raw materials, components used in the manufacturing process, and equipment. As part of our initiative to identify and mitigate risk, we clearly communicate our expectations to our suppliers. All suppliers are subject to a rigorous supplier appointment process. Where possible we build long standing relationships with local suppliers and make our expectations of business behaviour clear. OEM imposed suppliers are outside of our influence and scope. Where relevant we ensure that our suppliers are certified to ISO9001 and are complying with all applicable laws and regulations.

We believe that the risk of slavery and human trafficking in our own business and supply chain is low. We have robust HR policies and adopt rigorous recruitment procedures. Additionally, the complex and specialised nature of our business requires workers with a high degree of technical expertise and competency, making slavery and human trafficking within our organisation unlikely.

Relevant policies

We operate a series of policies that seek to prevent malpractice and encourages our workforce to raise awareness of any concerns, including:

- **Whistleblowing policy**

We encourage all our workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Supplier Code of Conduct**

We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

- **Recruitment & Selection policy**

We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency it is using before accepting workers from them. Our internal recruitment procedures ensure a robust hiring procedure including verification of relevant documentation, particularly right to work documentation.

- **Code of Conduct & Business Ethics**

Everybody connected with the company must maintain its reputation in line with our corporate values of Integrity, Innovation, Collaboration, Respect and Resilience. Everyone should act honestly, fairly and with transparency, and never in a manner that could discredit either themselves or FEL.

Preventing Modern Slavery

The terms and conditions of employment at Faltec seek to protect employees from the risk of modern slavery by openly and transparently outlining the agreements and procedures in which the individual will provide company service. The terms and conditions of employment are compliant to the current employment laws of England and Wales.

FEL requires all employees and workers to undertake appropriate statutory, mandatory or role - specific training and have a comprehensive understanding of their working conditions and job role.

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 of the company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal as per our disciplinary procedure.

Everybody to whom this policy applies 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.

If any part of this policy is unclear, clarification should be sought from the HR team.

Communication and employee awareness training

We require all staff working within our Procurement Department to complete training on modern slavery. This training covers:

- An overview of the Modern Slavery Act 2015.
- Definitions of modern slavery and the terms encompassed within this.
- How to identify the signs of slavery and human trafficking.
- What external help is available, for example local authorities, Modern Slavery helpline and Crimestoppers.

Board Member approval

This statement was approved on 1st April 2025 by our board of directors, who review and update it annually.



Alice Ambrose-Thurman

Director and Company Secretary