AVL Zöllner GmbH – Anti-Slavery and Human Trafficking Statement

In accordance with Section 54(1) of the Modern Slavery Act 2015 (the "**Act**"), this statement sets out our actions to understand the potential modern slavery and human trafficking risks related to our business and what steps have been put in place that are aimed at ensuring that there is no modern slavery or human trafficking in our own business and our supply chains and to demonstrate our commitment to preventing modern slavery and human trafficking. This statement relates to actions and activities during the financial year from 1 January 2024 to 31 December 2024.

Overview

The Act requires commercial organisations supplying goods or services and carrying on all or part of their business in the UK with an annual global turnover of more than GBP 36 million to prepare and publish an annual statement detailing what steps that organisation has taken to reduce the risk of modern slavery and human trafficking taking place in its own business or its supply chain.

What is modern slavery?

Modern slavery is a growing global problem that refers to situations where individuals are exploited and coerced into labour or services under condition akin to slavery, such as through force, fraud, or deception. It can include various forms of exploitation, such as debt, bondage, human trafficking, and forced marriage. Unfortunately, vulnerable people are affected in many different sectors including agriculture, construction, hospitality, retail, manufacturing and more.

Our organisational structure and supply chains

AVL Zöllner GmbH is part of the AVL Group and an affiliate of AVL List GmbH which is based in Graz, Austria. AVL List GmbH is a market leader with a first-class reputation. It is the world's largest independent company for the development, simulation, and testing technology of powertrains (hybrid, ICE, transmissions, electric motors, batteries, and software) for passenger cars, trucks, and large engines. You can find out more about our business at https://www.avl.com/en/locations/avl-zollner-gmbh.

Our policies

We are committed to the principles of integrity, honesty and fairness. We have set out these principles in various policies that are binding on the relevant stakeholders in the organisation. The following policies describe our approach to identifying risks of modern slavery and human trafficking, and the steps we are taking to prevent modern slavery and human trafficking in our operations:

- **Code of Conduct for Employees:** Our internal Code of Conduct is binding on all our employees and makes clear to them the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating locally or abroad and managing our supply chain.
- **Code of Conduct for Business Partners:** With our Code of Conduct for Business Partners, we are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- **AVL Whistleblower Policy:** We encourage all our employees, customers, and other business partners to report any concerns they may have relating to our organisation's direct operations or supply chains. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. The AVL Whistleblower System is designed to make it easy to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns can contact the organisation's digital whistleblowing tool Integrity Line.
- **Standard Terms and Conditions for Purchasing (T&Cs)**: In our standard terms and conditions for purchasing, we seek contractual assurance from our suppliers that they are not engaging (directly or indirectly) in any violation of human rights, use of child labour or any other conduct which is prohibited by our Code of Conduct for Business Partners.
- **Recruitment Policy:** We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency we are using before accepting workers from that agency.

You can find out more about our commitment to human rights and ethical behaviour and how it is embedded in our business principles in our group-wide statement on human rights, ethical behaviour and working conditions ("Human Resources Statement").

Our due diligence processes and risk assessment

The application of our policies and procedures includes due diligence on the suppliers we work with in accordance with our policies. Prior to any commencement of business, we ask our external suppliers to submit declarations that they comply with our T&Cs and the standards contained therein and that they request from their own suppliers and subcontractors to comply with similar standards. We have implemented platforms to assess our suppliers in relation to compliance with legislation and our ethical standards.

Our processes for assessing and managing our effectiveness in preventing (modern) slavery and human trafficking

To ensure the effectiveness of our implemented measures against modern slavery and human trafficking, we monitor the number of external suppliers who have returned signed declarations of compliance to us. In the event the declarations are not returned, or suppliers are found to be in violation of our Code of Conduct for Business Partners, appropriate measures will be taken.

In view of the fact that compliance violations can never be completely ruled out, no matter how sophisticated the compliance management, the AVL Whistleblower System is open to potential reporting persons along our entire supply chain. In addition, the AVL Whistleblower System is also intended to help recognise and eliminate compliance violations as early as possible.

Our training on modern slavery and human trafficking

Topics as human rights and ethical behaviour, including modern slavery and human trafficking, are part of AVL's global Compliance Management System (CMS) which is based on the AVL Code of Conduct. The Code of Conduct is trained worldwide as part of the mandatory compliance training for each AVL employee.

For managers there are in-depth training courses on leadership, compliance and our ethical standards.

Director approval

This statement was approved by our Managing Director, and it is reviewed and updated annually.

Dipl.-Ing. Arnold Berger, MBA
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Arnold Berger
Managing Director – AVL Zöllner GmbH