

Modern slavery statement for financial year 2022

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Plastic Omnium Automotive Limited ("POA") has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. As a member of the Plastic Omnium Group, POA has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

We operate as a tier 1 manufacturer of automotive parts, comprising the UK subsidiary of the world's leading producer of automotive bumper systems, tailgates and front-end modules. The company manufactures exclusively in the UK from its 3 production plants, 2 final assembly facilities and an engineering centre.

Our risk areas

We source a considerable volume of automotive components from overseas suppliers, the vast majority of whom are located in Western and Central Europe. These suppliers are very often imposed by the automotive manufacturer and accordingly are mostly substantial industrial companies operating in an advanced technological environment and often with a requirement to comply with the automotive manufacturers sourcing policies. We consider these supply chains to have a very low risk of slavery and/or human trafficking. The majority of tooling is also sourced from Western Europe from companies with very specialist skills. We do source some components from China, from customer-imposed suppliers. Purchasing for the majority of production materials and parts is carried out by a central purchasing team, in a French fellow-subsiidiary. Our UK purchasing teams employed directly by POA, for the most part handle maintenance, repairs and operations (MRO) supplies to our UK facilities from UK suppliers, together with development project supplies mostly from Western and Central Europe suppliers.

Our policies

The Plastic Omnium Group has adopted a Supplier Charter ("the Charter") issued to suppliers, who have an obligation to report any non-compliance. As a pre-requisite new suppliers must sign-up to the Charter as have the majority of existing suppliers.

The charter undertakes to respect

- The Universal Declaration on Human Rights of the United Nations and its two complementary pacts (the international pact relating to economic, social and cultural rights and the international pact relating to civil and political rights)

- ☐ The ten principles of the United Nations Global Compact;

☐ The Fundamental Conventions of the International Labor Organization (ILO) as well as the ILO Declaration relating to the fundamental principles and rights at work

☐ The OECD guidelines

More specifically the Charter requires;

The Supplier undertakes to respect fundamental rights relating to working conditions, in particular, with regard to:

☐ recourse to any form of forced or compulsory labor in all its forms

☐ use of child labor

☐ discrimination in terms of employment and working conditions

☐ equal pay

☐ trade-union freedom and the protection of union rights

in compliance with the fundamental conventions of the International Labor Organization.

The Supplier shall undertake not to have recourse to illegal work such as defined by the rules of the countries in which it is involved.

In 2019 a training program rolled out across the Group ensured that all the POA employees involved in any manner in sales or purchasing activities were fully briefed on the Group's codes of practice including ethics and non-ethical behaviour.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified. There were no such reports in 2021. In the unlikely event that any slavery and/or human trafficking practices within the company are brought to our attention, our Human Resources Director will have full responsibility for immediately eradicating the practice.

Training

Our employees do receive training concerning the Group-wide codes of conduct with additional Supplier Charter training for Purchasing staff but In view of the very low perceived risk we do not provide specific modern slavery training.

Approval for this statement

This statement was approved by the Board of Directors on

Name (Director) Christophe Marceau

Signature



Date

12/05/23