TI Fluid Systems Plc (“Company”) – Slavery and Human Trafficking Statement for the Financial Year 2020

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps the Company and its subsidiaries (“TI Fluid Systems”) has taken to ensure that slavery and human trafficking is not taking place in its supply chains or in any part of its business.

TI Fluid Systems is a global automotive supplier. This statement applies to all companies in the TI Fluid Systems group.

TI Fluid Systems maintains a strong commitment to the highest principles of business conduct and ethics. The Company’s Code of Business Conduct (“COBC”) makes clear that the Company will enter into representation or supplier agreements only with companies and individuals, which have a demonstrated record of and commitment to the highest ethical standards. The COBC also requires that any employee of the Company that is responsible for retaining and contracting with external parties ensure that the external party is informed of their responsibility to act in a manner consistent with the Company’s COBC, other policies and any applicable laws or regulations. If any employee becomes aware of any activity contrary to these requirements, the employee should report this in accordance with the COBC. We require that all employees complete online COBC training and our legal department conducts additional internal training. The COBC is regularly reviewed and updated, as necessary and is available on the Company’s intranet.

A typical automotive supply chain involves many levels from raw material supplier to Original Equipment Manufacturer (“OEM”). TI Fluid Systems is generally a Tier 1 or Tier 2 supplier to the OEM.

TI Fluid Systems has manufacturing facilities in 28 countries, 11 of which are considered “higher risk” markets (Brazil, China, Colombia, India, Indonesia, Mexico, Morocco, Russia, South Africa, Thailand, and Turkey). As a supplier, TI Fluid Systems is subject to high corporate social responsibility standards, including participating in various programs and initiatives sponsored by its OEM customers. TI Fluid Systems is audited against these standards and completes corporate social responsibility questionnaires upon request from OEMs to evidence the steps taken to manage human rights and environmental issues in the supply chain.

As a customer, TI Fluid Systems has suppliers, located in 58 different countries, 19 of which are considered to be “higher risk” markets (Argentina, Brazil, China, Colombia, Egypt, India, Honduras, Hungary, Indonesia, Mexico, Nicaragua, Philippines, Romania, Serbia, South Africa, Thailand, Tunisia, Turkey, and Venezuela). TI Fluid Systems issues purchase orders that incorporate the applicable TI Fluid Systems purchasing terms and conditions (“T&Cs”) and Global Supplier Requirements Manual (“GSRM”). The T&Cs require that suppliers
comply with all local laws and sets obligations in terms of environmental impact and TI Fluid Systems reserves the right to terminate the relationship with our supplier in the event of non-compliance. The GSRM focuses on specific obligations around conflict mineral reporting, child labor and slavery.

In addition, TI Fluid Systems has undertaken the following additional steps: this statement is included on the TI Fluid Systems Purchasing Portal, which is accessible to TI Fluid Systems suppliers; and TI Fluid Systems has sent direct communication to all suppliers advising them on the Modern Slavery Act and the need for them to comply with its requirements. Our local HR teams are aware and ensure that new recruits are of employable age in the country in which they are employed. We have an independent ethics hotline where employees can identify their concerns. Employees are notified of the availability of this hotline, including its use for any concerns over child labor and slavery.

The Code, our Policies and contractual terms are clear on the need to protect basic human rights. However, we recognise that these measures can only give limited protection that slavery and human trafficking are not occurring within our supply chains. We continue to determine how we can obtain further comfort over the effectiveness of anti-slavery and human trafficking measures beyond the first tier of our supply chain.

The board of directors of the Company approved this statement at its board meeting on 13 May 2021 and authorised the Chief Executive Officer to sign this statement on its behalf.

Signed for and on behalf of TI Fluid Systems Plc
William L Kozyra Chief Executive Officer and President