

TI Fluid Systems Plc (“Company”) – Slavery and Human Trafficking Statement for the Financial Year 2017

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 Automotive”) 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 Automotive is a global automotive supplier. This statement applies to all companies in the TI Automotive group.

TI Automotive 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 ensures 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.

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

TI Automotive has manufacturing facilities in 27 countries, 12 of which are considered “higher risk” markets (Brazil, China, Colombia, India, Indonesia, Mexico, Morocco, Russia, South Africa, South Korea, Thailand, and Turkey). As a supplier, TI Automotive is subject to high corporate social responsibility standards imposed upon it by OEMs. TI Automotive 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 Automotive has suppliers, located in 47 different countries, 16 of which are considered to be “higher risk” markets (Argentina, Brazil, China, Colombia, India, Indonesia, Hong Kong, Mexico, Nicaragua, Philippines, Romania, South Africa, South Korea, Taiwan, Thailand, and Turkey). TI Automotive issues purchase orders that incorporate the applicable TI Automotive 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 Automotive 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 Automotive is undertaking the following additional steps: this statement will be included on the TI Automotive Purchasing Portal which is accessible to TI Automotive suppliers; and will undertake direct communication to high risk suppliers on the Modern Slavery Act and their compliance.

The board of directors of the Company delegated approval of this statement on its behalf to the Chief Executive Officer of the Company, at its board meeting on 11th December 2018.

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