

POLICY STATEMENT

Gestamp Tallent Limited is committed to developing and adopting a proactive approach to tackling hidden labour exploitation.

Hidden labour exploitation is exploitation of job applicants and workers either within our organisation or within third party individuals or gangs other than the employer or labour provider.

It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking.

1. Introduction

Gestamp Tallent Limited is committed to preventing slavery and human trafficking occurring in any of its activities, as well as seeking to ensure that our supply chains are also free from such practices.

2. Our organisational structure and operations

Gestamp Tallent Limited is a part of the Global Gestamp Business, dedicated to the design, development and manufacture of metal automotive components. The UK Region has its head office in Newton Aycliffe with 5 manufacturing sites in the UK.

Our UK Group Purchasing Manager and UK Group HR Manager are jointly responsible for the operation of this Policy.

3. Nature of our supply chains

Our key supply chains involve a wide range of goods and services from global supply chains with 95% of suppliers based in Europe.

4. Policies relating to slavery and human trafficking

Our commitment to implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations or supply chains is set out in our Corporate Social Responsibility Requirements for Gestamp Global Suppliers and internally within our Code of Conduct Policy.

a. Corporate Social Responsibility Requirements for Gestamp Global Suppliers

Our Corporate Social Responsibility places requirements on Suppliers in the following areas:

- **Observance of Human Rights**

Suppliers must at all times respect internationally recognised human rights and promote and oversee compliance with them within their organisations. Suppliers must ensure that neither they, their business partners nor their suppliers directly or indirectly violate any human rights in the course of their business activities.

- **Abolition of Child Labour**

Under no circumstances shall child labour be allowed. Suppliers must comply with applicable domestic regulations in this regard or the ILO's conventions on minimum employment age, if the latter is stricter.

- **Free Choice of Employment**

Suppliers must respect their employees' freedom to terminate their employment relationship as regulated by law and their contract. Suppliers must under no circumstances resort to forced or compulsory labour. For these purposes, labour is deemed to be forced when it is imposed by means of violence or threats or, more generally, when a person is unwillingly bound to an employment relationship.

- **Freedom of Association and the Right to Collective Bargaining**

Suppliers must observe their employees' right to associate freely, join labour unions and seek labour-related representation. Suppliers undertake to respect union independence and pluralism, under the terms set forth in applicable regulations

- **Fair remuneration and Benefits**

Suppliers must comply with applicable regulations in the relevant territory and industry in terms of salary and wage benefits for their employees.

- **Working days**

Suppliers shall meet the requirements of applicable legislation and industry standards, or relevant ILO conventions, if the latter are stricter

- **Ban on Discrimination**

Suppliers must foster the eradication of all forms of discrimination based on the existence or perception of a Protected Characteristic.

- **Health and Safety in the Workplace**

Suppliers agree to implement effective, task-specific health and safety policies based on prevention in the form of specific action plans and commitments applicable to all employees regardless of their role in the company.

We ensure that our suppliers are aware of our policies which are managed through a Supplier Registration Portal and regular Supplier audits.

5. Due diligence processes in relation to slavery and human trafficking

Our suppliers are audited by Supplier Development Team members against a criteria which includes the requirements of the Corporate Social Responsibility Policy.

6. The Code of Conduct Policy

The Code of Conduct Policy places requirements on employees in the following areas;

- **Integrity in our Workplace.**
- **Integrity in the Supply Chain.**
- **Integrity regarding our shareholders and business partners.**
- **Integrity in our environment.**

The Code also requires adherence to specific rules to include:

- **Health & Safety.**
- **Equal Opportunity.**
- **A respectful working environment and fair treatment.**
- **Respect for freedom of association and thought.**

7. Staff training

All our employees undergo periodic training and receive informative literature on the requirements of our Code of Conduct Policy.

A Speak-Up Campaign with independent telephone and email access is in existence to enable confidential and anonymous reporting of breaches of this policy for investigation by our Compliance Department.

All our staff with responsibility for the procurement of goods and services into our business are professionally qualified and our Supplier Development Team are trained on the Corporate Social Responsibility Policy and its supplier assessment criteria.

8. Future action

Our continuing commitment to developing and adopting a proactive approach to tackling hidden labour exploitation will include specific the following activities in the next 12 months.

- **Staff training**

We will add to our existing Management and Leadership programmes information and training to all appropriate staff to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and the continuing effective operation of our policies and procedures aimed at mitigating this risk.