# SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR VAUXHALL MOTORS LIMITED AND IBC VEHICLES LIMITED (THE "COMPANY") FOR THE FINANCIAL YEAR ENDING ON 31 DECEMBER 2021

### **OPENING STATEMENT FROM SENIOR MANAGEMENT**

In January 2021, Peugeot S.A. ("PSA") merged with Fiat Chrysler Automobiles N.V. ("FCA N.V."), and the newly combined company was renamed Stellantis N.V.

The Company is part of the Stellantis N.V. group of companies (Stellantis Group), a leading global mobility organisation in the automotive sector.

As part of the Stellantis Group, the Company is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and requiring the same high standards of its suppliers.

In April 2022, the Stellantis Group published the 2021 <u>Corporate Social Responsibility Report</u>. the Company supports this vision of which the respect of human rights and prohibition of all forms of forced or compulsory labour are integral parts.

The Company, implementing the policy of the Stellantis Group, considers collaboration with the supply chain an integral part of its success. The selection of suppliers by the Stellantis Group is based not only on the quality and on competitiveness of their products and services, but also their adherence and commitment to social, ethical and environmental principles that are set out in the <u>Stellantis Responsible Purchasing Guidelines</u>.

## STRUCTURE OF THE ORGANISATION

The Stellantis Group of which the Company forms part employs over 280,000 people and has business operations worldwide. To find out more about the nature of this business, please visit the Stellantis Group website.

To ensure competitiveness and continuous supply to all Stellantis Group operations, the Stellantis Group works directly with a wide range of suppliers, currently more than 2,000 for parts and services globally. These are classified into 3 categories ("Level 1", "Level 2" and "Panel") based on various contributing factors.

#### **POLICIES**

As part of our commitment to combating modern slavery, the following Stellantis Group policies apply globally:

- Stellantis N.V.'s Code of Conduct (which applies to all Stellantis employees) -Stellantis CoC EN.pdf
- Stellantis N.V.'s Responsible Purchasing Guidelines - <u>GLOBAL\_RESPONSIBLE\_PURCHASING\_GUIDELINES\_8DEC2021.pdf</u> (stellantis.com)

These Guidelines set out Stellantis' firm commitment to act in a socially responsible manner and in line with sustainable practices within Stellantis and at each level of the supply base that include ensuring the health and safety of its workforce, prohibiting human rights violations such as child labour and forced labour, and complying with conflict minerals and environmental protection regulations. Stellantis encourages the adoption and sharing of sustainable practices among its business partners and suppliers at all levels in the supply chain. Building strong responsible supply chains is an important focus for Stellantis. Stellantis uses assessment tools

that focus on topics such as the environment, labour and human rights, ethics and sustainable procurement. This approach helps develop opportunities within the supplier organizations while minimizing risk and potential reputational damage in the event of a failure in the supply chain. Stellantis monitors compliance with its Code of Conduct and the respect for human rights by its partners and subcontractors and by requiring contractual commitments and ongoing evaluations.

The Guidelines further demonstrate how Stellantis implements optimization measures such as identifying local suppliers and supporting them in ensuring protection of human rights and supporting a balanced economic development of territories.

Stellantis works to ensure that the conditions to build and sell vehicles meet customer expectations in compliance with social, environmental and ethical standards following the OECD Guiding Principles and the International Labor Organization (ILO) rules for human rights such as child labour and forced labour. Stellantis is a member of the UN Global Compact and also promotes the principles of the Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work and the United Nations Convention against Corruption to its suppliers. Stellantis acknowledges the necessity to comply with rules for the responsible sourcing of materials, such as in the global battery value chain. Through the efforts of all companies within the group the responsibilities are shared through Stellantis' extended supply network. To make sure that Stellantis' principles are duly met, Stellantis conducts targeted audits where risks are identified and is vigilant with the implementation of measures within its sphere of influence. All these goals, practices and responsibilities are globally common in all Stellantis locations and countries and for all suppliers within the Stellantis worldwide network.

Stellantis also makes sure that its suppliers are aware of applicable policies and adhere to the same high standards.

Suppliers must commit to these standards in several ways to evidence their fight against modern slavery, for example, by accepting Stellantis' Code of Conduct and the signing of the Responsible Purchasing Policy. These documents reference:

- Elimination of all forms of forced and compulsory labour, ILO Convention 29 and 105
- Effective abolition of child labour, ILO Convention 138 and 182
- Elimination of discrimination in respect of employment and occupation, ILO Convention
  111
- Remuneration, ILO Convention 100
- Respect for health and safety at work, ILO Convention 155

### **DUE DILIGENCE**

As part of efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, the Stellantis Group has in place due diligence procedures. All direct material suppliers to manufacturing plants must obtain a CSR Scorecard that is provided by an independent 3<sup>rd</sup> party provider. Additionally, all major indirect suppliers to manufacturing plants are assessed against an internal risk criteria. Where Stellantis identifies suppliers to manufacturing plants from its total supply base that pose a higher risk, Stellantis (via an independent 3<sup>rd</sup> party auditor) conduct an onsite audit. The suppliers with core non-compliant or critical findings are closely monitored. This also includes case-dependent follow-up audits

to ensure that supplier performance is increased. Suppliers to manufacturing plants that do not improve or cooperate with Stellantis in specified areas might be ultimately excluded from Stellantis's supplier panel.

Stellantis' procedures are designed to:

- Establish and assess areas of potential risk in its business and supply chains
- · Monitor potential risk areas in its business and supply chains
- Reduce the risk of slavery and human trafficking occurring in its business and supply chains
- Provide adequate protection for whistle blowers

## **RISK AND COMPLIANCE**

Stellantis, of which the Company is part, regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by ensuring that the above mentioned suppliers renew their CSR assessment regularly. This is achieved by monitoring the mandatory supplier CSR performance scorecards for suppliers in the panel and again when considering any business award. Suppliers are classified by their risk exposure based on multiple factors.

Although Stellantis has not identified or been made aware of any significant risk, we believe that our policies effectively prevent this risk and remain vigilant with respect to practices that do not fully respect the rights of individuals in their working environments directly or indirectly with the Stellantis Group.

### **EFFECTIVENESS AND KPIS**

The Stellantis Group uses key performance indicators (KPIs) to measure success in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. These are set out in detail in the 2021 <u>Corporate Social Responsibility Report</u>, see in particular Section 7.

The Stellantis Group uses Ecovadis assessments and engage SGS and RCS Global to conduct audits and provide independent reviews of our businesses and supply chains, and to recommend actions we can take to combat slavery and human trafficking from within.

#### **TRAINING**

The Company is part of the Stellantis Group which invests in educating staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our policies. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains. All employees are required to comply with the Stellantis Code of Conduct.

## **FURTHER ACTIONS AND SIGN-OFF**

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, the Company supports the commitment of the Stellantis Group to improve scores identified as KPIs in the 2021 Corporate Social

Responsibility Report applicable to Human rights in the supply chain and including tackling slavery and human trafficking.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Vauxhall Motors Limited and IBC Vehicles Limited for the financial year commencing 1 January 2021 and ending 31 December 2021.

This statement was approved by the Board of Directors for Vauxhall Motors Limited and IBC Vehicles Limited on 13 June 2022.

Signature:

PAUL WILLCOX Director General

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Vauxhall Motors Limited and IBC Vehicles Limited

Date: 13 June 2022