

## **MODERN SLAVERY STATEMENT**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 for the year ending 2017/2018 and sets out the steps that HBPO UK Ltd 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. HBPO UK Ltd 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.

### **Organisation Structure**

HBPO UK Ltd was formed in 2006 as an Assembly Plant for front-end modules for motor vehicles. We are part of the HBPO Group and our ultimate parent companies are Compagnie Plastic Omnium and Hella GmbH & Co. KG aA. HBPO has its head office in Germany and our group comprises assembly plants, research and development centres and head quarters in 31 locations and 12 countries around the globe.

HBPO UK Ltd's customers come from the automotive industry and we supply these customers with high-quality innovative products, systems and services.

### **Policies on Slavery and Human Trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our Code of Conduct, established by our Board of Directors in 2014 and given to and acknowledged by each HBPO employee, establishes the principle of adherence to the laws wherever we do business and to our internal rules. Our Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

### **Supplier Adherence to our Values**

All our suppliers, whether nominated by HBPO or by the customer directly, adhere to the requirements of our Sustainability Requirements for Suppliers policy and our general Purchasing Conditions policy. These policies specify the requirements for human rights and working standards, business ethics as well as environmental protection and safety. The suppliers are requested to pass on these requirements to their employees as well as to their own suppliers and to ensure adherence thereof.

## **Training**

In addition to suppliers subscribing to the Sustainability Requirement for Suppliers policy, every new employee of HBPO UK Ltd has to acknowledge the Code of Conduct when being hired and regular compliance training takes place within the Company.

## **Due Diligence and Risk Management**

HBPO UK Ltd takes its responsibility seriously and regularly reviews its measures in its supply chain for safeguarding human rights and combatting modern slavery and human trafficking.

We have in place, via our Code of Conduct, systems to encourage the reporting of concerns and the protection of whistle blowers.

## **Effectiveness in combating slavery and human trafficking**

We measure our effectiveness by monitoring our labour force, working hours, and ensuring free choice of employment.

A pre-assessment of a supplier is carried out before entering into a supply relationship, which may include plant visits in order to obtain an impression of the prevailing working conditions. Any deviations are reported.

We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies are discovered and/or noncompliance is not addressed in a timely manner.

From 2019, we will introduce e-learning training on the Code of Conduct and continue to perform regular compliance training to all our employees.

The Managing Director and Senior Management team of HBPO UK Ltd shall take the responsibility for implementing this policy statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation within its supply chains



Robert Fairclough  
Managing Director  
HBPO UK Ltd