



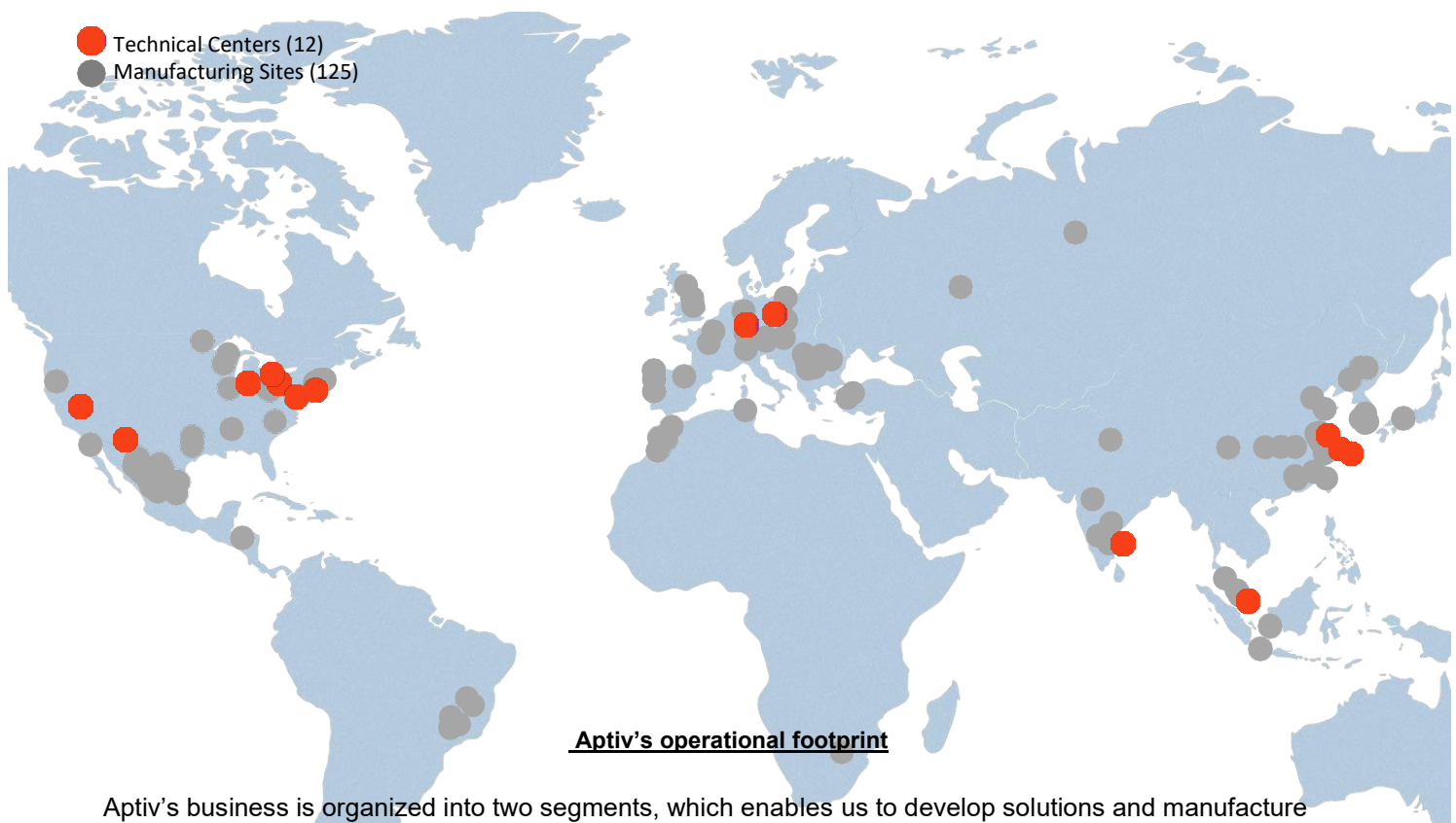
SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR APTIV INTERNATIONAL HOLDINGS (UK) LLP FOR 2020

This slavery and human trafficking statement is submitted pursuant to Section 54 of the United Kingdom's Modern Slavery Act 2015, which requires certain companies doing business within the UK to provide information about their efforts to address the issue of modern slavery and human trafficking within their business and supply chain. Aptiv fully supports these efforts, which align with our core values and beliefs, and are also part of our Sustainability program (<https://www.aptiv.com/sustainability>).

This report is inclusive of all entities and subsidiaries under the parent company "Aptiv International Holdings (UK) LLP" (referred to as "Aptiv" in this statement). This entity consolidates the activities of all our operations in the UK, among other locations.

Organization's structure, business and supply chain

Aptiv's parent company, Aptiv PLC, is one of the world's largest vehicle component manufacturers. Aptiv's customers include most of the world's automotive original equipment manufacturers. The Aptiv family of companies operate 124 major manufacturing facilities and 12 major technical centers to efficiently and effectively serve our global customers. We have a presence in 44 countries and have approximately 180000 employees globally focused on developing and producing market relevant product solutions for our customers.



Aptiv's business is organized into two segments, which enables us to develop solutions and manufacture highly-engineered products that align with the safe, green and connected megatrends. For more details, see page 4 of our annual report at

https://s22.q4cdn.com/336558720/files/doc_financials/2020/ar/2020_AptivAnnualReport.pdf



Supply chain overview

The automotive supply chain is complex. The vast majority of our supply chain is organized horizontally, and there are often three to eight levels of suppliers between an auto parts manufacturer and the mining level (raw materials extraction).

Aptiv has over 12,000 “tier 1” suppliers, operating out of more than 15,000 sites in approximately 65 countries.

Our policies in relation to modern slavery and human trafficking

Several company functions are involved in ensuring that human rights are respected across the value chain. Aptiv’s human resources function has the lead for Aptiv’s internal operations, while the supply chain management function oversees Aptiv’s suppliers.

Policies

We maintain a number of internal policies to ensure our requirements on modern slavery/forced labor are well communicated, integrated into our contractual framework, and agreed upon by all employees and business partners. These include:

For our own operations:

- Aptiv’s Code of Ethical Business Conduct describes our organizational requirements and values, and explains how we expect our employees and representatives to act. The Code contains a forced/slave labor clause (see page 14 at [Aptiv Code of Ethical Business Conduct](#)) Employees who violate our Code are subject to disciplinary measures, up to termination of employment.
- Aptiv’s Diversity, Equality and Human Rights Policy defines our expectations for treatment of employees, and our non-tolerance to child or forced labor. See [Aptiv’s Diversity, Equality and Human Rights Policy](#).
- We pay our employees in compliance with applicable law in their country of operations.

For our supply chain:

- Aptiv’s strategic suppliers are required to agree to the principles articulated in our Code of Conduct for Business Partners, which includes a clause on forced labor and human trafficking. Additional information is available at [Code of Conduct for Business Partners](#)
- In addition, Aptiv’s General Terms and Conditions require suppliers to commit that they will not utilize “slave, prisoner or any other form of forced or involuntary labor or engage in abusive employment in the supply of Goods under this Contract.”
- During the onboarding process for certain new strategic suppliers, a review of reputational issues is performed, including controversies on labor conditions, human rights and health and safety.



Due diligence: Part of the business and supply chain where risk exists, steps taken to assess and manage the risk

Risk assessment

As an international and responsible employer, we do not tolerate child and/or forced labor and reject any revenue from this exploitation. For Aptiv we believe it is a non-negotiable question of principle and values.

When considering risk from our operations or those in our supply chain, we take into account guidelines and recommendations from organizations such as the UN, OECD and ILO, as well as think tanks and NGOs that are active in the area of labor rights.

In addition, Aptiv is a member of the Responsible Minerals Initiative (RMI) in the context of its activities on conflict minerals. Aptiv also participates in a variety of sustainability work groups from automotive industry organizations (such as AIAG, CLEPA, and VDA) dealing with development of new or enhanced responsible purchasing processes.

Due diligence for our own operations

Aptiv produces original equipment components for car manufacturers. This production is typically stable, and not subject to significant seasonal variation. Therefore, our production workforce, ranging from medium to highly skilled, produce high volumes of complex technical products under stringent quality requirements. We believe our business does not match the criterion of activities highly exposed to forced labor risk.

Aptiv's Human Resources department systematically checks employee work permits and immigration documents at the hiring stage in every country where this is a legal requirement. During 2020 our internal audit staff found **no record** of forced labor in our operations, including in high risk countries.

In addition to corporate due diligence, local processes supplement the transversal requirements:

- **Compliance with labor laws** is managed by Human Resources. Local HR teams in each country ensure compliance and escalate matters where appropriate to our legal department.
- **Internal audits** are organized to check compliance with corporate policies and legal requirements in the country. Every year, extensive audit campaigns are performed. "Unsatisfactory" results are elevated to Executive Committee for oversight and remediation planning. Any audit findings that warrant a corrective action plan must be addressed within certain stringent deadlines.

Due diligence for our supply chain

As indicated in previous Modern Slavery statements, we have also focused our attention on labor agencies. Our supply chain management function has requested all labor agencies worldwide to sign our Code of Conduct for Business Partners, which includes a clause on human rights.

As part of the Aptiv Manufacturing Capability Assessment (MCA) audit process, Aptiv auditors inspect supplier records and observe their operations. If any inappropriate or unfair work conditions are observed or suspected, the situation is reviewed for appropriate action, on a case by case basis. This physical audit is also used to perform a check of the supplier's social responsibility policies and organization to verify compliance with our Code of Conduct for Business Partners.

We also reserve the right to conduct unannounced audits of our suppliers, including inspection of facilities and review of documentation, to ensure compliance with our standards.



Business grievance mechanism

The Aptiv DRIVE Line allows employees (as well as external stakeholders) to report (anonymously, if desired) alleged ethical or compliance violations, or any issue that employees may face, without fear of retaliation. We investigate all reported incidents. All Aptiv sites widely advertise the DRIVE Line in social areas and shop floors. Any victim of abusive disciplinary measures or forced labor conditions, may use this line to raise their concern to senior management without fear of retaliation.

This tool also makes it possible for our suppliers to report any issue regarding compliance to our Code of Conduct for Business Partners, including any breach of our forced labor policy.

No complaints related to forced labor have been reported to the Aptiv DRIVE Line.

Effectiveness measured with performance indicators

For our operations

At Aptiv, all salaried employees receive training regarding our Code of Ethical Business Conduct, which includes prohibitions on slavery and human trafficking. In 2020, 95% of Aptiv salaried employees completed Code of Ethical Business Conduct training.

Aptiv tracks the following indicators:

- Number of cases of forced labor reported in 2020 via the DRIVE line: 0
- Number of cases of forced labor identified in 2020 via internal audits: 0
- Rate of completion of the most recent Code of Ethical Business Conduct training: 95%.

For our suppliers

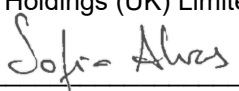
As of 2020, 99% of the direct strategic suppliers have signed our Code of Conduct for Business Partners.

All suppliers are encouraged to take our in-house sustainability training, setting expectations for how they will be measured going forward. In 2021, approximately 300 direct suppliers are expected to complete the training.

Please see our Sustainability report at: [Sustainability At Aptiv](#)

This statement was approved by the Partners of Aptiv International Holdings (UK) LLP

Aptiv Holdings (UK) Limited

By:  

Date: 30 August, 2021