

Webasto Roof Systems Ltd. Modern Slavery Statement for Financial Year ended 31st March 2018, issued pursuant to Section 54 of the Modern Slavery Act 2015.

Business, Structure and Supply Chains

Webasto Roof Systems Ltd. are a wholly owned subsidiary of Webasto SE, a German multi-national serving the automotive, bus, rail and marine industries with roof systems, heating, charging and battery systems. In the UK Webasto Roof Systems Ltd are manufacturers of sunroof and roof systems, supplying primarily to the UK based organisation, Jaguar Land Rover and employing approximately 320 people.

There are no subsidiaries of Webasto Roof Systems Ltd. and the organisation operates in the UK. Our supply chain is based primarily in Western Europe with a small number of suppliers in China. Our suppliers are determined either centrally by Purchasing in our parent company headquarters or in some cases locally from our UK offices.

Central purchasing guidelines specify the use of a risk management tool (Riskmethods) to automatically analyse the activities of specified suppliers, rating them on criteria including:

- Labour Practices & Human Rights
- Country Corruption and Bribery
- Environment
- Hazardous Substances etc....

A final rating is given based on the assessment of Riskmethods as to whether the Supplier meets the criteria and will determine if activities or suppliers are 'high risk' and if satisfactory and a supplier is engaged then that Supplier is expected to sign Webasto's General Terms and Conditions of Purchase.

Section 23 of the terms and conditions sets out expectations on Compliance, Social Responsibility and Sustainability and the Suppliers undertake to comply with the standards set by Webasto for the following:

- Freedom of association, wages and benefits and working hours
- Prevention of child labour
- Free choice of employment
- Health and Safety
- General environmental responsibility
- Product related environmental standards
- Promotion of standards in the supply chain

High Risk Activities

Based on the risk analysis tool we do not have any high risk activities, suppliers or business partners.

Policies and Codes

Below you can find the policies and codes we have pertaining to Modern Slavery, Human Trafficking and related matters:

Whistleblowing Policy UK

Policy written and managed by UK Human Resources

This policy encourages all workers to report any concerns of wrongdoing around the following matters, without fear of retaliation:

- A criminal offence; and/or
- A miscarriage of justice; and/or
- Damage to the environment; and/or
- Breach of a legal obligation; and/or
- A danger to health and safety; and/or
- A deliberate concealment of any of the above

Modern slavery and human trafficking could be considered by anyone dealing with our suppliers, agencies etc... and reporting using this guidance.

Anti-Bribery Policy UK

Policy written and managed by UK Human Resources

This policy encourages all workers to recognise and report any instances of bribery or corruption internally or by any party in a matter connected to Webasto, without fear of retaliation.

Any disclosures can be made using the Whistleblowing Policy above.

Occupational Health and Safety Policy

Policy written and managed centrally by Corporate Quality and Environmental Systems

This policy sets out our aims and standards for Occupational Health and Safety in accordance with our Company values including reference to rules and regulations related to safe and healthy working places or working conditions.

Employee Code of Conduct

Code is written and managed centrally by Corporate Compliance

The code has a section on Corporate Social Responsibility which goes into more detail with regard to Human Rights and expectations of employees and our business partners.

Agency Workers Policy

We do not have a policy in the UK however we develop partnerships with reputable agencies. We ensure that our agencies are paying their workers at least National Minimum Wage and that after 12 weeks they are paid in accordance with Agency Worker Regulations 2010, in that they have no less favourable treatment for working conditions and basic employment.

Due Diligence Processes

The organisation centrally undertakes due diligence when considering and vetting new suppliers. Due diligence activities include:

Centrally the main tool used to assess and manage risks in the supply chain is Riskmethods.

Geographical mapping of the supply chain is undertaken using Riskmethods to identify the risks of modern slavery and human trafficking.

Assessment and evaluation of the supply chain is also undertaken using Riskmethods for specific suppliers.

All suppliers, new and existing are reviewed regularly using Riskmethods to ensure that compliance is maintained. Risk alerts are issued automatically to any suppliers falling below the required compliance level.

Riskmethods provides each supplier with a 'risk profile' which can then be used to assess their compliance or non-compliance.

If a risk profile is highlighted as a concern, then that supplier is discussed internally and actions are put in place and tracked within the Riskmethods tool.

Sanctions against non-compliant suppliers could involve an action plan for improvements or for a serious violation of the Code of Conduct or terms and conditions of purchase then the business relationship could be terminated.

In the UK we do not use Riskmethods to assess and verify our locally sourced suppliers.

Key Performance Indicators

Centrally Riskmethods provides all information required to assess and verify that suppliers are compliant.

In the UK we currently have no KPI to measure the effectiveness of how we manage our risks. Currently we are reliant on the steps taken by our Central Purchasing and Legal teams.

In terms of locally sourced Suppliers we commit to developing in the UK in 2019:

- A system to evaluate potential suppliers before they enter the Supply Chain
- A system to regularly review those Suppliers periodically to show maintained compliance
- A training programme to deliver to all UK employees dealing (or potentially dealing with) Suppliers

Training

Both centrally and in the UK no specific training occurs for Modern Slavery currently but all employees dealing (or potentially dealing with) Suppliers are required to complete an e-learning module for the Code of Conduct which includes a section on Corporate Social Responsibility.

In addition to this in the UK specifically we are looking to create an overview training for Modern Slavery Awareness and the issues surrounding it, for all employees dealing with (or potentially dealing with) Suppliers. This will be delivered in 2019.

Centrally Purchasing teams are trained in the proper use of Riskmethods and how to identify risks and concerns coming out of that system.

Effectiveness in dealing with risks of Modern Slavery

The use of Riskmethods greatly reduces the risk of dealing with suppliers who engage in modern slavery and human trafficking or any other unethical processes.

The tool is effective in managing a global supply base, ensuring compliance is maintained.

In the UK we commit in 2019 to improving our risk management of locally sourced suppliers whilst acknowledging that the risk is geographically and demographically lower.

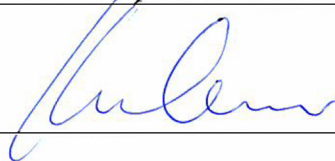
Managing Director Approval

This statement is reviewed annually in conjunction with local HR and Purchasing in the UK and Central Purchasing in our Headquarters.

PRINT NAME:

FLORIAN HEILMEIER

Signature:



Date:

28.03.2019
