

Modern Slavery Statement

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This statement covers the activities of Toyoda Gosei UK Ltd., known hereafter as 'the Company'.

1. Statement Definition

The Company recognises that it must understand all potential modern slavery risks related to its business and put in to place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business or supply chain.

This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020.

As part of the car manufacturing industry, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

One of the Company's core principles from the TG Spirit is 'Respect for the Individual'. The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. The Company takes a zero-tolerance approach to slavery and human trafficking and continues to earn the trust of society as a Company of integrity. We are strengthening our global efforts for legal compliance and working to instil a strong sense of ethics in our employees, this is linked directly to our commitment to eliminating Modern slavery from any, and all, supply chains.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

2. Modern Slavery Policy

In 2018 the Company launched a specific Modern Slavery Policy which is in addition to our Business Code of Conduct, Ethics and Whistleblowing Policies. This policy applies to all staff working for the Company in any capacity.

The Company's Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls thereby ensuring slavery and human trafficking is not taking place anywhere in our supply chains. The Company's policy sets out the standards and behaviours expected of all staff and details how to raise concerns regarding slavery and human trafficking issues.

As with our other policies, our Modern Slavery Policy encourages our employees to be open and accountable, speak up and report any wrongdoing to the Site Compliance Line, available to all employees, to voice any concerns that they have, including concerns about slavery and human trafficking.

3. Organisational structure and supply chains

The Company is a car manufacturing organisation that operates across two sites, Toyoda Gosei UK Ltd. (Rotherham) and Toyoda Gosei UK Ltd. (Wales). The Company manufactures rubber sealing weather-strip and painted Interior and Exterior parts for a range of car manufacturing organisations.

The Company supplies parts to the UK, Belgium, France, Germany, Spain, South Africa, the Netherlands and Turkey. The Company is a part of an organisation which has a global presence and currently operates in the following 17 countries:

1. Japan
2. United States of America
3. Canada
4. Mexico
5. Brazil
6. Thailand
7. Indonesia
8. Vietnam
9. India
10. Taiwan
11. China
12. Korea
13. Belgium
14. Germany
15. United Kingdom
16. Czech Republic
17. South Africa

Although each supplier has its own approach towards, and responsibility for, running its business ethically, the Company will not tolerate modern slavery in its business or supply chain.

The Company makes it clear that it will not tolerate or allow any unlawful business practices including, but not limited to:

- Use of child labour
- Workers receiving less than minimum wage
- Work hours exceeding legal limits, and
- Forced or compulsory labour

4. Responsibility

Responsibility for the Company's anti-slavery initiatives with regards to Policies, Risk Assessments, Investigations, Due diligence and Training falls within the realm of the Human Resources department and is supported and, where appropriate, investigated fully, by the Senior Human Resources Manager.

5. Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Business Code of Conduct and Ethics Statement**
The Standards of Business Conduct supports the Toyoda Gosei Charter for Business ethics and our Management Philosophy. Together they provide an overview of some of the legal and ethical standards the Company is expected to follow. The Company expects legal and ethical conduct from its employees in daily business operation, as the way duties are carried out directly affects the Company reputation.
- **Whistleblowing policy** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** The Company's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Agency Workers Information** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

6. Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- receiving the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the Supplier Self-Assessment Questionnaire and Conflict Material Survey, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

During early 2019, the Company also requested a copy of the Human Trafficking statements from our suppliers to confirm what due diligence measures their organisations are carrying out to ensure their Ethical Procurement is adhered to.

7. Performance Indicators and Training

The Company has reviewed its key performance indicators (KPIs). As a result, the Company has:

- required all Senior Managers, Human Resources and Purchasing employees to have completed training on modern slavery by September 2018, this will now form part of an annual, cyclical training activity;
- enhanced the Supplier Self-Assessment Audit for new suppliers whereby they must demonstrate that they have both heard of, and have, a Modern Slavery Policy and if they do not, they must be able to provide details on how the organisation meets current legislation.
- reviewed its existing supply chains which have a credential minimum of ISO9001, IATF or are controlled by our Customer base.

The Company requires all of its employees who have an input with the Purchasing, Supply Chain and Human Resources aspects of the organisation to have an awareness of Modern Slavery. As mentioned, during September 2018 all Senior Managers and relevant employees received training on Modern Slavery. Modern Slavery will also be referred to during Companywide annual Compliance Training which is now in June annually and Modern Slavery will be addressed in group sessions.

The Company plans to develop its modern slavery awareness through ongoing training so that our employees are able to identify and address potential modern slavery risks.

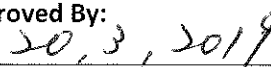
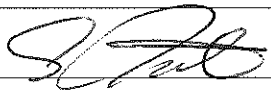
8. Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by including the topic in our Weekly TV Communications, addressing the situation in our Company newsletter and displaying updates on the Company 'Communications' board.

The information displayed explained to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

This statement was approved on April 1st 2019 by Toyoda Gosei UK Ltd. Managing Director who reviews and updates it annually.

Approved By: 	Shigenori Matsuo, Managing Director	
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