

Webasto Roof Systems Ltd. Modern Slavery Statement for Financial Year 2022-2023, issued pursuant to Section 54 of the Modern Slavery Act 2015.

Business

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 400 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.

Risk Management Structure

Central purchasing guidelines specify the use of a risk management tool (Prawave) to automatically analyse the activities of specified suppliers from both a human and geographical perspective. The use of Prawave is covered by the requirements of the Supply Chain Act 2023 (Germany) which also covers the requirements of the Modern Slavery Act 2015 (UK).

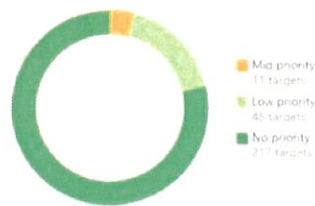
Prawave is rating suppliers on criteria including:

- Labour Practices & Human Rights including child and forced labour
- Wages and working conditions
- Environment including pollution
- Health and Safety
- Disruption
- Sustainability
- Financial and Legal status

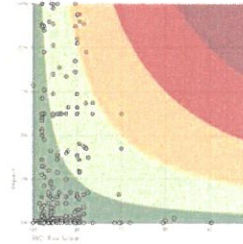
Prawave scores suppliers on different levels, starting as a base with a country and industry risk analysis, followed by a scoring on the findings specific to each supplier. The country score considers the general risks associated with the country in which the supplier resides (e.g. restrictions on freedom of association due to legislation). The industry risks likewise represent the general risks of an industry. For example metals or plastics industries may have a higher risk of environmental issues created by the production processes used in that industry. Alerts can be found on the Prawave home page which highlights any daily changes to a supplier based on their criteria.

Suppliers can be grouped according to site or region and UK suppliers are grouped into a collection in Prawave called 'UK Modern Slavery Act.' This means that central purchasing can check our supplier status easily and quickly on the Risk Matrix that is created for that collection and the priority status of those suppliers:

UK Modern Slavery Act Action Priority



UK Modern Slavery Act Risk Matrix



The heat map shows that currently (September 2023) our UK suppliers sit primarily within the green zones which is either low or no priority with a small amount of suppliers sitting within mid priority. We have no high priority suppliers currently. The priority directly relates to the number and severity of risks identified.

Should a supplier fall into the red zone, firstly the rating should be checked to see if it is relating to the peer score (industry or country) or to the supplier itself. If it is related to the supplier itself and not the peer score then they are asked to fill in a self-assessment on the reasons why their ratings have fallen into high priority.

High Risk Activities

Based on the Prewave Risk Matrix we do not have any high risk activities, suppliers or business partners currently.

Internal Requirements

Webasto has established a Supplier Code of Conduct in 2021 (reviewed in 2023) which we ask all suppliers to sign during the registration process. Existing suppliers as well had to sign the Code of Conduct during the rollout of a new supplier management tool. That way we ensure that all our suppliers are adhering to the requirements of the German Supply Chain Due Diligence Act.

The Code of Conduct contains regulations on social and environmental as well as business ethics principles, e.g:

- Freedom of association, fair wages and benefits and working hours
- Prevention of child labour, forced and compulsory labour
- Free choice of employment
- Non-discrimination, non-harassment
- Protection of human rights defenders
- Health and Safety
- General environmental responsibility
- Green materials, conservation of resources, reuse and recycling
- Product related environmental standards
- Conflict Minerals
- Promotion of standards in the supply chain

Webasto also reserves the right to audit the suppliers on the Code of Conduct

Policies and Codes

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

Social and Environmental Principles Policy

Code is written and managed centrally by Corporate Compliance.

This policy compliments the Code of Conduct to form a binding guideline for all employees, to ensure adherence to minimum social and environmental guidelines. Topics covered are below as follows:

Social Topics and Regulations	Environmental Topics and Regulations
<ul style="list-style-type: none">• Human rights• Freedom of association & right to collective bargaining• Prohibition of modern slavery• No child labour & protection of young workers• Working hours, wages & benefits• Non-discrimination, non-harassment• Gender rights & women's rights• Diversity, equity & inclusion• Occupational health & safety• Deployment of public & private security forces• Land, water and forest rights, forced eviction & respect of minorities and indigenous people	<ul style="list-style-type: none">• Environmental protection, energy reduction & natural resource protection• Green materials, conservation of resources, reuse & recycling• Substances with restriction & greenhouse gas emissions (GHG)• Material itemisation• Conflict minerals• Ecosystems, biodiversity & water protection• Hazardous substances and waste

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.

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.

In addition to this our central headquarters have a global system for whistleblowing which is also set out in our local policy.

Anti-Bribery Policy UK

Policy written and managed by UK Human Resources, supported by a central policy released from our headquarters.

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 or using the central portal, on which all employees have been given guidance.

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.

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 Prewave.

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

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

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

Prewave 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.

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.

Key Performance Indicators

Centrally Prewave 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. This is managed by Central Purchasing and Legal teams.

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.

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

Effectiveness in dealing with risks of Modern Slavery

The use of Prewave 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 2023 to improving our risk management of locally sourced suppliers (that they also sign into our Company Code of Conduct) whilst acknowledging that the risk is geographically and demographically lower.

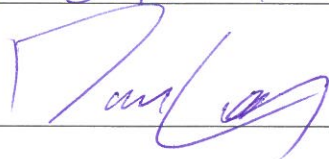
Managing Director Approval

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

PRINT NAME:

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Signature:



Date:

27/9/23