

## Modern Slavery Act Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It sets out the steps that Borgers Ltd. (UK) and its affiliates together with its Autoneum affiliates (collectively “Autoneum”) have taken, and are continuing to take, to ensure that modern slavery, human trafficking and child labour are not taking place within its business or supply chain.

Autoneum has a zero tolerance approach to any form of modern slavery and is committed to act in an ethical manner and to safeguard against any form of modern slavery or human trafficking and child labour. In order to realise this commitment, various measures have been taken in its supply chains and own businesses.

### A. Organization

Autoneum is globally leading in acoustic and thermal management for vehicles. Based on its long-standing expertise and unique technological know-how, Autoneum develops and produces multifunctional, lightweight components and systems for interior floor and engine bay as well as the underbody.

Customers include almost all automobile manufacturers in Europe, North & South America, Asia and Africa. Global presence and being close to the customer is not only a key success factor but also a crucial competitive advantage. Accordingly, Autoneum, headquartered in Winterthur, Switzerland, operates around 60 production facilities and employs around 16'000 people in 26 countries.

### B. Autoneum’s Code of Conduct

Autoneum’s internal Code of Conduct sets out the values and principles that form the basis for the high standards at Autoneum. The Code of Conduct applies to all parties acting on Autoneum’s behalf and recognizes its commitment towards improving society. Key principles include: providing a safe working environment that respects human rights, labour laws and health and safety regulations.

- Compliance with legislation, including fundamental rights at work, in particular freedom of association and elimination of discrimination throughout employment
- Commitment to the UN declaration on Human Rights and to diverse guidelines (ILO and OECD)

Autoneum performs regular online and face-to-face trainings with reference to the principles of its internal Code of Conduct for all employees to emphasise the importance of acting with integrity and in line with its own internal Code of Conduct.

Autoneum offers a safe work environment, has implemented diverse measures to ensure adherence to the allowed working hours and pays salaries above any applicable minimum wages.

Employees, who witness or suspect violations of our Code of Conduct, laws or other regulations, are expected to report their concerns to their supervisor, HR or Legal & Compliance. In addition, Autoneum has established a Speak-Up-Line to enable staff to report suspected

wrongdoing and raise serious concerns within the workplace. Autoneum is committed to ensuring that any staff concerns are taken seriously and investigated.

Autoneum will not allow any breach of any regulations banning forced labour, slavery and human trafficking and will immediately take disciplinary measures against employees who do not adhere to these.

Autoneum's Code of Conduct can be found on its website under "Compliance":

<https://www.autoneum.com/company/compliance/>

### **C. Supply Chain**

Autoneum's suppliers have to commit to the Code of Conduct for Suppliers ("Code"). According to the Code, any kind of forced labour including human trafficking and any form of modern human slavery will not be tolerated by Autoneum. Autoneum's suppliers shall refrain from any forced, bonded or involuntary labour. They have to guarantee that employees shall be free to leave their employer at their own discretion.

In order to ensure and demonstrate compliance with the Code, Autoneum's suppliers are obliged to keep a record of all relevant documentation and provide supporting documentation to Autoneum on request. Autoneum has the right at any time to audit its suppliers for compliance with the obligations as set out in the Code.

Autoneum has a zero tolerance policy towards violations of the laws banning forced labour, slavery and human trafficking. Autoneum's contractual agreements permit the immediate termination of any agreements with suppliers for violations against these stipulations.

Autoneum's Code can be found on its website on the supplier portal:

<https://www.autoneum.com/supplier-portal/>

Autoneum is committed to ensuring transparency across its business and supply chains to ensure the effective prevention of slavery and human trafficking.

This statement is signed on behalf of the Board of Borgers Ltd.

Scott Ward  
Director



Borgers Ltd. (UK)

September 1, 2024

Angela Davis  
Secretary

