

INTRODUCTION

Optimas OE Solutions Ltd and its subsidiaries (Optimas) are aware that modern slavery is a global and growing issue given the rapid rise in global migration existing throughout the world. Modern slavery encompasses slavery, servitude, forced labour and human trafficking. Optimas has a zero-tolerance approach to Modern Slavery of any kind throughout our operations and supply chain.

We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to highlight and enable action against any form of modern slavery taking place within the business or our supply chain.

All employees have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain and are expected to report concerns, using the appropriate reporting channels, and management are expected to act upon them.

OUR ORGANISATION

Optimas is an internationally renowned Tier 1 to the Automotive industry. We are committed to maintaining the integrity of the brand, including in the context of Modern Slavery. We have offices based in the UK, USA, Canada, Mexico, Brasil, the People's Republic of China, France, Germany, Spain, India, Japan. All are committed to compliance with our policy on Modern Slavery.

We have a large number of domestic and international commercial partners and we seek to ensure their compliance with our policy on Modern Slavery.

Our supply chain embraces both domestic and international suppliers and equally we endeavour to ensure their compliance with our policy on Modern Slavery.

We recognise that there is the potential risk of slavery and human trafficking in overseas supplier factories, logistic companies and other suppliers to the business and the Optimas takes all necessary measures to ensure that Slavery and Human Trafficking is not occurring in any part of its business or its supply chains. Optimas is involved in the procurement of finished goods and materials in the UK, Europe and the Far East.

POLICIES

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include

- Anti-slavery policy – this policy sets out the Optimas stance on modern slavery and explains how employees can identify any instances of this and where they can go for help
- Recruitment policy – we operate a robust recruitment policy, including conducting eligibility checks to work in the UK for all employees to safeguard against human trafficking or individuals being forced to work against their will
- Alert line policy – we operate an Alert line policy so that all employees know that they can raise concerns about how colleagues are being treated, or unethical practices within our business or supply chain, without fear of retaliation

- Code of Conduct – this code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

RULES OF ENGAGEMENT

The rules within our policy apply not only to our employees but also to our suppliers, sub-contractors and other business partners and are set out as follows:

- Optimas prohibits any benefiting from or contributing to Modern Slavery. - Optimas will not knowingly benefit in any way from forced or involuntary labour, whether in the form of prison labour, indentured labour, bonded labour or otherwise. All work must be entered into voluntarily and workers have the freedom to terminate their employment, having completed an agreed noticed period, without penalty.
- Optimas will not knowingly work with any supplier, subcontractor or service provider who charges workers recruitment fees. Workers should not be charged any fees or costs for recruitment, directly or indirectly.
- Optimas will not knowingly work with suppliers, subcontractors or service providers who retain worker's identity documentation or other valuable items, including work permits or travel documents (passports).
- Optimas will not knowingly work with suppliers, subcontractors or service providers who require workers to lodge deposits or bonds.
- Optimas will not knowingly work with suppliers who do not provide written contracts of employment detailing the employee rights and responsibilities, working hours, salary and other relevant employment conditions.
- Optimas will not knowingly work with suppliers, subcontractors or service providers who carry out contract substitution" where the contract with the employee does not match the contract the worker signed with the agent in the home county or country. - Any supplier, subcontractor or service provider to Optimas must include provision of grievance mechanisms within their organisation in order that workers have a confidential and safe process for raising any concerns.
- Optimas does not condone the use of any harsh or inhumane treatment. Disciplinary policies and procedures must be clearly defined and communicated to all workers and shall not include any corporal punishment, physical coercion or verbal abuse.
- Optimas actively promotes equality in the workplace, irrespective of nationality or legal status. All suppliers, subcontractors or services providers to the Optimas Group must ensure that workers are paid at least the minimum wage required by applicable laws and workers shall not be forced to work in excess of the number of hours permitted by national law. All overtime must be voluntary unless contractually agreed and recompensed.
- Any supplier, subcontractor or service provider to Optimas should ensure workers have freedom of movement. Workers should not be physically confined to factory premises. Mandatory residence in employer operated facilities shall not be made a condition of employment. All suppliers, subcontractors and service providers are required to adopt the labour policies within their own Code of Conduct as outlined above and be able to demonstrate that concrete steps have been undertaken to implement these labour policies.

DUE DILIGENCE

Optimas reserves the right to request compliance-related information and to carry out audits at any time having given reasonable notice. Following an audit, any instances of non-compliance with the labour policies will be communicated via an audit report and corrective measures will be highlighted.

Failure to comply with the corrective actions within a reasonable timeframe will result in the cancellation of orders.

New suppliers must satisfy these requirements before they are approved and given orders.

We will continue to work with our supply chain to identify opportunities to improve their understanding of the importance of the implementation of modern slavery policies and procedures that meet the highest standards. We understand that there is no room for complacency in this area.

We are not currently aware of any issues relating to slavery or human trafficking in our business or supply chain. We will continue to apply our processes with the aim of ensuring this remains the case.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Optimas's slavery and human trafficking statement for the financial year ending 31 December 2022.

A handwritten signature in black ink, reading "Rebecca W Goldman". The signature is written in a cursive style with a large, looped initial "R".

Rebecca W Goldman

General Counsel