

# **SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR PEUGEOT MOTOR COMPANY PLC, CITROËN U.K. LIMITED AND PEUGEOT CITROËN AUTOMOBILES UK LIMITED (THE “COMPANY”) FOR THE FINANCIAL YEAR ENDING ON 31 DECEMBER 2022**

## **OPENING STATEMENT FROM SENIOR MANAGEMENT**

The Company is part of the Stellantis N.V. group of companies (Stellantis Group), a leading global mobility and technology organisation in the automotive sector. General information on the Stellantis Group can be found at the [Stellantis Group website](#).

As part of the Stellantis Group, the Company is committed to preventing acts of modern slavery and human trafficking from occurring within its business and expecting the same high standards of its suppliers.

In April 2023, the Stellantis Group published the 2022 Corporate Social Responsibility Report. The Company supports and implements the policies contained in this Report, including the Stellantis Human Rights Policy, which includes key commitments against the use of all forms of child labour, forced labour, modern slavery and human trafficking.

The Company, implementing the policy of the Stellantis Group, considers collaboration with the supply chain an integral part of its success. The selection of suppliers by the Stellantis Group is based not only on the quality and competitiveness of their products and services, but also on their adherence and commitment to social, ethical and environmental principles that are set out in the [Stellantis Responsible Purchasing Guidelines](#). The Stellantis Group works directly with a wide range of suppliers, currently more than 2,000 direct materials suppliers globally.

## **STRUCTURE OF THE ORGANISATION**

The Stellantis Group has business operations worldwide, and respect of human rights is critical to its global strategy. To ensure proper attention to the oversight and governance of the Human Rights Policy, the Stellantis Group recently formed a Human Rights Committee and designated a Chief Human Rights Officer. The Human Rights Committee reports to the Stellantis' Global Ethics and Compliance Committee, which in turn is overseen by the Audit Committee of the Stellantis Board of Directors.

## **POLICIES**

The following Stellantis Group policies apply globally:

- Stellantis N.V.'s Code of Conduct (which applies to all Stellantis employees and contractors) - [Stellantis CoC EN.pdf](#)
- [Stellantis Human Rights policy](#)
- Stellantis N.V.'s Responsible Purchasing Guidelines - [Global Responsible Purchasing Guidelines \(stellantis.com\)](#)

The Code of Conduct expresses the basic values of Stellantis, which include principles for protecting our workforce, conducting business, interacting with external parties, and managing our assets and information. The Code applies to our workforce, which includes all individuals who work for Stellantis anywhere in the world, officers and the members of the Stellantis Board of Directors. The Code communicates our expectations that our stakeholders, including

suppliers, dealers, distributors, and Joint Venture partners, will act with integrity and in accordance with our Code.

The Human Rights Policy reflects an approach to human rights principles that is designed to be consistent with the spirit and intent of the United Nations Guiding Principles, the United Nations Universal Declaration of Human Rights, the United Nations Sustainable Development Goals, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Companies, the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO), the United Nations Guiding Principles on Business and Human Rights and the Modern Slavery Act 2015 with respect for the human rights, fundamental freedoms, democratic principles and standards established in the International Bill of Human Rights (the “Fundamental Human Rights Documents”).

The Global Responsible Purchasing Guidelines set out Stellantis’ firm commitment to act in a socially responsible manner in line with the Stellantis Code and the Stellantis Human Rights Policy, cascading the same commitment to the Stellantis supply chain. As part of an ongoing process, parties seeking to become Stellantis suppliers or to extend their status as suppliers, are required to adhere to the Guidelines. The framework underlying the Responsible Purchasing Guidelines refers to the Fundamental Human Rights Documents, highlighting the health and safety of its workforce, the prohibition of human rights violations such as child labour and forced labour, and compliance with conflict minerals and environmental protection regulations, among others. Stellantis views this framework as essential in its transition to a more sustainable future.

Stellantis renewed PSA’s membership of the UN Global Compact in 2021, 2022 and 2023 cementing the Stellantis Group’s alignment with the principles of the Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work and the United Nations Convention against Corruption.

### **MONITORING AND VIGILANCE**

The Stellantis Group has various controls to ensure the adequate deployment of its policies.

One of such controls is the Stellantis Vigilance Plan as described in its 2022 CSR report.

Another control is to deploy due diligence and auditing processes, including those conducted by third party auditors. Stellantis has two on-site audit programs that follow a risk management approach that flags higher risk suppliers for audits. These audits are also managed by independent external service providers who utilize local auditors who speak the language of the audited site and who have a thorough knowledge of the applicable local laws, regulations, and practices. The audits provide a snapshot of how the supplier is performing in terms of Stellantis’ reference guide and the local statutes and regulations. The external auditor creates an audit report for each audit and each noncompliance grade requires corrective action plans. If no satisfactory solution can be found to a critical or core noncompliance ratings, a disengagement plan may be put in place after consultation with internal individuals affected by the decision. If necessary, an audit may be conducted to verify that action plans were implemented.

Stellantis also has one further scoring program that evaluates Tier 1 suppliers based on a wide variety of corporate social responsibility criteria, including labour standards and commitments.

To gain more visibility into our supply chain, Stellantis uses Resilinc, a third-party supply chain risk-mapping service. The tool monitors a wide variety of global events with the potential to impact supply chains and pushes automated notifications of such events to both Stellantis Compliance and Global Purchasing. Coverage includes child labour, underage labour, slave labour, forced labour, criminal violations, human trafficking, poor labour conditions, and other violations.

As a further safeguard, Suppliers and their production plants are also expected to be IATF 16949-certified. The IATF standard meets the growing expectations of markets and governments in relation to ethical business practices. It incorporates changes and complexities specific to the automotive sector, such as requirements for onboard software, and strengthening product traceability in accordance with regulatory changes. Stellantis has added additional specific requirements for this certification. These additions include adherence to the Responsible Purchasing Guidelines and they contain specific CSR advice and actions required by suppliers. IATF conducts audits to ensure compliance with these specific requirements.

Also, with a risk-based approach, Stellantis is currently evaluating new technologies to develop the ability to map suppliers all the way to the raw material.

Finally, the Integrity Helpline, the Stellantis' tool for reporting concerns regarding violations of the Stellantis Code of Conduct, is available to the Company's workforce and the public at large (<https://www.stellantis.com/en/company/governance/how-to-report-a-violation-of-the-code-of-conduct>), by phone or web, on a 24/7 basis. The Company's workforce receives appropriate training and guidance in reporting concerns through this channel, anonymously if desired. Each report is reviewed and when appropriate, triggers an internal investigation. The investigations are conducted with neutrality and respect by trained investigators in order to check and verify the facts. Behaviours that, after investigation, are concluded to violate the Code of Conduct can be subject to disciplinary measures that are proportional to the seriousness of the offense.

## **EFFECTIVENESS AND KPIS**

The Stellantis Group uses key performance indicators (KPIs) to measure performance relevant to modern slavery prevention. These are set out in detail in the 2022 [Corporate Social Responsibility Report](#), see in particular Section 7.

The Stellantis Group uses Ecovadis assessments and engage SGS and RCS Global to conduct audits and provide independent reviews of our businesses and supply chains.

## **TRAINING**

The Company is part of the Stellantis Group which invests in educating staff and suppliers to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees and suppliers are encouraged to identify and report any potential breaches of our policies and are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains. All employees are required to comply with the Stellantis Code of Conduct.

## **FURTHER ACTIONS AND SIGN-OFF**

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, the Company supports the commitment of the Stellantis Group the actions listed in the 2022 Corporate Social Responsibility Report applicable to Human rights in the supply chain and including tackling slavery and human trafficking.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Peugeot Motor Company plc, Citroën U.K Limited and Peugeot Citroën Automobiles UK Limited for the financial year commencing 1 January 2022 and ending 31 December 2022.

This statement was approved by the Board of Directors for Peugeot Motor Company plc, Citroën U.K Limited and Peugeot Citroën Automobiles UK Limited on 12 July 2023.

Signature:

A handwritten signature in black ink, appearing to read 'Paul Willcox', written in a cursive style.

**PAUL WILLCOX**  
**Managing Director**  
**Peugeot Motor Company plc, Citroën U.K. Limited**  
**and Peugeot Citroën Automobiles UK Limited**  
**Date: 12 July 2023**