

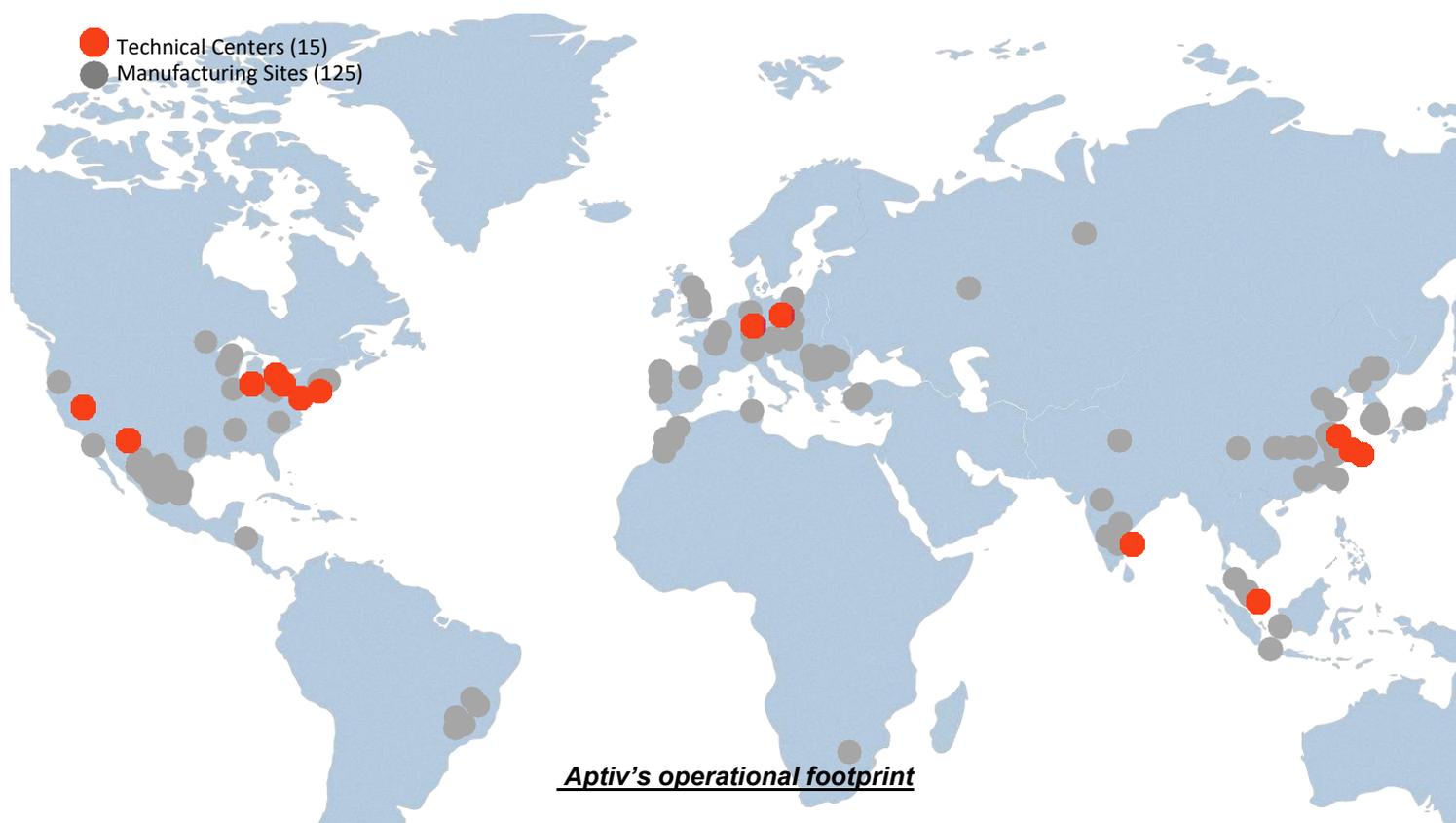
SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR APTIV INTERNATIONAL HOLDINGS (UK) LLP FOR 2019

This slavery and human trafficking statement is submitted pursuant to Section 54 of the United Kingdom's Modern Slavery Act 2015, which requires certain companies doing business within the UK to provide information about their efforts to address the issue of modern slavery and human trafficking within their business and supply chain. Aptiv fully supports these efforts, which align with our core values and beliefs, and are also part of our Sustainability program (<https://www.aptiv.com/sustainability>).

This report is inclusive of all entities and subsidiaries under the parent company "Aptiv International Holdings (UK) LLP" (referred to as "Aptiv" in this statement). This entity consolidates the activities of all our operations in the UK, among other locations.

Organization's structure, business and supply chain

Aptiv PLC, with its affiliated companies (including Aptiv International Holdings (UK) LLP), is one of the world's largest vehicle component manufacturers. Our customers include most of the world's automotive original equipment manufacturers. The Aptiv family of companies operate 126 major manufacturing facilities and 15 major technical centers to efficiently and effectively serve our global customers. We have a presence in 44 countries and have approximately 160,000 employees globally focused on developing and producing market relevant product solutions for our customers.



We have organized our business into two segments, which enables us to develop solutions and manufacture highly-engineered products that are "Safe", "Green" and "Connected." For more details, see page 4 of our annual report [here](#).



Supply chain overview

The automotive supply chain is very complicated. The vast majority of our supply chain is organized horizontally, and there are often three to eight levels of suppliers between an auto parts manufacturer and the mining level (raw materials extraction).

Aptiv has over 12,000 “tier 1” suppliers, operating out of more than 15,000 sites in approximately 80 countries.

Our policies in relation to modern slavery and human trafficking

Several company functions are involved in ensuring that human rights are respected across the value chain. Aptiv’s human resources function has the lead for Aptiv’s internal operations, while the supply chain management function oversees Aptiv’s suppliers.

Policies

We maintain a number of internal policies to ensure our requirements on modern slavery/forced labor are well communicated, integrated into our contractual framework, and agreed upon by all employees and business partners. These include:

For our own operations:

- Aptiv’s Code of Ethical Business Conduct describes our organizational requirements and values, and explains how we expect our employees and representatives to act. The Code contains a forced/slave labor clause (see page 16 at this [link](#)). Employees who violate our Code are subject to possible disciplinary measures, up to termination of employment.
- Aptiv’s Diversity, Equality and Human Rights Policy defines our expectations for treatment of employees, and our non-tolerance to child or forced labor. See policy [here](#).
- We pay our employees in compliance with applicable law in their country of operations.

For our supply chain:

- Aptiv’s strategic suppliers are required to agree to the principles articulated in our Supplier Code of Conduct, which includes a clause on forced labor and human trafficking. Additional information is available [here](#).
- In addition, Aptiv’s General Terms and Conditions require suppliers to commit that they will not utilize “slave, prisoner or any other form of forced or involuntary labor or engage in abusive employment in the supply of Goods under this Contract.”
- In case of a breach of the contractual obligations in our General Terms and Conditions, Aptiv has the right to terminate the contract and pursue indemnification.
- During the onboarding process to select new strategic suppliers, a verification of reputational issues is performed, including controversies on labor conditions, human rights and health and safety. Such vendors are also required to sign our Supplier Code of Conduct mentioned above.



Due diligence: Part of the business and supply chain where risk exists, steps taken to assess and manage the risk

Risk assessment

As an international and responsible employer, we do not tolerate child and/or forced labor and reject any revenue from this exploitation. For Aptiv we believe it is a non-negotiable question of principle and values.

We consider guidelines and recommendations regarding forced labor from organizations such as the UN, OECD and ILO, as well as think tanks and NGOs that are active in the area of labor rights.

In addition, Aptiv is a member of the CFSI (Conflict Free Smelter Initiative) in the context of its activities on conflict minerals. Aptiv also participates in a variety of sustainability work groups from automotive industry organizations (such as AIAG, CCFA, CLEPA, and VDA) dealing with development of new or enhanced responsible purchasing processes.

Due diligence for our own operations

Aptiv produces original equipment components for car manufacturers. This production is typically stable, and not subject to significant seasonal variation. Therefore, our production workforce, ranging from medium to highly skilled, produce high volumes of complex technical products under stringent quality requirements. We believe our business does not match the criterion of activities highly exposed to forced labor risk.

A new procedure was implemented in 2017 to strengthen our compliance requirements. Every finding related to a human rights matter, or noncompliance to labor laws, must be escalated to management. Findings that represent a significant infraction are directly addressed by senior management. For minor findings, local teams are responsible for implementing corrections, but they must report to senior management quarterly.

In addition to corporate due diligence, compliance with labor laws is managed by Human Resources, with assistance from our legal staff where necessary. We also conduct regular internal audits to check compliance with corporate policies and legal requirements, and issue corrective action plans to correct any identified gaps.

Aptiv's Human Resources department systematically checks employee work permits and immigration documents at the hiring stage in every country where this is a legal requirement. Our internal audit staff found **no record** of forced labor in our operations, including in high risk countries.

Due diligence for our supply chain

As indicated in previous Modern Slavery statements, we have also focused our attention on labor agencies. Our supply chain management function has requested all labor agencies worldwide to sign our Supplier Code of Conduct, which includes a clause on human rights.

As part of the Aptiv Manufacturing Capability Assessment (MCA) audit process, Aptiv auditors inspect supplier records and observe their operations. If any inappropriate or unfair work conditions are observed or suspected, the situation is reviewed for appropriate action, on a case by case basis. This physical audit is also used to perform a check of the supplier's social responsibility policies and organization to verify compliance with our Supplier Code of Conduct.

We also reserve the right to conduct unannounced audits of our suppliers, including inspection of facilities and review of documentation, to ensure compliance with our standards.



Business grievance mechanism

The Aptiv DRIVE Line allows employees (as well as external stakeholders) to report (anonymously, if desired) alleged ethical or compliance violations, or any issue that employees may face, without fear of retaliation. We investigate all reported incidents. All Aptiv sites widely advertise the DRIVE Line in social areas and shop floors. Any victim of abusive disciplinary measures or forced labor conditions, may use this line to raise their concern to senior management without fear of retaliation.

This tool also makes it possible for our suppliers to report any issue regarding compliance to our Supplier Code of Conduct, including any breach of our forced labor policy.

No complaints related to forced labor have been reported to the Aptiv DRIVE Line.

Effectiveness measured with performance indicators

For our operations

At Aptiv, all salaried employees receive training regarding our Code of Ethical Business Conduct, which includes prohibitions on slavery and human trafficking. In 2019 94% of Aptiv salaried employees completed Code of Ethical Business Conduct training, and more than 4,600 employees globally received in-person or live web-based ethics and compliance training.

Aptiv tracks the following indicators:

- Number of cases of forced labor reported in 2019 via the DRIVE line: 0
- Number of cases of forced labor identified in 2019 via internal audits: 0
- Rate of completion of the most recent Code of Ethical Business Conduct training: 94%.

For our suppliers

As of 2019, 95% of strategic suppliers have signed our Supplier Code of Conduct

Please see our Sustainability report at: [Sustainability At Aptiv](#)

This statement was approved by the Partners of Aptiv International Holdings (UK) LLP

Aptiv Holdings (UK) Limited

By: 

Date: July 30, 2020