

## Slavery and Human Trafficking Statement for HellermannTyton for the financial year 2018

This slavery and human trafficking statement is made 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. HellermannTyton fully supports these efforts, which align with our core values and beliefs (<http://www.hellermanntyton.co.uk/ethics>) and are also part of our Group-wide Corporate Social Responsibility programme (<http://www.apativ.com/sustainability>).

This report sets out the steps taken by HellermannTyton Group PLC and its UK subsidiary, HellermannTyton Limited, during the year ending 31 December 2018 (together referred to as "HellermannTyton" in this statement). These entities consolidate the activities of all our operations in the UK which fall within the scope of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

### Organisation's structure, business and supply chain

#### Our own business operations overview

HellermannTyton is a provider of cable management solutions to customers worldwide. These solutions are specified by original equipment manufacturers (OEMs) and installers then delivered directly to their production lines, their tier suppliers or via the wholesale and distribution channels. HellermannTyton and its subsidiary companies operate 16 major manufacturing facilities to efficiently and effectively serve our global customers. We have a presence in 38 countries and have more than 5,500 employees globally focused on developing and producing an extensive range of cable management products and solutions to meet the demanding needs of original equipment manufacturers and end users in diverse end-markets.



## Supply chain overview

Over half of our business supplies the automotive industry, including cars, bus, truck and construction equipment, usually via “tier 1” suppliers to the automotive OEMs. The rest of our business supplies OEMs and installers in other industries, such as railway, aerospace, wind power and infrastructure, typically via wholesalers and distributors. The automotive supply chain is one of the most complicated an industry can face. For the vast majority, our supply chain is organized horizontally, and there are often three to eight levels of suppliers between an auto part maker and the mining level (raw materials extraction).

**The data listed below represents our main suppliers with whom we have a direct business relationship.**

	Direct	Indirect	Total
Number of suppliers	600+	4000+	4600+
Number of Countries	20+	30+	30+

## Our policies in relation to modern slavery and human trafficking

Several company functions are involved in ensuring that human rights are respected within HellermannTyton’s business and supply chain. HellermannTyton’s human resources department has the lead for internal operations, while the supply chain management and procurement staff oversee HellermannTyton’s suppliers. The connection between these functions is made by the internal audit staff and in-house legal counsel.

### Policies

We maintain a number of internal policies to ensure our requirements on modern slavery/forced labour are well communicated, integrated into our contractual framework, and agreed upon by all employees and business partners. Policies are developed by senior representatives of human resources, procurement, legal and internal audit and are signed off at Director-level. These include:

#### For our own operations:

- HellermannTyton’s **Code of Ethical Business Conduct** (“Code”) describes our organisational requirements and values, and explains how we expect our employees and representatives to act. The Code clearly states that we do not use or tolerate forced or slave labour, or any form of human trafficking. Employees who violate our Code are subject to possible disciplinary measures, up to termination of employment.
- Our **Diversity, Equality and Human Rights Policy** defines our expectations for treatment of employees, and includes the same forced labour statement.
- We pay our employees in compliance with applicable law in their country of operations.

#### For our supply chain:

- HellermannTyton’s key suppliers are required to agree to the principles articulated in our Ethics Policy, which includes a clause on forced labour and human trafficking (<http://www.hellermanntyton.co.uk/ethics>).
- In addition, Section 15 of HellermannTyton’s Standard Conditions of Purchase requires suppliers to comply and ensure that its subcontractors and suppliers comply with our Ethics Policy and the United Kingdom Modern Slavery Act 2015 as amended from time to time, or any other applicable anti-slavery and human trafficking laws (<http://www.hellermanntyton.co.uk/terms-and-conditions>).
- In case of breach of the contractual obligations in our Standard Conditions of Purchase, HellermannTyton has the right to terminate the contract.
- During the onboarding process to select new core suppliers, a verification of reputational issues is performed, including controversies on labour conditions, human rights and health and safety. Such vendors are also made aware of our Ethics Policy mentioned above.

## **Due diligence and audits of suppliers and supply chain**

HellermannTyton has a zero-tolerance approach to any form of modern slavery. We take all matters of slavery, servitude, forced labour and human trafficking seriously and are committed to advancing our policies and systems across the entire Group, not just those caught by the Modern Slavery Act, to ensure we address and monitor all aspects of forced labour risk that is relevant to our business.

### **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 labour and reject any revenue from this exploitation. It is a non-negotiable question of principle and values. Any hypothetical breach of human rights in our operations would obviously generate significant business consequences.

Our parent company Aptiv regularly researches literature regarding forced labour guidelines on traceability, and recommendations for addressing these issues, from organizations such as the UN, OECD and ILO. Aptiv have identified a list of think tanks and NGOs that are active in the area of labour rights, and have analysed relevant publications and positions, with particular focus on automotive sector cases.

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**

The production of cable management solutions is stable, and not subject to significant seasonal variation. In general, our production work force ranges from medium to highly skilled, in order to produce high volumes of complex technical products under stringent quality requirements. Therefore, our industry is not considered highly exposed to slavery/forced labour risk. We estimate the risk of forced labour to be close to zero for the people we pay directly.

HellermannTyton'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. Where HellermannTyton uses agency staff we conduct regular audits on our labour providers to ensure that any workers they provide are paid and treated fairly. Our internal audit staff found **no record** of forced labour in our operations, including in high risk countries.

#### **Due diligence for our supply chain**

HellermannTyton reserves 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 DRIVE Line (Diversity, Respect, Integrity, Value and Excellence) 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 HellermannTyton sites widely advertise the DRIVE Line call-in number in social areas and shop floors. Any victim of abusive disciplinary measures, or forced labour conditions, may use this line to raise their concern to the top management without fear of retaliation.

This tool also makes it possible for our suppliers to report any issue regarding compliance to our Ethics Policy, including any breach of our forced labour policy.

No forced labour complaints have been received by the DRIVE Line.

## **Effectiveness measured with performance indicators**

### **For our operations**

At HellermannTyton, we believe that all employees should be trained on human rights matters. And, in fact, all HellermannTyton salaried employees receive periodic training regarding our Code of Ethical Business Conduct, which includes prohibitions on slavery and human trafficking.

HellermannTyton tracks the following indicators:

- Number of cases of forced labour elevated in 2018 via the DRIVE line: 0
- Number of cases of forced labour elevated in 2018 via internal audits: 0
- Rate of completion of the most recent code of conduct training: 95%.

### **For our suppliers**

HellermannTyton has adopted an Ethics Policy that we expect all of our strategic suppliers to adhere to. Within our supplier due diligence on-boarding process we ask all of our suppliers to agree to abide by our Ethics Policy before we will do business with them.

This statement was approved by the Boards of HellermannTyton Group PLC and HellermannTyton Limited, registered in England and Wales

Name : T. Jones

Position : Director

Signature:



Date : 28 June 2019