



Metaldyne International (UK) LTD

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Metaldyne International (UK) LTD

Anti-Slavery & Human Trafficking Policy

Date: **16.12.2025**

Classification: **Public**

Identifier:

Version: **1.0**

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METALDYNE INTERNATIONAL (UK) LTD
ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

1. PURPOSE & SCOPE

- 1.1 This policy sets out Metaldyne International (UK) LTD's policy on preventing Slavery & Human Trafficking in our business and supply chains.
- 1.2 This policy applies to all Metaldyne International (UK) LTD and to all Associates.

2. APPROVAL & RESPONSIBILITY

- 2.1 This policy has been approved by the board of directors of Metaldyne International (UK) LTD, who have ultimate responsibility for this policy and for ensuring it is adequately communicated to Metaldyne International (UK) LTD as a whole.
- 2.2 Metaldyne International (UK) LTD is responsible for ensuring awareness of and compliance with this policy and for establishing a "culture" of compliance. This includes ensuring effective dissemination of this policy throughout Metaldyne International (UK) LTD, providing relevant guidance and training, and appropriate safeguards, monitoring and resources.
- 2.3 All Associates are responsible for observing and complying with all applicable provisions of this policy and for avoiding any activity that might lead to, result in or suggest a breach of this policy.

3. WHAT IS SLAVERY & HUMAN TRAFFICKING?

- 3.1 For the purposes of this policy, "**Slavery & Human Trafficking**" includes slavery, servitude, forced, compulsory or bonded labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 3.2 Slavery & Human Trafficking can take a variety of forms and may not always be obvious. Therefore in the event of any doubt as to whether any particular conduct constitutes or might constitute Slavery & Human Trafficking for the purposes of this policy, advice should be taken from corporate legal counsel.

4. POLICY STATEMENT

- 4.1 Slavery & Human Trafficking is a crime and a violation of fundamental human rights. It is entirely contrary to Metaldyne International (UK) LTD's policy and values.
- 4.2 Metaldyne International (UK) LTD has a zero-tolerance approach to Slavery & Human Trafficking in its business. Metaldyne International (UK) LTD is committed to investing in, implementing and enforcing effective systems and controls across its business to safeguard against the risk of Slavery & Human Trafficking occurring in its business and supply chains.
- 4.3 Any conduct within Metaldyne International (UK) LTD's own operations which constitutes or might be construed as Slavery & Human Trafficking is strictly prohibited.
- 4.4 Metaldyne International (UK) LTD is also committed to tackling Slavery & Human Trafficking throughout its supply chains which is aligned with the Modern Slavery Act 2015.

- 4.5 Metaldyne International (UK) LTD expects the same zero-tolerance approach to Slavery & Human Trafficking from its Suppliers.

5. SLAVERY & HUMAN TRAFFICKING IN METALDYNE INTERNATIONAL (UK) LTD'S SUPPLY CHAINS

- 5.1 Metaldyne International (UK) LTD's zero-tolerance approach to Slavery & Human Trafficking also applies to its supply chains.
- 5.2 Metaldyne International (UK) LTD prohibits engagement with any Supplier who objects to, or acts inconsistently with, Metaldyne International (UK) LTD's zero-tolerance approach to Slavery & Human Trafficking.
- 5.3 Throughout the duration of Metaldyne International (UK) LTD's relationship with each Supplier, Associates who deal with that Supplier must be vigilant and monitor the Supplier's behaviour for evidence that they may be engaged in practices which constitute Slavery & Human Trafficking. This should include paying particular attention when undertaking Supplier site visits, quality reviews, or other events when Associates or workers of the Supplier may be present.
- 5.4 In the event that any behaviour that might constitute Slavery & Human Trafficking is suspected, it should be reported as set out in paragraph 6 so that further investigation can be undertaken. Such investigation should be undertaken pursuant to the corporate internal investigation procedure.
- 5.5 If following any such investigation any Supplier is determined to be engaging (or to be likely to be engaging) in Slavery & Human Trafficking:
- (a) if not currently supplying goods or services to Metaldyne International (UK) LTD, the Supplier should be eliminated from any selection process so that the Supplier is no longer capable of supplying goods or services to Metaldyne International (UK) LTD in the future; or
 - (b) if currently supplying goods or services to Metaldyne International (UK) LTD, efforts should be made to ensure that the Supplier immediately ceases to engage in Slavery & Human Trafficking and Metaldyne International (UK) LTD should cease dealing with the Supplier soon as practicable whilst avoiding material disruption or damage to Metaldyne International (UK) LTD's operations.

6. RAISING CONCERNS

- 6.1 The detection and reporting of actual or suspected Slavery & Human Trafficking in any part of Metaldyne International (UK) LTD's business or supply chains is the responsibility of all Associates.
- 6.2 All Associates must raise concerns about any actual or suspected Slavery & Human Trafficking at the earliest possible stage. This should be done in accordance with the the corporate "Speak Up" / whistleblowing reporting mechanism and internal investigation procedure.
- 6.3 If any Associate is unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of Metaldyne International (UK) LTD's supply chains constitutes any of the various forms of Slavery & Human Trafficking or a breach of this policy, relevant details should be provided to the corporate legal/compliance.

7. TRAINING & AWARENESS

Metaldyne International (UK) LTD must provide adequate training and communication to relevant Associates on identifying and reporting suspected Slavery & Human Trafficking. .

8. BREACHES OF THIS POLICY

Any breach of this policy by an Associate may lead to disciplinary action being taken by Metaldyne International (UK) LTD up to and including termination of employment. Where appropriate, Metaldyne International (UK) LTD will also liaise with relevant law enforcement bodies.

9. RECORDKEEPING

All Metaldyne International (UK) LTD must ensure that sufficient records are kept to evidence compliance with this policy.

10. DEFINITIONS

10.1

10.2 “Associates” means all Associates or workers within Metaldyne International (UK) LTD, which includes full time and part time Associates and other workers including contractors, agency workers, interns, apprentices and volunteers.

10.3 “**Metaldyne International (UK) LTD**” means Metaldyne International (UK) LTD and all subsidiary companies over which it exercises control, including all Metaldyne International (UK) LTD.

10.4 “**Slavery & Human Trafficking**” has the meaning set out in paragraph 3.1 above.

10.5 “**Supplier**” means the any supplier of goods and/or services to Metaldyne International (UK) LTD.