



## **Comau UK addendum to FCA (now Stellantis) Modern Slavery Act 2015**

### *Overview*

This document is the Comau UK addendum to FCA (now Stellantis) Modern Slavery Act 2015 attached hereto as per ANNEX 1. It applies to Comau UK, as the UK subsidiary fully owned by Comau SPA, the holding company of the Comau's Group, with registered office at Grugliasco, Via Rivalta 30, Turin ITALY. It must not be intended revising, modifying or elsewhere affecting FCA (now Stellantis) Modern Slavery Act 2015.

For the sake of clarity in reading this document, at the end of each chapter of the FCA (now Stellantis) Modern Slavery Act 2015, said addendum makes a specific reference to the relevant COMAU activity, with a view to give a specific picture of Comau's activities within the framework of FCA (now Stellantis) Modern Slavery Act 2015. The title and number of the articles to which said addendum refers to are those of the FCA (now Stellantis) Modern Slavery Act 2015.

## **1. INTRODUCTION**

### *The Organization*

Comau UK Limited is a subsidiary of Comau spa (together referred as "Comau" in this statement) and the latter is a company fully owned by FCA NV (now Stellantis NV after the merger with Peugeot). Comau, is a worldwide leader in delivering advanced industrial automation products and systems. Its portfolio includes technology and systems for electric, hybrid and traditional vehicle manufacturing, industrial robots, collaborative and wearable robotics, autonomous logistics, dedicated machining centers and interconnected digital services and products able to transmit, elaborate and analyze machine and process data.

With over 45 years of experience and a strong presence within every major industrial country, Comau is helping manufacturers of all sizes in almost any industry experience higher quality, increased productivity, faster time-to-market and lower overall costs. Comau's offering also extends to project management and consultancy, as well as maintenance and training for a wide range of industrial segments.

Comau UK Limited  
188 Bilton Road ad  
Rugby  
Warwickshire  
CV22 7TD  
United Kingdom

Tel: +44 (0)1788 554500

[www.comau.com](http://www.comau.com)



Registered in England  
Company Registration No. 02294036



Headquartered in Turin, Italy, Comau has an international network of 7 innovation centers, 5 digital hubs, 8 manufacturing plants that span 14 countries and employ more than 8,000 people. A global network of distributors and partners allows the company to respond quickly to the needs of customers, no matter where they are located throughout the world.

Through the training activities organized by its Academy, Comau is also committed to developing the technical and managerial knowledge necessary for companies to face the challenges and opportunities of Industry 4.0.

#### *COMAU Supply Chain*

Comau has its own supply chain dedicated to its core business and in this respect it applies all FCA/Stellantis's rules, procedures and processes, including the Code of Conduct referred to below. These rules are fully implemented, assessed and audited within Comau.

## **2. Our Policies on Slavery and Human Trafficking**

#### *FCA Code of Conduct*

Comau has adopted the FCA (now Stellantis) Code of Conduct, and all Comau's subsidiaries comply with all rules, principles and practices therein indicated.

#### *FCA Sustainability Guidelines for Suppliers*

Comau do not have its own sustainability report, while it is expected that, after the listing process of Comau spa at the Italian Stock Exchange occurring within 2022, Comau will draft its own sustainability report according to the current UE rules as implemented by the Italian Government.

In the meantime, Comau provides internal data to FCA/STellantis showing how it complies and adhere to the FCA/Stellantis Code of Conduct and policies (as reported in this paragraph of the FCA Modern Slavery Act 2015), as well as all policies and procedure which impose to Comau's supply chain the adherence of the principle related to human rights and working conditions.

In this respect, Comau's Purchase General Terms and Conditions require any new purchase order with suppliers to align with the principles set forth by FCA/Stellantis's policies, including the FCA/Stellantis Code of Conduct and the relevant Sustainability Guidelines for Suppliers. If a supplier fails to meet these standards, a corrective action plan is required and additional actions may be adopted in case of non-compliance, including and up to termination of the business relationship.



## **2. Due diligence for Slavery and Human Trafficking**

The FCA/Stellantis action plans described in this paragraph to prevent slavery and human trafficking are also implemented across the Comau companies, adapting them to the Comau framework consistently with Comau type of business . For instance the so called "FCA Sustainability Self Assessment SSSA" is conducted during the suppliers' selection process as well as through the application of certain compliance procedures (such as "Conflict minerals" ), with a view to admit in the supply chain those suppliers which do not supply materials or products containing great amounts greater than zero of tin, tantalum, tungsten, or gold originating in high risk countries.

## **4. FCA/Stellantis Ethics Helpline**

The FCA/Stellantis Ethic helpline applies also to all Comau companies, including Comau UK Limited.

## **5. Training**

Comau disseminates the Principles established in the Code of Conduct and the values of good governance to all employees. Employees worldwide regularly receive training in ethics and compliance, with particular focus on the Code of Conduct.

Comau is also committed to establishing a strong safety culture applying a broader approach in which employee health and safety is considered more broadly in terms of the workers' well-being. Employees are involved in this process through training and initiatives designed to increase safety awareness, and by participating in a comprehensive system for gathering feedback and suggestions.

*JOHN COOMBES*  
JOHN COOMBES (Sep 3, 2021 08:43 GMT+2)

John Coombes  
Managing Director  
COMAU UK Limited



## MODERN SLAVERY ACT 2015





This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (“the MSA”) on behalf of Fiat Chrysler Automobiles N.V. (“the Company”) and behalf of those subsidiaries of the Company to which Section 54 of the MSA applies.





# 1. Introduction



The Company is committed to **adopting, maintaining and improving systems and processes designed to eliminate slavery and human trafficking** from our supply chains or in any part of our business. The following statement sets out the steps which the Company is taking to combat slavery and human trafficking.

## The Organization

The Company is a public company with limited liability, incorporated and organized under the laws of the Netherlands. The Company's common shares are listed on the New York Stock Exchange and on the Mercato Telematico Azionario managed by Borsa Italiana S.p.A.





# Sustainable mobility

## Our Business

159  
manufacturing  
facilities

87  
research and  
development  
centers

Fiat Chrysler Automobiles (FCA), designs, engineers, manufactures and sells vehicles and related parts and services, components and production systems worldwide through 159 manufacturing facilities and 87 research and development centers.

The Group's automotive brands are : Abarth, Alfa Romeo, Chrysler, Dodge, Fiat, Fiat Professional, Jeep, Lancia, Ram, Maserati and Mopar, the parts and service brand. The Group's businesses also include Cornau (production systems), Magneti Marelli (components) and Teksid (iron and castings).

In addition, retail and dealer financing, leasing and rental services related to and in support of the Group's car business are provided either through subsidiaries or financial partners (such as captive companies, affiliates, joint ventures with leading banks and/or financial institutions, and specialized providers). Joint ventures operations include the specialized financial services provided by FCA Bank SpA and its UK subsidiaries; namely, FCA Automotive Services UK Ltd, FCA Dealer Services UK Ltd and Leasys UK Ltd.

FCA operates through companies located in more than 40 countries and has commercial relationships with customers in more than 140 countries. The Company has an annual turnover in excess of £36 million.

## Our Supply Chain

more than  
**75%** of the  
components  
provided by  
suppliers

FCA suppliers provide more than 75% of the components used in our vehicles. Suppliers are selected based on the quality and competitiveness of their products and services, as well as on their compliance with social, ethical and environmental standards. Sustainability standards and performance along the value chain also include aspects related to international human rights standards and labor laws. Suppliers at every tier of the supply chain carry much of the management responsibility; nevertheless, FCA is aware of the role that it can play in preventing human rights violations and promoting sound working conditions.

More details about FCA Supply Chain are available on the **FCA Sustainability Report**. 

Our operations impact local economies and, whenever possible, we utilize local suppliers near major locations of operation. This generates direct and indirect income and employment opportunities in the communities where the business is located, while minimizing transport-related environmental impacts.

Local suppliers are those that supply an FCA plant located in the same country where they operate. For example, at our plants in Brazil, more than 90% of our spending originated from in-country suppliers. In Poland, 57% of purchases came from local suppliers.





## 2. Our Policies on Slavery and Human Trafficking

### FCA Code of Conduct



At the FCA Group, one way we develop an environment that embodies the highest ethical standards in business conduct is through our Code of Conduct (the “**Code**”). The Code aims to ensure that all members of the FCA Group’s workforce act with the highest level of integrity, comply with all applicable laws, and build a better future for our Company and the communities in which we do business. The FCA Group endorses the United Nations (“**UN**”) Declaration on Human Rights and the International Labor Organization (“**ILO**”) Conventions.

Moreover since 2009, FCA Group has adopted a comprehensive set of Guidelines to address, among the others, workplace issues such as child and forced labor working hours, non-discrimination, freedom of association, health and safety and the environment. FCA Guidelines on “Human Rights” reflect our commitment to acting ethically and with integrity in our business relationships.

A new set of Practices have been prepared and will be communicated in 2018, including the new Practice on “Protecting Our Workforce and “Child and Forced Labor Prohibited” which includes also the prohibition of trafficking and other forms of slavery.


The FCA Group endeavours to ensure that the Code is regarded as a best practice of business conduct and observed by those third parties with whom FCA maintains business relationships of a lasting nature such as suppliers, dealers, advisors and agents.



## FCA Sustainability Guidelines for Suppliers

Supplier Sustainability Guidelines available on the FCA corporate website and on the FCA Supplier Portal require that Group suppliers adhere, at a minimum, to the following principles:

### Human rights and working conditions:

|  |   |   |   |
|--|---|---|---|
|  | ● rejection of the use of forced or child labor in any form | ● recognition of the right to freedom of association in accordance with applicable laws   |  |
| ● freedom from harassment and discrimination | ● safeguarding of employee health and safety                | ● guarantee of equal opportunities, fair working conditions, appropriate working time, equal compensation, and the right to training for employees. |   |

### Supplier General Terms & Conditions

Suppliers must conduct business activities according to ethical standards and procedures set forth by FCA. The Company's General Terms and Conditions require any new purchase order with suppliers to align with the principles set forth by FCA's policies, including the FCA Code of Conduct and the FCA Sustainability Guidelines for Suppliers. If a supplier fails to meet these standards, a corrective action plan, jointly developed with FCA, is required. Additional actions may be adopted by FCA in case of non-compliance, including and up to termination of the business relationship. FCA's Sustainability Guidelines for Suppliers are available on our corporate website as well as the supplier portal.





### 3. Due diligence for Slavery and Human Trafficking



Our due diligence processes include actions to safeguard against human rights abuses in any part of our business and in our supply chain. As part of our initiative to internally identify and mitigate any related risks the following tools have been developed:

- **an annual survey**

aimed at detecting any case of child and forced labor at worldwide FCA companies, including those located in countries that have not ratified ILO Conventions on these issues.

In 2017, no incidents of child labor or forced and compulsory labor were reported in any of the companies mapped;

- **a Human Rights survey**

performed by the Internal Audit department as part of the standard internal audit process, in order to cover due diligence requirements of the United Nations Guiding Principles on Business and Human Rights ("Ruggie Framework"). This survey gauges local supplier conditions and checks are performed in those countries with a high risk based on the yearly Audit Plan.

In 2017, FCA strengthened the checklist risk items related to child labor and young workers, forced labor, non-discrimination, conditions of employment, security and supply chain management. The human rights self-assessment compliance checklist was performed by individual legal entities and reviewed by Internal Audit & Compliance, with a coverage of 65% of the FCA workforce worldwide.



Direct material suppliers play a key role in the continuity of our operations and FCA recognizes that they can have a significant impact on external perceptions of our social responsibility. Accordingly, we believe that sustainability is a value to be spread and shared across the value chain; and, we regularly monitor risks related to human rights through two main monitoring tools:

- **the FCA Supplier Sustainability Self-Assessment ("SSSA")**

covering labor practice, human rights, ethics, diversity, and health and safety aspects

- **on-site audits**

conducted at high-risk supplier plants by either internal Supplier Quality Engineers or third-party auditors


In addition, potential suppliers, to be eligible, must demonstrate that they have adopted a code of conduct, a certified system for managing employee health and safety, and a program that promotes sustainability, both internally and along the supply chain. These conditions help ensure that they monitor and manage environmental aspects, labor practices, human rights, and their impact on society. More details are available on the **FCA Sustainability Report**.



## 4. FCA Ethics Helpline



Compliance with the Code of Conduct requires employees to report any non-compliance. Unless local law provides otherwise, employees must report violations of law, regulation or Company policy of which they become aware.

To allow the reporting of concerns and ensure the protection of individuals raising a concern, FCA has established dedicated channels, in order to provide a worldwide, common and independent intake. The **FCA Ethics Helpline**  was implemented in 2015 as an essential element of the Ethics Helpline management process in accordance with the Code of Conduct Principles.

It is managed by an independent provider, available 24 hours a day, seven days a week, in 19 languages.

The FCA Ethics Helpline allows employees, suppliers, clients and other stakeholders to request advice about the application of the Code of Conduct (for example to verify definitions of terms or restrictions under the Code), as well as reporting any concerns of alleged situations, events, or actions that they may be inconsistent with our Code. FCA has adopted a comprehensive awareness program to communicate the process which also includes a link to the Ethics Helpline published on the supplier portal.



## 5. Training



FCA disseminates the Principles established in the Code of Conduct and the values of good governance to all employees. Employees worldwide regularly receive training in ethics and compliance, with particular focus on the Code of Conduct.

Additional in-depth training on responsible working conditions is offered to suppliers in partnership with Automotive Industry Action Group ("AIAG"). This training is developed and updated collaboratively with other automakers and is designed to help protect the rights and dignity of the workers who make vehicle components.

FCA is also committed to establishing a strong safety culture applying a broader approach in which employee health and safety is considered more broadly in terms of the workers' well-being. Employees are involved in this process through training and initiatives designed to increase safety awareness, and by participating in a comprehensive system for gathering feedback and suggestions.

This statement was adopted by the Board of Directors of Fiat Chrysler Automobiles N.V. for the 2017 financial year.





FIAT CHRYSLER AUTOMOBILES

[www.fcagroup.com](http://www.fcagroup.com)