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## Modern Slavery Statement

Following the acquisition of the Federal-Mogul Corporation by Tenneco Inc. in October 2018, we are now part of the Tenneco Group of Companies, which has its head office in the US. The legacy Federal-Mogul group includes the Powertrain and Motorparts segments, which have over 53,000 employees worldwide and operate in 34 countries.

These segments had 2018 revenue of \$1.1B and \$774 million, respectively.

We are proud of the steps we have taken to combat slavery and human trafficking and Federal-Mogul Motorparts continues to support the protection of international human rights within the realm of its influence and is committed to the highest ethical standards. The group will not tolerate inhumane treatment of its employees such as, but not limited to, physical abuse, harassment or the threat thereof. The group does not employ forced, bonded or involuntary labour. All employment terms are to be voluntary between the group and its employees. This applies to all co-workers, managers, suppliers and customers and we are happy that this policy is strictly complied with.

### ORGANISATIONAL STRUCTURE

This statement applies to two operating facilities in the UK which are in the Motorparts division of the Federal-Mogul group.

- Our Chapel-en-le-Frith site is a manufacturer of friction products which include brakes & linings for the automotive sector and brake pads and blocks for the railways sector (trading as Federal-Mogul Friction Products Limited)
- Our Bradford site is a distribution centre for OE and AM products manufactured by Federal-Mogul group companies (trading as Federal-Mogul Aftermarket UK Limited)

### OUR BUSINESS

Our business has historically been organized into two business units:

- Powertrain, which is advanced technologies and precision components for demanding Powertrain applications and environments.
- Motorparts, which has leading products and globally recognized brands designed, manufactured and distributed for ease of installation and repair and which is anticipated to be included in the new organization, DRiV following the planned separation of DRiV from Tenneco.



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## **OUR SUPPLY CHAIN**

Our supply chains include the network created amongst different companies producing, handling and/or distributing specific products or services.

Specifically, the supply chain encompasses the steps it takes to get goods or services from the supplier to the customer.

Federal-Mogul categorizes its vendors into the following segments:

- Direct Material and Service vendors
- Indirect Material and Service vendors
- Capital Equipment (Capex) and Tooling
- Transportation

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We continue to be committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we regularly review our workplace policies and procedures, including the code of conduct, to assess their effectiveness in identifying and tracking modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity, in all our business relationships and to implementing and enforcing effective systems and controls, to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our ongoing efforts to identify and mitigate risk, we continue to complete the following:

- 150/TS audits
- Integrity certification for new starters and recertification on an annual basis for existing employees
- Code of Conduct training for all new employees
- Integrity certification on an individual's exit from the company's employment
- Equality training to all new employees
- Federal-Mogul Hotline
- Compliance Team
- Supporting HR procedures



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The systems we have in place continue to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chain
- Protect whistle blowers

## **SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme.

The programme begins when a new supplier is approved by Federal-Mogul. Before commencing any business with the supplier, they are sent a pack which contains all of Federal-Mogul policies and procedures which are relevant, such as the code of conduct. Each supplier is then requested to sign a contract which confirms they will abide by our policies and procedures, which include zero tolerance to slavery and human trafficking. Although each supplier is not reviewed due to the thousands of suppliers which we use, when each order is created the supplier receives a reminder of our policies and procedures by way of links with each order.

We have a compliance team, which consists of representatives from the following departments:

- General Counsel's office
- Finance
- Human Resources
- Internal Audits Department

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all our staff are provided with training. This training occurs on induction and refresher training continues to be provided on an annual basis to all salaried paid employees. We also require our business partners to provide training to their staff, suppliers and providers.

## **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We reserve the right to spot check our suppliers as we deem necessary and to measure how effective we have been, to ensure that slavery and human trafficking is not taking place in any part of our business or supply chain.



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## FURTHER STEPS

Following a review of the effectiveness of the steps we have taken in 2017 and 2018 to ensure that there is no slavery or human trafficking in our supply chains, we continue with the following actions, in order to combat slavery and human trafficking:

- We continue to deliver our training as described throughout this document to new employees on induction and to recertify existing employees on an annual basis.
- We work with our purchasing department to improve our requirements through our suppliers.
- We continue to promote our policies and the F-M hotline throughout our organization.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2019.

This statement has been approved by the Board and signed by:

\_\_\_\_\_  
**Michael Howard Lindley**  
Director

Signature: M H Lindley

Date: 7/1/20

\_\_\_\_\_  
**Andrew Bevington**  
Managing Director

Signature: [Handwritten Signature]

Date: 22.01.20

Federal-Mogul Friction Products Limited  
Chapel-en-le-Frith

Federal-Mogul Aftermarket Limited  
Bradford