



## **Tenneco Statement on Efforts to Prevent Modern Slavery and Human Trafficking in its Supply Chains**

Tenneco group companies have prepared and made public this Statement in furtherance of the California Transparency in Supply Chains Act and the UK Modern Slavery Act. These laws are designed to increase the amount of information made available by subject companies regarding their efforts to address the issue of modern slavery and human trafficking.

We are proud of the steps we have taken to combat modern slavery and human trafficking and Tenneco is committed to conducting its business in an ethical and responsible manner that supports and respects the protection of human rights. Tenneco or its group of companies will not tolerate inhumane treatment of its employees such as, but not limited to, physical abuse, harassment or the threat thereof. Nor does Tenneco group companies employ forced, bonded or involuntary labor. All employment terms are to be voluntary between the Tenneco group companies and its employees, which applies to all co-workers, managers, suppliers and customers and we are happy that this policy is strictly complied with.

### **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.

We categorize our 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 AND SUPPLIER ADHERENCE TO OUR VALUES**

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. Tenneco's compliance and ethics expectations are set forth in our [Code of Conduct](#), [Supplier Code of Conduct](#), [Supplier Requirements Manual](#), training materials, and other communications that Tenneco provides to its employees and suppliers. Tenneco supports a safe and healthy working environment for all workers, and seeks in all instances to provide working conditions that meet or exceed applicable laws and standards.

Tenneco views compliance with our commitment to human rights as an important responsibility of every Tenneco employee and supplier. Employees review and accept compliance with the Code of Conduct annually and suppliers are required to abide by Tenneco's Supplier Code of Conduct as a condition of doing business with Tenneco. Employees that violate the Code of Conduct may be disciplined or dismissed, depending upon the nature of the violation.



Tenneco further seeks to enforce its commitment to human rights through the publication, distribution, and enforcement of Tenneco's Supplier Code of Conduct. Each supplier wishing to do business with Tenneco is required to abide by the principles outlined in Tenneco's Supplier Code of Conduct. Tenneco assesses and selects its suppliers with care and seeks to engage only those suppliers that comply with all applicable laws, as well as the principles embodied in our Supplier Code of Conduct.

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.

## **TRAINING**

Tenneco conducts internal training concerning forced labor and fair working conditions, and relevant training materials are available on Tenneco's employee intranet site. Tenneco also requires that each supplier maintain a training program concerning Tenneco's commitment to forced labor and working conditions. Tenneco endorses and encourages suppliers to complete the [AIAG Supply Chain Sustainability Knowledge Assessment](#) and [AIAG Supply Chain Sustainability eLearning](#) provided by the [Automotive Industry Action Group \(AIAG\)](#).

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

Supplier's compliance with Tenneco's requirements is outlined in Tenneco's Supplier Code of Conduct and the Supplier Requirements Manual is a key indicator in the Tenneco supplier qualification and assessment process. Suppliers must verify compliance with Tenneco's requirements by completing periodic questionnaires. Additionally, as part of the onboarding process for direct material suppliers, Tenneco performs on-site audits which includes social and environmental criteria. To the extent that ethics or compliance issues are noted in the context of any interaction with a supplier, Tenneco has procedures in place to take appropriate and necessary action to address and resolve such issues.

We do 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.

## **FURTHER STEPS**


To promote accountability, Tenneco is committed to taking appropriate actions to discontinue relationships with suppliers and other third parties who fail to meet its high standards for lawful and ethical conduct, including prohibitions on the use of forced labor in any of its forms, such as human trafficking and slavery. Tenneco maintains an Ethics and Compliance Hotline and multiple reporting channels through which any concerns or potential deviations from Tenneco's expected values can be reported. Such reports are promptly investigated, and appropriate actions taken. We also continue to deliver our training as described throughout this document to new employees on induction and to recertify existing employees on an annual basis. Last, we work with our purchasing department to improve our requirements through our suppliers.

# TENNECO


This Statement has been approved by each company's respective Board of Directors and signed by the undersigned directors of each such company, as named below, as a representative thereof and not in his or her individual capacity.

This statement is made for the financial year ending 31<sup>st</sup> December 2022.

Carol Jones  
Director

  
Tenneco-Automotive UK Limited

Jean Thirion  
Director

  
Tenneco-Automotive UK Limited



Selina Minto  
Director  
Tenneco-Walker (U.K.) Limited



Gary O'Connell  
Director  
Tenneco-Walker (U.K.) Limited

Antony Murfin  
Director

  
Federal-Mogul Coventry Limited



Farkrah Shujaat  
Director  
Federal-Mogul Limited

Paul Fletcher  
Director

  
Federal-Mogul Controlled Power Limited



Steven Firth  
Director  
Piston Rings (UK) Limited



Carol A Jones  
Director  
F-M Motorparts Limited  
(on behalf of its subsidiary entities, Federal-Mogul  
Friction Products Limited and Federal-Mogul  
Aftermarket UK Limited)



Nivesh Mothilal  
Director

F-M Motorparts Limited

March 2023