

UK Modern Slavery Act Statement 2025

In the following statement, 'we,' 'us' or 'our' refers to the Panasonic Automotive Systems Co., Ltd - Fiscal Year 2024 (1st April 2024 to 31st March 2025)

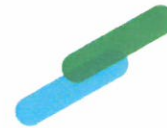
1. Panasonic Automotive Systems Business structure and operations

Panasonic Automotive Systems Co., Ltd., (PAS) headquartered in Yokohama, Kanagawa, Japan, is a leading global provider of advanced automotive technologies. The company was established in April 2022 as part of the Panasonic Group's strategic transformation of its automotive business. Panasonic Automotive Systems Group (comprising Panasonic Automotive Systems Co., Ltd. and its affiliates) employs approximately 21,000 people globally (consolidated) and operates in Japan, North America and Latin America, Southeast Asia, China, Europe, and India. Its operations span the development, manufacture, and sales of in-vehicle cockpit systems, ADAS (Advanced Driver Assistance Systems) and related devices, in-vehicle chargers, and systems and devices for xEVs. Panasonic Automotive Systems Group is committed to meeting the expectations of its customers around the world with technologies that stand by people in pursuit of its corporate vision of becoming the "Joy in Motion" design company. Our mission is to "create a sustainable mobility society," and to achieve this, we continue to provide new values for vehicles and mobility experiences.

In December 2024, Panasonic Automotive Systems Group entered a strategic partnership with Apollo, marking a significant transition in its ownership and governance structure. As a result of this change, Panasonic Automotive Systems Group is no longer a consolidated subsidiary of Panasonic Holdings Corporation. This partnership with Apollo positions Panasonic Automotive Systems Group to further strengthen its global competitiveness, accelerate innovation, and enhance its ability to respond flexibly to rapidly evolving automotive industry trends, while maintaining a strong focus on corporate responsibility, ethical conduct, and supply chain sustainability.

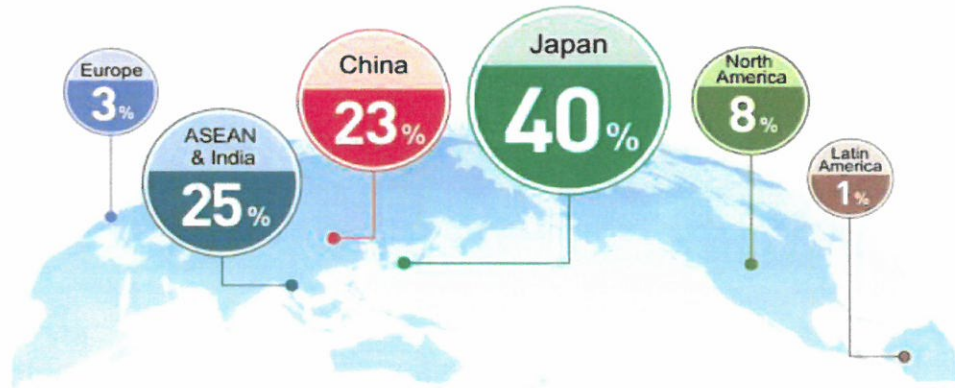
1.1 Supply Chain

Panasonic Automotive Systems Group does business with approximately 1,400 suppliers worldwide. We strive to do business with suppliers that not only provide superior technology and quality but also fulfill their social responsibilities including human rights and environmental considerations, healthy workplace environment, and fair transactions. Our suppliers are in various regions and countries, meaning that some parts and materials come from regions and countries with many migrant workers. By region, the percentage of suppliers providing parts and materials used directly in manufacturing was 40% from Japan, 23% from China, 25% from ASEAN/India, 3% from Europe, 8% from North America, and 1% from Latin America. By industry, 58% were in machined parts, 39% in electrical and electronic parts, and 3% in raw materials. In addition, through our responsible minerals due diligence activities, we extend supply chain visibility beyond our direct (Tier 1) suppliers, tracing upstream to refiners

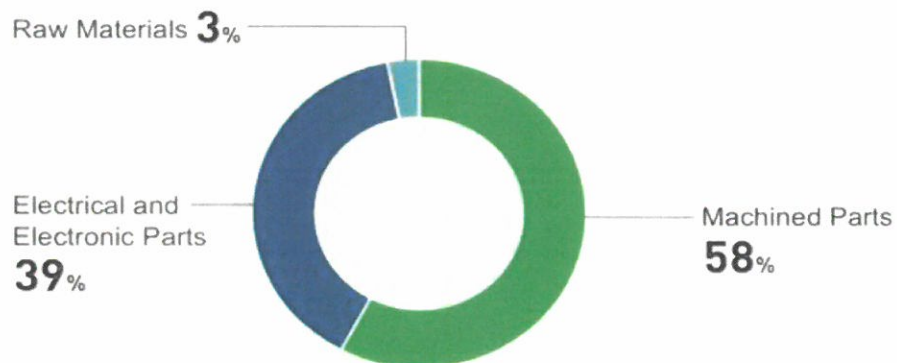


and smelters in line with Responsible Minerals Initiative (RMI)'s Conflict Minerals Reporting Template (CMRT) and Extended Minerals Reporting Template (EMRT).

The Number of Suppliers by Region (%)

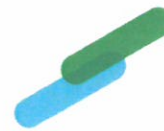


The Number of Suppliers by Product (%)



Panasonic Automotive Systems Group value chain spans the full lifecycle of automotive components and solutions, from sourcing to end-of-life. Upstream, the company relies on a wide range of standard materials and parts such as mechanical small parts, semiconductors, integrated circuits, resins, metals, and other critical raw materials. In parallel, suppliers provide customized parts including displays, glass, buttons, wire harnesses, and other electromechanical components, while buy-and-sell products are procured for direct selling to customers.

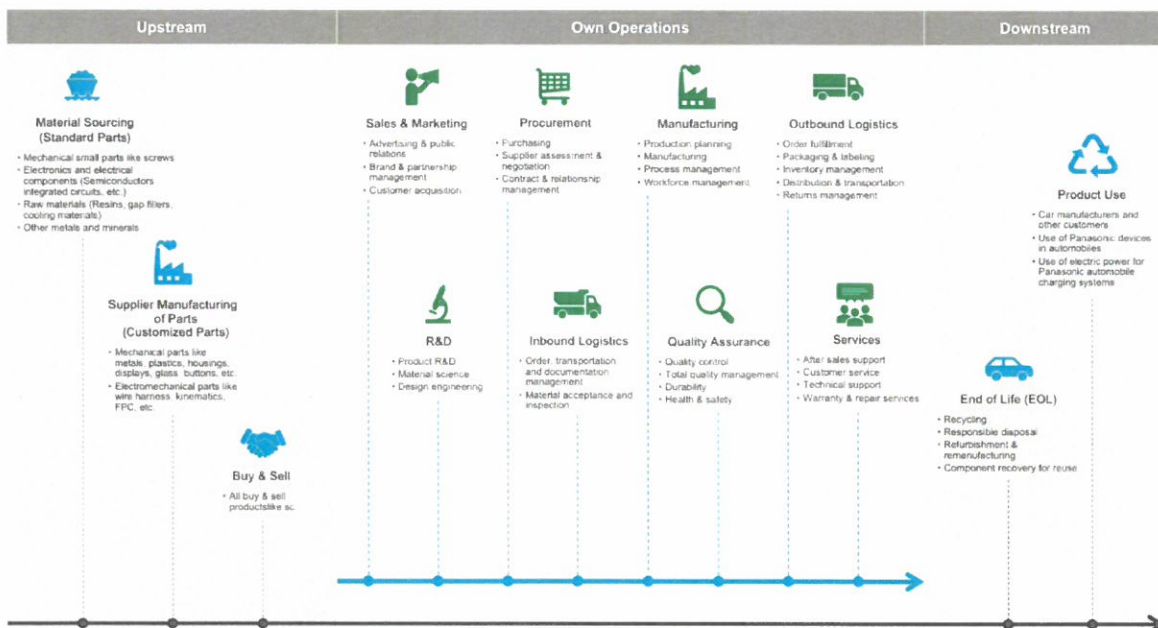
Within its own operations, Panasonic Automotive Systems Group manages the core functions that transform these inputs into innovative automotive solutions. Sales and marketing activities build customer relationships and partnerships, while R&D drives advancements in material science, design engineering, and product development. Procurement ensures strong supplier relationships and contract management, supported by inbound logistics for ordering, transportation, and inspection of materials. Manufacturing operations focus on planning, process management, and workforce efficiency, reinforced by rigorous quality assurance through total quality management, durability testing, and health and safety standards.



Outbound logistics then handle order fulfillment, packaging, labelling, inventory, and transportation, while services such as after-sales support, technical assistance, and warranty maintain customer trust and long-term value.

Downstream, Panasonic Automotive Systems Group products and solutions are integrated by car manufacturers and other customers, supporting both in-vehicle applications and broader energy use such as automobile charging systems. Finally, at the end of life, the company promotes and works towards improving circularity and sustainability, minimizing environmental impact and closing the loop of its value chain.

Value Chain



This statement covers Panasonic Automotive Systems Europe GmbH (PASEU), which is a part of Panasonic Automotive Systems Group and covers its European operations. PASEU is committed to make efforts to confront Modern Slavery at its sites and along its entire supply chain, in accordance with Section 54 of the Modern Slavery Act 2015. Also, PASEU yearly publishes its Slavery and Human Trafficking Statement since 2017.

2. Human Rights and Labour Commitment and Policies

As an automotive equipment manufacturer, Panasonic Automotive Systems Group develops, produces, sells, and provides services in relevant sectors through close cooperation with Group companies in Japan and abroad. All our business activities depend on the support of many people, including our Group employees, customers who use our products and services, suppliers involved in procurement and sales, and our business partners. Therefore, our business activities may impact them positively or negatively. Under our mission to “create a sustainable mobility-society,” we recognize that we cannot allow ourselves to develop the

expense of these people, and that we have a responsibility to protect their rights and contribute to the well-being and happiness of these people.

Furthermore, as a global company operating worldwide, we comply with all applicable laws and regulations in our business activities while considering the human rights of all our stakeholders and respecting internationally recognized human rights as expressed in the International Bill of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We conduct human rights due diligence to identify, prevent, and address potential adverse impacts of our operations on human rights, and we communicate our actions transparently to relevant stakeholders. We also expect our suppliers and business partners to understand and uphold our human rights and labour policies. In close cooperation with them, we strive to monitor supply chain risks and take timely, appropriate action to prevent and remediate any violations that may arise.

Specifically, we conduct following activities, in consultation with external experts as appropriate:

- Formulating and reviewing human rights policies;
- Raising awareness on human rights and conducting human rights due diligence;
- Responding to human rights risks in the supply chain;
- Establishing and operating grievance mechanisms;
- Engaging with stakeholders.

With this management transition, we established the Panasonic Automotive Systems Co., Ltd. [Human Rights and Labour Policy](#) (the "Human Rights and Labour Policy"), referencing the below international standards and incorporating external experts' opinions. This promotes initiatives for the prohibition of all forms of forced labour, the effective abolition of child labour, the elimination of discrimination in respect of employment and occupation, freedom of association and the effective recognition of the right to collective bargaining, as well as safe and healthy working environment. Furthermore, Panasonic Automotive Systems Group Human Rights and Labour policy states that, predicated on compliance with international standards and the laws and regulations of each country that apply to our business activities and transactions, we are committed to respecting internationally recognized human rights; identifying, preventing, and correcting human rights violation risks; promoting remedy and other measures for victims; creating a rewarding working environment; and engaging in dialogue on these issues with various stakeholders. Following this policy, we have established internal rules, developed a promotion system, and advanced specific initiatives for respecting human rights and creating a rewarding work environment.

As of August 2025, the executive officer responsible for the Group's initiatives to respect human rights is the Chief Human Resources Officer (CHRO). Crucial human rights issues are discussed and reported to the Management Meeting and the Board of Directors. The Board of Directors supervise these issues. We have appointed a person promoting the Group's day-to-day efforts to respect human rights through human rights and labour initiatives within the Human Resources Division. We are promoting initiatives at all Group business sites in cooperation with related functions but primarily with HR.

Moreover, the [Code of Ethics and Compliance](#) defines the commitments that all Group employees must fulfil and positions respect for human rights as our social responsibility. We strive to raise awareness of this responsibility.

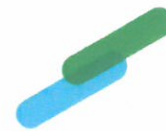
Main international standards used as reference:

- The United Nations' Guiding Principles on Business and Human Rights
- The United Nations' International Bill of Human Rights (Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social and Cultural Rights)
- The International Labour Organization (ILO)'s Declaration on Fundamental Principles and Rights at Work and ILO Core Conventions

We regularly, and periodically as necessary, review and improve those policies based on the opinion of external experts, relevant stakeholders, and their representatives. In addition, we provide regular opportunities for employees to learn about the Code of Ethics and Compliance, which includes respect for human rights at the time of entry into a company and promotion. We have translated it into 22 languages to ensure that it is understood by employees everywhere.

Panasonic Automotive Systems Group has summarized its core thinking on procurement in the following 3-item set of Procurement Policy. The fundamental basis of this policy is the concept that, "based on relationships of mutual trust, and through diligent study and cooperation, our suppliers are invaluable partners in creating the value our customers demand". We also utilise the [Panasonic Supply Chain CSR Promotion Guidelines](#) ("CSR Guidelines") to promote collaboration with suppliers in responsible procurement efforts. This CSR Guidelines stipulate the following provisions, while taking into account laws, regulations, and principles of international norms: labour rights, occupational health and safety, environment, ethics, product quality and safety, contribution to society and management systems.

Furthermore, we require that suppliers affirm the Code of Ethics & Compliance and the Panasonic Automotive Systems Co., Ltd. Human Rights and Labor Policy, and at the start of transactions for materials and components for the manufacturing of Panasonic products, we make it mandatory to conclude a Master Global Purchasing Agreement that stipulates compliance with the CSR Guidelines. In addition, we stipulate in the CSR Guidelines a respect for human rights as expressed in United Nations norms and principles, an evaluation of the status of suppliers' human rights initiatives and the implementation of prevention / mitigation / corrective measures, a request for compliance with tier 2 suppliers, and a request for cooperation with the Panasonic Group's human rights due diligence. The template of our Master Global Purchasing Agreement obliges suppliers to comply with the CSR Guidelines. Our latest contract for new suppliers contains an article on "Compliance with Panasonic Supply Chain CSR Promotion Guidelines." Suppliers who concluded agreements using the previous version of the contract were requested to submit separate agreements for this new article. This procedure is being carried out for all suppliers of the Panasonic Group. If more than one of our operating companies have contracts with the same supplier, the company with primary responsibility (i.e. that with the greater purchases) obtains this agreement as a representative. Of the suppliers for which Panasonic Automotive Systems Group has primary responsibility, 94% have submitted the agreement and we are chasing up the remaining suppliers



Also, Panasonic Automotive Systems Group has [Responsible Mineral Sourcing Policy](#) which promote responsible mineral procurement throughout our entire supply chain.

Our procurement department conducts CSR procurement training for our procurement staff members, who will be able to fulfill our social responsibilities in procurement activities, by teaching them about the company's approach to CSR, and they create opportunities to gain knowledge about procurement compliance. We have also conducted training for procurement employees overseas (in parts of Europe, the US, China, and other Asian countries). Through this training, we aim to consolidate their knowledge while confirming their understanding of the importance of essential topics and compliance in CSR procurement—including compliance with environmental, anti-corruption, and anti-bribery regulations, as well as human rights, labour, health and safety, and clean procurement in the supply chain. In addition to all this, we also build in basics on CSR procurement in our training curricula for new employees in procurement departments and those transferring from other divisions.

3. Human Rights Risk Assessment & Management

The Panasonic Automotive Systems Group recognizes the need to identify human rights issues throughout its value chain and business activities and has begun analysing priority risks. As we operate globally in a wide range of business areas, some of our businesses have extensive supply chains and we recognize the risk that workers in these supply chains may be in vulnerable positions or unsafe working environments in different countries or regions. Therefore, we begin by addressing human rights issues at our manufacturing sites and in our supply chain.

3.1 Own operations

In November 2023, we conducted a detailed self-assessment of human rights and labour issues at all of our overseas manufacturing companies to gain a bird's eye view of the Group's risks. The questions we asked referenced the self-assessment metrics from the Responsible Business Alliance (RBA) that applied to the Group. Through this process, we gained a general understanding of human rights and labour issues. However, we recognized that we need a more detailed understanding of issues to quickly address them.

Based on the assessment results, we identified high risk sites and requested them to create a correction plan, together with the completion date (fiscal year). During fiscal 2024, while these sites were working to reduce their risks, HR staff members from the Panasonic Automotive Systems Group visited the sites to explore the real causes of the risks. We then provided them with detailed support, including revision of their correction plans. According to the correction plan made by each site, all the issues identified during this procedure were addressed and corrected by the end of March 2025.

In fiscal 2025, we plan to conduct voluntary inspections concerning human rights and working conditions, not only in manufacturing sites but also in sales sites.

We consider forced labour and occupational health and safety as the specific risks to be prioritized at our manufacturing companies and sites based on their business characteristics

and past self-assessment results. Our process for prioritizing identified potential and existing human rights risks is as follows:

- 1) List all aspects of human rights issues that the Group's activities could adversely impact;
- 2) Evaluate the severity (scale, scope, and remediability) and likelihood of occurrence (based on publicly available data and past self-assessment results);
- 3) Collaborate with external and internal stakeholders to review the validity of methods and results.

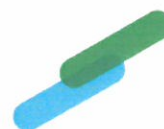
We will continuously improve our process for identifying material risks, and review the results of our efforts, especially in the event of imminent human rights risks, to ensure immediate prevention/mitigation/remediation of identified human rights risks as soon as possible.

3.2 Suppliers

To promote human rights due diligence and other aspects of CSR throughout the supply chain, the Group requires its suppliers to conduct CSR Self-Assessments. The CSR Self-Assessments are structured based on the CSR Guidelines, and we require that all new suppliers conduct the assessments before we start transactions with them. We also require our existing suppliers to conduct them regularly. We collect these assessment results using a web-based questionnaire, reducing the burden on suppliers and our Group and improving collection efficiency and accuracy.

As of March 31, 2025, we had collected the questionnaires from more than 1,140 suppliers (81%). After identifying issues, particularly those identified as priority management items in the CSR Self-Assessments, such as labor conditions for migrant workers, we will visit suppliers, check on-site conditions, hold interviews, and investigate issues if necessary and work to correct them. We will continue to collect these assessments from our suppliers on a regular basis. Since April 2022, the Group has been enhancing its work on initiatives for human rights due diligence. While incorporating guidance from outside experts, the Group has compiled a table to assess human rights risks at our suppliers by using risk indicators and indices provided by international organizations in order to identify suppliers for which action should be taken on a priority basis.

Since April 2023, all operating companies narrowed down the audit targets from among these identified suppliers based on the aforementioned risk approach and conducted supplier audits for a total of 24 suppliers (7 of which were audited by third-party organizations) using the supplier audit plans they formulated. The items identified through audits are shown in the table below. We have asked suppliers to improve these items, and we are monitoring their progress.



Category	Examples of Findings in Supplier Audits
Labour	Records of working hours, break times, and overtime hours have not been properly managed
Human rights	Breakrooms that ensure privacy for women are not provided.
Health and safety	Emergency evacuation routes are unclear.
Environment	Environment impact assessments are not properly conducted.
Ethics	Anti-bribery and other related training for all employees is not provided.
IT	Insufficient security management and employee training

4. Mitigation Measures to Address Modern Slavery Risks

To respect the human rights of the stakeholders in its business activities, products and services, and transactions, the Group conducts human rights due diligence based on the UN Guiding Principles on Business and Human Rights and in reference to the OECD Due Diligence Guidance for Responsible Business Conduct. We incorporate input from external experts and stakeholders in formulating related mechanisms and processes.

Our Human Rights and Labour Policy clearly states the prohibition of “any and all forms of forced labour.” We recognize that migrant workers who cross national and regional borders to work at our manufacturing sites and in our supply chain are particularly vulnerable. In light of this recognition, while the Group respects the human rights of such workers, we promote efforts to establish a recruitment and employment environment free from forced labour and unfair treatment, following all applicable laws, regulations, and internal rules and referencing international standards and guidelines the ILO and other organizations established. In fiscal 2023, we revised our internal rules to better clarify the procedures for initiatives to prevent forced labor throughout our supply and value chains and the roles we should play in these initiatives. Specifically, in the unlikely event that the Group or a third party, such as a supplier or business partner, is found to be engaged in, or suspected of being engaged in, forced labour or any of the 11 ILO Indicators of Forced Labour*, our internal rules stipulate that we must promptly address the negative impact on human rights, including by working to cease, correct, or mitigate such conduct or providing remediation for the victims. In the supply chain, we make similar requests to our suppliers through the Panasonic Supply Chain CSR Promotion Guidelines.

We also joined the Responsible Business Alliance (RBA)—an international CSR organization involved in the electronics, ICT, and automotive sectors—in October 2021 and utilize their self-assessment tools and guidance documents for solving issues. Furthermore, we participate in the Responsible Mineral Initiative (RMI) under RBA, for the promotion of responsible mineral procurement. As part of our commitment to responsible sourcing, we also undertake focused due diligence in areas identified as higher risk for modern slavery. For instance, The Group uses industry-standard survey forms issued by RMI to conduct surveys, including the tin-tantalum-tungsten-gold (3TG) survey form (CMRT) and the cobalt-mica survey form (EMRT). In fiscal

2025, we collected responses from 931 of 1,025 suppliers that we asked to conduct CMRT surveys and 920 of 1,025 suppliers that we asked to conduct EMRT surveys (as of March 31, 2025). Based on the data collected from the survey forms, we conducted a risk analysis and assessment and requested further investigations from suppliers, according to the risks that we identified. In fiscal 2025, roughly 60% of the designated refiners and smelters had Conformant/Active Smelter status (refiners and smelters that have either passed RMI audit or is currently undergoing one). We use RMI's reporting templates (CMRT and EMRT) for responsible mineral auditing, tracing back to the supply chain upstream. If we find unauthorized refiners and smelters in the reports submitted by our suppliers, we request them to remove the unauthorized entities from their sources.

4.1 Training and workshops

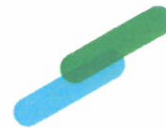
We have also conducted training for procurement employees overseas (in parts of Europe, the US, China, and other Asian countries). Through this training, we aim to consolidate their knowledge while confirming their understanding of the importance of essential topics and compliance in CSR procurement—including compliance with environmental, anti-corruption, and anti-bribery regulations, as well as human rights, labour, health and safety, and clean procurement in the supply chain. In addition to all this, we also build in basics on CSR procurement in our training curricula for new employees in procurement departments and those transferring from other divisions. In fiscal 2025, we conducted CSR audits (including third party audits) on 16 suppliers, including 2 suppliers in Japan and 14 overseas suppliers, and applied remedies for any problems found. One example of such remedies was for a domestic supplier who had not created their CSR policy and was instructed to create one. They have now published the policy on their website.

We provide training and raise awareness among new hires and newly promoted employees through a variety of educational materials, including e-learning on the Code of Ethics & Compliance, which covers human rights topics and is mandatory for all employees.

All PASEU employees also have to complete mandatory Code of Ethics and Compliance training courses, which highlight the importance of respecting human rights and access to the Global Hotlines.

5. Access to Remedy

The Group has established its "[Global Hotline EARS](#)" that anyone, including Group employees and suppliers, can use to anonymously report any violation or suspected violation of laws and regulations, agreements with our suppliers, the Group Code of Ethics & Compliance including human rights violations or other material codes in the Group's supply chain. This hotline is available in 32 languages. Whenever there is a report, the Group follows all internal rules and guidelines as well as the laws of the relevant countries with regard to the protection of the individual making the report, and from there it undertakes appropriate investigations and countermeasures. In all reporting systems, we ensure whistleblower anonymity and report confidentiality and publicize the contact information for reporting systems on our supplier web portal and our website, "[For Suppliers](#)."



We raise awareness of the system through various compliance trainings and posters at domestic and overseas workplaces and business sites to encourage employees to use it. We conducted audits through a third-party organization on human rights issues at suppliers that we received through the hotline, and we have witnessed suppliers take corrective actions.

In addition to our Global Hotline, we offer access to [JaCER](#), an industrywide and publicly accessible grievance platform established by the CSR Committee of the Japan Electronics and Information Technology Industries Association (JEITA). JaCER is a contact point for suppliers and their employees to report any adverse human rights impacts in the Group's supply chain. By accepting grievances through a third-party contact, we aim to make grievance handling fairer and more transparent, promote dialogue and redress, and work to resolve essential human rights issues.

[For Suppliers](#) (Redirected to the website of Panasonic Holdings Corporation)

[Global Hotline](#) (Redirected to the website of Panasonic Holdings Corporation)

[Grievance mechanism of Japan Center for Engagement and Remedy on Business and Human Rights \(JaCER\)](#)

This statement has been approved by:

Takafumi Harada
Managing Director

Panasonic Automotive Systems Europe GmbH