Artifex Interior Systems

Modern Slavery and Human Trafficking Statement

Financial Year: 1 April 2025 to 31 March 2026
Approved by the Board of Directors

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1. Our Commitment

Artifex Interior Systems ("Artifex") is committed to conducting business ethically, responsibly and with respect for internationally recognised human rights. We believe that all workers should be treated with dignity and respect and that no person should be subjected to forced labour, human trafficking, servitude, debt bondage or any other form of modern slavery.

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and describes the steps taken by Artifex during the financial year ending 31 March 2026 to identify, prevent and mitigate the risk of modern slavery and human trafficking within its business and supply chains.

Artifex maintains a zero-tolerance approach to modern slavery and is committed to continually strengthening its systems, processes and controls to identify and address risks wherever they may arise.

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2. Our Business

Artifex Interior Systems is a global supplier of automotive interior systems serving leading Original Equipment Manufacturers (OEMs) within the automotive industry.

Artifex is a wholly owned subsidiary of Tata AutoComp Systems Limited and employs approximately 4,100 people globally, with annual revenues of approximately USD 1.3 billion.

This statement specifically covers the UK and Slovakian operations described below, which operate under a common leadership and governance structure.

Artifex Interior Systems Limited

Manufacturing facilities are located in:

- Solihull
- Halewood
- Scunthorpe

Key statistics:

- Annual turnover of approximately USD 300 million
- Workforce of approximately 1,800 employees

Artifex Systems Slovakia s.r.o

Manufacturing facility located in:

- Lozorno, Slovakia

Key statistics:

- Annual turnover of approximately USD 190 million
- Workforce of approximately 800 employees

The UK and Slovakian operations are managed under a common leadership structure and are therefore covered by this combined Modern Slavery and Human Trafficking Statement.

Our manufacturing facilities produce automotive interior components using directly employed personnel and approved contractor resources operating under our management systems and standards.

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3. Our Supply Chain

Artifex procures a wide range of goods and services to support its manufacturing operations and customer requirements.

Key procurement categories include:

- Plastics and resins
- Textiles and fabrics
- Foams and chemical materials
- Metal components
- Tooling and production equipment
- Packaging materials
- Logistics and transportation services
- Maintenance and facility management services
- Professional and indirect services

Our supply chain extends across multiple countries and regions, including suppliers throughout Europe and other global markets.

Active Direct Material Suppliers

UK:

- 100 Artifex-controlled suppliers
- 83 customer-directed suppliers
- **183 suppliers in total**

Slovakia:

- 74 Artifex-controlled suppliers
- 42 customer-directed suppliers
- **116 suppliers in total**

Artifex recognises that modern slavery risks may arise both within our direct supply chain and beyond Tier 1 suppliers, particularly where suppliers source raw materials, labour-intensive services or components from higher-risk sectors or geographies.

Given the complexity of modern supply chains, we recognise that certain sectors, labour-intensive activities and geographical locations may present increased risks relating to labour rights and modern slavery. We therefore apply a risk-based approach to supplier selection, engagement and oversight.

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4. Policies and Governance

As a wholly owned subsidiary of Tata AutoComp Systems Limited, Artifex operates in accordance with the Tata Code of Conduct and has established policies and procedures supporting ethical business practices and the protection of human rights.

These include:

- Tata Code of Conduct
- Ethics and Compliance Programme
- Whistleblowing and Speak-Up Procedures
- Procurement and Supplier Approval Processes
- Supplier Terms and Conditions

The Tata Code of Conduct establishes expectations regarding fair treatment and employment practices, including the following principles:

- We do not employ children at our workplaces.
- We do not use forced, compulsory, bonded or involuntary labour in any form.
- We do not retain employees' original identity documents.
- We do not require employees to make payments or deposits as a condition of employment.
- We respect the dignity, rights and freedoms of all employees.

These principles apply across our operations and inform our expectations of suppliers, contractors and other business partners.

Operational responsibility for identifying and managing modern slavery risks is shared across Procurement, Human Resources, Operations and Compliance, with oversight provided by senior management.

Human Resources is responsible for maintaining appropriate recruitment and employment controls designed to mitigate the risk of worker exploitation, including oversight of agency labour arrangements.

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5. Supplier Standards and Contractual Controls

Artifex requires suppliers to operate in accordance with applicable laws and appropriate ethical business standards.

As part of our supplier onboarding and procurement processes, suppliers are expected to comply with our applicable terms and conditions, which contain provisions relating to modern slavery and labour rights.

Our standard terms require suppliers to:

- Comply with all applicable anti-slavery and human trafficking legislation.
- Avoid practices that constitute forced labour or illegal employment.
- Notify Artifex of any actual or suspected breaches of anti-slavery requirements.
- Maintain appropriate records relating to goods and services supplied.
- Cooperate with reasonable requests for information regarding labour practices and supply chain management.

Artifex retains the contractual right to review supplier compliance, request relevant information and undertake further due diligence or investigation where risks or concerns are identified.

These requirements establish clear expectations and form an important component of our supplier governance framework.

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6. Risk Assessment and Supplier Due Diligence

During the financial year ending 31 March 2026, Artifex continued to apply risk-based due diligence through its procurement and supplier management activities.

New suppliers were subject to an onboarding process designed to assess suitability across a number of areas, including:

- Commercial capability
- Quality performance
- Operational capability
- Regulatory compliance
- Ethical business practices

As part of supplier due diligence, Artifex considers applicable ethical, labour and human rights requirements alongside commercial, quality and operational criteria.

Modern slavery risk is considered using a risk-based approach that may take account of factors including:

- Supplier location and geographical risk
- Industry sector
- Nature of the goods or services supplied
- Labour intensity
- Reliance on temporary, migrant or agency labour
- Complexity of the upstream supply chain
- Subcontracting arrangements
- Known regulatory or compliance concerns
- Previous supplier performance or audit findings

Suppliers or categories presenting an elevated risk may be subject to enhanced due diligence, additional information requests, management review, site assessment or audit.

Particular attention is given to supplier categories that may present elevated labour and human rights risks, including:

- Textile manufacturing
- Logistics and transportation services
- Labour-intensive services, including temporary and agency labour
- Chemical and raw material production
- Global sourcing activities involving complex supply chains

Supplier relationships are also managed through ongoing engagement between Procurement, Quality and Operations teams.

Where concerns are identified through supplier management or due diligence processes, Artifex may undertake further investigation and require appropriate corrective actions.

During the reporting period, Artifex identified no confirmed incidents of modern slavery within its UK or Slovakian operations.

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7. Workforce Due Diligence

Artifex applies a range of controls designed to mitigate the risk of modern slavery and worker exploitation within its own operations.

These controls include:

- Verification of employee identity and right-to-work documentation.
- Issuance of written employment contracts and terms and conditions.
- Processes to ensure employees receive lawful pay and benefits through approved payroll systems.
- Monitoring of working hours and overtime arrangements.
- Due diligence and oversight of temporary labour providers and recruitment agencies.
- Review of indicators that may suggest worker vulnerability, coercion or exploitation.

Artifex expects all workers to enter employment freely and prohibits the retention of identity documents, recruitment fees, deposits or any practices that improperly restrict an individual's freedom of movement or employment choice.

8. Employee Awareness and Training

Artifex recognises that employee awareness is an important component of preventing and identifying modern slavery.

Employees have access to training and guidance through our training systems and internal communication channels.

Training and awareness activities address:

- The principles of the UK Modern Slavery Act
- Different forms of modern slavery and human trafficking
- Recognising indicators of labour exploitation
- Individual responsibilities for identifying and reporting concerns
- Available reporting and escalation channels

Additional awareness shall be provided to relevant managers, Human Resources teams and employees responsible for recruitment and agency labour management to support the identification of potential indicators of worker exploitation.

Potential indicators may include:

- Workers appearing to be under the control of another individual
- Reluctance or inability to speak independently
- Unusual payroll or banking arrangements
- Excessive working hours
- Concerns relating to accommodation or transportation
- Concerns regarding possession or control of personal or identity documentation

Any concerns identified are escalated through established Human Resources, Compliance or Speak-Up channels for review.

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9. Agency Labour and Vulnerable Workers

Artifex recognises that certain groups may face a greater risk of exploitation, including temporary workers, agency workers, migrant workers and individuals who may have limited understanding of local employment rights.

To mitigate these risks, Artifex:

- Engages with approved labour providers.
- Undertakes periodic reviews of agency arrangements.
- Promotes awareness of employee rights and reporting channels.
- Encourages workers to raise concerns without fear of retaliation.
- Investigates concerns relating to coercion, exploitation or unlawful employment practices.

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10. Speaking Up and Reporting Concerns

Artifex encourages employees, agency workers, contractors, suppliers and other stakeholders to report concerns regarding unethical behaviour, labour exploitation or suspected modern slavery.

Concerns may be raised through:

- Local management channels
- Human Resources representatives
- Compliance functions
- Confidential Whistleblowing and Speak-Up mechanisms

All concerns are treated seriously and reviewed in accordance with established investigation procedures.

Where appropriate, corrective actions are implemented to address identified weaknesses and prevent recurrence.

Artifex does not tolerate retaliation against individuals who raise concerns in good faith.

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11. Measuring Effectiveness

Artifex monitors the effectiveness of its approach to modern slavery through supplier management, workforce compliance, training and reporting processes.

During the financial year ending 31 March 2026:

- Two new production suppliers were onboarded and subject to the applicable supplier approval processes.
- Two supplier reviews were completed.
- Two supplier audits were completed.

- No confirmed incidents of modern slavery were identified within Artifex's UK or Slovakian operations.

Artifex recognises that the absence of confirmed incidents does not in itself demonstrate the absence of modern slavery risk. We will therefore continue to strengthen the measures used to identify risks and assess the effectiveness of our controls.

As our approach develops, relevant performance measures may include:

- Percentage of relevant suppliers subject to modern slavery risk assessment
- Number of enhanced supplier due diligence reviews undertaken
- Number of applicable supplier audits completed
- Number and status of supplier corrective actions
- Completion of relevant employee training
- Completion of agency labour provider reviews
- Concerns raised through Speak-Up or other reporting channels
- Completion and closure of corrective actions arising from identified concerns

These measures will help Artifex evaluate the effectiveness of its controls and identify opportunities for continuous improvement.

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12. Looking Ahead

Artifex remains committed to strengthening its approach to human rights, responsible sourcing and the prevention of modern slavery.

Following the end of the reporting period, during 2026 Artifex commenced engagement with an independent Environmental, Social and Governance (ESG) advisory partner to further enhance supplier risk assessment and supply chain transparency.

Our future priorities are focused on three principal areas:

Supply Chain

- Enhanced supply chain mapping
- Expanded supplier risk assessments
- Improved visibility of labour and human rights risks throughout the supply chain
- Increased supplier engagement on responsible sourcing practices

- Continued development of procurement and supplier management controls

Workforce

- Annual reviews of agency labour providers and labour governance arrangements
- Periodic workforce compliance audits covering recruitment, payroll, right-to-work and working time requirements
- Ongoing monitoring of recruitment and employment practices

Awareness and Reporting

- Continued employee awareness training
- Increased manager awareness of modern slavery indicators
- Enhanced promotion of Speak-Up and Whistleblowing channels to employees, agency workers and temporary workers

These initiatives will support our ongoing commitment to identifying, preventing and mitigating modern slavery risks across our business and supply chains.

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13. Board Approval

This Modern Slavery and Human Trafficking Statement has been reviewed and approved by the Board of Directors of **ARTIFEX INTERIOR SYSTEMS LIMITED** for the financial year ending 31 March 2026.

Approved by the Board on: _____5th October 2026_____

Signed on behalf of the Board of Directors:

Name: _____Alan Fennelly_____

Title: Chief Executive Officer / Director*

Signature: Alan Fennelly

Date: _____5th October 2026_____