



**MODERN SLAVERY STATEMENT**  
**2026**  
**HORSE POWERTRAIN LTD**

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## Organization structure

Horse Powertrain is an independent powertrain technology leader, built on 125 years of heritage from Renault and Geely. We bring together expertise, innovation and global reach to deliver innovative ICE and hybrid powertrain solutions.

With 18 manufacturing plants, five R&D facilities and approximately 19,000 employees, we're equipped to serve global OEMs at scale – and move fast in a shifting mobility landscape.

Horse Powertrain has the expertise, scale and innovation to meet the needs of almost every customer, in every region, across every fuel type.

## Our supply chain

The automotive components supply chain is inherently complex, shaped by its global footprint and a highly multi-tiered network of suppliers. At Horse Powertrain, we collaborate with a broad and diversified supplier base, however our purchasing spend is concentrated among a select group of strategic partners, with our top 100 suppliers accounting more than 90% of total turnover. This structure underscores the critical importance of these key suppliers in supporting our operations and driving performance across the entire value chain.

## Responding to the Modern Slavery Act

Horse Powertrain's position is to reject any form of forced labor and modern slavery in all its direct activities and commercial relationships. For this reason, respect for human rights is included in our ESG strategy to fully integrate due diligence into all decision-making processes, including supplier relations, product design and international operations.

The responsibility of the company in the area of human rights is to:

- avoid causing or contributing to adverse human rights impacts
- prevent and mitigate risks linked to their operations, products or services
- conduct human rights due diligence, including identifying and assessing risks, integrating findings into decision-making, tracking performance and communicating how impacts are addressed
- introduce human rights training and awareness throughout the organization.

## Human rights governance and policies

Effective human rights management begins with establishing strong governance that engages all levels of the company and every function, as it is a highly-complex and cross-functional topic, and requires a clear allocation of roles and responsibilities across the three lines of defense.

Within our organization, ESG topics – including human rights management – are placed under the COO, specifically within the ESG function, which is responsible for coordinating these matters. However, the first line of defense sits within

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operations and the relevant corporate functions, such as Procurement, R&D, Compliance, Human Resources, and Health & Safety, among others.

As a recently formed business, Horse Powertrain is currently developing its global risk and internal audit model.

Our company's values are Care, Collaborate, and Create Excellence – and are implemented in the form of policies.

## Code of business ethics

Our code of business ethics establishes the ethical standards that guide how we work and how we engage with employees, partners and other stakeholders.

One of its principles is respect for human and labor rights recognized in international frameworks including, eradication of forced labor, human trafficking and modern slavery.

This code also encourages all our business partners to undertake human rights due diligences in order to avoid indirectly contributing to adverse impacts on human rights.

## ESG standards for suppliers and partners

Our ESG standards for suppliers and partners define the ethical, social and environmental expectations that apply to third parties across our value chain and support the consistent application of our sustainability principles beyond our own operations.

With regards to human rights, topic partners shall eliminate all forms of forced labor, including but not limited to: modern slavery; hiring employees against their will or under threat, including the use of violence or intimidation; forced debt; limitation of freedom of movement; excessive overtime; abusive working and living conditions; or withholding of wages. Disciplinary measures applied shall be free from any forms of violence, physical punishment, humiliation, and treatment contrary to human dignity.

Specifically, suppliers shall also conduct adequate due diligence for other materials identified as being directly or indirectly contributing to violations of human rights.

## Other policies under development in 2026

Human Rights Policy – recognizing our responsibility to act in accordance with the United Nations Guiding Principles on Business and Human Rights, which state that companies must respect, prevent, mitigate, and remedy any negative impacts they may have on people.

Specifically in relation to forced labor and human trafficking, Horse Powertrain:

- rejects any form of forced labor, modern slavery, restriction of freedom of movement, excessive overtime, hiring employees against their will or under threat, including the use of violence or intimidation, withholding of wages, forced debt, abusive working and living conditions, retention of identity documents, or threats of reporting to the authorities

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- strictly prohibits all forms of human trafficking. The company is committed to identifying, preventing and addressing any risks of human trafficking within its operations and supply chain.

Conflict Minerals Policy – requiring all suppliers to only use minerals and metals whose extraction, processing, trade and transportation has not directly or indirectly resulted in human rights abuses, unethical business conduct (e.g. corruption), severe environmental harm or provided funding for armed conflict.

## Due diligence processes

During 2025, we initiated a due diligence process in our European and Latin American regions, and in 2026 in China, based on OECD Due Diligence Guidance for Responsible Business Conduct and UE Corporate Sustainability Due Diligence Directive.

The due diligence includes:

- review of legislation and standards, analyst reports, civil society complaints, and industry benchmarks
- interviews with corporate functions and plant management, as well as a document review of policies, systems and evidence
- development of a risk map across the value chain (upstream, own operations, and downstream), identifying rights holders and the nature of our involvement, and assessing impacts according to criteria of severity and likelihood
- analysis of governance and the prevention, mitigation and remediation measures implemented in our company, using the highest international standards and recommendations as a reference.

As a result, we have developed a list of measures to enhance respect for human rights:

- strengthening governance structure, ensuring human rights oversight has been organized according to a three-pillar model, which ensures clear accountability at all levels
- improving of the prevention, mitigation and remediation of potential negative impacts on human rights specially for our direct materials suppliers.

## Deep dive in procurement risk assessment and management

Some of the main human rights risks are the ones in the early stages of the value chain, affecting workers in the supply chain and local communities.

Therefore, we also request all direct suppliers of Horse Powertrain to:

- accept our ESG Standards for Partners – approved in 2025, these standards define the ethical, social and environmental expectations that apply to third parties, regardless of the country or territory in which partners operate and are designed to be observed throughout the partner’s own supply chain
- undergo a specific ESG assessment that covers human rights and labor rights.

We also carry out additional assessments for suppliers identified as higher risk based on technology, geographical location or previous ESG assessment results, in line with international best practice.

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Based on these risk criteria, an action plan is being developed to work with specific high-risk suppliers to make improvements. These may include additional audits, corrective actions, follow-up meetings, training or, as a last resort, termination of the contractual relationship.

## Strengthening prevention, mitigation and remediation measures

Following this risk assessment, an enhancement plan will be implemented in 2026 and 2027 including progressive actions in the following key areas:

- Policies and procedures: Ensure the integration of specific human rights policies in all relevant functions of the company.
- Roles and responsibilities: Review and ensure clear definition of those responsible for managing impacts, including the involvement of senior management and internal committees.
- Remediation of adverse effects: Develop a document that reflects the commitment of the company to remediate any impacts it may cause.
- Training and awareness: Develop training programs on human rights.
- Supply chain management: Continue to strengthen risk criteria, traceability and ESG requirements for suppliers, with special attention to high-risk suppliers.

## Stakeholder management and grievance mechanism

The company has implemented dedicated global reporting channels, managed by an independent external provider, to ensure that both employees and external stakeholders can safely raise concerns. These channels guarantee protection against retaliation and allow for confidential – and, where legally permitted, anonymous – reporting of any issues related to unethical conduct, breaches of the Code of Business Ethics, internal policies, human rights violation or applicable laws.

Concerns can also be communicated through traditional internal pathways, including the legal department, the compliance network, human resources or direct managers.

## Training on slavery and human trafficking

Horse Powertrain is currently developing its global risk governance model and complete management framework as well as its global learning programs.

In our initial due diligence phase, training needs on forced labor and human rights were identified for both employees and critical suppliers. Training on human rights, including force labor and modern slavery, will be implemented in 2026 and 2027.

### Signature:

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