

# SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR JAGUAR LAND ROVERAUTOMOTIVE PLC AND ITS SUBSIDIARIES (JLR) FOR THE FISCAL YEAR ENDED 31 MARCH 2024

This Statement sets out the steps JLR has taken to address the risk of slavery and human trafficking taking place within its own operations and supply chains.

Please note for the purposes of this Statement JLR’s joint venture arrangements are treated as being part of our supply chain.

## OUR ORGANISATION

### Business Sector

JLR’s primary business is the manufacture of premium automobiles. JLR has a House of Brands, comprising Jaguar, Discovery, Defender, Range Rover. JLR also supplies automotive parts, services and branded merchandise; offers a range of driving experiences and provides mobility and smart transportation services.

### Organisational Structure

The average number of staff working for JLR was approximately:

Average Staff Numbers ('000)	Year Ended 31 March 2024			Year Ended 31 March 2023		
	UK	Overseas	Total	UK	Overseas	Total
Direct Employees (Salaried)	18.5	4.1	22.6	14.8	3.8	18.6
Direct Employees (Hourly Paid)	14.5	5.3	19.8	11.2	3.9	15.1
Agency Staff	3.0	0.8	3.8	3.0	0.2	3.2
<b>Total</b>	<b>36.0</b>	<b>10.2</b>	<b>46.2</b>	<b>29.0</b>	<b>7.9</b>	<b>36.9</b>

JLR has a global sales network across 121 countries and approximately 1,396 franchised dealer sites worldwide. We have 19 JLR owned National Sales Companies (NSCs) servicing 22 key international markets. During the year ended 31 March 2024, sales and certain service support to the Russian market remained paused in line with our adherence to imposed global sanctions.

Other markets are serviced through export and import partners.



JLR’s traditional manufacturing base is in the UK. JLR also operates wholly-owned factories in Brazil and Slovakia. Other manufacturing operations include a vehicle assembly site at Pune in India, and contract manufacturing by Magna Steyr at Graz in Austria.

### Responding to the Modern Slavery Act

JLR has a cross-functional working group to respond to the risks of human trafficking and modern slavery. The working group has representation from Group Compliance, Industrial Operations, and Human Resources. We have an ongoing programme to improve our response to slavery and human trafficking risk. Existing policies and practices are regularly reviewed and updated as required.

# SLAVERY AND HUMAN TRAFFICKING RISKS WITHIN JLR'S OPERATIONS

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## **POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING**

In light of the Modern Slavery Act 2015, during the year end 31 March 2016 we updated JLR's Corporate Policies to be more explicit about slavery and human trafficking. A new JLR Code of Conduct was issued during the year ended 31 March 2017. During the year ended 31 March 2024 the Human Rights Policy and JLR Code of Conduct were reviewed but not changed.

### **Code of Conduct**

The JLR Code of Conduct (the Code) is applicable to all personnel working for and on behalf of JLR globally (JLR Personnel), including direct employees and agency and contract staff. The Code states that:

- We shall respect the human rights and dignity of all our stakeholders.
- We do not employ anyone under the age of 15 at our workplaces.
- We do not use forced labour in any form. We do not confiscate personal documents of JLR Personnel or force them to make any payment to us or to anyone else in order to secure employment with us or to work with us.

All JLR direct employees are required to sign up to the Code on joining the business. The Code is available to JLR Personnel on the JLR intranet and to external parties via the JLR Corporate website. The JLR Annual Compliance Declaration process requires all JLR salaried staff globally and selected other personnel to confirm that they are aware of the Code and acknowledge that they are bound by it. For the January 2024 declaration process, 100.0% of this population of 22,897 people completed their declaration.

### **Human Rights Policy**

JLR's Human Rights Policy articulates JLR's requirements with regards to the protection of human rights. The Policy applies to all JLR Personnel and has been distributed company-wide and is available for external parties via the JLR Corporate website. It sets out our commitment to respecting human rights and complying with laws, rules and regulations governing human rights in the territories in which we operate. This includes specific provisions addressing slavery, human trafficking, forced labour, child labour and upholding each employee's right to freedom of association.

### **Recruitment Practices**

JLR undertakes "right to work" checks on all potential direct employees prior to interview by the Company. This includes checking whether the candidate is of an appropriate age to work and, where applicable, that they have a valid work visa.

### **Trade Unions and Other Bodies Representing Workers**

Through the Code, Human Rights Policy and employment practices, JLR recognises and respects each employee's right to freedom of association, including the right to join trade unions.

### **Access to Remedy for Victims**

If JLR Personnel identify any potential signs of slavery, human trafficking or other human rights abuses, they are encouraged to report this to JLR management directly or through our externally run "Speak Up" confidential reporting facility. The guidance in our Confidential Reporting Policy includes examples around reporting concerns regarding slavery and human trafficking.

To date, JLR has received no reports of concerns regarding slavery or human trafficking in our operations. In the event that such issues were reported to us, we would undertake an urgent thorough investigation into the concerns raised under the supervision of members of the JLR Limited Board of Directors. If the investigation confirmed the concerns, we would put in place robust action plans to address the issue and protect the victims.

## **TRAINING ON SLAVERY AND HUMAN TRAFFICKING**

In the year ending March 2023, JLR launched a refreshed e-learning course on the JLR Code of Conduct, reiterating JLR's commitment to respecting human rights. This training includes a scenario addressing human rights concerns. As at March 2024, 98.1% of the target population had completed this training.

## **RISKS OF SLAVERY AND HUMAN TRAFFICKING IN JLR'S OWN OPERATIONS**

We have refreshed our assessment of slavery and human trafficking risks within JLR's own operations. We considered: the location of our operations; roles being performed; recruitment processes; and absence to date of reports of concerns regarding slavery and human trafficking.

As well as direct employees, JLR has agency and contract staff working at our sites. Contractual terms and conditions are in place with the companies that provide JLR with agency staff, requiring them to have policies and processes in place to protect human rights. We have obtained assurances from all key providers of agency staff with regards to their commitment to respecting human rights, including supplying us with a copy of their Slavery and Human Trafficking Statement, where applicable.

Based on our risk assessments, we continue to deem the risk of slavery or human trafficking occurring within JLR's direct employee population, or our agency and contract staff population under our direct supervision, to be low.

## SLAVERY AND HUMAN TRAFFICKING RISKS WITHIN JLR'S SUPPLY CHAINS

JLR sources goods and services directly from a global network of approximately 7,340 suppliers, based in 73 countries. These suppliers can be analysed by the area of the JLR business that they primarily supply goods and services to, as follows:

Area of JLR Business	Approximate Number of Suppliers	
	Year Ended 31 March 2024	Year Ended 31 March 2023
Production and Special Operations	575	600
Indirect Procurement and NSCs	5,900	5,500
Aftermarket	850	1,050
Branded Goods	15	25
Total	7,340	7,175

Like other automobile manufacturers, JLR's supply chain is highly complex. This complexity and limitations on the visibility beyond the first tier of the supply chain mean there are inherent challenges in efficiently and effectively assessing and addressing supply chain issues, such as human rights risks. Therefore, our work to address slavery and human trafficking risks within our supply chains has been focused primarily on our Tier 1 suppliers.

### RELATIONSHIPS WITH SUPPLIERS

JLR actively manages its relationships with its Tier 1 suppliers. There are clear contractual arrangements in place with all direct and indirect suppliers, who are required to sign up to JLR's Global Terms & Conditions (Global T&Cs). JLR communicates the standards expected of its suppliers through a variety of mechanisms, including: supplier conferences; Supplier Sourcing system, Covisint (a global supplier portal); direct buyer interactions; emails to suppliers; and via the JLR Corporate website.

### EXPECTATIONS OF SUPPLIERS

The standards JLR expects its suppliers to meet, including standards equivalent to those articulated in the Code, are set out in the Global T&Cs, which also detail human rights requirements, including basic working conditions. The Global T&Cs are supported by JLR's Global Sustainability Web Guide – Supplier Environmental & Social Requirements document and JLR's Supplier Code of Conduct which articulates the minimum environmental and social standards JLR expects all its suppliers and business partners to adhere to. These address human rights and labour standards including working conditions (including specific reference to the Modern Slavery Act), with expectations of processes and safeguards to demonstrate compliance. There is an accompanying Minimum Standard of Working Conditions Self-Assessment Checklist to the Web Guide.

There are several processes in operation that address human rights risks within JLR's supply chains. These include:

- The requirement to complete the automotive industry supplier sustainability assessments applies to all of our Production and Special Vehicle Operations suppliers, as well as those Indirect Procurement, Aftermarket and Branded Goods suppliers with an annual spend of more than £500,000. To date 2,083 suppliers (at individual statutory entity level) have completed the assessment, which includes questions regarding forced / bonded and child labour. Responses to the assessments are independently validated against the evidence suppliers provide. The assessment has been developed to address the Modern Slavery Act, as well as other sustainability related regulations. No slavery or human trafficking issues have been reported to us through these assessments.
- The Supplier Technical Assistance diagnostic tool assesses all potential new suppliers for Production and Special Vehicle Operations. It includes six questions on human rights. Suppliers are asked to confirm that they do not employ any form of forced or child labour. No slavery or human trafficking issues have yet been identified by this process.
- Branded Goods Manufacturing Site Self-Assessment (MSSA) is required to be completed by all new suppliers of branded goods. The MSSA asks for information on labour standards, whistleblowing facilities and ethical/ social audits completed. Responses have been received from all current branded goods suppliers. No slavery or human trafficking issues have been reported to us through these self-assessments.
- JLR China Supplier Self-Assessments, which new suppliers to JLR China are asked to complete, addressing legal and regulatory obligations. We also undertake searches of publicly available sources to see whether concerns are highlighted. No slavery or human trafficking issues have been identified through these assessments.

For the year ended 31 March 2024 we have received reports of human rights concerns relating to two suppliers:

- For the first supplier our investigations to date, which included a detailed audit of working conditions at the supplier's facilities and confidential interviews with employees, have determined that the concerns were not founded.
- In the second case, a Tier 1 supplier notified JLR, in relation to two aftermarket service parts, that its Tier 2 supplier components contained material purchased from a sub-supplier that was alleged to have utilised forced labour. The aftermarket service parts were for prior model year vehicles and are not in JLR's current vehicle lines. JLR addressed this issue with its Tier 1 supplier and stopped all shipments of the affected parts until the Tier 1 supplier can demonstrate that the sub-supplier is no longer in its supply chain. Moreover, JLR quarantined the affected parts within its custody for destruction.

If we became aware of slavery or human trafficking concerns within our supply chains, we would seek to work with the relevant suppliers to improve conditions for their workforce. We reserve the right to deselect suppliers, if they were to fail to make required improvements within a reasonable timeframe.

## ASSESSMENT OF RISKS OF SLAVERY AND HUMAN TRAFFICKING IN JLR'S SUPPLY CHAINS

JLR maintains a register of suppliers that have published Slavery and Human Trafficking statements, which we monitor as part of our assessment of suppliers' approaches to addressing modern slavery risks. To date, we have identified approximately 760 of our suppliers that have published a Statement setting out the actions they are taking to address slavery and human trafficking in their operations and supply chains.

In our Slavery and Human Trafficking Statement for the year ended 31 March 2023, we reported that we had identified 43 suppliers who were deemed to present an elevated risk of slavery and human trafficking. We distributed a Slavery and Human Trafficking Questionnaire to these suppliers, in order to seek additional assurance. Of these 43 suppliers:

- 26 provided a satisfactory initial response to the questionnaire;
- 8 required further follow-up and we are working with these suppliers to obtain relevant assurances;
- 5 are no longer JLR suppliers; and
- In 4 cases, no response has been received to date.

For the year ended 31 March 2024, we have undertaken our annual exercise to assess slavery and human trafficking risk within JLR's supply chains. We have evaluated our Tier 1 suppliers by considering the countries where our suppliers are based, products and services being supplied and the volume of spend. The data was evaluated against recognised external indices of perceived slavery risk within sectors and geographic areas, to assess whether suppliers may represent an elevated modern slavery risk.

For the year ended 31 March 2024, our supply chain risk has identified an additional 45 suppliers which may represent an elevated slavery or human trafficking risk. These suppliers span 6 countries: Brazil, China, India, Romania, South Africa, and UAE. We are currently seeking further information to understand how these suppliers protect human rights within their operations.

We have performed several social audits in the year ended 31 March 2024 of suppliers which may represent an elevated slavery or human trafficking risk. These audits have not identified significant risks or issues with those suppliers.

There are also a number of people working on our sites as employees of companies providing outsourced services, such as cleaning, logistics and catering. The nature of these services may mean there is an increased inherent risk of slavery and human trafficking. The companies that provide these services are subject to the Global T&Cs and the Supplier Code of Conduct. As we evolve our programme to monitor our suppliers' implementation of the Supplier Code, we intend to seek additional assurances from these companies that they have effective procedures to protect their staff from slavery and human trafficking risks.

## EVOLVING APPROACH TO SLAVERY AND HUMAN TRAFFICKING RISK IN SUPPLY CHAINS

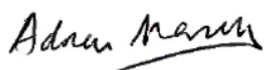
The JLR Code of Conduct and our Supplier Code of Conduct, together with our Policies and contractual terms are clear on the need to protect human rights. However, we recognise that these measures only give a limited degree of comfort that slavery and human trafficking are not occurring within our supply chains. We will continue to assess how we might obtain further comfort over the effectiveness of anti-slavery and human trafficking measures beyond the first tier of our supply chain.

As our programme progresses, we have prioritised potentially higher risk suppliers for the risk mitigation measures we implement. During the year ended 31 March 2024, we have obtained more granular data from suppliers, undertaken more detailed reviews of supplier information (particularly regarding commodity level information), rolled-out self-assessment questionnaires to additional higher risk suppliers, and commissioned a programme of social audits at higher risk suppliers.

We have implemented supply chain traceability and risk scanning tools to continue to seek further transparency within our supply chain to identify potential risks relating to forced and child labour.

## APPROVAL

This statement has been reviewed by the Board of Directors of Jaguar Land Rover Automotive plc and is approved on the Board's behalf by the Chief Executive Officer.



**Adrian Mardell**  
Chief Executive Officer of JLR  
16 May 2024

ATTESTATION REQUIRED BY CANADA FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Jaguar Land Rover plc.

A handwritten signature in black ink that reads "Adrian Mardell". The signature is written in a cursive style with a horizontal line underneath the name.

Adrian Mardell  
Chief Executive Officer of Jaguar Land Rover plc  
16 May 2024