## Nissan Motor (GB) Limited (the "Company")

#### Slavery and Human Trafficking Statement for Financial Year ended 31 March 2024

This statement has been created in compliance with Section 54, Part 6 of the Modern Slavery Act 2015. The legislation requires all UK-based commercial organisations with an annual turnover of £36m or above, to produce a slavery and human trafficking statement setting out the steps they have taken to ensure there is no modern slavery in their supply chains, or their own business. The Company fully supports this legislation and the Government's drive to minimise the risk of slavery and human trafficking in UK supply chains.

The Company is part of the Nissan group of companies ("**Nissan Group**") (ultimate parent company, Nissan Motor Co., Ltd., registered in Japan). The "Nissan" brand operates on a global basis.

## 1. Organisation structure and supply chain

The Company operates in the UK and the principle activity of the Company continues to be the distribution/sale of passenger motor vehicles, light commercial vehicles, aftersales parts, accessories and vehicle maintenance services in the UK via its approved network of sellers for onward sale and/ or directly to end customers.

Due to the global nature of its value chain, its human rights strategy is managed at Nissan Group's global/corporate level to ensure consistency of its management and implementation in all the regions/across all entities within the Nissan Group.

#### 2. Governance and Policy Framework

The Company is committed to respecting and promoting human rights and does not condone any kind of slavery or trafficking of persons. The Company does not tolerate forced, bonded or indentured labour and has zero tolerance for the use of child labour. The Company's approach to modern slavery risk management is guided by a comprehensive set of global polices covering Nissan Group's operations and value chain. Human rights issues have been included in the Nissan corporate risk map based on the Global Risk Management Policy.

## 3. Nissan Human Rights Policy

The purpose Nissan's Human Rights policy is to emphasize the principle that Nissan respects human rights in all areas of its operations. It outlines Nissan's commitment to respecting the human rights of all stakeholders, including employees, suppliers and communities. It prohibits forced and child labour, as well as human trafficking.

This policy applies to all regions and locations of Nissan Motor Co., Ltd. and its consolidated subsidiaries in all locations and regions and their respective officers, directors, corporate executives and employees.

This policy was reviewed in financial year 2024 to strengthen Nissan's human rights initiatives in two ways:

- expanding the scope to request to business partners (including distributors and dealers) and requesting them to observe the Nissan Supplier Sustainability Guidelines, as well as to promote corporate responsibilities regarding human rights throughout their own value chain by conducting activities in line with Nissan's Human Rights Policy;
- outlining Nissan's commitment to engage in open dialogue with both its internal and external stakeholders and its aim to continuously review and update the policy (as required).

The updated Human Rights policy aligns with the UN Guiding Principles on Business and Human Rights (UNGPs), ILO Conventions and OECD guidelines.

## 4. Preventing Modern Slavery within the Company

The Company has in place an Agreement and Conditions of Employment with its employees document which deals with areas such as hours of work and working conditions to protect and safeguard employees from the risk of modern slavery and human trafficking.

Activity was undertaken to revise the Nissan Global Guideline on Human Rights during financial year 2024. The Nissan Global Guideline on Human Rights (July 2025) provides operational guidance for employees to uphold human rights and covers the following topics in relation to modern slavery:

- in relation to forced labour, it states that Nissan does not condone any kind of slavery or trafficking of persons and that Nissan and its local companies should not tolerate forced, bonded or indentured labour, involuntary or exploitative prison labour, or any other similar labour or restrictions on employees. Nissan also applies ethical recruitment practices and prohibits recruiters to charge recruitment fees to potential employees.
- in relation to child labour, the guidelines state that Nissan does not condone child labour and that Nissan and its local companies should not tolerate child labour, which applies to any person under the age of 15 or the age of completing compulsory education or under the minimum age for employment in the country, whichever is the strictest applicable age. It also states that employees under the aged of 18 should not perform hazardous work (i.e. work that is likely to jeopardize their health or safety).

Nissan's Global Code of Conduct outlines the behaviours we expect from employees and encourages them, as part of their duty as employees, to report any suspected violations of the Global Code of Conduct.

Nissan's Whistleblower Policy (an internal policy for employees) states that it is every employee's responsibility to report actual or suspected misconduct, impropriety or unethical behaviour, irregularity, and/or violation of the Nissan Code of Conduct, other company policies, health & safety requirements or other legal or regulatory requirements. Under this policy, we require employees to report promptly, honestly and in good faith any actual or reasonably suspected non-compliant behaviour and assist in any investigation by the Company without fear of retaliation, reprisals or victimisation.

All employees receive mandatory annual training on the Global Code of Conduct. Furthermore, Nissan rolled out globally the updated mandatory Human Rights e-Learning training module for employees during financial year 2024.

# 5. Value chain

Activity was undertaken during financial year 2024 to update the Nissan Supplier Sustainability Guidelines. The guidelines set out clear expectations for suppliers to uphold human rights and prevent modern slavery and child labour across their operations and supply chains.

Amongst the topics covered under these guidelines are human rights and labour issues:

- ✓ Respecting human rights
- ✓ Prohibiting child labour
- ✓ Prohibiting forced labour
- ✓ Prohibition of discrimination and harassment
- ✓ Compliance with laws of each country and region regarding remuneration
- ✓ Comply with laws of each country and region regarding working hours
- ✓ Dialogue and consultation with employees
- ✓ Ensuring a safe and healthy working environment

The guidance states that each supplier is required to identify, cease, prevent or mitigate the adverse impacts on the environment, human rights, etc of overall business activities at the same

level as the Nissan Sustainability Due Diligence Standard. It also sets out the need to conduct due diligence on raw materials and comply with laws related to responsible raw material procurement.

The Nissan Supplier Sustainability Guidelines provides links to copies of the following policies and guidelines: Global Code of Conduct, Nissan Human Rights Policy, Nissan Global Guideline on Human Rights, Nissan Sustainability Due Diligence Standard and Responsible Materials Sourcing Policy.

## 5.1 Supplier accountability

Within the <u>Nissan Supplier Sustainability Guidelines</u> Nissan requests its suppliers to promote legal and regulatory compliance throughout their supply chain and consignment suppliers. Suppliers are also encouraged to conduct self-assessments and participate in third-party audits, selected by Nissan, to verify compliance. If requested, suppliers are expected by Nissan to take such assessment.

Suppliers are requested to submit a Supplier Commitment form signed by a legal representative to affirm its commitment to the Supplier Sustainability Guidelines.

Within this framework, it is intended that Nissan will gradually expand the number of suppliers that participate in the program.

#### 5.2 Responsible Material Sourcing Policy

This policy defines the approaches on raw materials, which are considered to pose a high risk to human rights and the environment, and the natural resources contained in materials and components used in the manufacture of Nissan's products.

Nissan conducts due diligence on the natural resources contained in materials or components used to manufacture its products, assessing potential impacts on sustainability issues such as on human rights in line with the Nissan Sustainability Due Diligence Standard and is conducted on a risk-based approach. Nissan has identified materials based on factors such as usage volume (including future projections) and potential risks related to ethics, social (including child and forced labour) and the environment. This resulted in the new Responsible Materials Sourcing Policy expanding its coverage to include all minerals from conflict affected and high-risk areas (including tin, tungsten, tantalum and gold) and minerals for the manufacturing of batteries containing cobalt, nickel, lithium and natural graphite), natural rubber and other raw materials with social and environmental impacts of concern.

Further details in relation to our Responsible Materials Sourcing Policy, Actions for Mineral Sourcing and Responsible Sourcing, including on activities carried out during financial year 2024 can be found by accessing this link: Responsible Materials Sourcing Policy

## 6. Risk Assessment and Due Diligence

Nissan conducts risk management through a structured multi-tiered approach in line with <u>Nissan Sustainability Due Diligence Standard</u> which defines Nissan's due diligence procedures for identifying, preventing, and mitigating adverse environmental and human rights impacts. Nissan also operates the human rights due diligence process in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs), and the OECD Due Diligence Guidance for Responsible Business Conduct.

## 6.1 Due Diligence steps

- Risk Assessment
   Nissan identifies and prioritizes modern slavery risks across its operations and supply chains, using internal and third-party assessments.
- Prevention and Mitigation
  Awareness is raised among staff and suppliers, with sustainability clauses embedded in contracts. Corrective actions are taken where risks are found.

- Monitoring Remedial actions are reviewed regularly, and effectiveness is evaluated to ensure risks are properly addressed.
- Grievance Mechanism
   Anonymous reporting channels are available to all stakeholders, with protection against retaliation

#### 6.2 Further information

Further information and details on Nissan's activities with regards to human rights and supply chain management can be found by accessing the links below and set out in the Annex:

- Nissan global website: <u>Social | Sustainability | Nissan Motor Corporation Global Website</u> (<u>nissan-global.com</u>)
- Sustainability data book 2025: <a href="https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/SR/2025/ASSETS/PDF/DB25\_E\_All.pdf">https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/SR/2025/ASSETS/PDF/DB25\_E\_All.pdf</a>

This statement was approved by the board of directors of Nissan Motor (GB) Limited on 25 September 2025.



**James Taylor** 

Managing Director Nissan Motor (GB) Limited 25 September 2025

#### **Annex**

Summary and links to policies, standards and guidelines referred to in this statement:

- Nissan Human Rights Policy: Prohibits forced labour, child labour, and human trafficking. Aligns with UNGPs, ILO conventions, and OECD guidelines. https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/HUMAN RIGHTS/
- Nissan Global Guideline on Human Rights: Provides operational guidance for employees to uphold human rights
   <a href="https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/HUMAN RIGHTS GUIDELINE/ASSETS/PDF/">https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/HUMAN RIGHTS GUIDELINE/ASSETS/PDF/</a>
   Nissan Global Guideline On Human Rights e.pdf
- 3. Nissan Sustainability Due Diligence Standard: Defines procedures for identifying, preventing, and mitigating adverse human rights impacts. <a href="https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/DUE\_DILIGENCE/">https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/DUE\_DILIGENCE/</a>
- 4.Nissan Supplier Sustainability Guidelines: Sets expectations for suppliers on labour rights, environmental responsibility, and ethical conduct. <a href="https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/SUPPLIERS/">https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/SUPPLIERS/</a>
- 5.Responsible Materials Sourcing Policy: Focuses on ethical sourcing of high-risk materials such as cobalt, lithium, and natural rubber. https://www.nissan-global.com/EN/SUSTAINABILITY/LIBRARY/MATERIALS\_SOURCING/