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Registered in England & Wales No. 02375355

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## **GNB INDUSTRIAL POWER (UK) LIMITED**

### **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 for the financial year ended 31 March 2024 and sets out the steps that GNB Industrial Power (UK) Limited (“**GNB**”, “**we**” “**our**”) has undertaken - and is continuing to take - to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude forced and compulsory labour and human trafficking. GNB has a zero tolerance approach to any form of modern slavery and is committed to acting in an ethical manner, with integrity and transparency in all business dealings.

GNB is committed to creating effective systems and controls to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **OUR ORGANISATION**

GNB is a company belonging to the Exide Group of Companies and ultimately owned by Energy Technologies Holdings LLC, a limited liability company incorporated in the State of Delaware, USA (“Exide Group”). Exide Group is a global supplier of stored electrical-energy solutions for the automotive, motion and energy solutions markets.

GNB sells and distributes electrical storage batteries and associated products supported by a national service network to customers in the industrial batteries markets throughout the UK and Ireland.

GNB has carried out a desk-based review of, and identified its first tier suppliers (those most significant based on annual spend in our supply chain) as Exide Group’s manufacturing facilities located in Europe. These internal suppliers provide GNB with batteries, battery cells and chargers for resale to customers within the motion and energy solutions battery markets. GNB’s other suppliers are mainly UK based companies which supply components used in the assembly of GNB batteries and service based providers to our business.

## OUR EMPLOYEES

Exide Group's Code of Ethics and Business Conduct ("the Code") outlines the principles of conducting business with honesty, integrity and in strict compliance with the law and every employee is expected to know and follow the Code.

All GNB employees are required to read the Code and confirm they will adhere to the Code when they join GNB, and annually thereafter.

## OUR SUPPLIERS

GNB and Exide Group's European manufacturing facilities operate a supplier policy and maintain a preferred supplier list.

Due diligence is conducted on suppliers before allowing them to become a preferred supplier. This due diligence includes a self-assessment questionnaire which is sent out to prospective suppliers through our procurement process. We have also sent questionnaires to our sub-contractors and will review their responses and agree any required actions.

Whilst we do not have a standalone modern slavery policy, there are related aspects of this issue incorporated within our global Corporate Social Responsibility Policy. GNB is committed to promoting adherence to the policy by itself and its suppliers.

In addition to the above, we will be introducing specific supplier contract clauses in our terms and conditions of purchase to address anti-slavery and human trafficking.

## OUR POLICIES

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Code of Ethics and Business Conduct.** As mentioned above, the Code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
2. **Corporate Social Responsibility Policy.** We set out our commitment to upholding universally held ethical principles, especially integrity, honesty and respect of human dignity.
3. **Environmental, Health and Safety Policy.** This policy includes ensuring the health, well-being and safety of all employees, contractors, visitors and the community in which we live and work.
4. **Recruitment Policy.** This policy includes conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

- 5. **Supplier Quality Manual.** This sets out the standards to which we require our suppliers to adhere.
- 6. **Conflict Minerals Policy.** This policy sets out the requirement of relevant suppliers to provide information on the use and sourcing of Conflict Minerals in the materials supplied to Exide Group.

**TRAINING**

We regularly train our employees in areas of ethics, business conduct and compliance through our Global Compliance Training Program. We intend to include in the program training on making our employees aware of the issues surrounding modern slavery and what to do if they suspect that it is taking place within our supply chain.

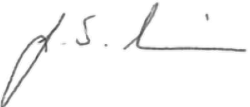
**OUR PERFORMANCE INDICATORS**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified;
- the use of grievances mechanisms;
- Requiring employees to undertake anti-slavery and human trafficking training.

**APPROVAL FOR THIS STATEMENT**

This statement was approved by the Board of Directors on 22 August, 2024.



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**Name:** Jason Lavin  
**Position:** Director  
**Date:** 22.08.2024