

Honda in Europe's Modern Slavery¹ and Human Trafficking Statement for the Financial Year 2024/25

This statement is made and published pursuant to section 54 of the UK Modern Slavery Act 2015 ("**MSA 2015**"). It sets out the actions taken by Honda Motor Europe Limited ("**HME**") and other relevant group companies (together being "**Honda in Europe**")² during the financial year ending 31 March 2025 to prevent slavery and human trafficking from occurring in its supply chains and business.

The Honda Group³ strives to be "*a company that society wants to exist*". It acknowledges that its broad portfolio of products – and the processes involved in their development, manufacturing and distribution – have a meaningful impact on society. Guided by this understanding, the Group aims to operate as a responsible and ethical enterprise and a valued partner within the communities it serves.

1. Honda Philosophy

As part of the Honda Philosophy, one of the Fundamental Beliefs is "*Respect for the Individual*". This principle guides the Honda Group in valuing and respecting the unique contributions of each individual. Accordingly, the Honda Group is committed to ensuring that all individuals involved in the development, manufacture, distribution, sale and service of its products are treated with dignity and respect.

In line with its commitment to ethical business conduct, the Honda Group does not engage in practices or activities that compromise fundamental human rights, including any form of modern slavery.

2. Our Business

The Honda Group develops, manufactures, sells⁴ and distributes automobiles, motorcycles, power products, marine engines and associated spare parts globally. It also provides a range of associated services, including financial solutions and customer support.

Honda in Europe forms part of the wider Honda Group, whose ultimate parent company is Honda Motor Co., Ltd., headquartered in Japan. As of 31 March 2025, the Honda Group employs approximately 226,261 employees worldwide and operates across six global regions: Japan, China, Asia & Oceania, North America, South America and Europe, Middle East & Africa.

Honda in Europe engages in a broad spectrum of business activities including:

- research and development;
- sales;
- distribution and logistics services;
- connectivity services;
- smart charging services; and
- financial services.

Due to the diversity of its operations and product offering, Honda in Europe manages a highly complex supply chain. This includes suppliers of goods and services based in the UK and across the globe.

3. Supply Chain

While each supplier maintains its own approach and responsibility for ethical business conduct, Honda in Europe will not tolerate modern slavery in its business or supply chain. Honda in Europe endeavours to ensure that its suppliers share the same commitment to preventing modern slavery and encourages them to implement appropriate measures to identify and address such risks.

The measures that Honda in Europe has taken are set out below.

¹ Modern slavery is defined as "the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation."

² This statement sets out the steps taken by the UK operations of Honda Motor Europe Limited ("**HME**"), Honda Finance Europe Plc ("**HFE**"), Honda R&D Europe (U.K.) Limited ("**HRE-UK**") and Honda Motor Europe Logistics NV ("**HMEL**") together "**Honda in Europe**".

³ The "**Honda Group**" includes the global affiliates of, and all companies directly or indirectly owned or controlled by, Honda Motor Co., Ltd.

⁴ Direct sales are limited to certain product categories and countries.

(a) Honda Supplier Sustainability Guidelines (“Sustainability Guidelines”)

Honda Motor Europe Logistics NV (“HME”) issues Sustainability Guidelines and communicates any updates to its suppliers. The Sustainability Guidelines outline minimum expectations regarding business ethics, working conditions and human rights, and are aligned with the Japan Automobile Manufacturers Association (JAMA) “Supplier Corporate Social Responsibility Guidelines”.

Through these Sustainability Guidelines, HME aims to ensure that all suppliers share the Honda Group’s values and adopt a zero-tolerance approach to modern slavery. The guidelines explicitly prohibit unlawful business practices including:

- use of child labour;
- use of conflict minerals in smelters;
- human trafficking;
- payment of wages below the legal minimum;
- working hours exceeding legal limits
- forced or compulsory labour; and
- unsafe or unhealthy working environments.

HME undertakes on a periodic basis to request suppliers of Honda genuine spare parts in addition to large suppliers of other products and services to review the Sustainability Guidelines and confirm their understanding and acceptance by signing a “Sustainability Acknowledgement Declaration”. This declaration affirms that suppliers: (a) understand the content of the guidelines; and (b) acknowledge that Honda will not tolerate actions contrary to the guidelines.

For suppliers who have not signed a Sustainability Acknowledgment Declaration, HME follows up to understand their reasons – such as whether they have their own guidelines or code of conduct that they commit to follow.

(b) Supplier Contracts

Honda in Europe is determined to ensure its suppliers comply with the MSA 2015 and includes contractual obligations to help prevent modern slavery within its supply chain.

All new contracts and all contract renewals between HME and suppliers, which are governed by English law, include specific anti-slavery clauses. These clauses:

- prohibit the supplier from engaging in any form of modern slavery practice (as defined by the MSA 2015);
- require the supplier to report any actual or suspected incidents of modern slavery to Honda in Europe; and
- require the supplier to take any remedial action necessary to address modern slavery practices identified within its supply chain.

If a supplier fails to comply with the anti-slavery clauses, HME reserves the right to terminate the contract.

Honda R&D Europe (U.K.) Limited (“HRE-UK”) ensures that suppliers are contractually required to comply with laws, including those relating to modern slavery..

Honda Finance Europe Plc (“HFE”) conducts due diligence checks on a suppliers’ financial status to assess the risk of non-compliance with the MSA 2015, recognising that financially unstable companies may be more likely to engage in unethical practices. HFE also performs audits on its suppliers as necessary.

All new contracts between HME and suppliers of Honda genuine parts contain appropriate anti-slavery clauses.

(c) Potential New Suppliers

Honda in Europe highlights its ethical approach, including its stance on modern slavery, to potential suppliers during the tendering process for new products and services. This ensures that prospective suppliers are made aware, from the outset, of the expectations and contractual obligations Honda in Europe will impose if they are successful in securing a contract.

(d) Conflict Minerals

Honda in Europe recognises the prevalence of human rights violations (including modern slavery) within the conflict mineral supply chain.

Since 2013, HME has issued an annual survey to its suppliers to identify the origin of conflict minerals. This initiative aims to enhance HME's understanding of its supply chain and promote responsible sourcing. The survey is distributed to HME's suppliers, who are then requested to cascade it through their supply chains down to the smelter level. The results are reported annually by Honda Motor Co., Ltd to the U.S. Securities and Exchange Commission and are made available [Here](#).

(e) Supplier Ethics Lines

HME provides a whistleblowing channel called "HME Speak Up", which is accessible to anyone outside of Honda - including suppliers of HME and other Honda entities operating in UK and Europe. HME Speak Up can be accessed via www.honda.co.uk.

Separately, HME offers a dedicated supplier whistleblowing channel known as the "Supplier Ethics Line". Contact details for the Supplier Ethics Line – email and phone line - are communicated to HME suppliers, for example, via the Sustainability Guidelines.

Both HME Speak Up and the Supplier Ethics Line enable suppliers to report (anonymously, if they wish) any suspected unethical conduct, including modern slavery, breaches of the Honda Code of Conduct, or violations of the HME Sustainability Guidelines.

HME Speak Up and the Supplier Ethics Line are monitored regularly. All reported incidents are handled confidentially and escalated to the Regional Compliance and Ethics Committee, which oversees compliance for Honda in Europe.

(f) EU Key Performance Indicator ("KPI") Reporting Structure

HME reports quarterly against compliance KPIs to its Compliance and Ethics Committee. These KPIs measure, amongst other matters, how effective HME has been in ensuring that modern slavery and human trafficking are not present within its supply chain or any other part of the business.

Examples of the compliance KPIs include:

- the number and nature of non-compliance issues identified which may include modern slavery concerns;
- details of any reported suspicions relating to modern slavery; and
- the number and the nature of contacts received from suppliers via the Supplier Ethics Line.

The Committee reviews these results and discusses appropriate countermeasures in response to any poor performance against the KPIs. Appropriate actions are implemented, and results are reported back to the Committee.

4. Internal Measures

(a) The Honda Group Code of Conduct

First published in 2003, the Honda Group Code of Conduct set out expectations for all Honda Group personnel to act in a manner that supports Honda's aspiration to be *"a company that society will want to exist"*. The Code is publicly available for download on its global website.

Specifically, the Code of Conduct requires all Honda Group personnel to:

- ensure that their relationships and activities comply with applicable laws, rules and regulations, and the common sense of the community in which they operate;

- understand and abide by the words as well as the spirit of applicable laws and regulations, stay informed of relevant updates, and take appropriate action;
- report or consult with their supervisor or legal department whenever they notice, or are made aware of, violations of laws or regulations; and
- respect human rights and refrain from treating any person in an unjust manner.

Failure to comply with the Code of Conduct constitutes a disciplinary offence. All Honda Group personnel are required to read and refresh their knowledge on the Code of Conduct annually.

(b) Ethics Proposal Line

All Honda in Europe personnel have access to an “*Ethics Proposal Line*” - a dedicated channel that allows Honda personnel to report (anonymously, if they wish) any breach, suspected breach or anticipated breach of Honda’s Code of Conduct, or any other unethical or fraudulent conduct.

The Ethics Proposal Line is monitored regularly, and all reported incidents are handled confidentially. Concerns raised to the HME and HMEL Ethics Proposal Lines are reported to the Regional Compliance and Ethics Committee, which is attended by senior regional management members.

(c) Anti-Slavery Policy and Guidance

Honda in Europe has a Regional Anti-Slavery Policy, which is reviewed, updated and approved annually by the Regional Compliance Officer.

The policy applies to all Honda in Europe personnel, including employees and contractors, and outlines Honda’s commitments to preventing modern slavery. Any breach of the policy constitutes a disciplinary offence.

In October 2019, HME issued a guidance document titled “Guidance on Modern Slavery Reporting and Investigation”. This document complements the Regional Anti-slavery Policy and provides clear instructions for HME personnel on what to do if they become aware of, or suspect, that modern slavery within Honda in Europe’s business or supply chain.

(e) Training

HME provides an e-learning module on modern slavery, which is made available to Honda personnel employed or engaged by HME, HFE and HMEL. The module covers an overview of the MSA 2015 and outlines the steps Honda in Europe is taking to prevent modern slavery in its supply chain. The e-learning module contains an online assessment, and completion is mandatory for all relevant personnel upon joining Honda and annually thereafter. In addition, HME delivers training on modern slavery to newly appointed managers as part of the legal and compliance module within a one-day, face-to-face training programme.

By ensuring its personnel are trained on modern slavery, Honda in Europe reinforces its commitment to ethical practices across all levels of the business and management.

(f) Additional activities for the Financial Year ending 31 March 2026

To further Honda in Europe’s commitment to preventing modern slavery in its supply chain, the following actions are proposed for the current financial year:

- HME will continue to review and update relevant policies and ensure that personnel complete the mandatory modern slavery e-learning module.
- HME conducted a trial last year and Honda is considering wider implementation to improve the efficiency and quality of the conflict minerals process.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Honda in Europe’s Modern Slavery and Human Trafficking Statement for the financial year ending 31 March 2025.