

2023 Modern Slavery Statement

Introduction From Manager & Director

Our values and daily work include commitments to acting ethically - with integrity and transparency - in all business dealings and we intend to not only 1) put effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain but also 2) not tolerate forced labour (including slavery, indenture, human trafficking) or child labour in our operations. This statement describes what we, PHINIA Holdings Luxembourg SARL (PHINIA Lux), a Luxembourg based holding company that owns several entities registered in the United Kingdom (UK), including the operating company, PHINIA Delphi UK Ltd (PHINIA UK), have done to prevent and eliminate modern slavery, human trafficking within our business and supply chains for the year ending 31 Dec 2023. It was approved and signed as of 31 May 2024.

Our Business Structure, Supply Chains & Due Diligence

Our ultimate parent company, PHINIA Inc., which has its corporate office in the United States, began trading on the New York Stock Exchange (NYSE) in July 2023 after it spun off from its former parent company, BorgWarner Inc. We have defined values that include integrity and inclusion that guide our global operations with more than 13,000 people and 44 locations across 20 countries.

Globally, we are a market-leading premium solutions and components provider, developing fuel systems, electrical systems, and aftermarket solutions that keep vehicles and industrial applications running for longer. We also conduct research and development with investment in alternative fuel technologies that offer the potential for enhanced sustainability. We have over 100 years of manufacturing expertise and industry relationships with a portfolio that includes the product brands DELPHI®, DELCO REMY® and HARTRIDGE®.

This rich history helps guide our support for eliminating modern slavery as well as our broader approach to human rights, integrity, and respect within our business. Our respect for and commitment to honoring labour rights, broader civil rights, and community development drives us to consider these items as well as other responsibilities impacting people within our due diligence efforts to create an operating framework with ethical trade practices, corporate social responsibility, and respect for human rights.

In connection with obtaining raw materials, components, and parts for our fuel systems and aftermarket businesses from suppliers around the world, we conduct due diligence reviewing trade sanctions and other elements related to these suppliers. Our negotiated agreements with suppliers, purchase order terms and conditions, and the additional guidance on our supplier dedicated pages at [PHINIA - Supplier and Supply Chain Management](#) show suppliers and customers our commitment and expectations for doing business with us. Our terms require suppliers to comply with express language prohibiting modern slavery. We have implemented a Supplier Code of Conduct and scorecard that helps us identify preferred suppliers based on the risks posed and participation level. We continue to evolve and improve processes to ensure we and our suppliers have practices in place to avoid engaging in modern slavery or human

trafficking. We also look for opportunities to improve our current technology to enhance due diligence capabilities.

As we head into our second year as PHINIA, we will continue to collaborate with and reach out to our suppliers and customers to understand how we can help improve our mitigation of and further reduce the risk of potential incidents of forced labour and human trafficking. This work will require sustained focus on process enhancements designed to identify any potential wrongdoing, purge it from our supply chain, and act on our opportunities for improvement. Some of our processes may include deeper screening, online reviews, on-site reviews, relationship management, informal training, and site audits that consider working conditions as well as other items to eliminate any risk of potential incident of human trafficking or forced labour within our business and supply chain.

Policies Relating to Slavery and Human Trafficking

In addition to our Supplier Code of Conduct which recognizes our commitment to good citizenship and abiding by applicable legal requirements, PHINIA policies prohibit all forms of forced, involuntary, or child labour. We believe that people in all locales should be provided with wages and benefit levels that effectively provide for basic needs. PHINIA's upcoming Respect & Dignity policy articulates these commitments and expands the language of those expressed in our Code of Ethical Conduct to specifically include human rights protections. While we initially "lifted and shifted" policies from our former parent, at the end of 2023, we began planning a global project to review and revise many of our global policies to address and align them with the sustainability, community, and people protection goals we have as a company. In short, we seek to prioritize and address our risks in a way that improves outcomes for the people in our business and communities, as well as in our supply chain.

Risk Assessment & Management

In 2023, the Sustainability Assessment Questionnaire (SAQ) was deployed with our supplier scorecard to help us monitor risks suppliers may present. When significant risks relating to people such as forced labour or trafficking are identified, our Global Supply Chain Management team initiates activities to address those including our Legal and the Compliance Office teams in the efforts. Together, we determine the appropriate next steps for investigation, training, and remediation.

An additional mechanism to consider risks posed is our global whistleblower hotline (phone and web-based) system which allows internal and external parties to report, anonymously if they choose (consistent with applicable law), any activities that are inconsistent with our policies or the law. The Compliance Hotline is available 24/7 and hosted externally by a vetted global third party service provider that provides intake services for calls and a web form for online reporting. Each report is taken seriously and reviewed by the Compliance Office for further steps. Concerns may also be received locally and, when related to a potential violation, included in the system to help trend and track concerns such as forced labour or modern slavery.

We encourage an open and transparent environment where employees and business partners feel safe and are protected from retaliation. To that end, we are moving toward consideration in our risk assessment processes for ourselves, our suppliers and potentially our customers that include geography, industry, operational context (e.g. economic condition of the specific area), goods or services, mapping of our policies and procedures with the standards of the [United Nations Universal Declaration for Human Rights](https://www.un.org/en/documents/udhr) (www.un.org/en/documents/udhr), [United](https://www.un.org/en/documents/udhr)

[Nations Guiding Principles on Business and Human Rights](#), and [OECD Guidelines for Multinational Enterprises](#), and the [International Labour Organization \(ILO\) Declaration of Fundamental Principles and Rights at Work](#) to identify and assess potential human rights impacts in all of our operations and markets. We have not yet completed a global risk assessment for PHINIA though we have plans to do so in the next twelve to twenty-four months.

Social Responsibility at PHINIA

PHINIA will not work with any suppliers who have demonstrably and repeatedly failed to comply with standards for protecting human rights.

The assumption of responsibility for our communities and future generations matters to PHINIA. We are prioritizing combining the pursuit of our business economic objectives with consideration for Sustainability. PHINIA recognizes the rights of local communities to have decent living conditions; education, employment, social activities; and the right to Free, Prior, and Informed Consent (FPIC) to developments that affect them and the lands on which they live, with particular consideration for the presence of vulnerable groups. We seek to avoid and expect that our business partners also avoid forced eviction and the deprivation of land, forests, and waters in the acquisition, development or other use of resources.

Additionally, we are considering signing onto and joining the United Nations Global Compact. We support the ten principles of the Global Compact and use the international standards to set the bar higher for respecting people and their human and workers' rights, as well as in environmental protection, and the fight against corruption.

The Company's Management and Senior Leaders, have taken the responsibility for implementing this policy statement and its objectives, providing adequate resources, and making appropriate investment to ensure that neither slavery, forced labour, child labour nor human trafficking are taking place within our business.

Signed by Romeo Wolaly
Manager
PHINIA Lux

Signed by Neil Fryer
Director
PHINIA UK
with witness to signature