



Swindon Pressings Ltd. Slavery and Human Trafficking Statement for 2016

This statement is made by Swindon Pressings Ltd. pursuant to section 54 of the U.K. Modern Slavery Act 2015 ('the Act') to identify actions taken by Swindon Pressings Ltd. and the BMW Group during the financial year ending 31st December 2016 to prevent slavery and human trafficking from occurring in its supply chains and business. The statement considers:

1. BMW Group business and supply chains
2. BMW Group's approach to human rights (including slavery and human trafficking)
3. The approach of the BMW Group to eliminating slavery and human trafficking from its business and supply chain

Although not all BMW Group companies are subject to the Act, the BMW Group takes a group-wide approach to its human rights commitments.

THE BMW GROUP'S BUSINESS AND SUPPLY CHAINS

THE BMW GROUP'S BUSINESS

The BMW Group is one of the most successful manufacturers of cars in the world and its BMW, MINI and Rolls-Royce premium brands are three of the strongest in the automotive industry today. The BMW Group also has a strong market position in the motorcycle industry and is a successful financial services provider. In recent years, the company has become one of the leading providers of premium services for individual mobility.

The ultimate parent company of the BMW Group is Bayerische Motoren Werke Aktiengesellschaft (BMW AG). It was founded in 1916 and has its headquarters in Munich, Germany.

Today, the BMW Group is an international organisation, represented in over 150 countries and, at the end of 2016, it employed 124,729 people. The BMW Group has a large research and innovation network, operating from 13 locations in 5 countries; a production network of 30 locations in 14 countries; and a worldwide vehicle sales network of around 3,310 BMW, 1,550 MINI, 1,150 BMW Motorcycle and 140 Rolls-Royce Motor Car dealerships.

Swindon Pressings Ltd. is part of the BMW Group. Plant Swindon produces pressings for both MINI and BMW vehicles and complex sub-assemblies for MINI.

SUPPLY CHAINS

The automotive supply chain is one of the most complicated of any industry. There are often six to ten levels of suppliers between a manufacturer and the source of raw materials that enter the manufacturing process.

The BMW Group works with around 13,000 1st tier suppliers in more than 70 countries. The BMW Group's global supplier network makes a major contribution to value creation, quality and innovation. Therefore, the supply chain is critical to the success of the BMW Group and has a significant impact on the BMW Group's sustainability performance. It is therefore essential that our partners fulfil the same environmental and social standards we set ourselves.

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THE BMW GROUP'S COMMITMENT TO HUMAN RIGHTS (INCLUDING SLAVERY AND HUMAN TRAFFICKING)

Respect for human rights is fundamental to the strategy and culture of the BMW Group. We fully endorse the United Nations Guiding Principles on Business and Human Rights (UNGP). Our value-oriented personnel policy has set out our position on human rights with regard to our employees for over a decade ("Respect for human rights is a given"). Our human rights policy ("**Joint Declaration on Human Rights and Working Conditions in the BMW Group**") (endorsed in 2005 and reconfirmed in 2010) underlines and specifies our commitment. It applies to all BMW Group activities worldwide and also encourages business partners to adhere to these human rights standards.

As part of its commitment, the BMW Group is an active member in the following cross-sectoral initiatives and networks on human rights:

- UN Global Compact – the world's largest initiative for responsible corporate leadership
- econsense – Forum for Sustainable Development of German Business
- CSR Europe – The European Business Network for Corporate Social Responsibility
- Aluminium Stewardship Initiative - for environmental, social and human rights standards in aluminium production (ASI)

It is our principal aspiration to avoid negative impacts on human rights arising from our business activities throughout the value chain. This is essential to us, and our expectation is that our business partners are also committed to respect human rights. This includes all applicable anti-slavery and trafficking laws. Among other measures, we therefore implement human rights requirements as contractual obligations with suppliers and dealers, inform our partners about the BMW Group's commitment, and discuss our expectations with them.

THE BMW GROUP'S DUE DILIGENCE PROCESS FOR HUMAN RIGHTS (INCLUDING SLAVERY AND HUMAN TRAFFICKING)

THE BMW GROUP'S BUSINESS

Our human rights due diligence approach is aligned with the requirements of the UN Guiding Principles on Business and Human Rights (UNGP). We conducted a comprehensive internal risk analysis, which considered all human rights (as mentioned in the International Bill of Human Rights), all our business activities and all stakeholders (employees, dealers/importers, suppliers, joint ventures, communities, clients etc.). Existing processes were risk-assessed, and their effectiveness was evaluated in group-wide interviews with specialist units. This risk assessment included an identification of potential human rights risks, which are of relevance for the BMW Group and the identification of vulnerable groups, e.g. children or migrant workers. New legal requirements in the field of human rights, e. g. arising out of the Act, were addressed accordingly. The analysis revealed no major unaddressed fields of action inside the BMW Group, as the commitment to respect human rights already has a long tradition at the BMW Group and elements of a due diligence process, training and communication had been implemented already.

SUPPLY CHAINS

The BMW Group's public statement "BMW Group Supplier Sustainability Standard" outlines the basic principles we require our suppliers to adhere to. Human rights standards are also included in our international purchasing conditions. As a member of the "Drive Sustainability", BMW Group has developed and published the "Automotive Industry Guiding Principles to Enhance Sustainability Performance in the Supply Chain." These guidelines describe minimum expectations towards business ethics, working conditions, human rights and environmental leadership for our suppliers as well as their subcontractors.



We recognise the risk of human rights violations occurring in the supply chain beyond our immediate suppliers. Therefore we identify components and materials at risk of human rights violations, and work closely with our suppliers to achieve greater transparency in these supply chains, and we engage in industry-wide initiatives like the Aluminium Stewardship Initiative (ASI).

MODERN SLAVERY ACT 2015

In order to fulfil the requirements of the Act 2015, the BMW Group implemented a risk management process for suppliers of production and non-production material with focus on the existence of:

- Sustainability reports for companies with more than 500 employees
- Written company policies on principles relating to the following social aspects:
 - Observance of human rights
 - Prohibition of forced labour, human trafficking and child labour

In addition to this, a special process was initiated in 2016 to evaluate all high-risk suppliers for our UK-based business service activities (e.g. distribution of parts, agencies supplying non-permanent workers, suppliers of lifestyle products, and ancillary services such as maintenance, security services, cleaning services, catering services, landscaping).

The 68 high-risk suppliers were evaluated on the following aspects, among others:

- A member of management responsible for social sustainability (61 suppliers: 90% achieved compliance)
- A Code of Conduct in place (51 suppliers: 75%)
- A written company policy on principles relating to prohibition of forced labour, human trafficking and child labour (33 suppliers: 49%)
- Internal or external social audits / assessments conducted at the supplier site (32 suppliers: 47%)
- Supplier Sustainability Policy and the communication to their subcontractors (31 suppliers: 45%)
- Training sessions to enhance the understanding of Corporate Social Responsibility (48 suppliers: 70%)

For suppliers with sustainability deficiencies, we supplemented the supplier contracts with corrective action plans and binding rules. We can therefore ensure that all sustainability requirements will be met within a reasonable time.

HUMAN RIGHTS AND ELIMINATING SLAVERY AND HUMAN TRAFFICKING

Based on the results of our human rights due diligence approach (see above), we see the main risks for potential human rights violations in our supply chain due to the complexity and international nature of our business model. For the BMW Group, it is therefore essential that our business partners meet the same social standards we set for ourselves. The “BMW Group Supplier Sustainability Standard” (see above) is the foundation upon which this process is based. The Standard establishes basic principles that are to be adhered to by all the BMW Group’s suppliers. This includes compliance with all internationally recognised human rights as well as environmental, labour and social standards. Since 2015, a special emphasis has also been placed on the topic of slavery and human trafficking.

The BMW Group offers a wide range of sustainability training courses for purchasers, internal process partners and suppliers to make them more aware of the topic and inform them about cause and effect. This includes classroom courses in association with the University of Ulm to become a “Certified Sustainability Officer” as well as web-based training course in association with econsense, which include case studies on sustainability in the supplier network. In addition, we participate in industry-wide supplier training in high risk countries, which are coordinated by CSR Europe (European Business Network for Corporate Social Responsibility). In 2016, training was conducted in India, China, and the Czech Republic.



The BMW Group has a formalised process to identify potential human rights issues and to mitigate the risk of our business partners not meeting our standards. The BMW Group assesses the potential human rights risks of all our 13,000 active supplier locations to achieve the highest possible level of transparency possible. The BMW Group has implemented a sustainability risk assessment (which includes human rights risks as part of the social risks) as a core component of our risk management process. The assessment identifies possible human rights risks at all suppliers and considers both the country risk profile and the commodity risk profile. Risk-specific measures such as a risk-adjusted self-assessment-questionnaire (validated), optional external audits, as well as corrective action plans are then implemented as required, based upon the outcome of the assessment.

In 2016, around 5,600 (2015: 1,900) potential and existing supplier operations were reviewed with regard to current and potential negative human rights impacts. The assessments identified around 3,300 potential negative impacts. Around 1,000 of these potential risks were associated with suppliers who were subsequently rejected. Action plans and improvements were agreed with around 2,300 (2015: 400) nominated supplier operations based on the pre-agreed evaluation process. Examples of reasons why suppliers could have potential negative impacts were:

- Lack of a sustainability policy for suppliers and their sub-suppliers
- Lack of a policy for observing human rights
- Lack of an environmental management system
- Lack of work instructions for the correct handling of chemicals
- Lack of a social management system

The BMW Group is working with these suppliers to address the issues identified by implementing a concrete plan of action, which is closely monitored. If a supplier operates from a higher risk location, the supplier is audited and if necessary, the BMW Group provides additional support and training to ensure appropriate standards are attained. The sustainability audits are carried out by external auditors, while the sustainability onsite assessments are performed by employees of the BMW Group. Should no improvement be recognised, the supplier will be put on "new business hold" as a final warning and ultimately, delisted as a supplier for the BMW Group.

THE BMW GROUP'S STAFF TRAINING ON HUMAN RIGHTS

After the adoption of the UN Guiding Principles on Business and Human Rights, the BMW Group implemented a comprehensive employee human rights training programme. We train our employees on human rights via face-to-face training and also communicate our position e.g. by newsletters, using the staff intranet and during compliance presentations, e.g. in 2016 at our plant in Thailand or the "APAC BMW Group Compliance Conference" in Kuala Lumpur. Human rights are also integrated in induction events for new employees and a web-based training.

Senior management of the UK-based entities have been made aware of each entity's responsibilities under the Act, and an additional training program will be initiated to inform and educate relevant UK employees about the specific aspects of the Act 2015, in addition to the broader Human Rights training provided by the BMW Group.

A handwritten signature in blue ink, appearing to read "Frank Bachmann".

Frank Bachmann,
CEO Plants Oxford, Swindon
Swindon Pressings Ltd.

A handwritten signature in black ink, appearing to read "Jeremy Stoyale".

Jeremy Stoyale,
Chief Financial Officer
Swindon Pressings Ltd.



COMPANY REFERENCES

- Our policy, the “Joint Declaration on Human Rights and Working Conditions in the BMW Group”, has been adopted by the BMW AG’s CEO with Works Council assent in 2005, reconfirmed in 2010. The document is published on our Website:

https://www.bmwgroup.com/content/dam/bmw-group-websites/bmwgroup_com/responsibility/downloads/en/2005/BMWGroup_Human_Rights.pdf

- In regards to our suppliers, the publicly available “BMW Group Supplier Sustainability Standard” outlines basic principles we require our suppliers to adhere to including respect for human rights:

https://www.bmwgroup.com/content/dam/bmw-group-websites/bmwgroup_com/responsibility/downloads/en/2012/BMWGroupSupplierSustainabilityStandard.pdf

- Human rights are also included in our International Purchasing Terms and Conditions

https://www.bmwgroup.com/content/dam/bmw-group-websites/bmwgroup_com/responsibility/downloads/en/2014/140331_IPC_clean_englisch_Status_31.03.2014.pdf

- Further information regarding our supply chain risk management can be found at

<https://www.bmwgroup.com/en/responsibility/supply-chain-management.html>