

## Modern Slavery and Human Trafficking Statement

This statement is pursuant to Section 54 of the UK Modern Slavery Act 2015 and is published on behalf of Managed Programs Industries (MPI), Performance Design, LLC, and MPI Europe GmbH (together, "MPI" or "the Group").

### **Introduction**

MPI is committed to acting ethically and with integrity in all business dealings. We oppose all forms of modern slavery and human trafficking and are dedicated to preventing these abuses within our own operations and throughout our global supply chains.

### **Our Business and Structure**

Managed Programs is a manufacturing group headquartered in Auburn Hills, Michigan, USA, with operations in the U.S., Germany, and Korea. Our affiliate companies include Performance Design, LLC (U.S.) and MPI Europe GmbH (Germany). We specialize in the design, tooling, and manufacture of high-performance carbon fiber, nylon, billet aluminum, and composite intake manifolds, as well as technical plastic components. Our supply chains span North America, Europe, and Asia.

### **Our Commitment**

MPI has a zero-tolerance approach to modern slavery and human trafficking. We are committed to ensuring compliance with the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, and equivalent laws in other jurisdictions where we operate.

Michigan addresses human trafficking through its Penal Code and a range of victim support programs. State initiatives include the criminalization of forced labor and debt bondage, the establishment of the Michigan Human Trafficking Commission, safe harbor protections for minors, expungement of certain offenses committed as a result of trafficking, and legislation that restricts state funds from supporting projects linked to forced or child labor.

### **Risk Assessment**

We employ a dedicated workforce at our facility and rely on a network of suppliers for raw materials, components, and services that support our operations. We recognize that certain aspects of manufacturing, including the use of temporary labor and reliance on third-party suppliers, present risks of modern slavery and human trafficking. We are committed to identifying these risks and taking appropriate action to eliminate them.

### **Policies and Governance**

To address these risks, we have taken proactive steps. We currently follow our Purchase Order Terms and Conditions for suppliers that affirm compliance with labor laws and prohibit forced or trafficked labor in their operations. MPI has also implemented policies and governance frameworks, including: a Group Code of Conduct, Supplier Standards & Contracts, Whistleblowing Policy, and Board Oversight.

We are also beginning employee training programs that raise awareness of the signs of modern slavery and provide clear reporting pathways if concerns arise. Our managers and supervisors will

be the first to receive this training, which will be extended more broadly across our workforce in the coming year.

### **Monitoring and Continuous Improvement**

Our commitment extends into the future. We will review and update policies annually, expand supplier audits, track and report progress, and strengthen global alignment across all operations. This ongoing effort reflects not only legal compliance with Michigan's anti-trafficking framework but also our voluntary commitment to transparency and ethical business practices in line with best international practices.

### **Approval**

This statement has been approved by the Board of Directors of MPI and applies to MPI, Performance Design, LLC, and MPI Europe GmbH.

Signed,

A blue ink signature of Caleb Newman, consisting of a stylized 'C' followed by a horizontal line.

Caleb Newman  
President  
Managed Programs Industries (MPI)  
September 16, 2025