

## Tesla Global Modern Slavery and Child Labor Transparency Statement

This statement is made on behalf of Tesla, Inc. and its subsidiaries, including reporting entities Tesla Motors Australia, Pty Ltd¹, Tesla Motors Limited², Tesla Motors Canada ULC³, and Tesla Toronto Automation ULC⁴(together, "Tesla"), for Tesla's fiscal year ending on December 31, 2024. We are publishing this statement under the Australia Modern Slavery Act of 2018, the UK Modern Slavery Act of 2015, the California Transparency in Supply Chains Act of 2010, and the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2023, as a demonstration of our commitment to combat modern slavery and child labor and an affirmation of the values we hold and adopt across Tesla's business operations and supply chain.

#### **Our commitment**

The ethical treatment of all people and regard for human rights is core to Tesla's vision of a sustainable future for all. We are committed to ensuring that the way we conduct our business reflects our values and our belief that everyone should be treated with dignity and respect.

In line with Tesla's mission to accelerate the world's transition to sustainable energy, Tesla is committed to ensuring that its operations and those of the companies in our supply chain respect human rights and protect the environment. We strive to maximize the positive impact of our supply chain for people and the planet. Our goal is that wherever Tesla's supply chain has an impact, local conditions for stakeholders continuously improve as a result of our purchasing decisions and relationships.

Combatting modern slavery and eliminating child labor requires collaboration between governments, civil society, international organizations, and the private sector. Tesla is committed to pursuing a holistic approach to identify, mitigate, and remedy modern slavery and child labor risks in our supply chain and operations. We will continue to learn from our experience and improve our programs year over year.

Tesla recognizes the International Labour Organization ("ILO") definitions of forced labor, modern slavery, and human trafficking and is committed to combatting any form of such abuses, including debt bondage, indentured labor and compulsory prison labor. We are committed to ensuring that our supply chain – from raw materials to final products – is free of such abuses and we will not knowingly accept products or services from suppliers that include forced labor or human trafficking in any form.

We will not tolerate any transporting, harboring, recruiting, transferring, or receiving of persons by means of threat, force, coercion, abduction, or fraud for labor or services. No worker may be coerced to work or subjected to physical punishment or threats of violence or other forms of physical, sexual,

<sup>&</sup>lt;sup>1</sup> Tesla Motors Australia, Pty Ltd, an indirect wholly owned subsidiary of Tesla, Inc., is an Australian proprietary company that sells Tesla vehicles and energy products.

<sup>&</sup>lt;sup>2</sup> Tesla Motors Limited, an indirect wholly owned subsidiary of Tesla, Inc., is a UK private limited company that sells Tesla vehicles and energy products.

<sup>&</sup>lt;sup>3</sup> Tesla Motors Canada ULC, an indirect wholly owned subsidiary of Tesla, Inc., is a Canadian unlimited company that sells Tesla vehicles and energy products.

<sup>&</sup>lt;sup>4</sup> Tesla Toronto Automation ULC, a direct subsidiary of Tesla Motors Canada ULC and an indirect wholly owned subsidiary of Tesla, Inc., is a Canadian unlimited company that specializes in designing and building advanced automation equipment, primarily for the production of Tesla's battery cells and related manufacturing processes.

psychological, or verbal abuse as a method of discipline or control. We also do not allow any direct or indirect control tactics, including threats, corporal punishment, or economic, emotional, or familial abuse at our facilities nor in the facilities of our suppliers.

All workers have the right to freedom of movement, and the conditions of employment must not restrict their movement through the retention of identity papers, holding of deposits, accommodation requirements, or any other action aimed at restricting worker mobility.

While modern slavery can impact any population, we acknowledge that some groups are more vulnerable than others. In our efforts, we take care to respect those most vulnerable or marginalized, including certain groups like migrant workers, contract, agency, and temporary workers, ethnic/religious minorities, indigenous peoples, and young or student workers.

In line with the Employer Pays Principle, no worker should be required to pay recruitment or other similar fees to secure or retain their employment. Tesla does not allow the use of recruitment fees or other related fees for employment such as application, recruiting, hiring, placement, or processing fees, from workers. The cost of recruitment should be borne by the employer. Tesla requires full reimbursement to workers who have paid recruitment fees or other related fees for employment.

We respect the rights of children and young workers. Tesla prohibits the use of child labor in our operations and supply chain. Tesla follows local and national laws restricting the employment of underage workers. Regardless of local laws, no workers at a facility or location that provides materials or services for Tesla or Tesla products may be under the age of 15. Should a case of child labor be identified within our supply chain – as defined by local law or younger than 15, whichever is more stringent – Tesla will take immediate action and ensure appropriate remediation. Tesla prohibits workers under the age of 18 from engaging in hazardous work or overnight work. If a worker under the age of 18 was found to be involved in hazardous or overnight work, we would remove them from the situation and provide alternative work that is age-appropriate and not hazardous.

Tesla also recognizes the Universal Declaration of Human Rights ("UDHR"), which focuses on dignity, respect and equality, without discrimination, for all people. In addition, we utilize the United Nations Guiding Principles on Business and Human Rights ("UNGPs") and the Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises. Tesla follows the Organization for Economic Co- operation and Development ("OECD") Due Diligence Guidance for Responsible Business Conduct, and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas when identifying, mitigating and reporting risks within our value chain. We look to the OECD Due Diligence Guidelines to inform our process and use feedback from our internal and external stakeholders to find ways to continually improve it.

Tesla sets Responsible Sourcing standards through our Responsible Sourcing policies and drives supplier conformance with those standards through our contracts and supplier guidelines. We have three Responsible Sourcing policies—the Supplier Code of Conduct, Global Human Rights Policy, and Responsible Sourcing Policy (together, our "Policies")— which are applicable to all suppliers, regardless of supplier type, to ensure we are upholding our commitment to Responsible Sourcing throughout our extended value chain. These policies are available to our suppliers on Tesla's Supplier Relationship Management Portal.

Our supplier guidelines address our policies on responsible sourcing of minerals and state our expectation that all Tesla suppliers are accountable for performing forced labor due diligence on their

supply chains in accordance with international standards and legal requirements. Our contractual terms with suppliers require compliance with our Policies and all applicable local regulations, including those regarding forced labor, modern slavery, and child labor in the countries where they are doing business. Our contracts include language and restrictions related to supply chain traceability and the removal of high-risk entities in the supply chain, and we require new suppliers to acknowledge Tesla's Supplier Code of Conduct during onboarding.

We foster compliance with our policies and supplier expectations by identifying potential risks in our extended supply chain, conducting assessments and audits at the Tier 1 and upstream level, and working in collaboration with suppliers to improve identified risks and mitigate potential future risks. We use multiple sources of information, including subject area experts, public reports and our involvement with organizations, to identify specific areas of concern on which we may need to conduct additional due diligence.

Where we find violations of our policies, we take appropriate actions to address the issue and improve supplier operations and conditions for workers. Tesla considers indicators of forced and child labor to be the highest severity of non-conformances and thereby prioritizes responding to these risks. Generally, we work in partnership with suppliers to review root causes, and as appropriate, approve plans to improve, remediate, and monitor evidence of improvement and worker engagement. If appropriate, Tesla may disengage with a supplier and not re-engage until evidence of remediation is provided and the supplier has strengthened its management systems to prevent future violations.

## Our organizational structure, business operations, and supply chain

Our business was founded in 2003, and we helped define and create the clean energy market. We design, develop, manufacture, sell, and lease high-performance fully electric vehicles and energy generation and storage systems, and offer services related to our products. For more information about our business and organizations, please see our annual report on Form 10-K for the year ended December 31, 2024, filed publicly with the U.S. Securities and Exchange Commission ("SEC").

Tesla, Inc. is headquartered in Texas, USA. As of December 31, 2024, Tesla had 125,665 full-time employees located in our subsidiaries and operations around the world.

Tesla's supply chain has a unique hybrid of traditional automotive and high-tech industry suppliers from around the world. We are highly dependent on the information provided to them by their respective supply chains. However, all of Tesla's supply chain partners, regardless of location in the supply chain, are subject to our Policies. Direct suppliers are required to provide evidence of the existence of policies that address, among other things, social issues.

Our Policies are the foundation for ensuring social and environmental responsibility and ethical conduct by our suppliers throughout our global supply chain — no matter the industry, region or materials, and including with respect to preventing the use of modern slavery, child labor and human trafficking. Tesla continues to identify and do business with organizations that conduct their business with principles that are consistent with our policies.

#### Our employees and those who work for our suppliers

Our recruitment procedures comply with the relevant local regulations and standards; we adopt a fair and equitable approach when scouting for talent; and all wages are compliant with local laws and regulations. Tesla also advocates freedom of employment, which means all work should be done voluntarily. No employee should be forced to work against their will. Our employees may terminate

their employment by giving any required contractual or statutory notice. Child labor and the employment of children below the applicable minimum legal age is strictly forbidden at Tesla. Tesla's Policies set out our approach to this matter and are applied throughout the company and across our global supply chain. Tesla employees must also adhere to our Code of Business Ethics (https://digitalassets.tesla.com/tesla-contents/image/upload/Business\_Code\_Of\_Ethics).

### Our supply chain

Tesla purchases thousands of parts, which we source globally from thousands of suppliers. We have developed close relationships with several key suppliers, particularly in the procurement of battery materials and certain other key system parts.

Our Policies are part of our ongoing efforts to ensure that social and environmental responsibility and ethical conduct exist throughout our supply chain, regardless of industry, region or materials. Annually, we publish an Impact Report that describes our efforts to identify and manage environmental and social risks in our global supply chain as well as disclose suppliers with whom we have a direct relationship in our battery supply chain. We also publicly file with the SEC a Conflict Minerals Report (most recently published on May 31, 2025, for FY24) with a description of our global due diligence efforts related to the sourcing of certain "conflict minerals," including tantalum, tin, tungsten and gold (known commonly as "3TG"). These reports also describe our broader efforts to work with our global suppliers to ensure they adhere to our policies.

#### How we manage modern slavery and child labor risks in our supply chain

In line with the UNGPs, identifying and prioritizing the most salient risks connected to Tesla's operations and supply chain is central to our human rights due diligence practices. In 2024, we continued to evaluate the risks and opportunities previously identified in our 2023 company-wide sustainability assessment. In particular, the potential for child labor and forced labor continue to be salient risks for Tesla because of the potential for harm if such incidents were to occur.

Our Global Human Rights Policy recognizes the potential for forced labor, modern slavery, child labor, and young workers as salient human rights and salient responsible sourcing risks to Tesla, in particular regarding suppliers or sub-suppliers located in countries that may have a higher risk of modern slavery or child labor, potential exposure to entities that may not comply with human rights and labor laws, and certain products and natural resources that may have higher modern slavery or child labor rights risks based on how they are produced or mined.

In response, Tesla has implemented the following risk assessment and mitigation activities:

- Risk assessment:
  - Prioritizing mapping high-risk supply chains to raw materials;
  - Understanding suppliers' existing policies and management systems related to forced labor;
  - Requiring suppliers to undergo independent, third-party audits, including assessment against the ILO indicators of forced labor through on-site inspections and confidential worker interviews;
  - Implementing a Tesla-specific program of social and environmental compliance audits that follows the Responsible Business Alliance ("RBA")'s audit guidance and assessing select suppliers on issues including their compliance with freely chosen employment. The assessments look for indicators of forced labor, such as:
    - Supplier sites where working hours exceed the 60-hour weekly

- threshold
- Share of foreign migrant workers
- Supplier sites with dispatch/contract workers
- Worker accommodation
- Use of third-party labor agencies
- Evidence of working hours document falsification, passport withholding, withheld wages, recruitment fees and inhumane treatment
- Implementing targeted assessments of suppliers with a higher risk of forced labor;
- Maintaining awareness of geographic risks, labor trends, and other factors through various sources;
- Incorporating NGO and other stakeholder reports (including feedback) to assess risk and inform business decisions;
- Screening suppliers using a combination of resources, including reputable thirdparty tools and experts, including legal advisors; and
- Incorporating the voices of workers, rights holders and rights defenders by providing avenues for those stakeholders to raise potential concerns, including anonymously through an Integrity Line that is available 24 hours a day, seven days a week.

### • Risk mitigation:

- Requiring suppliers to acknowledge our Supplier Code of Conduct at onboarding, which includes anti-forced labor provisions, and make anti-forced labor commitments in supplier contracts;
- Requiring suppliers to implement corrective action plans for gaps identified during audits or other avenues;
- Taking action against contractors and appropriate parties who fail to meet the requirements of our Policies, including potential termination of contract;
- Requiring our Tier 1 suppliers to certify that their materials incorporated into Tesla products comply with the applicable laws;
- Transitioning away from purchasing goods or services from any supplier that is believed to be engaging in non-compliant practices if the supplier does not take corrective actions and the violation is not remediated in a satisfactory manner;
- Engaging in multi-stakeholder working groups, such as those within the RBA and its associated Responsible Labor Initiative working group on forced labor, so we may better understand how we can enhance our efforts, contribute to others' understanding of best practices, stay up-to-date with industry trends and best practices, and support shared solutions;
- Training relevant employees to both raise awareness of the issues surrounding modern slavery and ensure that employees who work with suppliers are trained on issues of modern slavery and child labor, particularly with respect to identifying and mitigating such risks within our supply chain; and
- Expecting our suppliers and their respective suppliers to implement an effective grievance management system for their operations, reaching suppliers' workers and their legitimate representatives;
- When concerns are raised through our Integrity Line or other worker voice, grievance, and remedy channels, working with stakeholders to address conditions raised, as appropriate (Tesla utilizes a tracking system to document concerns raised by employees while protecting the identity of employees who wish to stay anonymous) to ensure follow-through and resolution and allow for appropriate teams to review data and consider proactive solutions.

### Examples of how we manage modern slavery risks across our supply chains include:

- <u>Progress on Tesla's own social and environmental compliance audit program:</u> 2024 marked the seventh year of the program.
  - Our audits of suppliers evaluate requirements such as:
    - All work must be voluntary
    - Regardless of local laws, no workers at a facility or location that provides materials or services for Tesla or Tesla products may be under the age of 15
    - Working hours are not to exceed the maximum set by local law.
       Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or uncommon circumstances
    - For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed
    - No harsh and inhumane treatment of workers
    - No harassment of or discrimination against workers
    - Process to cascade the Supplier Code of Conduct requirements to company's own suppliers and to monitor their compliance to the Code
  - We continue to push the automotive industry, and third-party audit firms, towards a greater global usage of social audits. For example, social audits have traditionally focused on suppliers located in China and the greater APAC region. We see value in expanding social audits to suppliers globally. These efforts will increase the respect for worker's rights and safety throughout the automotive industry. Tesla maintains strong engagement with our selected third-party audit firms, including through on-site training and performance evaluations designed to ensure a high and consistent level of quality for the auditors Tesla uses, and continues to push for increasing the number of experienced auditors globally.
  - We believe that our program has a long-term positive impact. For example, in 2024, for suppliers undergoing a re-audit, we saw continued improvement with an overall pass rate of 63%.
  - We further enhanced our efforts to improve our suppliers' capability to address non-conformances identified during our audits by embedding a Corrective Action Plan (CAP) review into the audit process requirements, regardless of whether a supplier must undergo a closure audit We also launched capacity building training sessions at supplier facilities. These enhancements supported our selected suppliers in addressing non-conformances identified during audits, resulting in a 72% pass rate in subsequent closure audits.
- Supplier Self-Assessment Questionnaire (SAQ): Launched in 2022, the SAQ is a tool used to identify and assess the potential adverse impacts of Tesla's supply chain operations on people, the planet, and communities. By having suppliers affirm that they have policies, processes, and controls in place at the manufacturing-site level consistent with Tesla's Supplier Code of Conduct requirements—including labor, health and safety, environment, ethics, and supply chain responsibility—we identify potential risk areas. This systematic process enables us to identify risks at scale based on actual supplier practices, which allows Tesla teams to proactively prioritize more extensive due diligence for high-risk suppliers based on the extent of the potential impact on workers' health, safety or fundamental human rights and the number of workers and employees impacted at the supplier site.
  - The SAQ pushes Tesla's responsible sourcing due diligence beyond generalized, inherent

- risk associated with certain commodities and countries and toward the identification of concrete risks by requiring each unique location providing production parts, materials, or services to Tesla to submit their respective responses. Tesla leverages this approach for all direct supplier categories, including batteries, aluminum, chemicals, and indirect materials and services, including service centers, construction, and on-site contractors.
- o In 2024, we increased the total number of supplier site responses by 44%, for a total of over 1,400 total SAQ submissions. Submissions reflect facilities across 40+ countries that employ over 2 million supply chain workers. The SAQ allows us to identify suppliers who lack policies on issues such as limits to overtime, overtime pay, and freely chosen employment, and ensure consistency of their practices with the requirements of our Supplier Code of Conduct.
- The main risks identified through our SAQs are: (a) insufficient risk prioritization due to reliance on abstract risk assessment only, (b) organizational visibility to identified risks, and (c) supplier policies and implementation on freely chosen employment and child labor.
- The associated actions to mitigate these risks include (a) using SAQ results to inform corporate social responsibility audit prioritization, (b) building analytics to inform supply chain managers of potential risks identified for their suppliers and (c) communicating results to supply chain stakeholders at all levels, and (d) developing and communicating Tesla's Freely Chosen Employment and Young Workers Guidelines to suppliers as guidance on expectations and requirements.
- Tesla Employee Training: Throughout 2024, we held monthly responsible sourcing trainings for the entire procurement team. These trainings included topics such as: supply chain mapping, CSR audits, monitoring supply chain risk, upstream positive impact. Each year around International Human Rights Day (December 11<sup>th</sup>) the training covers topics relevant to the intersection of Tesla and Human Rights. In 2024 it covered how Tesla works to defend, protect and advance human rights for workers throughout our value chain. During the Human Rights Day training, more than 450 supply chain employees were trained to communicate with suppliers on the Universal Declaration of Human Rights.
- <u>Supplier Training:</u> In 2024, we launched newly established capacity building training sessions at supplier facilities, which engaged 147 personnel from several suppliers' production facilities.
- <u>Acting on Grievances Raised:</u> In 2024, we received concerns related to responsible sourcing through various grievance channels. These concerns were assessed, and where substantiated, they were mitigated. We continue to address issues related to indicators of modern slavery as they arise.

## Key achievements in 2024:

- 226 audits completed through our own CSR Audit Program
- 34 audits completed at lithium, nickel, and cobalt mines and refiners, including 14 (a 180% year-over-year increase) against the Initiative for Responsible Mining Assurance (IRMA), recognized widely as the most robust standard
- 465 additional responses across 40+ countries received through our SAQ
- 15,000+ supplier contacts informed of Tesla's human rights expectations and Integrity Line

- 6,821 workers at our suppliers reimbursed for recruitment fees
- Developed supplier-facing guidance documents developed and communicated on Freely Chosen Employment and Young Workers

Below is a list of these indicators and their identified prevalence as observed through our CSR audits.

Indicator that led to deeper assessment against ILO Indicators of Forced Labor to evaluate vulnerabilities and inform further improvement measures needed	% of CSR auditees where indicator was identified
On-site worker accommodation	59%
Use of dispatch or contract workers	58%
Use of third-party labor agencies	39%
Use of foreign migrant workers	7%

In 2024, through our deeper assessment, we identified areas of concern. Below are examples of these areas and how we mitigated them.

Supply	Areas of concern	Examples of Tesla Implemented/Initiated
chain		Measures
Several	Excessive overtime	Suppliers created corrective action plans to
		reduce working hours and were re-assessed for
		improvement during follow-up closure audits
Several	Worker-paid	Since 2023, thousands of supplier workers have
	recruitment fees	been reimbursed by their employers (Tesla's
		suppliers) based on Tesla's requirement for
		suppliers to implement the Employer Pays
		Principle
Drive unit	Withholding of	Supplier-established procedure to no longer
	wages	deduct from workers' wages costs including
		passport renewal fees, residential permits and
		labor agency monthly service fees.
Battery	Retention of	Tesla initiated an investigation for additional
	personal identity	information, implementation of a corrective
	documents or	action plan, and raised expectations for changes
	passports	in policy
Chassis	Deception through	Suppliers provided translated employment
and power	unclear	contracts and pay slips based on migrant workers'
electronics	communications	nationalities, so that migrant workers can
supply		understand their employment terms,
chain		entitlements, and wages calculations.

The U.S. Department of Labor 2024 List of Goods Produced by Child Labor or Forced Labor identifies several inputs to Tesla products as a risk. Below is how we manage modern slavery and child labor risks in

## those supply chains:

#### Gold

- Conducted due diligence in line with the OECD Due Diligence Guidance for Responsible Minerals Supply Chains, including surveying our supply chain to understand the 3TG smelters and refiners in Tesla's supply chain. We continue to require our direct suppliers to source only from smelters and refiners ("SoR") that are certified to a globally recognized due diligence framework or otherwise meet Tesla's expectations.
- In 2024, Tesla contributed to the RMI Audit Fund, funding four Responsible Minerals Assurance Program (RMAP) assessments to increase compliant smelters and refiners in Tesla's supply chain. Where a supplier provides us with information that one or more SoR in our supply chain is not certified, we request information on their current actions and timelines to remove that SoR. We continue to explore opportunities to strengthen our approach to responsible sourcing of 3TG.

#### Mica

- In recognition of the risk of child labor in the mica supply chain, Tesla engages with its Tier 1 suppliers and requires that they are or become members of the Responsible Mica Initiative.
- In 2024, we investigated into a prioritized mica supply chain and uncovered broad, contextual challenges poverty, impacts of climate change, limited access to quality education, weak child protection systems, and lack of alternative livelihoods which compound to exacerbate certain supply chain vulnerabilities. In line with the UN Guiding Principles, we remain engaged to drive traceability, formalization, and systemic improvements, while recognizing these efforts will take time and are not the complete solution. We are committed to embedding responsible sourcing practices as we scale and work to address root causes, not just symptoms.
- Main risks identified and actions taken:

Supply Chain Tier	2024 Assessment Conducted	Tesla Employee s Shadowe d?	Findings	Mitigation actions
Tier 1 (located in Asia)	1) Corporate Social Responsibility Audit against Tesla's Supplier Code of Conduct	Yes	Certain practices related to Labor and Health and Safety, including: working hours, days of rest, fire systems, emergency exits and worker-paid health exam fees	Supplier developed corrective action plans, for example, the repayment of employment fees to workers were verified by the audit firm
Tier 2 Exporter/Pr ocessing Facility (located in Africa	1) Audit against Responsible Mica Initiative's Global Mica Processor Standard and OECD Due Diligence Guidance, including management and worker interviews  2) Child Labor and Child Rights Light Assessment, including community consultation	Yes	Certain management systems related to Labor and Health and Safety leading to lack of formal labor structure, lack of supply chain due diligence and lack of traceability	Audit firm developed corrective action plan. Tesla and a Tier 1 supplier commissioned external capacity building programming for a tier 2 supplier, with module 1 consisting of on-site training and follow-ups focused on strengthening management systems and module 2 to be implemented in 2025

Artisanal	1) Audit against	Yes	Certain pay structure in mica supply	A third party retained by Tesla evaluated the
and small-	OECD Due		chain may not fully address needs of	feasibility of implementing Better Mining's
scale	Diligence		individuals who have few or no	monitoring, corrective action and traceability
mining	Guidance,		alternatives to mica mining,	program, working to identify the mine sites in
(ASM)Mines	including worker		particularly amidst poverty	our supply chain and digitally trace materials
(located in	interviews		exacerbated by climate impacts,	to Tesla's tier 1 suppliers. With support from
Africa)			leading to lack of organizational	tier 1 and tier 2 suppliers, implementation
	2) Child Labor and		structure, leading to potentially weak	will continue in 2025+ to enable improved
	Child Rights Light		labor practices and inadequate safety	conditions and traceability
	Assessment,		conditions	
	including			
	community			
	consultation			
	3) Rapid			
	Assessment			
	against CRAFT			
	Code			

# Silica

 Tesla continued to focus on supply chain mapping and due diligence for our solar supply chain, gaining visibility into upstream suppliers down to the polysilicon level.

#### Cobalt

- In 2024, we direct sourced >61% of the cobalt that goes into our batteries. This allows for increased leverage for environmental and social impact at mining and refining level and strong traceability. For materials that we do not direct source, we apply the same supply chain mapping and due diligence requirements.
- As part of our risk mitigation efforts, all of our direct cobalt suppliers (mines and refiners) completed an audit, and 10 cobalt suppliers completed an audit against a Tesla-preferred international standard covering environmental and social risks. Tesla maintains regular engagement with Non-Governmental Organizations (NGOs).
  - In 2024, our direct cobalt supplier conducted a comprehensive thirdparty audit against the Copper Mark a comprehensive responsible
    mining standard. The audit showed that our supplier met criteria
    related to 'no child labor', 'respect for human rights', 'business
    integrity', and 'revenue transparency'. This audit is in addition to a
    series of audits and assessments over the past 3 years, which
    included a human rights risk assessment, developing a procedure to
    gather, review and respond to community requests, and assessing
    existing grievance mechanism against expectations laid out in the
    UNGPs.
- O While all of Tesla's sources are industrial mines, we continue to co-fund the Fair Cobalt Alliance (FCA) working to improve conditions and livelihoods for artisanal and small-scale mining (ASM) in the DRC. We remain committed to staying engaged in the DRC to invest in communities that form the backbone of the cobalt mining industry.
- In 2024, the Fair Cobalt Alliance accomplished the following:
  - 23 children who were found working in ASM enrolled in a comprehensive remediation program that includes re-integration to education, living stipends, and health and psycho-social support
  - 27 local community savings and loans groups were deployed
  - 4,000 artisanal miners were trained on safety standards
  - 131 roofs were constructed over underground tunnels to stabilize pit entry and prevent flooding, and 8 underground ventilators were installed to improve air quality

#### Assessing the effectiveness of our actions

In 2024, Tesla continued to expand the scope and breadth of its responsible sourcing efforts to take a closer look at how we are sourcing our materials and to better understand the potential risks of those sourcing decisions. We strive to continually improve in our efforts to identify and respond to issues within our supply chain and track improvements over time. In line with the UNGPs, the table below outlines how our activities map to the UNGP framework and the progress we have made towards combatting modern slavery and child labor in 2024.

UNGP R	eporting ork	Our Priority	Progress Against Priority in 2024
	Policy Commit- ment	Our policies are best in class and are updated every two years with input from diverse stakeholders	We updated our Global Human Rights     Policy and Responsible Sourcing Policy     in Q1 2025. Both policies are publicly     available:     https://www.tesla.com/legal/addition     al-resources
PART A: Governance of Respect for Human Rights		Combatting modern slavery and child labor remains a priority for Tesla's Responsible Sourcing team and is integrated into business decisions, including in discussions with senior management	In 2024, we committed more resources to combat forced labor risk in our supply chain and continued to discuss salient issues with management.
	Embedding respect for human rights	Suppliers are aware of our expectations	<ul> <li>Our standard supplier contract includes requirements related to responsible sourcing.</li> <li>Tesla responsible sourcing policies are available on our public website and in our supplier relationship management portal. 15,000+ supplier contacts were notified of Tesla's human rights expectations and Integrity Line.</li> <li>Our Supplier Code of Conduct and policies are translated into multiple languages, available on our website, and annually communicated to all suppliers.</li> </ul>
		Tesla colleagues are trained in identifying and mitigating human rights risks	In 2024, more than 450 supply chain employees trained to communicate with suppliers on the Universal Declaration of Human Rights.
		We incorporate lessons learned and continually improve our response	<ul> <li>Engaged external stakeholders to incorporate their feedback on our previous disclosures, overall strategy and policies.</li> <li>Utilized our improved screening process to vet current and potential suppliers and pre-empt risks before they enter our supply chain.</li> </ul>

	Statement of Salient Issues	By updating Tesla's salient issues proactively every two years, our efforts match our operating environment	•	Continued to evaluate the saliency of risks and opportunities previously identified in our company-wide sustainability assessment, in particular the potential for child labor and forced labor.
	Determination of Salient Issues	Our saliency assessment incorporates the perspective of internal and external stakeholders	•	Engaged with civil society, investor groups, representatives of impacted communities, employees, and industry experts to finalize our list of salient issues.
ocus of Reporting	Choice of Focal Geographies	Our mitigation efforts correspond to high risk geographies and countries from which we source	•	Scored various commodities and localized our efforts in certain sourcing regions.
PART B: Defining a Focus of Reporting	Additional Severe Impacts	We comprehensively identify, mitigate and remedy severe human rights impacts	•	See our latest Impact Report for progress on other salient human rights risks.

PART C: Management of Salient Human Rights Issues This part of the disclosure focuses on Forced Labor, Modern Slavery, Human Trafficking, and Child Labor	Specific Policies	We increase awareness of our human rights policies and commitments	<ul> <li>Tesla responsible sourcing policies are available both in the public domain and in our supplier relationship management portal.</li> <li>Supplier Code of Conduct and policies are translated into multiple languages.</li> </ul>
	Stakeholde r Engageme nt	We participate in cross- industry groups and collaborative efforts to improve our understanding and our approach to collectively addressing and combatting modern slavery and child labor	<ul> <li>Member of the Responsible         Business Alliance</li> <li>Member of Responsible Minerals         Initiative Emerging Minerals Working         Groups (Lithium, Nickel)</li> <li>Member of the Fair Cobalt         Alliance Steering Committee</li> <li>Member of the Board of the Global         Battery Alliance and on the Steering         Committee of the Battery Passport.</li> </ul>
	Assessing Impacts	We audit our suppliers and evaluate progress year over year on a range of environmental, social and governance issues including policies and indicators of forced labor risk	<ul> <li>226 initial and closure CSR audits at Tier 1 suppliers with 100,00+ workers impacted.</li> <li>Require suppliers to undergo a specialized audit focused on their facility labor practices.</li> <li>Where violations are identified, work with suppliers to review root causes, approve plans to improve and remediate issues, and monitor evidence of improvement and worker engagement. We may pause sourcing from a supplier until identified issues are remediated, or transition away from a relationship when a violation is not resolved.</li> </ul>
	Integratin g Findings and Taking Action	We improve our tools and processes to be better able to identify and mitigate risks	Our ongoing screening process includes third party risk intelligence tools that provide further information on potential linkages with high-risk areas or suppliers.  • Deployed in-depth mapping exercises for high-risk supply chains to proactively increase our understanding of our sourcing practices.
PART C: Mana Human Traffi	Tracking Performan ce	Tesla develops a strong monitoring and evaluation program for addressing human rights risks	Continue to clean data to be able to develop system integration tools that will allow us to better understand trends and patterns in our supply chain risk profiles.

Ren	nediation	We continuously improve and enable effective remedy if Tesla causes, contributes or is linked to human rights harm	<ul> <li>Our third-party grievance mechanism is publicly available.</li> <li>Track supplier progress against corrective action plans to ensure suppliers close findings in a timely manner.</li> <li>Since 2023, 6,821 supplier workers were reimbursed over \$490,000 by their employers after we identified instances where workers were charged recruitment or other fees for employment; as a form of remediation, we require reimbursement of the full cost of such fees.</li> </ul>
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## Internal collaboration and oversight

Tesla maintains a specialized Responsible Sourcing team within its Supply Chain Organization to lead human rights and environmental due diligence efforts. These efforts cover all of Tesla's subsidiaries throughout the world, including those in Australia, Canada and the UK. Our responsible sourcing efforts are overseen internally by executive representatives from Supply Chain. We regularly report on progress and review our responsible sourcing efforts with cross-functional representatives from Global Compliance, Environmental Health & Safety, Global Trade Compliance, Internal Audit, Investor Relations, Legal, and Sustainability, among others, to keep other areas of the organization informed of our efforts and support with prioritization of our efforts to maximize impact. In addition, our Board of Directors is informed of our policy updates and human rights efforts. We also engage external groups on a regular basis to provide feedback on our approach to responsible sourcing.

#### **Continuous improvement**

Tesla continues to improve upon its responsible sourcing program in line with the company's growth and supply chain developments.

A more detailed overview of Tesla's supply chain human rights and environmental due diligence can be found in Tesla's publicly available 2024 Impact Report.

This statement is given on behalf of Tesla, Inc. and its subsidiaries, including Tesla Motors Limited, for Tesla's financial year ending 31 December 2024. This statement sets out our evaluation of risks of modern slavery in our business and the actions taken during the financial year to address these risks and prevent modern slavery and human trafficking in our operations and supply chains. For purposes of compliance with the UK's Modern Slavery Act 2015, this statement has been approved by the Tesla Motors Limited Board of Directors and is signed by a director of that entity on the date indicated below.

By: \_\_ Chaber

Name: Joseph Gruber

Title: Director

Date: June 13, 2025

\* \* \*

This statement is given on behalf of Tesla, Inc. and its subsidiaries, including Tesla Motors Australia, Pty Ltd, for Tesla's financial year ending 31 December 2024. This statement sets out our evaluation of risks of modern slavery in our business and the actions taken during the financial year to address these risks and prevent modern slavery and human trafficking in our operations and supply chains. For purposes of compliance with Australia's Modern Slavery Act 2018, this statement has been approved by the Tesla Motors Australia, Pty Ltd Board of Directors and is signed by two directors of that entity on the date indicated below.

By: \_\_\_\_\_\_\_\_\_
Name: David Jon Feinstein

Title: Director Date: June 10, 2025

Name: Kenneth Moore

Title: Director Date: June 10, 2025

By:

\* \* \*

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the statement for Tesla Motors Canada ULC and its subsidiary Tesla Toronto Automation ULC. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the statement is true, accurate and complete in all material respects for the purposes of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, for the reporting year listed above.

I have the authority to bind Tesla Motors Canada ULC and Tesla Toronto Automation ULC.

Name: David Jon Feinstein

Title: Director Date: May 28, 2025

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