

**HELLA STATEMENT  
AUSTRALIAN MODERN  
SLAVERY ACT**

**01.01.2023 to 31.12.2023**

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## 1. Introduction

This statement covers the reporting period of HELLA Australia from January 01, 2023, to December 31, 2023, and is made pursuant to Part II, section 14 of the Australian Modern Slavery Act 2018 and has been prepared in consultation with all reporting entities registered in Australia, as listed below:

- HELLA Asia Pacific Pty Ltd. ABN 46 004 516 947
- HELLA Asia Pacific Holdings Pty Ltd. ABN 59 007 958 787
- HELLA Australia Pty. Ltd. ABN 77 006 245 524

In this statement “HELLA Australia” refers collectively to all the reporting entities above registered in Australia. HELLA Australia is part of the HELLA group (HELLA) and has locally incorporated global standards issued by the parent company HELLA.

HELLA is a listed, internationally positioned automotive supplier operating under the umbrella brand FORVIA. Within this de facto group, HELLA stands for high-performance lighting technology and automotive electronics. At the same time, the company covers a broad service and product portfolio for the spare parts and workshop business as well as for manufacturers of special vehicles with its Lifecycle Solutions business group. HELLA has more than 37,000 employees at over 125 locations worldwide and generated sales of 8.0 billion Euros in the 2023 financial year (1 January to 31 December 2023).

This statement details the actions HELLA Australia has taken to assess and address modern slavery risks in its own operations and supply chains.

HELLA continuously adapts its company-specific regulations to changing conditions. We strive to continuously improve the transparency of our processes and our measures to extend our due diligence obligations.

## 2. FORVIA/HELLA Values

Our corporate culture is rooted on six company values: We Drive with vision, We build on accountability, We cultivate teamwork, We embrace agility, We act with respect, We believe in open-mindedness.



These values shape our quest to meet and exceed the expectations of our customers, suppliers, business partners and shareholders, in all daily operations.

HELLA is committed to respecting human rights in its own business and its value chain. We reject all forms of forced or compulsory labour, modern slavery and human trafficking and do not make use of any forms of forced and compulsory labour in its activities. All practices shall be in line with the Core ILO Conventions on Forced Labour.

We are aware that forced and compulsory labour can manifest in various forms including modern slavery, human trafficking. Forced or compulsory labour means any work or service which is obtained from a person under the threat of any penalty and which the person has not offered voluntarily. Forced or compulsory labour practices can include among others servitude, withholding original identity documents, movement restrictions, debt bondage work or other types of coercion.

### **3. Our Structure, Operations and Supply Chain**

#### **Our Structure and Operations**

HELLA has been operating in Australia since 1961. **HELLA Asia Pacific Pty. Ltd.** is a company of the HELLA group and is responsible for the local operations and non-operating subsidiaries. It is the leading reporting and tax entity in Australia. The primary subsidiaries of HELLA Asia Pacific Pty Ltd. are HELLA Asia Pacific Holdings Pty. Ltd., HELLA Australia Pty. Ltd., HELLA New Zealand Limited and HELLA India Electronics Pvt. Ltd.

**HELLA Asia Pacific Holdings Pty Ltd.** owns the local operating and non-operating subsidiaries.

**HELLA Australia Pty. Ltd.** is the responsible sales entity.

#### **Supply Chain**

The HELLA purchasing department is responsible for an annual worldwide purchasing volume of more than 4 billion for production materials, capital goods and services in the calendar year 2023. Production materials account for the largest share. At HELLA, we are convinced that working in a trusted





partnership with our suppliers is a key factor for success. We rely on partnerships and cooperating with our suppliers to fulfil our and our customers' high expectations. We thus strive to build close relationships with suppliers and incorporate them in our business processes.

The HELLA group maintains supplier relationships with several thousand strategic suppliers worldwide. This complex structure entails a certain risk that violations of human rights in the supply chain may occur.

HELLA Australia works with around three hundred suppliers. The majority (+80%) of HELLA Australia's suppliers are Australian based companies who are providing goods or services in the following categories:

- Component parts
- Rental
- Electricity, gas and water services
- Local freight and customs clearance services

Approximately 40% of the HELLA Australia sales emanate from products imported from HELLA New Zealand with imports mainly from Europe, USA, India, and China accounting for the balance.

## **4. Risks of Modern Slavery in Operations and Supply Chain**

### **Operations**

HELLA employees more than 37.000 employees worldwide. As a responsible employer, HELLA has the obligation to ensure the protection and promotion of the human rights related to working conditions. The [HELLA Human Rights Policy](#) sets standards and clearly describes our expectations with regard to human rights related issues that may occur in our operations.

It covers among other aspects:

- No Child Labour
- No Forced Labour and Free Choice of Employment
- Freedom of Association and the Right to Collective Bargaining



- Non-Discrimination and Equal Opportunity
- Adequate Wages and Benefits
- Working Hours
- Education and Training
- Right to Health and Safety
- Due Diligence in cases of Land Acquisition
- Expectations towards Security Personnel

To identify human rights risks in its own operations, HELLA has designed a holistic human rights risk assessment approach, which is stepwise being rolled out at the company sites. This human rights risk analysis is being performed yearly or on ad-hoc basis. HELLA's Management Board and other involved departments are informed about the results of the risk analysis on a regular or ad hoc basis. For the calendar year 2023, HELLA has conducted an internal Human Rights Risk Assessment by performing corporate and risk - based local human rights risk analysis in order to verify HELLA's risk & control approach on human rights.

## **Supply Chain**

To ensure that HELLA's suppliers respect international human rights standards, including the prohibition of any form of forced labour, HELLA has rolled out the binding HELLA Code of Conduct for Suppliers and Service Providers throughout its supply chain. Furthermore, HELLA started to introduce its Human Rights Policy detailing the efforts that our company takes to avoid any violations of human rights in its supply chain.

HELLA recognizes that human rights violations continue to exist globally. As HELLA sources around the world, we may, in limited cases, be indirectly exposed to human rights risks. Such risks may for instance include business relationships in our direct or sub-supply chain with suppliers in risk countries with weaker governance related to human rights. Also, HELLA might be exposed to supplier entities not operating in compliance with regional regulations or international standards. HELLA has only limited transparency over its sub-supply chain and the related workforce. Further risks may include resource-related risks. HELLA products contain for instance conflict minerals (so-called "3TGs" tin,



tantalum, tungsten, and gold), mica or cobalt which may in mining or production be associated with higher risks of modern slavery or further human rights violations.

## **5. Actions taken to assess and address Modern Slavery risks**

### **Policies to Address Modern Slavery**

HELLA is committed to comply with global laws and regulations and to conduct business with integrity and in an ethical manner. All HELLA companies are subject to HELLA policies and guidelines. They include the HELLA Code of Conduct, HELLA Human Rights Policy, as well as the HELLA Code of Conduct for Suppliers and Service Providers, which incorporates requirements in the supply chain.

#### **HELLA Code of Conduct**

All HELLA employees are bound by HELLA's Code of Conduct<sup>1</sup> worldwide. It serves to distinguish right from wrong behaviour and to master the legal challenges that arise in our everyday cooperation with colleagues, customers, suppliers, other business partners and third parties. It sets out, for example, provisions of labour law and social principles by which HELLA clearly rejects all forms of forced labour, including slavery and human trafficking.

#### **HELLA Code of Conduct for Suppliers and Service Providers**

The HELLA Code of Conduct for Suppliers and Service Providers<sup>2</sup> is intended to ensure that business activities along our value creation chain comply with international standards and conventions. This document summarizes our expectations towards suppliers and service providers in terms of working conditions, occupational health and safety, business ethics and the environment.

We expect our suppliers to conduct their business activities in a socially and ecologically responsible manner and to adhere to our Code of Conduct for Suppliers and Service Providers. HELLA procures a significant proportion of its overall purchasing volume from major suppliers in OECD countries with standards and processes related to respecting human rights.

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<sup>1</sup> <https://www.hella.com/en/Company/Compliance-258/>

<sup>2</sup> <https://www.hella.com/en/Company/Compliance-258/>





## **HELLA Human Rights Policy**

As Hella operates globally and has global supply chains, HELLA is committed to respect internationally recognized human rights. The HELLA Human Rights Policy<sup>3</sup> was issued in May 2022 by the HELLA Management Board. The policy describes the fundamental human rights respected and protected at HELLA which are related to working conditions and environment, including free choice of employment, prohibition of child labour, forced labour, modern slavery, human trafficking and rejects any form of harassment or torture. The policy describes the human rights due diligence approach HELLA has adopted within our company and supply chains, measures in place to avoid human rights violations, risk assessment procedures, remedial actions, complaint procedure and how we document the entire process. The HELLA Human Rights Policy applies to all employees, business partners and suppliers and complements other HELLA policies and guidelines which refer to human rights and the environment. The FORVIA Human Rights training course was rolled-out in 2023, mandatory for all employees, with the purpose of raising awareness on the relevance and due diligence approach regarding Human Rights in FORVIA's own business and supply chain and information on the available reporting system in case of infringements.

HELLA is committed to support the internationally recognized human rights based on the principles contained in the following international standards:

- International Bill of Human Rights
- The Fundamental ILO Conventions, including ILO C29 - Forced Labour Convention (1930), ILO C105 - Abolition of Forced Labour Convention (1957) and Protocol of 2014 to the Forced Labour Convention (1930).
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
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<sup>3</sup> <https://www.hella.com/en/Company/Compliance-258/>





## **Contractual Clauses**

By accepting the HELLA Code of Conduct for Suppliers and Service Providers and the Human Rights Policy, HELLA's strategic suppliers commit themselves to act responsibly and adhere to the principles outlined above. We expect our suppliers to ensure that their own suppliers and service providers likewise observe and follow these principles.

## **Due Diligence**

We endeavour to avoid adverse effects on human rights which may be caused by our business activities throughout the value chain.

HELLA verifies compliance with the HELLA Code of Conduct and the HELLA Human Rights Policy for Suppliers and Service Providers by means of spot checks and implemented the sustainability assessment by EcoVadis, a service provider specializing in business sustainability ratings, for selected strategic suppliers. Information on environmental performance and sustainability is obtained through risk-based sustainability assessments of selected strategic suppliers and through other measures such as self-disclosure for specific topics. In addition, HELLA asks its strategic suppliers to certify their management systems related to sustainability risk areas such as environmental management (ISO 14001) or health and safety management (ISO 45001).

The results are considered in our annual supplier evaluation process and a purchasing criterion for new business. For suppliers with deficits, action plans with corrective measures are drawn up to ensure that expectations are met within a reasonable timeframe. HELLA reserves the right to terminate relationships with suppliers in the event of persistent serious violations.

## **Reporting Tool**

HELLA does not tolerate any violations of the Human Rights policy or the Code of Conduct or regulations. Misconduct must be reported to superiors, managing directors or compliance and legal officers. Our web-based reporting system "tellUS!" is available not only to employees, but also to business partners and other external stakeholders worldwide, who can use this reporting channel to report possible violations of laws and other serious misconduct anonymously and in mother tongue, if required. The reporting portal can be always accessed directly via the HELLA intranet site as well as via the HELLA website.



## Training

To further raise awareness among employees, we rely on targeted training measures. These include training on the Code of Conduct as well as communication measures. The acknowledgment of the Code of Conduct and the Human Rights Policy is anchored in our onboarding.

## 6. Assessing Effectiveness

HELLA approaches the mitigation of risks related to modern slavery in our own operations and in our supply chains in various ways. During the reporting period, our focus was to gain a better understanding of the potential risks and identify the related suppliers. A holistic assessment of the effectiveness of our measures has not yet been completed. During this reporting period, HELLA includes the sustainability performance of its strategic suppliers in its annual supplier evaluation. We will continue to evolve the assessment and develop related KPIs. We are currently establishing further measures to address modern slavery risks in our supply chains via a sustainability-assessment of our strategic suppliers. Any such measures will also be implemented on a local level in HELLA Australia.

## 7. Process of Consultation with the group and subsidiary entities

In drafting this statement, HELLA Australia has consulted with central stakeholders at HELLA group level, as coordinated global and local measures and controls are needed in complex international supply chains.

This statement has been approved by the boards of each of the three reporting entities covered by this statement.

### **Darren Robinson**

Managing Director HELLA Asia Pacific Pty Ltd.

HELLA Asia Pacific Pty Ltd. | ABN 46 004 516 947

HELLA Asia Pacific Holdings Pty Ltd. | ABN 59 007 958 787

HELLA Australia Pty. Ltd. | ABN 77 006 245 524

A handwritten signature in black ink, appearing to be 'Darren Robinson', is written over the text of the signature block.