HELLA STATEMENT
UK MODERN SLAVERY ACT

01.01.2025 to 31.12.2025

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1. INTRODUCTION

This Statement on Slavery and Human Trafficking is published in accordance with the UK Modern Slavery Act for HELLA GmbH & Co. KGaA (hereinafter 'HELLA'), headquartered in Lippstadt, Germany. It covers the fiscal year from 01 January 2025 to 31 December 2025 and applies to all consolidated HELLA subsidiaries[1] listed in the 2025 Annual Report[2], including HELLA Ltd. and HELLA UK Holdings Ltd. in the United Kingdom.

2. ABOUT HELLA AND OUR SUPPLY CHAIN

About HELLA

FORVIA HELLA is a listed international automotive supplier. As a company of the FORVIA Group, FORVIA HELLA stands for high-performance lighting technology and vehicle electronics and, with the Lifecycle Solutions Business Group, also covers a broad service and product portfolio for the spare parts and workshop business as well as for manufacturers of special vehicles. With currently around 34,000 employees at over 125 locations, the company is active worldwide and generated adjusted sales of €8.0 billion in the fiscal year 2025.

About our Supply Chain

HELLA Purchasing is responsible for an annual purchasing volume of more than € 5 billion for production materials, capital goods and services in the calendar year 2025. Production materials account for the largest share. At HELLA, we are convinced that working in partnership with our suppliers is a key factor for success. We rely on partnerships and cooperating with our suppliers to fulfil our customers' high expectations. We thus strive to build close relationships with suppliers and incorporate them in our business processes.

HELLA maintains supplier relationships with hundreds of suppliers worldwide. This complex structure entails a certain risk that violations of human rights in the supply chain may occur. We expect our suppliers to conduct their business activities in a socially and ecologically responsible manner and to adhere to highest standards. HELLA procures a significant

1 Joint ventures, HELLA Gutmann Solutions and Docter Optics including subsidiaries are separately responsible for managing their supply chains and personnel and are therefore not considered here.

[2] https://www.hella.com/forvia-com/assets/documents/HELLA_Annual_Report_FY2025_secured.pdf

proportion of its overall purchasing volume from major suppliers in OECD countries, in which high standards and processes related to respecting human rights are valid.

3. RISKS OF MODERN SLAVERY IN OPERATIONS AND SUPPLY CHAIN

Own Operations

HELLA employees around 34.000 employees worldwide. As a responsible employer, HELLA has the obligation to ensure the protection and promotion of the human rights related to working conditions, such as described in our Human Rights Policy:

- 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. 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 2024, 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

HELLA expects its suppliers and business partners to respect international human rights standards, including the prohibition of any form of forced labour. HELLA has thus rolled out the binding HELLA Code of Conduct for Suppliers and Service Providers throughout its supply chain. Furthermore, HELLA has established 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. Further risks may include resource-related risks. HELLA products contain for instance conflict minerals (so-called "3TGs") and the extended minerals list (tin, tantalum, tungsten, and gold, cobalt, mica, copper, nickel, lithium and natural graphite) which may in mining or production be associated with higher risks of modern slavery or further human rights violations.

4. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

We endeavour to avoid adverse effects on human rights which may be caused by our business activities throughout the value chain. Thus, we have formulated our expectations related to human rights in our policies and take actions to verify compliance with these.

OUR POLICIES

We are committed to comply with globally with all applicable laws and regulations and to conduct business in a fair manner. All HELLA companies are subject to HELLA policies and

guidelines. The HELLA Human Rights Policy[3] as well as our Code of Conduct for Suppliers and Service Providers[4] incorporate sustainability requirements in the supply chain.

HELLA Code of Conduct

All HELLA employees are bound by HELLA's Code of Conduct[5] 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 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 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 FORVIA Human Rights training course was rolled out in 2023 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.

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.

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

[3] https://www.hella.com/forvia-com/assets/documents_global/Human-Rights-Policy-2024_EN.pdf

[4] https://www.hella.com/forvia-com/assets/documents_global/Code-of-Suppliers-2025.pdf

[5]https://www.hella.com/forvia-com/assets/documents_global/Code_of_Conduct_2024-EN.pdf

- International Bill of Human Rights
- The Fundamental ILO Conventions, including ILO C29 - Forced Labour Convention, ILO C105 - Abolition of Forced Labour Convention and Protocol to the Forced Labour Convention
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises

Child Labour Prevention Guideline

HELLA rejects all forms of child labour and has therefore implemented an internal policy in order to prevent any form of child labour in its subsidiaries. The Child Labour Prevention Guideline is a supportive document of the HELLA Human Rights Policy that states the prohibition of child labour and provides the framework for the conditions in which a person under 18 years can be employed and the type of work permitted. It describes preventive measures applicable in all locations to reduce the risk of child labour occurring in HELLA operations and remedial actions applicable in case of infringements.

Forced Labour Prevention and Ethical Recruitment Guideline

HELLA rejects all forms of forced or compulsory labour, modern slavery and human trafficking and does 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. HELLA is furthermore committed to adhere to ethical recruitment standards. It has therefore implemented an internal policy in order to prevent any form of forced or compulsory labour and to ensure ethical recruitment standards. The Forced Labour Prevention and Ethical Recruitment Guideline is a supportive document of the HELLA Human Rights Policy that states the prohibition of forced labour and provides for due diligence measures and standards applicable in the recruitment and employment process to prevent forced labour.

HELLA Code of Conduct for Suppliers and Service Providers

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

By accepting the HELLA Code of Conduct for Suppliers and Service Providers, 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

HELLA verifies compliance with its sustainability expectations by means of spot checks and implemented the sustainability assessment by Ecovadis, a service provider specializing in business sustainability ratings, for selected strategic suppliers. HELLA has established a risk assessment for direct suppliers based on country risk, business impact and Ecovadis rating. Suppliers that are observed as potential risk suppliers from this analysis are further investigated to make sure a certain standard is met for Environment and Human Rights. 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 as 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 audit suppliers and terminate relationships with suppliers in the event of persistent serious violations.

REPORTING TOOL

HELLA does not tolerate any violations of the Code of Conduct. Misconduct must be reported to superiors, managing directors or Compliance & Legal Officers. Our web-based reporting system "tellUS!" is available not only for employees, but also for business partners and other stakeholders, who can use this reporting channel to report possible violations of laws and other

serious misconduct anonymously, if required. The reporting portal can be accessed directly via the HELLA intranet site as well as via the HELLA website.

TRAINING AND COMMUNICATION

To further raise awareness among employees, we rely on targeted training measures. This includes training on the Code of Conduct as well as extensive communication measures. The communication and confirmation of the Code of Conduct- and HELLA Human Rights Policy is also anchored in the HELLA onboarding process.

HELLA continuously adapts its company-specific regulations to changing conditions. We strive to continuously improve the transparency of our procurement processes and our measures to extend the duty of care.

Approved and signed on behalf of the Management Board

Lippstadt, 11.05.2026

Prof. Dr. Peter Laier

CEO
HELLA GmbH & Co. KGaA