

Human Rights Policy



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Equal rights is one of FORVIA's basic principles. For better readability, where the following text refers to a specific gender, it should be understood to address all genders.

Foreword



Dear Colleagues, Business Partners, and Stakeholders,

At FORVIA, acting responsibly is fundamental to how we operate across our value chain.

This Human Rights Policy reaffirms our commitment to internationally recognized standards and to ensuring integrity, respect, and accountability in everything we do.

We expect the same level of commitment from our partners and provide a confidential Speak Up channel for any concerns.

Together, we are building a safer, fairer, and more sustainable future.

Martin Fischer
Chief Executive Officer, FORVIA



Dear Colleagues, Business Partners, and Stakeholders,

At FORVIA HELLA, human rights are not an abstract concept. They are about the actual working conditions, safety, and dignity of every individual connected to our business.

With this Human Rights Policy, we reaffirm our commitment to integrating human rights due diligence into our daily business operations. This means going beyond written principles: it means actively identifying risks in our supply chains, collaborating transparently with our partners, and taking corrective action when necessary. I am firmly convinced that true leadership is measured by how we treat one another. I therefore encourage each of you to embrace this policy not as a document, but as a shared commitment to concrete action, every single day.

Thank you for joining us on this journey.

Prof. Dr. Peter Laier
Chief Executive Officer, HELLA

1. Introduction

FORVIA, a global automotive technology supplier, comprises the complementary technology and industrial strengths of Faurecia and HELLA. With over 150,000 people, including more than 15,000 R&D engineers across 40+ countries, FORVIA provides a unique and comprehensive approach to the automotive challenges of today and tomorrow. Composed of six Business Groups and a strong IP portfolio of over 13,000 patents, FORVIA is focused on becoming the preferred innovation and integration partner for OEMs worldwide.

Our corporate culture is rooted in six basic 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. At FORVIA, responsibility for people is not a concept merely for internal consideration; instead, it is a priority that extends throughout the entire value chain. Against this background, FORVIA strives, inter alia, to work with suppliers who respect human rights.

This policy sets out the aspects regarding human rights and the environment FORVIA expects from its employees, business partners and suppliers. It describes the human rights and environment due diligence approach within our company and in our supply chain: how we assess the risks, what measures we take to avoid human rights infringements, plans for remedial actions, a complaints procedure where employees and stakeholders can report human rights and environment violations anonymously and how we document this process.

FORVIA is committed to respect human rights.
The FORVIA Human Rights Policy is based on the following international standards:

- » **International Bill of Human Rights consisting of Universal Declaration of Human Rights (1948), International Covenant on Civil and Political Rights (1966) and International Covenant on Economic, Social and Cultural Rights (1966)**

- » **The Fundamental ILO Conventions as stated by the ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up (1998)**

- » **UN Guiding Principles on Business and Human Rights (2011)**

- » **OECD Guidelines for Multinational Enterprises (2011)**

This Human Rights Policy applies to all FORVIA employees, business partners and suppliers and complements other FORVIA policies and guidelines which make reference to human rights and the environment, such as, but not limited to: FORVIA Code of Conduct and the FORVIA Code of Conduct for Suppliers and Service Providers; nevertheless, FORVIA's human rights and environment expectations as stated in the FORVIA Human Rights Policy shall prevail in case of conflicting provisions between these policies and guidelines.



FORVIA

2. Respecting Human Rights and Environmental Obligation

FORVIA is committed to respect internationally recognized human rights and protect the environment. The company expects its business partners and suppliers to act in the same manner.

HUMAN RIGHTS RELATED TO WORKING CONDITIONS

2.1 No Child Labour

FORVIA rejects all forms of child labour, including the worst forms of child labour (e.g., illicit activities or work which is likely to harm the health, safety or morals of children). The childhood, dignity, health, safety and education of children must be respected and protected.

The minimum age of employment of young people, as well as their health, safety and morals in an employment relationship shall comply with the provisions of the Core ILO Conventions¹.

2.2 No Forced Labour and Free Choice of Employment

FORVIA 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 Conventions².

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, with holding original identity documents, movement restrictions, debt bondage work or other types of coercion.

At FORVIA, employees are free to choose their employment and to end their employment relationship at any time in line with respect of a reasonable notice period according to local law.

¹ ILO C138 - Minimum Age Convention (1973) and ILO C182 - Worst Forms of Child Labour Convention (1999)

² ILO C29 - Forced Labour Convention (1930), ILO C105 - Abolition of Forced Labour Convention (1957) and Protocol of 2014 to the Forced Labour Convention (1930)

2.3 Freedom of Association and the Right to Collective Bargaining

FORVIA recognizes the rights to freedom of association and collective bargaining, in line with local law³.

At Employees shall have the right to establish and to join unions or employee representative bodies, to elect their own representatives and to organize their activities. FORVIA remains neutral during these activities. The employees or their representatives shall not be subject to any form of discrimination based on their union membership.

In countries where these rights are restricted by local law, local solutions for keeping an open dialogue with the employees are taken into consideration.

2.4 Non-Discrimination and Equal Opportunity

FORVIA rejects all forms of discrimination on the grounds of age, race, colour, sex, language, religion, political or philosophical ideas, national or social origin, property, birth, sexual orientation, gender identity, marital status, pregnancy, parenthood, health or disability, union activity or any other status protected by law. The company is committed to equality of treatment and opportunity⁴, as well as to the principle of equal remuneration for work of equal value regardless of gender⁵. Employees shall be recruited, hired, remunerated or promoted based only on their qualifications and skills.

At FORVIA, employees are treated in a humane manner, with dignity and respect. FORVIA values diversity and encourages an inclusive work environment. The company strongly rejects any behaviour which creates an offensive, hostile or intimidating work environment as well as all forms of harassment, including sexual harassment and mental or physical abuse.

■ 3 ILO C87 - Freedom of Association and Protection of the Right to Organise Convention (1948) and ILO C98 - Right to Organise and Collective Bargaining Convention (1949)
4 ILO C111 - Discrimination (Employment and Occupation) Convention (1958)
5 ILO C100 - Equal Remuneration Convention (1951)

2.5 Wages and Benefits

FORVIA is committed to remunerate its employees with an adequate wage which is amounting to at least the minimum wage as established by the local law or determined in accordance with the regulations of the place of employment, so that a decent living for the employee can be ensured. Local living costs and the local social security benefits shall be taken into account.

2.6 Working Hours

At FORVIA, working hours shall comply with local laws. FORVIA values health and safety of all employees and thus complies with local laws regarding break periods, rest and leisure times.

FORVIA supports the balance between professional and personal life. The different FORVIA sites are developing appropriate local measures to support employees further.

2.7 Education and Training

FORVIA takes the development and further training of its employees seriously. FORVIA provides education and training programs so that employees can develop their skills, maintain their performance and keep employability levels high in the long run. Employees' potentials are developed through different training programs.

FORVIA is focusing on technical training as well as personal development on a global scale. Access to further education and training is based on the principle of equal opportunities for all employees.

2.8 The Right to Health and Safety

As an employer, FORVIA ensures compliance with all legal and social regulations. It protects and respects the human rights to health and life. FORVIA's health and safety standards focus on a culture of prevention. With the corporate occupational health and safety management system based on international standards, FORVIA aims to prevent accidents at all workplaces around the world. FORVIA demands

that all employees adhere to strict and clear safety rules at all times. The company continuously trains employees in line with their roles and raises their awareness for safety related aspects. FORVIA analyses binding global standards and health and safety risks systematically and develops corresponding programs. FORVIA closely monitors its health and safety performance.

FORVIA fosters the continuous improvement of the occupational health and safety management by exchanging best practices, conducting audits and certification procedures according to international standards.

Where appropriate, FORVIA also expects its business partners to monitor and control the levels of industrial noise to avoid noise pollution.

2.9 Land Acquisition

For acquiring, developing, or using land or buildings, FORVIA has developed and implemented standard processes and rules regarding the steps and checks needed to be taken before acquiring land or buildings. This includes full due diligence with regards to ownership, actual use and future development possibilities. During these processes, consideration to the human rights that might be affected is given.

2.10 Security Personnel

Whenever using security personnel belonging to FORVIA or external parties, human rights shall be respected during their activities. In respecting the right to life, no one shall be subject to torture, inhumane or degrading treatment.



HUMAN RIGHTS AND THE ENVIRONMENT

The preservation of natural resources which are the basis for future generations is part of FORVIA's corporate responsibility. FORVIA acts in an environmentally responsible manner at all times. The company recognizes the importance of transitioning to a low carbon economy. A safe and clean environment is a precondition to realize human rights. FORVIA has set carbon neutrality targets and aims to develop products that support the conservation of natural resources.

To this end, FORVIA has established an environmental management system at all production sites, which gets certified on a regular basis. Through environmental risk assessments and high environmental standards based on legal regulations, industry standards, and international environmental conventions, FORVIA strives to avoid any harm to the health of people and the environment.

This includes activities regulated by international conventions¹, such as the ban on the use of mercury and other specific chemicals, as well as the disposal and export of hazardous waste.

■ 1 Minamata Convention on Mercury (2013)
Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (1989)
Stockholm Convention on Persistent Organic Pollutants (2001)



3. FORVIA Human Rights Due Diligence Approach

Within FORVIA's Own Business

FORVIA shall analyze the human rights and environment-related risks yearly as well as on an ad hoc basis if the risk situation is changing significantly. In FORVIA's own business area, the internal risk analysis shall be carried out on a corporate and local level; findings from the complaints procedure shall also be taken into account. The human rights and environment risks identified shall be appropriately prioritized. Based on the results of the FORVIA's internal risk analysis, appropriate preventive measures will be developed, if necessary.

The results of FORVIA's internal risk analysis shall be communicated internally to the Management Board and other relevant departments annually.

If human rights or environment violations are discovered, appropriate remedial action to prevent, end or minimize the extent of the violation shall be taken without delay. The effectiveness of the remedial actions shall be reviewed yearly or on an ad hoc basis.

Within FORVIA's Supply Chain

FORVIA commits to responsible procurement. As a global company with a complex, international, and dynamic supplier network FORVIA is aware of its social responsibility along supply chains and expects human rights to be respected and the environment to be protected by its suppliers. The resulting minimum requirements for direct suppliers are defined in the contractual clauses, in this Human Rights Policy and in the FORVIA Code of Conduct for Suppliers and Service Providers, which are part of FORVIA's general purchasing terms and conditions.

The FORVIA partner agrees to comply with all applicable national laws and other regulations in the context of its business operations at any time. Furthermore, the business partner shall comply with all requirements and demands of FORVIA with respect to ethics, social acceptability, environmental sustainability, protection of biodiversity and natural ecosystems, deforestation and forest degradation. The

business partner acknowledges the importance of animal welfare and commit to uphold these standards throughout the Contract. Detailed requirements are summarized in the FORVIA Code of Conduct for Suppliers and Service Providers and this FORVIA Human Right Policy, which have been received by the Business Partner and which are also available at the URL address below:

www.forvia.com/en/suppliers

FORVIA Partners shall comply with requirements for Conflict Minerals, Social and Labor Requirements stated in the FORVIA Code of Conduct for Suppliers and Service Providers and the FORVIA Human Right Policy and is responsible for addressing these requirements to its own suppliers, subcontractors, and service providers.

FORVIA partners are requested to be regularly assessed by the sustainability rating company EcoVadis to meet yearly scoring target announced by the FORVIA group.

FORVIA pursues a risk-based approach to identify, evaluate and eliminate violations of human rights and environmental obligations in its supply chains. FORVIA reserves the right to check its suppliers' compliance with human rights and environmental obligations through supplier self-assessments, onsite visits and audits. If violations of human rights or environment obligations are discovered in any of these assessments, remedial actions must be taken in a reasonable amount of time. If suppliers do not remedy the identified violations, FORVIA reserves the right to restrict the business relationship with these suppliers.

The results of the human rights and environment risk analysis in the supply chain shall be communicated internally to the Management Board and other relevant departments.

4. Complaints Procedure

The FORVIA business partner is requested to inform FORVIA about any infringements with regards to the FORVIA Code of Conduct for suppliers and service providers and the FORVIA Human Right Policy. FORVIA is also offering the following whistleblowing platforms.

FORVIA HELLA's and FORVIA Faurecia's web-based reporting systems "**tellUS!**" and **speak^{UP}** is available to all FORVIA employees to report possible violations of human rights and environmental obligations, laws and other serious misconduct, if wished anonymously. Not only employees, but also business partners and other stakeholders - including the direct and indirect suppliers - can use this reporting channel always to report such suspected violations including notable violations of human rights and environmental laws and rules.

The reporting portal can be accessed directly via FORVIA HELLA or FORVIA Faurecia intranet as well as via FORVIA HELLA's or FORVIA Faurecia's public website.

HELLA: hella.whistleblownetwork.net

FAURECIA: www.faurecia.ethicspoint.com

FORVIA has a dedicated organization, including the Compliance Office, which manages incoming complaints in a confidential, impartial and diligent manner according to established procedural rules.



5. Implementation of the FORVIA Human Rights Policy

Within FORVIA's Own Business

This policy applies to and is binding for all organizational units and holding companies in which FORVIA directly or indirectly holds shares of more than 50 %. In the case of minority shareholdings and memberships in organizations, those who represent the FORVIA Group on the respective decision-making bodies shall take all necessary measures to ensure compliance with the principles set forth in this policy. This policy applies to and is binding for all employees of the FORVIA Group and members of the corporate bodies of the FORVIA companies, regardless of their position, function or level of employment.

All the necessary steps shall be taken to ensure that employees are aware of the human rights and environment principles contained in this policy and that these principles are binding. The Human Rights Policy shall be communicated to the employees in an appropriate manner. Employees are expected to adhere to these principles in their day-to-day work.

Within FORVIA's Supply Chain

FORVIA expects human rights and environmental obligations to be respected within supply chain.

Therefore, FORVIA's purchasing contractual terms stipulate the obligation of direct suppliers to comply with the human rights and environmental obligations and FORVIA's right to check if they comply with it. The direct suppliers of FORVIA are required to appropriately address human rights and environmental obligations within their business activities and in their supply chains.

6. Final Clauses and Review

Governance

The framework for FORVIA's sustainability activities is defined by the FORVIA HELLA Management Board as well as the FORVIA Faurecia Executive Committee. They decide on targets and initiatives within the group. At FORVIA, human rights and environmental obligations are part of the HR, Compliance and Sustainability activities.

The Human Rights Officers of FORVIA Faurecia and FORVIA HELLA connect stakeholders and evaluate new requirements. In order to avoid human rights and environmental violations the Human Rights Officers are responsible for the overarching activities related to human rights and environment, such as the implementation of these principles. For this purpose, the Human Rights Officers will report annually or on an ad-hoc basis to the Management Board and Executive Committee about the steps taken to avoid violations of human rights and environmental obligations.

Documentation and Reporting FORVIA will report annually on its human rights and environment due diligence in its own activities and in its supply chain. Documents related to these activities are going to be kept and made available to selected stakeholders as stated by law.

Contact

In case of questions related to this Human Rights Policy, please contact FORVIA HELLA's Sustainability Council via email at:

sustainability.hella@forvia.com

Review of the Policy

Human Rights and environment due diligence is an ongoing and dynamic process as human rights and environment risks may change over time and FORVIA's operations and operating context may evolve. For this reason, FORVIA will review this policy whenever it is necessary or required.

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