# **GROUP HUMAN RIGHTS AT WORK**



The Vitesco Technologies Group is a supplier of modern drive technologies and electrification solutions for sustainable vehicles. Its product portfolio comprises electric drive units, electronic controls, sensors, actuators, and solutions for treating exhaust gases. With more than ten years' experience in electric vehicles, Vitesco Technologies offers trailblazing solutions for all the possible steps to electrification that will be taken for all the drive technology developments in the future. The Company has production and development sites in all growing markets (China, Europe, and North America). In the 2022 fiscal year, the Group achieved sales of €9.1 billion and had 38,043 employees at approximately 50 sites. Vitesco Technologies Group AG is the parent company and has been based in Regensburg, Germany since September 30, 2021.

www.vitesco-technologies.com

# CONTENTS

# Vitesco Technologies Group Human Rights

#### Preface

1. Foundation of the Human Rights Policy

#### 1.1. Company Values

- **1.2. General Principles**
- 2. Our Management System Approach
- 3. Protection of Human Rights and Environment-Related Rights
- 3.1. Child Labor and Young Workers
- **3.2.** Ban of Forced Labor / Freely Chosen Employment
- **3.3. Freedom of Association and Collective Bargaining**
- **3.4.** No Harsh or Inhumane Treatment
- **3.5. Non-discrimination and Equal Opportunities**
- 3.6. Wages and Benefits
- 3.7. Working Hours
- 3.8. Use of Private or Public Security Personnel
- **3.9.** Protection of Local Communities and Indigenuous People
- 3.10. Protection of Human Rights Defenders
- 3.11. Health & Safety
- **3.12. Environmental Due Diligence**
- **3.13. Business Ethics**
- 3.14. Supply Chain Due Diligence



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# PREFACE



K Embedded within our corporate culture, human rights due diligence remains a crucial focal point for us. >>

Ingo Holstein, Chief Human Resources Officer (CHRO)



Cur ongoing commitment involves employing a management system framework to pinpoint and execute preventative and responsive strategies addressing human rights and environmental vulnerabilities. This allows us continuously to improve our human rights-related due diligence and challenge the effectiveness of our established processes in different business activities. >>

Weili Zang, Global Head of Sustainability Audits & System

Preface

1. Foundation

2. Approach

3. Protection

# Vitesco Technologies Group Human Rights Policy



- Vitesco Technologies places labor standards and the safeguarding of human rights as central tenets in all its operations. We enforce guidelines concerning working hours, salaries, and social advantages, while maintaining a strict zero-tolerance stance against human rights violations including modern slavery, as well as instances of harassment, discrimination, and violence. >>
  - Dr. Anja Rivera de la Cruz, Global Head of Sustainability & Security



At Vitesco Technologies, we firmly believe that companies can only be successful long-term if they respect and protect human rights. Sustainable economic growth, along with increases in productivity and quality can only be achieved with responsible corporate governance. >>

Thilo Schneider, Global Human Rights & CSR Manager





# PREFACE

Our employment and workplace standards, as laid out in this Human Rights Policy, complementing our Code of Conduct for employees and the Business Partner Code of Conduct, are therefore also in line with the Code of Conduct of the Responsible Business Alliance (RBA standard). Vitesco Technologies is committed to upholding the highest standards of human rights, and in case of any inconsistency between this policy and other relevant documents, the policy that provides greater protection to human rights will apply. We use this Human Rights Policy as a rule and framework to safeguard Human Rights and high workplace standards in all our business activities and to assist our company in managing our operations as well as guiding our Business Partners to be compliant with our standards and regulations. The policy, thus, defines the minimum employment and workplace rules at Vitesco Technologies that our company and employees as well as Business Partners must follow and rightsholders impacted by our business can rely on. This Human Rights Policy applies to entire Vitesco Technologies, comprising all internal employees, contract employees, students, executive staff, executive directors, and members of the executive board. Further it also applies to all Vitesco Technologies subsidiaries,

Ethical business conduct and social responsibility are important pillars of Vitesco Technologies' ambition to actively drive sustainability along the value chain. Therefore, it is a priority for Vitesco Technologies, as globally acting company, to respect and promote human rights and ethical standards at workplaces and in all business activities. We are committed, in accordance with the principles of the United Nations Global Compact, to support and respect human rights and not to engage in human rights abuses - this is done in accordance with the General Declaration of Human Rights as referred to in the UN Guiding Principles on Business and Human Rights. We act in accordance with the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We follow the OECD Guidelines for Multinational Enterprises and actively support the Sustainable Development Goals. Rising levels of commercial and financial globalization can increase economic volatility, labor market vulnerability, job insecurity and inequality within the countries Vitesco Technologies operates in. Against this background, we strive to provide a fair and attractive working environment with personal freedom and empowerment, opportunities for training and career, and a special focus on diversity, equity, inclusion, and flexibility. Accordingly, our employees, business partners and people including minority holdings, business partners, suppliers, within our supply chain shall be treated with respect and and dealers. dignity, while our business operations are conducted ethically, in a socially responsible and environmentally sustainable way.

1. Foundation

2. Approach

3. Protection





# 1. FOUNDATION OF THE HUMAN RIGHTS POLICY





3. Protection

# Vitesco Technologies Group Human Rights Policy



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The policy contains three sections. Section 1 outlines the basic principles guiding our way we do business. Section 2 briefly describes our management system approach and section 3 lists the human rights and environment-related risks to be respected in order to manage conformity to this policy.

### **1.1. COMPANY VALUES**

The general foundation for this Human Rights Policy is built by Vitesco Technologies' Company Values. These Company Values, Passionate, Partnering and Pioneering, are key to our group culture of reflecting, acting, and interacting with each other. They form guidelines through which everyone of us can contribute to the success of the organization. We measure ourselves against these values, and our business partners congruently.

Coherent with our Company Values, we expect our management team, employees, and our business partners to conduct their business activities with the utmost honesty, fairness, and responsibility regarding human rights topics, employment, and workplace standards. Only sustainable and responsible actions will provide for future business success.

### **1.2. GENERAL PRINCIPLES**

Vitesco Technologies, in all its activities, operates in full compliance with the laws, rules, and regulations of the countries in which it operates. Local laws must be respected even when there is full compliance to the Group Human Rights Policy. If, however, there are differing standards between the standards codified in this Policy and local law, we define conformance to this Policy as meeting the stricter requirements.

2. Approach

3. Protection

# Vitesco Technologies Group Human Rights Policy

#### **1.2.1.** Local v/s International

Human rights are not restricted to local boundaries but crossing national and cultural boundaries. In Vitesco Technologies, the Human Rights Policy is based on agreements which the international community has endorsed to protect and promote the rights of people at work, regardless of their nationality or culture. At the same time, the General Principle of the Human Rights Policy respects local laws and regulations which are necessary to our businesses to function in a regulated manner.

#### **1.2.2. Highest Standards**

Vitesco Technologies' Human Rights Policy is based on international laws and regulations that form an organizational specific set of standards, the organization and all relevant stakeholders must comply. At the same time, the Human Rights Policy requires strict compliance with local laws and regulations. In those rare cases, where there is a discrepancy between the Human Rights Policy, local legislation or benchmark industry standards, the higher standard shall be applied, whichever affords greater protection to the individual.

#### **1.2.3. Shared Responsibility for Good Practice**

As a global organization, Vitesco Technologies sets highest standards of compliance. However, it is not

possible in this policy to set out all the legal requirements relevant to the conduct of our employees' workers', and business partners' action, for each of the countries where Vitesco Technologies and its subsidiary operate. Knowing, understanding, and following the local laws is the basic obligation of our country organizations and of all our partners.

#### **1.2.4. Transparency and Accountability**

Vitesco Technologies commits to be transparent about its human rights performance, including regular reporting on human rights impacts and the measures taken to address them. Our goal is to enable stakeholders to hold us accountable for our human rights performance and to identify areas for improvement. By being transparent and accountable, we aim to build trust with stakeholders and demonstrate our commitment to respecting human rights.





# 2. OUR MANAGEMENT SYSTEM APPROACH



2. Approach

3. Protection



Vitesco Technologies sees the identification of human rights and environment-related risks as well as the implementation of preventive and remedial measures as an ongoing task and therefore follows a management system approach.



# Vitesco Technologies Group Human Rights Policy

The Human Rights Management System at Vitesco Technologies establishes effective processes to respect human rights across the Group and the value chain and enables us to achieve continuous improvement through human rights-related due diligence in all business processes.

The effective management of human rights requires the coordination of various management systems, demanding collaboration across multiple functions:

- > The Human Relations Management System
- > The Occupational Health and Safety Management System
- > The Environmental and Energy Managements **Systems**
- > The Compliance Management System
- > The Human Rights Management System

Based on this integrated management systems approach, Vitesco Technologies implements and promotes (a) compliance with applicable laws, regulations and stakeholder requirements; (b) conformance with international guidelines on human rights and responsible business conduct, including the RBA Code, as well as internal rules and regulations; and (c) identification and

mitigation of operational risks, including the disclosure of the results of the risk assessment and effectiveness checks of the management system.

As a common ground, all Management Systems encompass several standard elements including:

- > Our company's commitment
- > The indication of management accountability and responsibilities
- > Processes to identify legal and further requirements
- > Risk assessment and management
- > Improvement objectives according to a Plan-Do-Check-Act cycle
- > Training and communication
- > Feedback and grievance mechanisms
- > Audits and assessments
- > Corrective action processes and continuous improvement
- > Documentation through internal rules and process landscape
- > Supplier and business partner responsibilities





The Human Rights Management System itself is managed under the direction and supervision of the Human Rights Officer (Menschenrechtsbeauftragter), who reports directly to the CHRO and acts independently and without instruction in this role. The task of the Human Rights Officer is performed by the Head of Group Sustainability & Security, who monitors the implementation of human rights due diligence and is responsible for regular and ad hoc reporting to the Executive Board. The Global Human Rights & CSR Manager is responsible for the operational aspects of the due diligence processes, including the regular implementation of risk analyses as well as prevention and remediation management.

To be able to identify and assess our human rights and environment-related risks across the Group, we have created an additional committee, the Human Rights Committee. It is made up of risk-relevant functions from Purchasing, HR, Environment, and Occupational Safety departments, as well as central employee representatives and representatives from our locations.

The Human Rights Committee is tasked with analyzing the risks arising from within our own business area and our supply chain and identifying the priority risks. Furthermore, it is the Committee's task to decide on preventive and remedial measures and to evaluate and review the adequacy and effectiveness of all measures taken by Vitesco Technologies.

For more detailed description of the human rights management system please visit our website or the intranet to access our Policy Statement on respect for human rights according to § 6 Para 2 of the German Supply Chain Due Diligence Act.





( Preface

1. Foundation

2. Approach

3. Protection



# **3. PROTECTION OF HUMAN RIGHTS AND ENVIRONMENT-RELATED RIGHTS**



Preface

1. Foundation

2. Approach

3. Protection





Ultimately, our commitment to safeguarding human rights and environment-related rights includes but are not limited to the following rights:

#### **3.1. CHILD LABOR AND YOUNG WORKERS**

Child Labor is an intolerable violation of fundamental human rights and has been shown to hinder children's development, potentially leading to lifelong physical or psychological damage. Child Labor is therefore strictly forbidden and not to be entertained in any stage of employment in the organization and/or its business activities and business relations. The determination of the minimum working age in a par-

ticular country, along with regulations pertaining to the employment of young workers, will be established based on either the International Labor Organization (ILO) conventions or the applicable national/regional laws, whichever provides greater safeguards for individuals. In any case, the minimum age for admission to employment must not be less than the age for completing compulsory schooling, and not less than 15 years. An appropriate mechanism to verify the age of employees at the time of joining the organization is set up in the recruitment system. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Persons under the age of 18 years shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Considering student employment practices, a minimum age of 13 years is permitted only for light working

Preface

1. Foundation

2. Approach

3. Protection

# **Vitesco Technologies** Group Human Rights Policy

condition. For hazardous working conditions, a minimum age of 18 years needs to be adhered. Vitesco Technologies and its business partners properly manage student workers through adequate maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. In addition, appropriate support and training is provided to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level

workers performing equal or similar tasks. If child labor is identified, immediate assistance/remediation is provided.

#### **3.2. BAN OF FORCED LABOR /** FREELY CHOSEN EMPLOYMENT

At Vitesco Technologies, forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services. There shall be no unreasonable restrictions on employees' and workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities including, if applicable,

workers' dormitories or living quarters. Everybody must have the right to decide whether to engage in work, or not.

Any actions taken to impede on this right are considered a violation of a person's right to freely choose their employment and against Vitesco Technologies Responsible Recruitment Principles, which cover all hiring practices, including the practices of third parties such as employment agencies and recruiters. Preventative measures are in place to address the most common root causes of forced labor and to facilitate the responsible recruitment of directly or indirectly hired employees:

1. Ensure documents or valuables are not retained. All employees and workers shall be free to leave work at any time or terminate their employment without penalty when there is no breach of any contract and/or if reasonable notice period is respected as per employee's or workers' contract. At any point in time, Vitesco Technologies, its subsidiaries or any parties representing the organization may not forcefully hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits unless otherwise required by the law. In case of an existing law, at no time should employees be denied access to their documents.









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Preface

1. Foundation

2. Approach

3. Protection

# Vitesco Technologies Group Human Rights Policy

2. Ensure contract terms and conditions are clear and understood by workers. As part of the recruitment process, all employees and workers must be provided with a written employment agreement or offer letter containing a description of terms and conditions of employment. Upon request, the agreement or offer letter must be provided in a language the employees and workers can understand. Foreign delegates and/or migrant employees must receive the employment agreement prior to the employee departing from his or her home country and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the host country unless these modifications are made to meet local law and provide equal or better employment terms.

3. Ensure a strict NO RECRUITMENT FEES policy

is established: Employees and workers shall not be required to pay Vitesco Technologies, its subsidiaries or third parties recruiting for the organization any kind of recruitment fees or other related fees for their employment. If any such fees are found to have been paid, such fees shall be repaid immediately.

#### **3.3. FREEDOM OF ASSOCIATION** AND COLLECTIVE BARGAINING

Vitesco Technologies promotes open and effective communication in the workplace and believes this to be one of the cornerstones of social and environmental compliance. Therefore, it is essential that employees and workers have a voice in the workplace and exercise their right to choose the methods by which they may communicate with management.

Vitesco Technologies does not seek to promote, nor prevent, the lawful formation of workers' organizations, in particular trade unions, but protects the right of employees and workers to make their own choices in this regard, free of unlawful interference. At the same time, Vitesco Technologies respects the right of all employees and workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Employees, workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate forms of worker representations.

#### **3.4. NO HARSH OR INHUMANE** TREATMENT

Everybody involved with Vitesco Technologies and its business activities shall be treated fairly and reasonably and has a right to be free from cruel or oppressive treatment. No practice of harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of employees is tolerated; nor is the threat of any such treatment.

Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated





to employees and workers. Everybody shall have access to the rules and regulations of the workplace in the language they understand. It is fundamentally important to train employees and workers in these rules and regulations, the consequences of breach of rules and regulations, and the available systems of appeal. Employees and workers must be able to challenge any unreasonable disciplinary practices. Such practices must not be arbitrary.

#### **3.5. NON-DISCRIMINATION AND EQUAL OPPORTUNITIES**

Vitesco Technologies is committed to providing employees with a respectful workplace free of harassment and unlawful discrimination. Unlawful discrimination or harassment, e.g., based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, illness, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status, is prohibited. Furthermore, the mentioned unlawful discrimination does not stand valid during a hiring process and are as well not valid grounds for termination of employment. The principle of equal pay for work of equal value must apply regardless of the criteria mentioned above.

Employees and workers shall be provided with reasonable options to practice their religion. In addition, pursuant to ILO Discrimination (Employment and Occupation) Convention (No.111), employees and workers or potential employees and workers should not be subjected to medical tests (unless legally required or required to ensure workplace safety), including pregnancy or virginity All use of temporary, dispatch and outsourced labor

tests, or physical exams that could be used in a discriminatory way.

At Vitesco Technologies, our ambition is to have an environment where all talents can thrive to their fullest potential, and we expect all employees to uphold this virtue. We continue to shape our culture of belonging by listening and learning, instilling accountability, actively developing, and retaining our talent and working every day to be positive role models. We support the UN Women's Empowerment Principles and strongly encourage its business partners to formally support these principles in their own operations as well as their supply chains.

### **3.6. WAGES AND BENEFITS**

Vitesco Technologies respects the right of all workers to earn a living wage, a wage that meets basic needs for workers and their families and provides some discretionary income. Compensation paid to employees and workers shall at a minimum comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, employees and workers shall be compensated for overtime at pay rates greater than regular hourly rates. Arbitrary deductions from wages as a disciplinary measure (e.g., for non-appropriate behavior towards other employees or for being late to work) shall not be permitted. For each pay period, employees and workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.



2. Approach

# **Vitesco Technologies** Group Human Rights Policy

will be within the limits of the local law. We follow the principle of equal pay for equal work based on objective criteria.

## **3.7. WORKING HOURS**

Regulated working hours is one of the key interests of Vitesco Technologies human relations management as the company strongly believes in balance of work and leisure. Working excessive hours is clearly recognized to pose danger to employees' and workers' health and to their families. Strain reduces productivity, increases turnover time, and increases injury and illness. Therefore, working hours are not to exceed the maximum set by local law.

Appropriate rest period between two working days shall be granted as well as annual holidays as per the regulations are guaranteed. The sum of regular and overtime hours in a week shall not exceed 60 hours in a 7-day period, unless there are exceptional circumstances. In such cases, all the following conditions must be met:

- > this is permitted by law
- > appropriate safeguards are taken to protect workers' health and safety
- > emergency or unusual situations (specially for plant locations).
- > Permitted by a collective agreement (if applicable) freely negotiated with a workers' organization representing a significant portion of the workforce.
- > All overtime must be voluntary





### **3.8. USE OF PRIVATE OR PUBLIC** SECURITY PERSONNEL

We do not tolerate unlawful conduct on the part of security personnel toward employees or third parties. If security forces or security service providers are used, they must ensure internationally recognized human rights are respected and that security personnel receive adequate guidance and training in accordance with the principles contained in the International Code of Conduct for Private Security Service Providers by the ICoCA. This includes:

- > to operate in a manner that recognizes and supports the rule of law, respects human rights, and protects the interests of their clients
- > to take steps to establish and maintain an effective internal governance framework to deter, monitor, report, and effectively address adverse impacts on human rights
- > to respect the human rights of persons they encounter, including, the rights to freedom of expression, association, and peaceful assembly and against arbitrary or unlawful interference with privacy or deprivation of property

#### **3.9. PROTECTION OF LOCAL COMMUNITIES AND INDIGENUOUS** PEOPLE

Vitesco Technologies acknowledges and respects the existence of land use and customary rights of local

3.11. HEALTH & SAFETY communities, including those of Indigenous people and individuals, and recognizes any associated rights, social Health and safety protection are essential elements of and cultural heritage, and environmental and economic Vitesco Technologies' group culture. By undertaking preventive measures and eliminating hazards, we aim at interest. Vitesco Technologies refrains from unlawful evictions or reducing risks and protecting employees, workers and relocations as well as the unlawful deprivation of land, persons involved in our business activities from acciforests or waters, or any other resource that secures dents and work-related illnesses. Ongoing worker input the livelihood of a person. In cases negative impacts on and education are essential in this regard. local communities and Indigenous people are discov-Vitesco Technologies also recognizes that in addition to ered, those impacts shall be stopped and remediated minimizing the incidence of work-related accidents and illness, a safe and healthy work environment enhances immediately. the quality of products and services, consistency of **3.10. PROTECTION OF HUMAN RIGHTS** production, worker retention and morale. Therefore, we strive to actively foster the health of employees and workers by providing occupational health & safety Human rights defenders, an individual or group of individuals who actively work to promote and protect management and emergency support. human rights, play a crucial role in our society by rais-Vitesco Technologies has implemented an occupational ing awareness about human rights issues, documenthealth and safety management system according to ing human rights abuses, and advocating for justice ISO 45001. As a part of the management system, the and accountability. Those can be lawyers, journalists, group function Sustainability and Security (S&S) also or activists, as well as ordinary individuals and may maintains a "Safety & Health Manual" which defines all engage in activities like peaceful protests, public camthe Vitesco Technologies internal requirements in line paigns, litigation, investigative journalism, community with the ISO 45001 international norm. organizing, or providing support and resources to The management system includes but not limited to the victims of human rights abuses. following topics: > Occupational Safety

# DEFENDERS

We do not tolerate any acts of intimidation, threat, defamation, or criminalization towards human rights defenders in relation to the products or services we provide. Vitesco Technologies acknowledges the significance of safeguarding human rights defenders and commits to take action to ensure their protection whenever we become aware of such a fact.



1. Foundation

2. Approach

# **Vitesco Technologies** Group Human Rights Policy

> Emergency Preparedness Occupational Injury and Illness > Industrial Hygiene > Machine Safeguarding





- > Health and Safety Communication
- > Hazardous Substances
- > Safety & Health Risk Assessment

#### **3.12. ENVIRONMENTAL DUE** DILIGENCE

The consideration of the interaction between human rights-related and environment-related risks is an integral part of the Vitesco Technologies Human Rights Management System. Already implemented management systems such as ISO14001 – Environmental Management System touch on human rights topics and are therefore relevant.

Ecological sustainability, environmental and climate protection are integral parts of Vitesco Technologies business strategy and mission. With our products, solutions, and processes, we want to make a significant contribution to reducing environmental impacts along the entire value chain and actively promote resource efficiency, circularity, and climate protection. We continuously identify our environmental impacts and minimize adverse effects, for the benefit of the planet and our communities, as well as the health and safety of employees and workers.

Vitesco Technologies has implemented integrated environmental and energy management systems according to ISO 14001 and ISO 50001. As a part of the management systems, the group function Sustainability & Security maintains a part of Vitesco Technologies' Business Process Map, which defines all internal requirements in line with the ISO 14001 international norm.

The management systems include but are not limited to the following topics:

- > Environmental impacts, risks & opportunities
- > Compliance with legal requirements (e.g., Minamata Convention, Basel Convention, Stockholm Convention)
- > Permits and Reporting
- > Pollution Prevention and Resource Reduction
- > Hazardous Substances
- > Material Restrictions
- > Water & Emission Management (incl. noise or dust emission)
- > Waste and Circularity Aspects (e.g., waste recovery & recycling)
- > Energy Consumption and Greenhouse **Gas Emissions**
- > Biodiversity Aspects (e.g., sealed ground, local nature conservation)

## **3.13. BUSINESS ETHICS**

Strict observance of ethical standards by all Vitesco Technologies employees, business partners and stakeholders are essential for building a culture of integrity and respect in the organization, as well as for protecting its reputation and maintaining the trust in the industry. We expect everyone involved in Vitesco Technologies' business activities to be an ambassador for our high ethical standards, as laid out in our Code of Conduct and the Business Partner Code of Conduct.



1. Foundation

2. Approach

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Implementation, monitoring and reporting of these ethical standards is handled through Vitesco Technologies' Compliance Management System.

This management system is including but not limited to:

- > Business Integrity
- > Fair business, advertising, and competition
- > No improper advantages
- > Data Protection and respect of privacy
- > Confidential reporting channels for any ethics concerns and non-retaliation
- > Transparent payment flows.

Vitesco Technologies is committed to respecting Human Rights through its purchasing decisions and practices.

## **3.14. SUPPLY CHAIN DUE DILIGENCE**

At Vitesco Technologies, we have a clear expectation for all employees to uphold and respect human rights. Specifically, when it comes to our relationship with suppliers, we acknowledge the pivotal role that Purchasing plays in promoting Vitesco Technologies' commitment to human rights within our supply chain. Purchasing is responsible for effectively communicating our human rights requirements as outlined in our Business Partner Code of Conduct (BPCoC) to suppliers and to actively supporting Vitesco Technologies' efforts to identify and evaluate human rights risks within the supply chain, while also speaking out against and report any misconduct they come across.

Furthermore, Purchasing integrates human rights considerations into the evaluation and selection of suppliers and actively contributes to the enhancement of our due diligence processes within our established purchasing practices and supplier selection procedures. Additionally, Purchasing should help to enhance supply chain transparency, e.g. with regard to ensuring the traceability of minerals sourced from conflict-affected and high-risk regions.



2. Approach





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Vitesco Technologies Group AG Siemensstraße 12 93055 Regensburg Germany

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Release Date: July 1, 2023





