

MODERN SLAVERY STATEMENT 2022

INFORMATION ON REPORTING

The following statement constitutes the Modern Slavery Statement for Vitesco Technologies and is made pursuant to section 54 of the UK Modern Slavery Act 2015. It sets out the steps that Vitesco Technologies has taken and that the company further undertakes to prevent modern slavery or human trafficking within its business or supply chain. The statement covers all subsidiaries and minority holdings where Vitesco Technologies exercises management control (hereinafter collectively referred to as “Vitesco Technologies”). The statement covers the fiscal year 2022 from January 1 to December 31, 2022.

COMPANY PROFILE

Vitesco Technologies 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 main drive-technology developments in the future. The company has production and development sites in the growing markets (China, Europe, and North America). In the 2022 fiscal year, the Group achieved sales of €9.1 billion and had 38.000 employees at approximately 50 sites. Vitesco Technologies Group AG is the parent company and is based in Regensburg, Germany since September 30, 2021.

BUSINESS MODEL AND VALUE CREATION

Vitesco Technologies focusses on the development and production of components and system solutions for drivetrains in hybrid vehicles, electric vehicles, and combustion engines. Its portfolio comprises 48-volt electrification solutions, electric drive systems, and power electronics for hybrid-electric and battery-electric vehicles. Furthermore, its product palette includes electronic controls, sensors, actuators, turbochargers, hydraulic components, and pumps as well as exhaust-gas solutions.

Vitesco Technologies' business operations are divided into two business units: Powertrain Solutions and Electrification Solutions.

The Vitesco Technologies Group sells its products to customers in more than 40 countries and is a partner of major OEMs worldwide.

POLICIES IN RELATION TO FIGHTING MODERN SLAVERY AND HUMAN TRAFFICKING

We are committed to 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.

Vitesco Technologies has incorporated its commitment to Human Rights in several policies: the Human Rights Policy, Code of Conduct and the Business Partner Code of Conduct. Our **policy statement on respect of human rights** describes our management approach on human rights due diligence. All policies and statements can be accessed through our website under <https://www.vitesco-technologies.com/en-us/company/sustainability/human-rights-and-diversity>.

OUR HUMAN RIGHTS DUE DILIGENCE SYSTEM

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, including slavery and human trafficking. 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.

RESPONSIBILITIES AND ANCHORING IN THE OVERALL ORGANIZATION

The overarching responsibility of our due diligence processes is anchored in the CHRO role and assigned to the Sustainability & Security central function. In addition, Vitesco Technologies has established a clear management structure: the Human Rights Management System 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.

In order 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, Environmental Protection 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.

To ensure that our risk management is practiced at all levels and in all areas of the company, we have provided key functions with the requisite knowledge and required authority. We have appointed local Human Rights Officers at all our locations. In Purchasing, the Purchasing & SQM Processes & Supplier Integrity department is responsible for monitoring due diligence with regards to our supply chain. All key functions provide information for risk analysis, implement preventive measures, engage with local stakeholders, and take immediate remedial action if any human rights violations occur.

Within this organizational set-up, the results of the processes listed are reported regularly and on an ad hoc basis to the Global Human Rights & CSR Manager and presented to the Human Rights Committee.

HUMAN RIGHTS RISK MANAGEMENT

Comprehensive and ongoing risk analysis is the basis for appropriate preventive and remedial measures. This involves regularly reviewing risks that may arise in our own business area and with regard to our direct suppliers. The same applies to risks at indirect suppliers if there are substantiated indications that suggest a violation of a human rights-related or environmental obligation.

After completing the initial risk analysis in our own locations according to the German Supply Chain Due Diligence in 2022, a standard process was established according to which the local Human Rights Officers at our local sites continuously record and assess human rights risks and regularly report to the Global Human Rights & CSR Manager. In addition, we defined risk escalation criteria and use internal and external monitoring controls to identify human rights risks and to review the effectiveness of our risk mitigation measures.

Risk analysis with regards to our direct suppliers is carried out continuously in a phased process. All suppliers are classified into risk groups based on country, industry and product characteristics. We focus on all suppliers for whom the first (abstract) risk analysis led to the identification of a high risk. In a second step, these suppliers are asked for a self-assessment using the Responsible Business Alliance (RBA) questionnaire. If the original risk assessment does not improve as a result of the self-assessment, which is checked for plausibility in each case, we carry out risk-based and random checks in a third step in the form of audits conducted by an independent organization.

PREVENTIVE MEASURES IN OUR OWN BUSINESS AREA

New employees of Vitesco Technologies are informed about the Code of Conduct and our Human Rights Policy when hired. Additionally, employees receive regular training on both, Code of Conduct and Human Rights Policy.

We also train relevant internal stakeholders on the human rights management system, in particular our local human rights officers and relevant functions in Purchasing.

We regularly subject our own locations to internal audits conducted by our qualified internal auditors. Other already implemented management systems that touch on human rights topics are externally verified at the majority of our sites (e.g. ISO14001 – Environmental Management System, ISO45001 – Occupational Health and Safety Management System). We also have the human rights management systems at our sites externally audited by an independent organization.

PREVENTIVE MEASURES WITH REGARD TO OUR SUPPLIERS

Vitesco Technologies has implemented procurement strategies and practices that prevent or minimize human rights risks. This is based on our Business Partner Code of Conduct, which commits our suppliers to comply with the human rights- and environment-related expectations set out therein and to enforce them along the supply chain, in particular with their own suppliers.

We also offer training to our suppliers and our Purchasers, for example through access to the Responsible Business Alliance's (RBA) e-learning platform.

The purchasing department comprehensively checks new suppliers for their compliance with human rights- and environment-related obligations in accordance with our Business Partner Code of Conduct. If, based on this

review, a very high risk exists, no business relationships are entered into with the potential supplier. Existing suppliers are also subjected to annual and ad-hoc risk analyses. For selected suppliers, we have auditors from an independent organization carry out on-site inspections.

Vitesco Technologies has also defined firm escalation criteria and an escalation process for human rights-related risks to ensure that these risks are tracked and remedied at suppliers. In addition, human rights criteria are included in the overall supplier assessment. The supplier assessment is conducted annually and influences the awarding of new business.

Vitesco Technologies also requires its business partners to support due diligence and traceability throughout its supply chain for all minerals. This involves the business partner conducting due diligence on its supply chains to determine whether products sold to Vitesco Technologies contain critical minerals or materials, and from which smelters they originate. This information serves as the basis for our external reporting and is made available to stakeholders upon request in the form of the Conflict Minerals Reporting Template (CMRT) provided by the Responsible Minerals Initiative (RMI). Given reasonable notice, the business partner must be prepared to provide Vitesco Technologies with current and updated information, such as CMRTs, and to work to eliminate non-compliant smelters within their respective supply chains.

Regensburg, September 20, 2023

For and on behalf of the Executive Board:

Ingo Holstein

Chief Human Resources Officer

ANNEX

Vitesco Technologies Group subsidiaries explicitly subject to mandatory reporting obligations in the United Kingdom:

Vitesco Technologies UK Ltd.