

Declaration of Principles on Human Rights



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Forward

As an internationally active group of companies with almost 300 years of history and tradition and a corporate culture that is based on values of consistency, longevity and commitment and always puts people first, we are aware of our corporate and social responsibility. We are therefore committed to respecting human rights in our own business activities as well as in our global supply and value chains and to providing access to remedy for those affected by human rights violations. In doing so, we align our business activities with the guiding principles of the German Supply Chain Due Diligence Act ("LkSG") and thus implement its requirements.

In addition, our understanding and our human rights due diligence processes are based on the following international human rights reference instruments to which we are committed:

The International Bill of Human Rights, i.e. the United Nations Universal Declaration of Human Rights as well as the Civil and Social Covenants, which define civil, political and social rights to which all people are entitled for the sake of their dignity.

The core labor standards of the International Labor Organization (ILO) with its four basic principles on freedom of association and the right to collective bargaining, the elimination of forced and child labor and the prohibition of discrimination in respect of employment and occupation.

We expect our business partners to also commit to respecting human rights, to establishing appropriate due diligence processes and to passing these expectations on to their own suppliers.

Topics and potentially affected persons

We recognize that our business activities and our global supply and value chains have the potential to cause adverse impacts on human rights.

We are committed to respecting all internationally recognized human rights and focus our human rights due diligence processes in particular on the following human rights issues, which we have identified as material for our company through a risk analysis. In these areas, we see the greatest risks of adverse impacts on people that are directly or indirectly related to our business activities at our locations and in our global supply and value chains:

- *Forced and child labor;*
- *Restrictions on the freedom of assembly and association (this also includes the systematic combating, suppression and sabotage of employee representatives);*
- *Discrimination in any form (e.g. based on gender, age, ethnic and social origin, nationality, religion or ideology, physical or mental disability, sexual orientation);*
- *Endangering data protection and privacy;*
- *threats to health and safety in the workplace;*
- *precarious employment and working conditions (e.g. in the case of unregulated temporary work or the abuse of short-term contracts);*
- *Corruption and bribery;*
- *threats to consumer protection and a lack of product responsibility;*
- *Restriction of the rights of local communities and indigenous peoples;*
- *Damage to health, the roof or economic assets required for subsistence, for example through water, soil or air pollution or deforestation;*
- *Restriction of land rights;*
- *Engagement or use of private or public security forces.*

In our efforts to respect human rights, we focus on the following groups of people, as their human rights are potentially jeopardized by business activities along our global supply and value chains:

- *own employees at national and international locations including trainees*
- *Employees of business partners and joint venture partners;*
- *Groups of people in our direct and indirect supply chain: employees in the production and processing of raw materials and the manufacture of intermediate products, smallholder farmers, employees of service providers and direct suppliers;*
- *Groups of people in our downstream value chain: employees of customers, end customers, people in the environment of the products and services (e.g. in the case of sponsoring);*
- *Groups of people regardless of their location in the value chain: people in informal or precarious employment relationships, trade union representatives and trade unionists on site (directly or at suppliers, service providers and business partners, joint venture employees);*

- *Groups of people with an indirect link to the value chain: members of local communities and residents near sites, family members, employees of public authorities.*

Within these groups of people, we have identified individuals who are subject to a higher risk of adverse human rights impacts. These potentially affected persons occupy a special position within our due diligence processes. These are groups of people who have special needs, who are socially marginalized or who find it difficult to make their concerns heard. We include particularly vulnerable groups of people:

- *Women;*
- *children;*
- *local communities;*
- *(esp. indigenous peoples);*
- *older people;*
- *poor people;*
- *sick people;*
- *people with disabilities;*
- *groups in weak/unregulated environments;*
- *ethnic/religious minorities;*
- *lesbian, gay, bisexual, transgender, intersex and queer people.*

Implementation of the due diligence obligations

For us, respect for human rights is a continuous process. The implementation of human rights due diligence in line with changing contextual conditions, the type of business activity and the size and structure of the company is constantly reviewed and continuously developed.

We have therefore anchored human rights due diligence processes as an integral part of our organization and in our relationships with our business partners.

Risk analysis

We consider it part of our duty of care to be aware of potential and actual adverse human rights or environmental risks and impacts of our business activities on people or the environment along the entire value chain. We therefore use an established management process to identify and assess the relevant human rights or environmental issues and those potentially affected by our business activities as well as our direct and indirect business relationships. This includes analyzing both human rights or environmental risks and the impact of using our products and services.

To this end, we have systematically added human rights issues to our company-wide risk and supplier management system. In our management process, we also take into account human rights criticism from third parties and reported incidents.

The analysis of human rights risks and impacts is updated annually and whenever there are significant changes to the company's profile or business activities. To this end, we involve internal and external human rights experts, business partners and selected stakeholders.

The results of the analysis of human rights risks and impacts are incorporated into our corporate decision-making processes with regard to supplier selection, business partner management, product responsibility and development as well as mergers and acquisitions. The risk analysis forms the basis for identifying appropriate measures. The management regularly discusses human rights conflicts of interest and relevant findings from our human rights due diligence processes. In addition, we use the results as a basis for creating and, where necessary, adapting internal regulations, processes and training in order to meet the changing requirements of our due diligence processes.

The following key risks were identified during the risk analysis:

- The potential for human rights and environmental risks in the company's own business area is generally classified as "low". Only in the transportation services and travel sectors can - industry-related - a higher risk be identified with regard to working conditions and discrimination, as well as effects on the environment.
- Our network of direct suppliers is global - especially at the locations of our production plants. In view of existing, general country risks, we therefore see

particular human rights risk potential for direct suppliers outside Europe. However, it is not possible to make a general allocation to specific industries.

When implementing our due diligence obligations, we do not focus specifically on certain risks, but are guided by the principles set out in the law for prioritizing risks. The results of the risk analysis are continuously incorporated into the corporate decision-making processes with regard to internal business strategies and supplier selection and management.

Measures

In order to fulfill our responsibility to respect human rights, we rely on a combination of different measures. The aim is to protect the (potentially) affected persons and to prevent or at least minimize adverse human rights impacts on them. We have established standardized processes for this purpose. We actively and systematically involve rights holders (such as employees and workers of suppliers or local communities) and human rights experts, regularly exchange information with other companies, including as part of industry initiatives, and cooperate with stakeholders to promote the realization of human rights.

The concerns expressed by rights holders or their legitimate representatives, local stakeholders, experts and civil society are taken into account.

Outside our company, we contractually oblige at least all of our direct business partners to comply with the laws applicable in the respective country, the requirements of the LkSG and the core labor standards of the ILO, to respect human rights and to adequately address human rights-related risks with their own business partners.

Effectiveness control

We review the effectiveness of our measures to prevent and mitigate adverse human rights impacts at least once a year and on an ad hoc basis. We also check whether our requirements are being met. Within our company, we also carry out risk-based audits, follow up on all reports of potential human rights violations, conduct employee surveys and check the effectiveness of training and development measures using comprehension questions during training or final tests. We check the effectiveness of measures in our value chain by monitoring the results of our continuous analysis of human rights risks and impacts. We also carry out risk-based audits of our direct suppliers, e.g. in the form of document reviews, online assessments and on-site inspections. Wherever possible, we ensure the involvement of potentially affected parties or at least their representatives and, with regard to the aforementioned audits, the consultation of rights holders.

Complaints mechanism

We reject all forms of human rights violations. Appropriate and effective grievance management is therefore an important part of our due diligence processes in order to effectively prevent and remedy any potential adverse human rights impacts caused by our company and our business activities. We have set up a company grievance management system that is accessible both inside and outside the company.

We operate a system for notices that provides a confidential communication channel for internal and external stakeholders and all potentially affected parties worldwide to report possible violations of human rights and international treaties. Opportunities to access the system for notices are communicated proactively and in appropriate language to these groups in order to take account of differences in the target groups. Reports can also be made anonymously. We actively inform the target groups to be reached about the available grievance mechanisms using measures that are adapted to the target group and the local context.

All reported information and well-founded suspicions of possible human rights violations are dealt with as part of a transparent, balanced and predictable process for all parties involved. The confidentiality and anonymity of informants is respected. As far as possible and within our sphere of influence, we ensure that informants are protected from discrimination and

punishment in connection with the complaints they submit. Our systematic handling of complaints and the knowledge gained from them enables us to continuously improve our human rights due diligence processes.

We also review the effectiveness of the existing complaints mechanisms in accordance with the LkSG once a year and on an ad hoc basis in the event of significant changes in the risk situation or specific indications of restrictions in complaints management.

Remedial measures

In the event that we as a company have directly caused a violation of human rights, we work quickly to prevent the business activities that caused this or to make them compliant with human rights and work towards redress. If our employees behave in a way that is incompatible with human rights, appropriate sanctions are introduced.

In the event that we contribute to potential or actual human rights violations through our business activities or are indirectly associated with them, we endeavor to contribute to appropriate remediation and prompt redress by the responsible parties. If we have a well-founded suspicion or concrete indication of possible human rights violations in our company or along our upstream and downstream value chain, we investigate this carefully and consistently. We oblige our business partners to support us in clarifying the facts and to cooperate fully within a reasonable timeframe. Depending on the severity of the violation, we reserve the right to respond appropriately to our business partners, from requesting that the

violation be remedied immediately to taking legal action and terminating the business relationship. Irrespective of this, we will work towards remedying the breach.

Reporting

In our annual sustainability report in accordance with the CSRD, we inform the public about our human rights commitments and due diligence processes and their effectiveness.

To this end, we report on the material human rights risks and impacts we have identified as a result of business activities along our global supply and value chains and describe the preventive and remedial measures we have implemented. To show how effective our human rights due diligence processes are, we also publish the key figures we use to measure their effectiveness.

Responsibilities

We have defined clear responsibilities for the exercise of and compliance with our human rights due diligence obligations. At the highest management level, our Executive Board is responsible for respecting human rights in our business activities as well as in the upstream and downstream value chain. Regular and ad hoc internal reporting to this level on the results of

our continuous risk analysis relevant to human rights, information from our grievance mechanisms and information on the effectiveness of our remedial and preventive measures and complaints procedures ensures that informed decisions can always be made.

The Head of Supplier Quality Management is responsible for the operational implementation of our human rights due diligence processes.

Training courses

We consider it an important part of our due diligence obligations to sensitize our employees to respect human rights and to impart the necessary expertise for the effective implementation of human rights due diligence processes. We are therefore committed to conducting regular training courses for this purpose in the future.

Further development of our human rights due diligence processes

For us, respecting human rights and implementing human rights due diligence in our operational processes is an important contribution to improving the human rights situation along the German automotive industry's global supply and value chains. We accept this

challenge and are committed to continuously developing our human rights due diligence processes.

We attach great importance to effective due diligence processes. We are therefore committed to engaging in dialog with people who are potentially affected by adverse human rights impacts of our business activities and along our upstream and downstream value chain. The purpose of these dialog formats is to identify human rights risks and assess the effectiveness of our measures to prevent, mitigate and remedy adverse human rights impacts.

The Management of the MöllerGroup GmbH

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