



Declaration of Principles on Respect for Human Rights





GRAMMER Group's commitment to respecting human rights

GRAMMER Group specializes in the development and production of components and systems for passenger car interiors as well as driver and passenger seats for offroad commercial vehicles, trucks, buses and trains. Every day, our employees develop and produce innovative and flexible solutions for the challenges of global competition.

As a global partner to the vehicle industry, GRAMMER Group is aware of its responsibility within global supply chains. We can only be successful as a business in the long term if the impact of our business activities is in harmony with people and the environment. Therefore, GRAMMER Group is committed to strengthening human rights and preventing human rights violations and taking appropriate remedial action in the event of violations. This commitment applies to our own business activities as well as to our global supply and value chains. We demand and promote compliance with laws and standards of conduct on human rights including good working conditions and do not tolerate any violations of human rights and environmental obligations by our employees, suppliers and business partners.

Those rights are reflected in several key areas, in particular

- **Child and forced labor:** We are strictly opposed to any form of child labor and are committed to the effective abolition of child labor. Children must not be inhibited in their development. Their dignity must be respected and their safety and health must not be

impaired, but protected by appropriate measures. We are as well committed to eradicating forced or compulsory labor and all forms of slavery, including modern forms of slavery and human trafficking. We take steps to ensure that such practices do not occur in our operations or supply chains.

- **Freedom of Association and Collective Bargaining:** We respect the right of our employees to form and join trade unions and to bargain collectively and their right to strike, depending on applicable law.
- **Equal Opportunity and Non-Discrimination:** We are committed to maintaining equal opportunities among employees and preventing all forms of discrimination. We stand for the fair treatment of all employees and do not tolerate any form of discrimination or unjustified unequal treatment, for example on the basis of characteristics such as gender, ethnicity, origin, nationality, religion or ideology, political, social or union affiliation, sexual identity and orientation, physical and/or mental disabilities or age. Our recruitment processes are transparent, fair, and based on merit. We do not engage in or support discrimination in hiring practices.
- **Diversity, Equity, and Inclusion:** We value and respect diversity in our workforce. We strive to create an inclusive environment where everyone feels valued, respected, and able to contribute to their full potential.

- **Wages and Benefits:** We provide fair and competitive wages and benefits to all our employees. We comply with all applicable wage laws and regulations, including minimum wage, overtime, and mandated benefits.
- **Rights of Minorities and Indigenous People:** We respect the rights of minority and indigenous groups. We strive to avoid adverse impacts on their cultures, traditions, and livelihoods.
- **Land, Forest, and Water Rights and Forced Eviction:** We respect the rights of individuals and communities to access and use their land, forests, and water. We do not support or engage in forced evictions.
- **Use of Private or Public Security Forces:** We are committed to the security forces we use respect human rights and comply with international standards and national laws.

With this policy statement, we commit ourselves to strengthening respect for human rights in our own business and along our value chain and to preventing human rights violations. It is regularly reviewed, adapted and further developed.

Responsibilities and measures for human rights due diligence in GRAMMER Group

The Executive Board of GRAMMER AG is responsible for ensuring human rights due diligence. GRAMMER has appointed a Human Rights Officer who is responsible for monitoring the appropriateness and effectiveness of risk management, i.e. the measures to be taken in the context of human rights due diligence, and in particular performs monitoring and evaluation tasks in this context.

The management and monitoring of human rights policy in our own business unit and our global supply and value chains is the responsibility of the Legal & Compliance, Corporate Social Responsibility, Supply Chain Management, Risk Management and Human Resources departments in particular. They coordinate activities, set priorities and lead company-wide efforts to respect human rights. Responsibility for implementation lies with the operating units, which ensure the integration of this policy in their respective regions. Our ambition is for each of our employees to take responsibility for respecting human rights and implementing them on a day-to-day basis in their own area.

International standards and guidelines

GRAMMER Group aligns its corporate activities in particular with the following internationally applicable standards and guidelines:

- [Universal Declaration of Human Rights of the United Nations \(UN\)](#)
- [United Nations Guiding Principles on Business and Human Rights \(UNGPR\)](#)
- [Conventions and recommendations of the International Labor Organization \(ILO\) on labor and social standards](#)
- [Principles of the United Nations Global Compact \(UNGC\)](#)
- [Guidelines of the Organization for Economic Cooperation and Development \(OECD\) for multinational enterprises](#)
- [Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal](#)
- [Stockholm Convention on Persistent Organic Pollutants](#)
- [Minamata Convention on Mercury](#)

Risk management on human rights due diligence at GRAMMER Group

As part of its risk management system, GRAMMER Group continuously and systematically examines what particular risks of human rights violations and environment-related hazards exist in its own business and supply chains. In doing so, we rely on a comprehensive risk assessment and, building on this, identify and review the impact of our actions and the trade of our suppliers and business partners on human rights due diligence. We have identified working hours, discrimination, occupational health and safety, and environmental protection as particularly sensitive areas in our own business activities, as well as the potential risk area of child and young workers labor as well as forced labor in our supply chains.

Based on these findings, we derive preventive measures to minimize and avoid risks, implement them, monitor their effectiveness and, if necessary, make appropriate adjustments to the risk areas.

Expectations on employees, suppliers and business partners

Based on the findings of the risk analyses and the international standards mentioned above, we have developed our guidelines for GRAMMER Group. They provide a binding framework for all employees, suppliers and business partners and define specific goals.

- GRAMMER Code of Conduct
- GRAMMER Code of Conduct for Suppliers
- GRAMMER Environmental and Energy Guidelines

GRAMMER expects its own employees to comply with applicable laws and internal guidelines and to cooperate in ensuring compliance with these obligations.

All suppliers and business partners of GRAMMER Group are obliged to comply with the aforementioned minimum requirements, internationally and nationally applicable laws as well as the core labor standards of the International Labor Organization (ILO) and to pass on these obligations in their own supply chains.

Complaint mechanisms and remedies

In order to raise awareness of human rights, we train our employees through our own GRAMMER Academy using classroom and online trainings. We encourage them to consistently observe human rights in their own areas of responsibility and to report suspected violations of this policy statement via the existing complaints procedures.

In addition, we organize training for suppliers, conduct audits, implement our own sustainability projects, formulate specific requirements for our suppliers and business partners, and support them in complying with and implementing them. We also work together with recognized certification organizations.

In order to systematically prevent or counteract violations, we have established various channels through which employees, suppliers, business partners and all other stakeholders can report irregular behavior or express concerns. We have installed a digital whistleblowing system for the systematic recording of complaints, which can be accessed worldwide via the intranet and internet. The platform provides our employees, suppliers, business partners and other stakeholders with a protected, secure and anonymous reporting channel. In addition, there are other ways to submit reports, for example in person, by telephone or by e-mail to the Compliance department.

The complaints options enable us to identify negative developments at an early stage and initiate necessary measures. In addition, our internal processes for dealing with tips and complaints are constantly being developed further.

Violations are not tolerated and are consistently pursued. We follow a defined and transparent procedure to ensure the greatest possible objectivity in processing inquiries and tips and in determining measures. Identified violations may result in legal consequences up to and including termination of employment and business relationships.

Documentation and reporting

All our human rights due diligence processes and activities are systematically documented so that they can be tracked at any time.

We actively and regularly inform all our stakeholders via our website and internally via our intranet as well as via newsletters about human rights and environment-related obligations, their compliance, reporting and follow-up.

We provide regular and transparent information on implementation and our progress as part of our annual sustainability reporting.

Effectiveness control and continuous improvement

For GRAMMER Group, respect for human rights is a fundamental contribution to achieving the United Nations Sustainable Development Goals. We are aware that the implementation of human rights due diligence in our own business activities as well as in supply and value chains is a continuous process.

We therefore regularly review our strategic approaches, processes as well as operational measures with the aim of continuously improving human rights due diligence both in our own business activities and in our upstream and downstream supply chains.

We will regularly review and adapt this policy statement to reflect current changes and processes.

Ursensollen, February 2025

GRAMMER AG

The Executive Board



Jens Öhlenschläger



Jurate Keblyte



Guoqiang Li



Georg Braeker



Holger Leyh

GRAMMER Deutschland GmbH

The Management Board

grammer.com

