

Human Rights & Working Conditions Policy

Organisation's structure

As a global partner of the automobile industry with sites in more than 25 countries, the Eberspächer Group makes a contribution to environmentally sustainable, safe and comfortable mobility through innovative solutions. Obeying the law and legislation, complying with internal regulations and observing basic ethical standards always and everywhere (Compliance) constitute the foundation on which our economic success is based. We acknowledge our social responsibility to our employees, business partners and the community at large, and our responsibility to protect the environment and to preserve natural resources.

In doing so, we strive not only to make a contribution to the sustainable development of our company and of the community at large, but also to win and retain the trust of all our employees and business partners.

Relevant policies

The **Code of Conduct** of the Eberspächer Group combines all the most important principles for compliance with the law and with regulations, as well as for morally and ethically acceptable conduct in business transactions and in dealings with colleagues. It is binding throughout the world on all members of the Company management, all employees, and everyone else who works for Eberspächer.

The Eberspächer Group has set up a worldwide **Compliance Organization** to support its employees. This coordinates all of our compliance activities and supports employees worldwide in managing compliance risks through information, advice, and training. It is a permanent point of contact for all issues in this connection.

Any employee as well as any business partner can report breaches of regulations or the law to the Compliance Organization without suffering disadvantage as a result. Eberspächer treats compliance-related information in confidence. The identity of whistleblowers is protected within the framework of the law and is disclosed only with express consent.

Eberspächer also expects its business partners worldwide to respect the principles set in the Eberspächer **Business Partner Code of Conduct**, such as respecting human rights and the environment, the requirement of strict observance of the law, proscription of corruption and integrity in competition, and to act in accordance with them in their business activities.

The rules set out in this policy are not exhaustive; combined with our Code of Conduct as well as our Business Partner Code of Conduct, they establish the fundamental rules of business conduct and ethical guidelines of working conditions and human rights applicable to all Eberspächer employees and partners.

1. Child labour and young workers

Eberspächer complies with national legislation and regulations governing child labor. In any case, we will not employ workers who have not reached the minimum age according to the ILO Convention 138. We ensure that our business partners adopt the same provisions. We do not tolerate any form of forced labor or child labor.

2. Working hours

Working hours (including overtime), as well as break times and periodic days off, shall be compliant with applicable laws, regulations, local practices, collective-bargaining agreements and international conventions.

3. Wages and benefits

Business Partners will comply with all applicable laws, regulations, local practices, global benchmarks including those relating to minimum wages, overtime hours and legally mandated benefits. In places where no legal requirement exists for defining a minimum wage, ILO Convention 131 can serve as a basis for the definition. Workers must be paid in a fairly and timely manner, and the basis on which workers are being paid must be clearly conveyed.

4. Harassment and non-discrimination

As part of our global business, Eberspächer works successfully with people from different countries and cultures, irrespective of ethnic, national and social origin, gender, color, age, language, disability, religious, political or other opinion, or sexual identity. We value diversity. We do not tolerate discrimination or harassment based on the aforementioned.

5. Freedom of association and collective bargaining

Eberspächer recognizes the existence of trade unions worldwide and the right of workers to form the union organization of their choice and/ or to organize workers' representation in accordance with the laws and regulations in force.

6. Modern slavery

Eberspächer is committed to improve our practices to combat slavery and human trafficking. We recognize that slavery and human trafficking is a real yet hidden issue in our society. We will not tolerate slavery and human trafficking in our business or supply chain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure that any form of slavery is not taking place in our own business or supply chain.