

e.solutions GmbH Policy Statement on Human Rights, Environmental Standards, and Sustainability Requirements

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Foreword

The corporate culture of e.solutions GmbH is defined by our core values. These are: integrity, responsibility, transparency, appreciation, and trust. Our corporate governance is guided by ethical principles. e.solutions GmbH is committed to the International Bill of Human Rights and to high social and environmental standards.

Adhering to these values and ethical principles – alongside compliance with applicable laws – forms the foundation of our business activities and decisions. We expect the same commitment from our business partners.

A) Respect for human rights and the associated social and environmental standards

The management of e.solutions GmbH is aware of the company's social and corporate responsibility to respect human rights, uphold the associated social and environmental standards, and comply with applicable laws. At e.solutions GmbH, our standards for corporate conduct are derived from this responsibility.

Specifically, we are committed to complying with the following international standards:

- The International Bill of Human Rights, consisting of the United Nations Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR)
- The UN Guiding Principles on Business and Human Rights
- The ILO Declaration on Fundamental Principles and Rights at Work
- The Ten Principles of the UN Global Compact

At e.solutions GmbH, we respect human rights and the associated social and environmental standards in our own business operations and strive to ensure compliance with these fundamental rights throughout our supply chains. Equally important is adherence to the applicable laws and regulations, insofar as they are applicable to us or our suppliers. We consider this to be the basis of our entrepreneurial success. Therefore, we place high demands not only on ourselves, but also on our suppliers and business partners.

To prevent our business operations from negatively impacting human rights and to fulfill our due diligence obligations under the German Supply Chain Due Diligence Act (hereinafter referred to as the LKSG), we have established a Code of Conduct and other internal company guidelines, which our employees are introduced to when they join our company and during regular training sessions. Through our Supplier Code of Conduct, we require our suppliers to uphold our standards and, if necessary, engage in dialogue with them to ensure that they and their suppliers comply with them.

If an employee or business partner suspects a violation of human rights or associated social or environmental rights, we provide a means to report this suspicion and, if necessary, take immediate action to address and remedy the situation.

The standards, which apply both to our own business operations and throughout our supply chain all the way to the origin, are set out below.

1. Ban on forced labour

We do not tolerate any form of forced labour and therefore reject the use of forced or unlawful compulsory labour in accordance with the ILO core labour standards. This includes all forms of slavery and human trafficking. All employment contracts must always be voluntary and all employment relationships must be terminable with reasonable or statutory notice.

2. Ban on child labour

We reject child labour. The dignity of children must be respected. This includes in particular

- Compliance with the minimum age requirement: The minimum age for employment as stipulated by the applicable national laws in accordance with the ILO core labour standards, must be observed. We verify the minimum age required for the specific job regarding applicants and employees.
- Right to training and education: Children must not be deprived of their education due to employment.
- Protection of health and safety.

3. Freedom of association and the right to collective bargaining

We respect the right of workers to form representative bodies and to engage in collective bargaining to regulate working conditions. Employees are neither advantaged nor disadvantaged on the basis of their membership or non-membership of a trade union or employee representative body. Regular dialogue between employee representatives and employees with management is desired and encouraged.

4. Protection against discrimination

Equal treatment is an important and fundamental principle of our corporate policy. Discrimination or unequal treatment will not be tolerated. No one should be discriminated against, disadvantaged, favoured, or harassed based on gender, skin colour, religion, nationality, political or other beliefs, ethnic origin, disability, age, sexual orientation or any other characteristic protected by local laws, such as belonging to a national minority or being pregnant. Diversity within the company and an inclusive corporate culture are important to us.

5. Right to health and safety at work

Protecting and promoting the health of the people who work for us is our top priority. All applicable occupational health and safety laws must be observed. No one should be harmed as a result of their work.

6. Working hours

We are guided by the ILO core labour standards and comply with the applicable national working time regulations. This includes compensation for overtime - in the form of time off or appropriate remuneration.

7. Right to appropriate remuneration

We oppose all forms of wage dumping. Every employee is entitled to appropriate remuneration. Where applicable and relevant, legally guaranteed minimum standards and minimum remuneration must be observed. Wages and reimbursable expenses to be must be paid promptly, in full and in recognised currencies. Deductions from payroll are only permitted if there is a sufficient legal basis and a corresponding justification.

8. Protection of personal data

We are committed to protecting the personal rights of our employees and of the employees of our business partners with regard to the use of their personal data. All relevant data protection laws must be observed. The protection of the right to one's own data includes in particular the right to information, correction, blocking or deletion of one's own personal data.

9. Rights of local communities and minorities

The livelihoods and health of local communities, indigenous peoples and minorities are of particular concern to us. This includes, for example, the careful and environmentally friendly use of natural resources such as air, water, groundwater, soil and forests and, in particular, the proper handling of (hazardous) waste.

We firmly stand against the destruction of cultural and ritual sites, unlawful forced eviction and the deprivation of land, forests and waters, as well as deforestation.

10. Handling raw materials and energy

Careful and environmentally friendly use of raw materials and energy is important to us. Our principles are outlined in an environmental guideline. Regarding energy, we pay particular attention to ecological aspects by using renewable energies and regularly evaluating and implementing potential savings.

11. Deployment of security forces

We contractually require our security service providers to uphold all internationally recognised human rights and the associated environmental rights. We also ensure through appropriate guidelines and measures that our security service providers receive training accordingly.

B) Our approach to implementing human rights and environmental due diligence obligations

e.solutions GmbH has over 1,200 employees at two sites in Germany and develops advanced infotainment systems for the automotive industry. In our own business operations, we encounter certain human rights or environmental risks more frequently than others. The same applies to our suppliers. As part of our due diligence obligations, we therefore focus on areas that have been identified as higher risk. We prioritise these risks using criteria such as the expected severity of an injury and its probability of occurrence. The outcome of the risk analysis lead to an action plan, which is reviewed at regular intervals for implementation status and effectiveness.

Our management holds overall responsibility for risk management. The Chief Compliance Officer, the Human Rights Officer and the Head of the Legal Department have a special role in the implementation of risk management with additional support from The Sustainability Officer. The contact person responsible for the respective supplier is responsible for communicating due diligence obligations to our suppliers and provides support in the event of a need for clarification with our suppliers. The Human Rights Officer oversees this process.

The aim of our risk management system is to uphold human rights and the associated environmental rights to the greatest extent possible within the given legal framework, to identify critical or high-risk aspects and to take appropriate measures to mitigate them.

1. Risk analysis

Through regular risk analyses, we systematically assess and evaluate the potential impact of our own activities and those of our suppliers on people and the environment. This process also includes ad-hoc risk assessments, such as in response to significant changes in the risk situation or reported breaches by direct or indirect suppliers. The process can be described as follows:

Using an abstract risk analysis based on our procurement structure and the associated industry and country risks, suppliers are evaluated and prioritised according to their potential risk profile, particularly in regions with an elevated country risk. In the case of suppliers who have or may have an increased risk disposition, specific risks are further assessed for plausibility by performing a closer risk analysis by obtaining and evaluating further information, e.g. by means of a so-called S rating. The risks identified are weighted and prioritised according to their risk value, causal contribution and potential influence. The prioritised risks form the starting point for ongoing improvements in the area of prevention and remedial measures.

2. Prevention, remedial and control measures

a. Prevention

The findings on human rights and environmental risks and impacts identified through the risk analysis and prioritisation are taken into account in our corporate decision-making processes (e.g. when selecting and evaluating suppliers and when making decisions about our activities in certain markets). Any conflicts between business objectives and respect for human rights as well as findings from our human rights and environmental due diligence activities are regularly discussed with our management.

Our findings are taken into account in the further development and revision of our internal regulations, processes and training programs. Our internal Code of Conduct reflects this and our employees receive regular training on these topics. Each division of e.solutions is responsible within its area of competence and responsibility for complying with and implementing due diligence obligations with regard to human rights and the associated environmental rights.

The commitment of our suppliers and other business partners to respect human rights is also an indispensable prerequisite for any form of cooperation.

Our Supplier Code of Conduct, which is also published on our website, contains the basic principles, standards to be observed and sustainability requirements and forms the basis for our supplier relationships.

The Supplier Code of Conduct obliges our suppliers to observe and respect human rights and the associated environmental rights. Our suppliers are also requested to demand this from their respective suppliers in an appropriate manner.

The scope of preventive measures vis-à-vis our suppliers is risk-oriented and is depends on the size of the supplier and the potential risks. If necessary or required, we initiate additional steps, such as supplier training.

b. Remedy

To determine when additional actions are necessary, we have established a reporting system in addition to regular risk analyses. This information is communicated internally to our employees through training sessions and is also published on our website for external partners.

Information on our whistleblower and complaints procedure can be found online at www.esolutions.de.

Information that reaches us via this reporting system, as well as facts that come to our attention in any other way, are examined and evaluated by the responsible departments. External partners are involved when necessary. If there is a reasonable suspicion that harm have already occurred, a risk analysis is conducted for each specific case. When there is substantiated knowledge, we will take action internally or vis-à-vis our direct and indirect suppliers.

Should a violation of human rights or associated environmental rights occur, we will address this and, where we are in a position to do so, impose appropriate sanctions. Depending on the extent of the violation, we reserve the right to require our business partners to remedy the situation immediately, to take legal action, to temporarily suspend the business relationship or, as a last resort, to terminate it.

c. Control

To ensure that we guarantee the best possible compliance with human rights in our company and in our supply chain, we review the effectiveness of our measures and processes as well as compliance with our requirements at least once a year and also on an ad hoc basis. Our Human Rights Officer, Chief Compliance Officer and Legal Department are involved in this effectiveness review. External partners are involved as needed.

We also investigate any indications of human rights violations and monitor the effectiveness of our education and training measures in this regard. We review the effectiveness of our whistleblower and complaints system annually and on an ad-hoc basis.

C) Documentation and reporting

We document our measures and will regularly report on our activities in the area of human rights and environmental protection in our own business operations and along the supply chain in accordance with legal requirements. This report will be published on our website.

D) Miscellaneous

This Policy Statement is reviewed regularly and updated as necessary.

No rights of individuals or third parties can be derived from this Policy Statement.

If you have any questions or comments on this Policy Statement or on other human rights-related topics, please contact our Human Rights Officer, Ms. Katharina Heisch, via e-mail:

Menschenrechtsbeauftragte@esolutions.de.

e.solutions GmbH

Ingolstadt, 02.01.2025

Uwe Reder
Managing Director

Timo Schreiber
Managing Director

This Policy Statement has been adopted and signed by the management of e.solutions GmbH.

Only the German version bears an original signature. For reference, please consult the signed German document.