



CODE ON HUMAN RIGHTS AND WORKING CONDITIONS

Pollmann International

Dear employees,

Pollmann International takes its social responsibility very seriously. Compliance with human rights and fair working conditions are an integral part of our corporate culture.

The management board of Pollmann International has signed this Code on Human Rights and Working Conditions. The Code is based on the key international standards on human rights and working conditions, such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

This Code explains how our company promotes human rights and good working conditions and implements the Core Labour Standards of the International Labour Organization (ILO). Important topics such as the equal treatment of all employees, the right to health and safety in the workplace and the protection of personal data of employees, customers and suppliers are also included.

This Code applies to employees and suppliers of Pollmann International GmbH, Pollmann Austria GmbH, Pollmann Werkzeugbau GmbH, MAXXOM Automation GmbH, Pollmann CZ s.r.o., Pollmann Mechatronics (Kunshan) Co., Ltd., and Pollmann de México S.A. de C.V. In this way, we are making an indispensable contribution to the long-term success of our company.

Sincerely,



Robert Stubenberger, COO-PINT



Helmut Grobbauer, HR-PINT



Markus Pollmann, Owner

CONTENTS

1. INTRODUCTION	4
1.1 FOUNDATIONS.....	4
1.2. OBJECTIVES OF THE POLLMANN INTERNATIONAL CODE ON HUMAN RIGHTS AND WORKING CONDITIONS	4
2. PROMOTION OF HUMAN RIGHTS AND GOOD WORKING CONDITIONS AT POLLMANN INTERNATIONAL	5
2.1. PROHIBITION OF CHILD LABOR	5
2.2. PROHIBITION OF FORCED LABOR	5
2.3. ETHICAL RECRUITING	5
2.4. FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING	6
2.5. PROTECTION AGAINST DISCRIMINATION	6
2.6. DIVERSITY, EQUITY AND INCLUSION	6
2.7. WOMEN’S RIGHTS	6
2.8. RIGHTS OF MINORITIES AND INDIGENOUS PEOPLES.....	7
2.9. RIGHT TO HEALTH AND SAFETY AT WORK	7
2.10. PRIVATE OR PUBLIC SECURITY FORCES	7
2.11. REMUNERATION.....	7
2.12. WORKING HOURS.....	8
2.13. QUALIFICATION	8
2.14. RIGHT TO PRIVACY – PROTECTION OF PERSONAL DATA	8
2.15. RIGHTS OF LOCAL COMMUNITIES NEAR LOCATIONS OF POLLMANN INTERNATIONAL.....	8
2.16. LAND, FOREST AND WATER RIGHTS AND FORCED EVICTION	9
3. DEALING WITH BUSINESS PARTNERS	9
3.1. SUPPLIERS.....	9
4. IMPLEMENTATION OF THE CODE ON HUMAN RIGHTS AND WORKING CONDITIONS OF POLLMANN INTERNATIONAL	10
4.1. RESPONSIBILITY	10
4.2. AUDIT AND REGULAR REPORTING	10
4.3. REVIEW AND DIALOG	10
4.4. PROCESSING OF QUESTIONS AND REPORTS	11
FINAL CLAUSE	11

1. INTRODUCTION

1.1 FOUNDATIONS

Pollmann International has integrated responsible, sustainable and legally compliant action as a fundamental principle in its corporate values and firmly anchored it in its corporate strategy. Through its serious commitment to ecological and social responsibility, Pollmann International has created a stable foundation to ensure the long-term success of the company.

We reaffirm our commitment to upholding internationally recognized human rights. This Pollmann International Code on Human Rights and Working Conditions extends the existing declarations on this topic, including in the Code of Conduct of Pollmann International as amended. Pollmann International sees the prevention of human rights violations as an integral part of its self-image and primary goal. With regard to human rights, the responsibility of Pollmann International focuses on areas and fields of action in which it can exert an influence as a commercial enterprise.

Human rights are fundamental norms that serve to protect the dignity and equality of all people. They are universal, inalienable and indivisible and belong equally to every individual. This definition can be found in the International Bill of Human Rights. Pollmann International is guided in its actions by the following international standards:

- ILO Declaration on fundamental Principles and Rights at Work,
- UN Guiding Principles on Business and Human Rights,
- OECD Guidelines for Multinational Enterprises,
- The Ten Principles of the UN Global Compact.

We are also guided by the following principles:

- Automotive Industry Guiding Principles to Enhance Sustainability Performance in the Supply Chain (AIAG & Drive Sustainability)
- Automotive Sustainability Practical Guidance (AIAG & Drive Sustainability)

1.2. OBJECTIVES OF THE POLLMANN INTERNATIONAL CODE ON HUMAN RIGHTS AND WORKING CONDITIONS

This Code defines and explains how Pollmann International promotes human rights and implements the Core Labour Standards of the International Labour Organization (ILO) in its business activities. It applies globally at all company locations and in all business areas of Pollmann International.

The Pollmann Group consists of the following companies:

- Pollmann International GmbH (PINT)
- Pollmann Austria GmbH (PAT)
- Pollmann Werkzeugbau GmbH
- MAXXOM Automation GmbH
- Pollmann CZ s.r.o.
- Pollmann Mechatronics (Kunshan) Co., Ltd.
- Pollmann de México S.A. de C.V.

This Pollmann International Code on Human Rights and Working Condition focuses on the topics that are particularly relevant for the company and its employees. It applies in particular to:

- employees
- suppliers

This Pollmann International Code on Human Rights and Working Conditions underlines and substantiates the commitment to respecting human rights. It expands the existing Code of Conduct of Pollmann International as well as all other internal company principles, guidelines and instructions. It is to be implemented in accordance with the applicable legal regulations at the various locations and markets and considers the diversity of cultures. If national legislation restricts the implementation of certain aspects of the Code on Human Rights and Working Conditions of Pollmann International, the company will endeavor to uphold human rights to the greatest extent possible within the given legal framework.

2. PROMOTION OF HUMAN RIGHTS AND GOOD WORKING CONDITIONS AT POLLMANN INTERNATIONAL

In the following sections, the central focal points with regard to human rights and working conditions are explained in more detail.

Pollmann International has a deep respect for the human rights of its employees and strives to exceed the applicable standards for working conditions. Cooperation within Pollmann is characterized by mutual respect and the values that are anchored in the corporate strategy of Pollmann International. These values determine the behavior and attitude of employees worldwide and include principles such as honesty, fairness and loyalty. Pollmann managers play a decisive role model here by actively living these values and implementing them in their day-to-day management activities.

2.1. PROHIBITION OF CHILD LABOR

Pollmann International does not accept any form of child labor.

Children must not be prevented from continuing their education and subsequently developing personally through gainful employment. Their dignity must be respected and their health and safety protected. In accordance with the Core Labour Standards of the ILO, Pollmann International observes the minimum age for employment and expressly rejects any form of child labor.

2.2. PROHIBITION OF FORCED LABOR

Pollmann International does not accept any form of forced or compulsory labor.

We strictly reject the use of forced or unlawful compulsory labor in accordance with the Core Labour Standards of the ILO in our business activities. Modern slavery, including human trafficking, will not be accepted under any circumstances.

2.3. ETHICAL RECRUITING

It is not permitted to give potential employees a false impression of the type of work to be performed or to demand recruitment fees from employees. The confiscation, destruction, concealment or denial of access to passports and other government-issued identification documents of employees is prohibited.

At the beginning of their recruitment, employees must receive a written contract or employment notification in a language they can easily understand. In this document, their rights and responsibilities must be set out truthfully and clearly.

2.4. FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

Pollmann International respects the right of all employees to establish employee representatives and to conduct negotiations to regulate working conditions.

The corporate culture of Pollmann International is characterized by trusting and constructive cooperation with the respective employee representatives. Even in controversial discussions, the aim is always to maintain sustainable cooperation for the benefit of the company and its employees. Membership or non-membership of a trade union or employee representative body has no influence on the treatment of employees. At locations where there is no employee representation, Pollmann International promotes regular dialog between employees and the company.

2.5. PROTECTION AGAINST DISCRIMINATION

A central principle of our corporate policy is the equal treatment of all employees.

Discrimination and harassment of employees is not tolerated at Pollmann International. No person may be discriminated against, favored or harassed on the basis of characteristics such as gender, skin color, origin, faith, political or other beliefs, ethnic background, age, physical or mental impairment, sexual orientation or other characteristics protected by local laws, such as membership in a national minority, pregnancy or previous military service (veteran status).

We are committed to government programs aimed at overcoming the effects of past discriminatory practices or other disadvantages.

2.6. DIVERSITY, EQUITY AND INCLUSION

Pollmann International values a corporate and work culture that respects diversity, equity and inclusion. Diversity should be valued and celebrated at all levels so that everyone can reach their full potential and make their contribution.

2.7. WOMEN'S RIGHTS

Pollmann International adheres to the women's rights set out in the UN Convention on the Elimination of All Forms of Discrimination Against Women and expects the same behavior from its business partners. No discrimination against women is tolerated.

Pollmann International provides equal opportunities in employment. Equal pay is offered for equal work regardless of gender.

2.8. RIGHTS OF MINORITIES AND INDIGENOUS PEOPLES

We respect the rights of minorities and indigenous peoples and take them into account in our business activities. Pollmann International acts in accordance with the principles of the

- International Labour Organization (ILO) on Indigenous and Tribal Peoples in independent countries (ILO Convention No. 169)
- United Nations (UN) Declaration on the Rights of Indigenous People.

2.9. RIGHT TO HEALTH AND SAFETY AT WORK

One of the key priorities at Pollmann International is to protect and promote the health of its employees.

The company strictly adheres to the applicable occupational health and safety laws worldwide and implements additional standards of its own to increase occupational safety. The application of effective management systems and certifications enables us to regularly review the relevant regulations regarding occupational health and safety and ergonomic workplace design in order to reduce the risk of accidents.

The responsible managers fulfill their obligations in accordance with the applicable occupational health and safety requirements of Pollmann International. They ensure that the employees concerned are regularly instructed on relevant health and safety aspects in the workplace. Managers receive regular training in this area. In addition, the company implements health management initiatives to actively promote the physical and mental health of its employees.

In addition, Pollmann International takes appropriate protective measures to ensure the safety of its employees and visitors at all locations. Based on site-specific risk analyses, suitable measures are implemented in accordance with the applicable laws.

2.10. PRIVATE OR PUBLIC SECURITY FORCES

The commissioning of security forces by business partners is only permitted if there is no impairment of the freedom of association. It is prohibited to commission security forces if they use torture, violence or other inhumane and degrading behavior against other people.

The Pollmann Group does not accept unlawful behavior by security personnel towards employees or external persons. Pollmann International strives to ensure that security service providers are contractually obliged to respect human rights and provides advice and training where necessary.

2.11. REMUNERATION

The employees of Pollmann International are offered competitive and performance-related remuneration. This is supplemented by additional benefits.

Pollmann International remunerates its employees fairly, both internally and compared to external benchmarks. Uniform principles form the basis for a globally balanced remuneration system. Where available, the legally prescribed minimum wages or minimum standards in the respective economic sectors are respected and adhered to when determining remuneration. In addition, Pollmann International strives to position the overall remuneration package (consisting of remuneration and additional benefits) for its employees attractively in comparison to the relevant labor market.

Performance behavior and work results serve as decisive criteria for remuneration at all locations of Pollmann International. The company remunerates employees based on their individual or collective performance in accordance with local guidelines.

2.12. WORKING HOURS

Pollmann International always follows at least the current national working time regulations. In addition, our working time principles define the guidelines applicable within Pollmann with regard to rest periods, time off, and vacation. These principles support all Pollmann International companies worldwide in the development of their own working time guidelines.

The regulations regarding working hours and breaks take into account both operational requirements and the individual needs of employees. They are based on ergonomic criteria that consider medically recognized physical and psychological stress factors.

Pollmann International is actively committed to achieving a good work-life balance for employees at different stages of their career and life. Thus, the company provides various working time models and offers advisory services to employees. Each Pollmann International location develops customized measures that meet the regional and country-specific conditions.

2.13. QUALIFICATION

Pollmann International attaches great importance to the long-term employability of all employees. When hiring new employees, their individual skills are taken into account and promoted and developed accordingly. The company invests specifically in the skills and talents of its employees through forward-looking training and further education programs in order to ensure high performance and employability in the long term. This includes not only professional qualifications, but also personal development. Access to qualification measures and training is made possible for all employees in accordance with the principle of equal opportunities.

2.14. RIGHT TO PRIVACY – PROTECTION OF PERSONAL DATA

Pollmann International applies high data protection standards to protect the personal rights of employees, customers and suppliers with regard to the use of their personal data. As a matter of principle, we are guided by German and European data protection standards in order to ensure the best possible respect for personal rights in all Pollmann Group companies at a global level.

The use of advanced information technologies and increasing digital networking can pose considerable challenges in the handling of personal data in day-to-day business operations. Pollmann International works to ensure that such data is used in accordance with the law in order to minimize the impact on privacy and to protect the rights of each individual. This also includes the right to information, rectification, blocking or deletion of data.

2.15. RIGHTS OF LOCAL COMMUNITIES NEAR LOCATIONS OF POLLMANN INTERNATIONAL

Pollmann International respects the human rights of local communities at its sites that may be affected by the corporate activities of Pollmann Group companies. In addition, the company strives to minimize the impact on the local population during site preparation, construction work and ongoing operations. Environmental and social analyses are carried out on various factors such as water availability, traffic conditions and emissions. Pollmann International attaches great importance to environmentally friendly and resource-efficient processes and procedures in order to minimize possible negative impacts on the local population.

2.16. LAND, FOREST AND WATER RIGHTS AND FORCED EVICTION

When acquiring, developing or otherwise using land, forests and waters, neither forced eviction or displacement nor unlawful deprivation of land, forests and waters may be carried out.

3. DEALING WITH BUSINESS PARTNERS

Pollmann International expects its business partners to respect and comply with human rights, in particular the Core Labour Standards of the ILO, the UN Guiding Principles on Business and Human Rights as well as the principles of the UN Global Compact. We are actively committed to implementing and adhering to these principles along our entire value chain.

3.1. SUPPLIERS

Pollmann International expects their suppliers to respect the human rights in the course of their business activities. It is essential for Pollmann International that suppliers fulfill their social responsibility and in particular observe the Core Labour Standards of the ILO. This is an indispensable basis for long-term business relationships.

Pollmann International, as a globally active company, cooperates with an extensive network of suppliers. With the increasing internationalization of purchasing and ever more complex supply chains, the risk of being directly or indirectly associated with human rights violations is growing. In order to promote compliance with social standards in its supplier network, Pollmann International is involved in cross-industry initiatives and networks.

The General Terms and Conditions and the International Purchasing Conditions of Pollmann International oblige suppliers to respect human rights, in particular the ILO Declaration on Fundamental Principles and Rights at Work. They are also encouraged to demand this commitment from their own suppliers, for example by agreeing sustainability principles with their own suppliers.

In addition to the prohibition of child and forced labor, the protection against discrimination and ensuring freedom of association, suppliers are obliged to meet health and safety standards and ensure adequate working conditions.

Respect for human rights is a decisive criterion in the supplier selection process. Possible violations of required standards are pursued by the Pollmann purchasing team. If necessary, an escalation process is initiated and corrective action plans are developed together with the supplier. If a supplier fails to take effective corrective action, this may ultimately lead to the termination of the business relationship by Pollmann International.

4. IMPLEMENTATION OF THE CODE ON HUMAN RIGHTS AND WORKING CONDITIONS OF POLLMANN INTERNATIONAL

Pollmann International implements its Code on Human Rights and Working Conditions in accordance with the UN Guiding Principles on Business and Human Rights. Human rights are an integral part of the corporate culture of Pollmann International and play an important role in the operational management processes and key investment decisions.

The Code on Human Rights and Working Conditions of Pollmann International is communicated to all employees.

4.1. RESPONSIBILITY

Managers are responsible for implementing the Code on Human Rights and Working Conditions of Pollmann International in their respective areas of responsibility.

It is the responsibility of every manager to inform their employees about the content and relevance of this Code and to advise and support them in implementing the principles set out in it in their day-to-day business. In addition, managers must take the Code on Human Rights and Working Conditions into account when carrying out their management duties. This applies, for example, to interactions with employees or the basis for business decisions. If there are any indications of possible violations of human rights, managers are required to clarify these carefully and immediately.

It is the duty of every employee to respect this Code on Human Rights and Working Conditions of Pollmann International and to align their professional conduct with the principles set out in it.

If an employee notices signs for possible violations of human rights, they can either contact their immediate manager or the contact point listed below. All questions and reports are treated in strict confidence. The compliance team investigates the information and takes appropriate corrective action if necessary. This may enable problems to be resolved at an early stage and prevent greater disadvantages for those affected.

4.2. AUDIT AND REGULAR REPORTING

The management board of Pollmann International receives regular reports on the status and implementation of this Code on Human Rights and Working Conditions.

4.3. REVIEW AND DIALOG

This Code on Human Rights and Working Conditions was developed in cooperation with the responsible specialist departments of Pollmann International and external stakeholders. Due to the constantly changing challenges in the area of respect for human rights for companies, Pollmann International is committed to regularly reviewing its human rights standards and ensuring that they are always up to date and effective. Pollmann International will closely monitor important changes in its immediate environment and adapt internal processes accordingly if necessary. The company also undertakes to carry out critical self-reflection with regard to its position on human rights.

4.4. PROCESSING OF QUESTIONS AND REPORTS

Incoming questions and reports are processed by a compliance team. Occasionally, relevant specialist departments or external stakeholders are also involved in the process. The team reviews the reported matters and initiates the necessary measures.

If the review reveals that Pollmann International has directly or indirectly caused or contributed to a violation, appropriate corrective action will be taken immediately. Violations by employees of the human rights principles described in the Code may lead to consequences under labor law in accordance with the applicable local legislation.

The following website can be used to report any suspected abuses and misconduct:
<https://pollmann.secureveal.com/>

FINAL CLAUSE

The Code on Human Rights and Working Conditions of Pollmann International becomes effective on the day it is signed. No individual claims or claims of third parties can be derived from the Code. Only the German version of this Code is binding.