

Global Human Rights Policy

BACKGROUND:

Gentherm is committed to ensuring that we treat people with respect at all times. This document describes Gentherm's global policy and stance related to key human rights topics. Respecting the fundamental and essential human rights of our employees, customers, suppliers, and other stakeholders is the foundation of our Global Human Rights Policy and a basic requirement for the way that Gentherm does business.

Our Global Human Rights Policy is intended to supplement (and not amend) the [Gentherm Code of Conduct](#), our Winning Culture Behaviors, and numerous applicable local policies and practices developed in accordance with local regulations and requirements. Gentherm acknowledges internationally recognized human rights standards and this policy aligns with many of the key principles identified in the United Nations Guiding Principles on Business and Human Rights, UN Universal Declaration of Human Rights the International Labor Organization Declaration on Fundamental Principles and Rights at Work, and others.

This policy will be distributed to all new employees as part of their employee orientation / new hire training process, and will be included in Gentherm's annual Global Conflict of Interest & Business Conduct Assessment survey, ensuring appropriate employee training and awareness regarding these important topics.

This policy applies to Gentherm globally, including all of its subsidiaries, affiliates, partnerships, suppliers, and other business associations that are effectively controlled by the company. All Gentherm directors, officers, and employees, including part-time, temporary, and other personnel working for or on behalf of Gentherm are subject to this policy.

GENTHERM GLOBAL HUMAN RIGHTS POLICY COMPONENTS:

Gentherm recognizes the importance of building and maintaining a working environment that supports and protects the fundamental human rights for our employees, customers, suppliers, and stakeholders. These include, but are not limited to the following items:

1. *Harassment and Discrimination*

- a. Gentherm prohibits any sort of discrimination or harassment based on race, age, sex, national origin, religion, sexual orientation, gender identity and/or expression, disability, or any other status protected by applicable law. These requirements apply not only to our active employee base, but also to our recruiting, hiring and recruiting employee separation practices.
- b. Gentherm is committed to creating an environment that does not tolerate harassment or discrimination of any form, supporting minority, indigenous people, and women's rights and to valuing our employees, including potential employees / recruits, based on their professional qualifications, skills, performance and experience.

2. *Forced Labor / Human Trafficking*

- a. Gentherm strictly prohibits any use, in any form, of forced labor, including indentured labor, bonded labor, prison labor, or any similar form of non-voluntary working arrangement. This would also include any arrangement that includes or supports in any manner, human trafficking, forced relocation, or other similar practices.
- b. Gentherm also forbids the use of physical punishment, threats of violence, physical intimidation or other forms of physical or mental abuse in any form.

3. *Child Labor*

- a. Gentherm prohibits the hiring of employees under the age of 15, or higher based on the local legal minimum working age / required schooling age.

4. *Safe & Healthy Working Conditions*

- a. Gentherm is committed to providing a safe and healthy working environment to our employees, including full compliance with all applicable healthy and safety laws and regulations, as well as compliance with internal healthy and safety policies.
- b. This commitment includes a strong focus on actions designed to minimize the risk of on-the-job accidents and injuries, and ongoing programs to continually strive to reduce workplace safety incidents.
- c. Safe and healthy working conditions further includes working to provide and maintain a workplace that is free from violence, intimidation, infectious disease or other conditions detrimental to employee health and wellness, whether from internal or external sources. Actions and activities in support of this effort may include professional security personnel, restricted / badge-access buildings and grounds, and other workplace controls as appropriate.
- d. As part of providing a safe and healthy workplace, sites will not implement unreasonable restrictions on workers' freedom of movement during their time on-site. Employees will be allowed reasonable allowances for movement related to health and well-being.
- e. As part of supporting a safe and healthy environment, sites will respect all applicable regulations related to land, forest, and water usage, as well as the rights of the local communities, related to these topics. Gentherm does not support forced / illegal eviction of peoples or communities, and always aligns with applicable laws and regulations in this area.

5. *Freedom of Association and Collective Bargaining*

Gentherm respects our employees' right to join or form, including the right not to join, a labor union without fear of retaliation, intimidation, or harassment. If employees are represented by a legally recognized union, Gentherm leadership is committed to establishing productive and positive communications and to bargaining in good faith with appropriate, freely chosen representatives / labor leadership.

6. *Working Hours, Benefits, and Wages*

Gentherm complies with all applicable laws related to the payment of wages and benefits for our employees. It is our general practice to compensate our employees in a competitive manner relative to the industry and local benchmarks and standards. Gentherm is also committed to ensuring equal pay for equal work.

ADDITIONAL GUIDANCE (DUE DILIGENCE, GOVERNANCE, & MORE)

Gentherm will consider this policy and its underlying principles as we select major suppliers and service providers, taking into account noted non-compliance in these areas. We will strive to ensure that these principles are followed throughout our entire supply chain. Our suppliers, contractors and other business partners with whom we do business, are expected to adhere to these standards, including, but not limited to, human rights and labor practices. As part of our commitment to these principals, Gentherm has made our Supplier Requirements Manual and Supplier Code of Conduct available to our vendors.

Gentherm encourages our employees, suppliers, customers, and any other stakeholders to report any activity that is contrary to our Global Human Rights Policy to appropriate management / leadership, via the numerous resources available, including but not limited to:

- Gentherm Ethics Hotline – phone or [web-based](#)
- Local Human Resources
- Direct Manager / Local Management
- Gentherm Legal Department, including Global Compliance

Failure to comply with this policy, may result in penalties up to and including possible termination of employment or contract, as appropriate.

Employees, suppliers, customers, and any other stakeholders with questions, suggestions for improvement, implementation, or other feedback on our Global Human Rights Policy can reach out to Gentherm management, either by contacting Gentherm Human Resources, or the Gentherm Legal / Compliance team at Compliance@Gentherm.com.