

Declaration of principles of voestalpine Automotive Components Dettingen GmbH & Co KG

voestalpine Automotive Components Dettingen GmbH & Co. KG, hereinafter referred to as "vaAC Dettingen", develops and produces ready-to-install stamped and formed parts, complex assemblies as well as safety and impact protection components for well-known automobile manufacturers. This declaration of principles applies to vaAC Dettingen and the economically affiliated companies listed in the annex. We are part of the voestalpine Group with the parent company voestalpine AG based in Linz, Austria. In accordance with the values and principles of the voestalpine Group, we are aware of our comprehensive economic, ecological and social responsibility in our own business area and in our co-operation with business partners. Compliance with generally recognised standards relating to corporate governance, the environment and human rights is crucial to our long-term business success and is therefore an integral part of our business activities. We derive the areas of action for implementing our duty of care from a risk assessment of the core elements of our business activities. They are continuously adapted to new requirements and findings. Our approach is also embedded in the voestalpine Group's sustainability strategy. All obligations, standards and measures derived from this apply to us.

We respect internationally recognised human rights

In its unconditional commitment to respecting human rights, vaAC Dettingen relies on the International Bill of Human Rights, the UN Principles on Business and Human Rights and the core labour standards of the International Labour Organisation (ILO). As part of the voestalpine Group, we also support the UN Global Compact (UNGC) and are committed to its ten principles in the areas of human rights, labour, environment and anti-corruption.

Respect for the rights of all people is a fundamental maxim of our actions.

We take care of the environment

vaAC Dettingen is committed to complying with all relevant environmental laws and regulations as well as internationally recognised environmental protection standards. These include the requirements of the international conventions of Minamata (mercury), Stockholm (persistent organic pollutants) and Basel (hazardous waste).

We formulate clear expectations of all employees and business partners

In fulfilling our human rights and environmental due diligence obligations, we refer to the United Nations Guiding Principles on Business and Human Rights, among other things. We are committed to prevent, eliminate and minimise negative impacts on human rights and the environment in our own business activities. We also point out that our business partners (suppliers and customers) should also respect human rights and the environment and fulfil their human rights and environmental due diligence obligations. The following guidelines implement this requirement:

- The voestalpine Code of Conduct specifies the commitment to respecting human rights and protecting the environment in the "Social Responsibility" section and in the "Environment & Climate Protection" section. It applies to all employees of the voestalpine Group (<https://www.voestalpine.com/group/en/group/compliance/>).
- Our expectations of business partners are derived from the voestalpine Code of Conduct and are anchored in the binding Code of Conduct for Business Partners. The voestalpine Code of Conduct for Business Partners applies to all suppliers and customers of vaAC Dettingen (<https://www.voestalpine.com/group/en/group/compliance/>).

To ensure that the above guidelines are understood and implemented, we train our employees worldwide on the topics of human rights and their implementation in everyday working life and in the supply chain. Human rights and environmental protection are included as recurring agenda items in our communication with our business partners.

We organise our due diligence based on risk

Existing risk management systems and risk analyses as part of our human rights and environmental due diligence obligations help us to understand whether and where human rights or the environment could be at risk at our sites and in our supply chains. The risk analysis is updated annually.

Due diligence obligations in the supply chain

The first step in analysing the risks in our supply chains is a filter system based on country-specific information and industry- and product group-specific risk factors. In this way, we regularly obtain an overview of human rights and environmental risks in our supply chains, which are specifically named in the above-mentioned codes of conduct and provided with a corresponding expectation regarding their avoidance. A comprehensive risk analysis for the supply chain was carried out for the first time using data from the 2022/2023 financial year and will be repeated cyclically (at least annually) from then on. We apply a system developed at voestalpine for this purpose. The application of the filter system helps us to apply testing mechanisms specifically to the suppliers identified and to derive preventive measures.

In our supply chains, there is a risk of human rights violations in the extraction of raw materials for steel production. Furthermore, we are aware that risks of human rights violations can also occur in the global supply chains of other (indirect) materials we use. However, vaAC Dettingen is not aware of any violations of human rights in its own supply chains - insofar as they can be traced back to their origin. We are working to increase the transparency of our supply chains in order to better assess these risks and continuously improve our due diligence in this regard.

Based on the risk filter, the next step is to request specific evidence from our business partners of how they fulfil the requirements of our Code of Conduct for Business Partners. We also support business partners in implementing our requirements. We are also involved in various initiatives within the voestalpine Group together with other stakeholders, such as the Responsible Steel Initiative. In this way, we endeavour to prevent human rights and environmental violations by our business partners in good time.

Where necessary, we or third parties carry out checks to ensure the careful implementation of any improvement measures. This requires the cooperation and collaboration of our business partners. If human rights and environmental violations are identified, we will intervene

consistently and take suitable and appropriate remedial measures in accordance with the severity of the respective violations in order to end or at least minimise the violations. These remedial measures may ultimately lead to the suspension or termination of the supply relationship.

Due diligence obligations at own locations

In order to fulfil the due diligence obligations at our own sites, we are expanding our risk management approach for vaAC Dettingen's own business division in parallel with our approach along the supply chains.

As part of this, we first carry out a comprehensive risk analysis in order to identify and assess the risks for our locations in accordance with the German Supply Chain Sustainability Act (Lieferkettensorgfaltspflichtengesetz – LkSG) and determine any need for action. If we identify new significant risks, we will initiate appropriate preventive measures in the 2024/2025 financial year. If a human rights or environmental risk materialises, we will take action to put an end to it promptly using tailored solutions. Employees who have intentionally or grossly negligently violated the Code of Conduct for Employees are already subject to disciplinary measures and, if necessary, consequences under civil and criminal law.

We have made it our mission to prevent human rights and environmental violations at our sites to the best of our knowledge and belief. In the future, we will continue to work on adapting and continuously developing our risk management on the basis of our experience. We will continue to update this policy statement in line with these adjustments and further developments.

voestalpine whistleblowing system

The voestalpine Group has various ways of reporting environmental and human rights risks and violations that affect our own business operations or our supply chains. Information obtained from whistleblowers helps us to recognise human rights and environmental risks and violations at an early stage, thereby preserving our values and preventing damage to our company, our employees and our business partners. Employees, business partners and other persons have the opportunity to report violations anonymously via the voestalpine web-based whistleblower system at <https://www.bkms-system.net/voestalpine> to report violations. The web-based whistleblower system enables reporting in various languages. Other channels are listed at <https://www.voestalpine.com/group/de/konzern/compliance/meldungen-von-fehlverhalten/>. The reports that are viewed and received are promptly forwarded to the responsible departments for review.

Employees who report violations of laws, the Code of Conduct or other internal guidelines and regulations in good faith will not be subject to reprisals or negative consequences of any kind.

We report regularly on our activities

From 2024, we will report annually on the fulfilment of our human rights due diligence obligations in a separate report in accordance with the LkSG. The report will be published on our website. The voestalpine Group publishes the sustainability strategy, the overarching human rights approach and the Group's measures in the annual Corporate Responsibility Report.

We take responsibility

The management of voestalpine Automotive Components Dettingen Verwaltungs GmbH, which is the general partner of voestalpine Automotive Components Dettingen GmbH & Co. KG and manages the company, is responsible for implementing and complying with the human rights and environmental due diligence obligations described in this declaration.

The management of the voestalpine Automotive Components Dettingen GmbH & Co. KG

Tobias Grossmann
Management - CEO & COO

Michael Wieser
Management - CFO

Annex - Locations

Location/plant/company
voestalpine Automotive Components Dettingen GmbH & Co. KG DE - 72581 Dettingen/Erms
voestalpine Automotive Components Dettingen GmbH & Co. KG Schmölln location DE - 04626 Schmölln
voestalpine Automotive Components Birkenfeld GmbH & Co. KG DE - 55765 Birkenfeld / Nahe
voestalpine Automotive Components Böhmenkirch GmbH & Co. KG DE - 89558 Böhmenkirch
voestalpine Automotive Components Fontaine S.A. FR - 90150 Fontaine
voestalpine Automotive Components Arad SRL RO - 310130 Arad
voestalpine Automotive Components Aguascalientes S. de R.L. de C.V. MEX - 20340 Aguascalientes
voestalpine Automotive Components East London (Pty) Ltd. ZA - 5601 East London
voestalpine Automotive Components Shenyang Co., Ltd. CN - 110101 Shenyang
voestalpine Automotive Components Tianjin Co. Ltd. CN - 301700 Tianjin