



## Schaeffler Group Human Trafficking Policy

Schaeffler Group considers the respect for human rights as integral part of our corporate responsibility and supports the core principles outlined in the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Global Compact and the ILO Core Conventions on Labor Standards. Schaeffler actively prevents infringements of human rights independently from whether they are related to our own operations or those of our business partners. This is also lined out in the Schaeffler Group Code of Conduct and Supplier Code of Conduct.

Almost every country in the world is affected by trafficking, whether as a country of origin, transit or destination for victims. Severe forms of human trafficking refer to the recruitment, transportation, transfer, harboring or receipt of persons through the use of force, coercion, abduction, fraud, deception, abuse of power, or giving payments or benefits to a person in control of the victim. Trafficking may take place for the purpose of exploitation, which includes the prostitution of others, sexual exploitation, forced labor, slavery or similar practices.

Therefore, Schaeffler Group pays special attention to human trafficking.

Schaeffler Group strictly rejects any form of human trafficking. The following principles apply to all areas of our company and all our subcontractors and other agents. We are committed to taking responsibility for our employees, society, and future generations.

### **Prohibition of human trafficking**

Schaeffler Group strictly prohibits its employees and all subcontractors and agents from using trafficked labor or engaging in any forms of trafficking in persons as defined above including the procurement of commercial sex acts.

It is not allowed to destroy, conceal, confiscate, or otherwise deny an employee access to the employee's identity or immigration documents, such as passports or drivers' licenses.

### **Recruitment process**

During the recruitment of employees, it is prohibited to use misleading or fraudulent practices or offering of employment, such as failing to disclose basic information in a format and language accessible to the employee. It is not allowed to make material misrepresentations during the recruitment of employees

regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided or arranged by employer or agent), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.

Recruiters and recruitment companies must comply with local labor laws of the country in which the recruiting takes place at any time. Employees may not be charged with recruitment fees by the employer (i.e. fees of any type, including charges, costs, assessments, or other financial obligations, that are associated with the recruiting process, regardless of the time, manner, or location of imposition or collection of the fee).



#### **Employee mobility**

If housing is provided or arranged for employees, the housing must meet the host country housing and safety standards.

Employees, who are not residents of the country in which the work is taking place, need to be paid their return transportation costs upon the end of employment unless they are legally permitted to remain in the country of employment and choose to do so.

#### **Employment contracts**

An employment contract, recruitment agreement, or other legally required work document must be provided in written

in a language the employee understands. The document must contain a detailed description of the terms and conditions of employment and be submitted to the employee at least five days before the employee relocates cross-border to perform work.

#### **Whistleblowing on human rights**

Any case of a potential human rights violation including human trafficking can be reported via the Schaeffler Group whistleblowing system. This system is available in a number of languages and allows anonymous, confidential, specially encrypted, secure communication with the investigation team in Schaeffler Group's Compliance department.

#### **The whistleblowing system can be reached by the following means:**

Post: Schaeffler AG, Forensics and Investigations,  
Industriestrasse 1 – 3, 91074 Herzogenaurach, Germany  
24/7 telephone hotline: +49 30 12095120 (German, English, French)  
Availability by phone in other languages:  
Spanisch +1 213 2791017  
Portuguese +55 21 20182964  
Chinese +86 10 85233042  
E-mail: investigations@schaeffler.com  
Online reporting channel <https://www.bkms-system.net/schaeffler>

Schaeffler Group will vigorously investigate any leads regarding misconduct in accordance with the principle of proportionality. Every lead will be followed up. Depending on the result, a comprehensible decision is made as to what consequences are suitable, necessary, and commensurate.

**Corinna Schittenhelm**  
Vorstand Personal