

Policy Statement of thyssenkrupp Automotive Body Solutions GmbH on Compliance with Human Rights and Environmental Due Diligence Obligations

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Preamble

thyssenkrupp and thyssenkrupp Automotive Body Solutions GmbH are committed to the highest sustainability standards, which encompass good corporate governance as well as environmental and social responsibility. As an international industrial and technology group, we source raw materials, goods, and services worldwide.

In doing so, we put people first. This applies equally to everyone—both our own employees and our suppliers.

At thyssenkrupp, we have created a Group-wide compass in the form of our Mission Statement, which guides our actions and behavior. Our fundamental values naturally also include respect for human rights and basic environmental standards.

Our values such as personal responsibility, openness, and transparency, as well as behavior that is always legally compliant and ethically correct, play an important role in this.

Understanding of Human Rights and Environmental Due Diligence thyssenkrupp Automotive Body Solutions GmbH

As part of the thyssenkrupp Group, we comply with all applicable laws, regulations, and standards in the countries where we operate or are based, and we expect the same from our suppliers. Where national laws contain more comprehensive provisions than the regulations applicable at thyssenkrupp and thyssenkrupp Automotive Body Solutions GmbH, national law takes precedence. We expect our Group companies, as well as executives, members of the Executive Board and management, and other employees, as well as our suppliers, to comply with the principles of the United Nations Global Compact, the United Nations Universal Declaration of Human Rights, the International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights, and the core labor standards of the International Labour Organization (ILO). Our additional human rights and environmental expectations¹ must also be acknowledged and observed by all our employees and suppliers:

- **Child labor:** Compliance with the prohibition and abstention from any form of child labor;
- **Discrimination:** Ensuring a work environment free from discrimination based on gender, skin color, religion, nationality, political or other beliefs, ethnic origin, disability, age, sexual orientation and identity, or other characteristics;
- **Forced labor:** Rejection of any form of forced or compulsory labor, slavery, or human trafficking;
- **Freedom of association:** The right to form employee representative bodies, as well as to strike and engage in collective bargaining;
- **Compensation and working hours:** Compliance with applicable national legislation regarding working hours, compensation, minimum wage, and social benefits, or with ILO international standards where national regulations are lacking;
- **Contract Workers:** Regardless of the type of contract, applicable national law must be observed in contractual and labor relations when employing contract workers.

¹ thyssenkrupp has also set out human rights and environmental expectations in its Code of Conduct (CoC) and Supplier Code of Conduct (SCoC).

Contract workers must be educated and monitored through appropriate measures, particularly with regard to human rights risks;

- **Occupational health and safety:** Establishment and implementation of an appropriate occupational health and safety management system to prevent accidents and work-related illnesses as effectively as possible;
- **Protection of freedom of expression, personal rights, and privacy;**
- **No causing of harmful soil degradation, water pollution, air pollution, harmful noise emissions, or excessive water consumption** that is likely to significantly impair protected rights and legal interests;
- **No unlawful appropriation of land, forests, and water bodies** whose use secures people's livelihoods;
- **No violation of environmental obligations²** arising from the use, storage, transboundary movement, or disposal of mercury (compounds), persistent organic pollutants, or hazardous waste.

Our Approach to Compliance with Human Rights and Environmental Due Diligence Obligations

thyssenkrupp and thyssenkrupp Automotive Body Solutions GmbH have developed a group-wide concept and corresponding organizational structure to create a sustainable culture for compliance with human rights and environmental due diligence obligations.

³This is ensured through interdisciplinary collaboration among various departments, which, together with other experts, are responsible for implementing due diligence obligations within our own business unit, thyssenkrupp Automotive Body Solutions GmbH, or within our supply chain. This integrated approach is also reflected in the responsibilities of our management team members for human rights and environmental protection.

² Compliance with the Stockholm Convention on Persistent Organic Pollutants, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal, and the Minamata Convention on Mercury.

³ The "own business area" encompasses all of our activities in Germany and abroad that are carried out for the manufacture and use of products and the provision of services.

The SCA Officer Business at thyssenkrupp Automotive Body Solutions GmbH oversees the implementation of the framework for compliance with human rights and environmental due diligence obligations at thyssenkrupp Automotive Body Solutions GmbH. The SCA Officer Business reports to the management of thyssenkrupp Automotive Body Solutions GmbH and coordinates continuously with the SCA Council Group and the SCA Officer Group at thyssenkrupp.

This SCA Council Group⁴ is responsible for implementing the concept for compliance with human rights and environmental due diligence obligations within the thyssenkrupp Group. This committee meets regularly and as needed. The SCA Council Group is coordinated by the SCA Officer Group, which acts as the spokesperson for the SCA Council Group and reports directly to the Executive Board of the thyssenkrupp Group. The SCA Council Group includes members from various central functions and departments as well as representatives from the segments of the thyssenkrupp Group.

In addition, there is a regular Group-wide exchange between the SCA Council Group and experts and managers from the segments.

The Group Function Legal & Compliance is responsible for the legally mandated oversight of risk management at thyssenkrupp AG. The Group General Counsel and Chief Compliance Officer has been appointed to perform these duties.

For thyssenkrupp Automotive Body Solutions, the VP Compliance Automotive is responsible for the required oversight of risk management.

Our Strategy: Working Together for Human Rights and Environmental Protection

thyssenkrupp and thyssenkrupp Automotive Body Solutions GmbH are continuously working to analyze the human rights and environmental impacts of our business activities in order to minimize potential risks and prevent them from occurring. To this end, thyssenkrupp has established a Group-wide framework for compliance with human rights and environmental

⁴ “German Act on Corporate Due Diligence in Supply Chains,” or the Supply Chain Act for short.

due diligence obligations, characterized by an integrated and interdisciplinary risk management system—⁵ —comprising risk analyses, processes for preventive and remedial measures, the definition of responsibilities, the issuance of a policy statement, the maintenance of a grievance procedure, as well as documentation and reporting. This system is also used by thyssenkrupp Automotive Body Solutions GmbH to comply with human rights and environmental due diligence obligations.

⁶The key components of thyssenkrupp's concept for compliance with human rights and environmental due diligence obligations are regulated in the thyssenkrupp Code of Conduct (CoC), among other places:

- thyssenkrupp Code of Conduct (CoC);
- thyssenkrupp Supplier Code of Conduct (SCoC);
- International Framework Agreement (IFA);
- thyssenkrupp Standards and Regulations for Occupational Health and Safety;
- thyssenkrupp Standards and Regulations for Environment and Energy.

We have implemented this risk management system as part of the thyssenkrupp Group. It consists of several elements, in particular:

1. A central risk analysis for our own business unit as well as for the supply chain, in which risks are assessed based on Group-wide sustainability criteria regarding human rights, occupational health and safety, and environmental protection (“SCA risk areas”)⁷ ,
2. the operational implementation of measures designed to minimize or eliminate identified risks, as well as
3. an accessible, publicly available complaint procedure for reporting potential misconduct.

⁵ When we refer to risk management systems, we mean the risk management system for compliance with human rights and environmental due diligence obligations.

⁶ All of thyssenkrupp's own standards and regulations are enshrined in internal guidelines and policies, as well as other documents.

⁷ The interests of potentially affected vulnerable persons—that is, persons whose rights are particularly at risk—are taken into account in the risk analysis of the relevant protected interest

<u>SCA Risk Areas</u>	<u>SCA Individual Risks</u>
<ul style="list-style-type: none"> - Human rights: discrimination 	<p>Child labor; forced labor; workplace discrimination; ; freedom of association; compensation and working ; land grabbing; foreign personnel; contamination; dis- crimination; protection of freedom of expression, personal rights, and privacy</p>
<ul style="list-style-type: none"> - Working health protection: measures 	<p>in particular due to obviously inadequate safety and safety standards, lack of appropriate protective and protective equipment, lack of measures to prevent preventing fatigue, and inadequate training of employees</p>
<ul style="list-style-type: none"> - Environmental protection: 	<p>Use / Storage / Disposal of Chemicals and waste; generation of emissions and consumption of energy and water.</p>

With our multi-level approach, we have implemented uniform minimum standards as part of the thyssenkrupp Group, which we can apply and expand at thyssenkrupp Automotive Body Solutions GmbH in a targeted manner to minimize risk.

Our risk analysis is updated continuously and at least once a year. We also carry out a new risk analysis when necessary (e.g., in the event of a change in the risk situation). The same applies to the risk management system, which we continuously develop and whose effectiveness is regularly reviewed.

In addition to managing and coordinating the monitoring of relevant risks, the SCA Officer Business at thyssenkrupp Automotive Body Solutions GmbH regularly reports to the management of thyssenkrupp Automotive Body Solutions GmbH on the risk management system and the results of the risk analysis conducted.

In our own business unit: How we conduct ourselves at thyssenkrupp Automotive Body Solutions GmbH

Risk Analysis Within Our Own Business Operations

Our own business operations include all of our activities in Germany and abroad that are carried out for the purpose of manufacturing and marketing products and providing services. Our risk analysis within our own business area is based on two pillars: an abstract and a concrete risk assessment.

In the abstract risk assessment, companies are first assigned abstract risk indices by industry and country (“risk mapping”). Furthermore, results from the analysis of Group-wide mandatory measures, processes, and procedures for compliance with human rights and environmental protection are utilized and evaluated for their impact on the LkSG’s protected interests.

The concrete risk assessment is conducted through a survey of thyssenkrupp Group companies, including a self-assessment of risks relevant to thyssenkrupp—which is part of our Risk and Internal Control Management (RIC)—as well as the processing of information from the grievance procedure and other sources. The content of the self-assessment by thyssenkrupp Automotive Body Solutions GmbH regarding compliance with protected human rights and environmental rights and legal interests is uniformly prescribed by the SCA Council Group of thyssenkrupp AG and made available to the thyssenkrupp Group companies.

The risk assessment is continuously refined based on the companies’ self-assessments and the evaluation of reports from the grievance procedure as well as other information. Prioritization is based on the probability of occurrence, the severity of the violation by degree, the number of affected individuals and irreversibility, the company’s ability to influence, and its contribution to individual risks or risk areas.

The results of the risk analysis are evaluated, reviewed, and summarized into a risk score. The evaluation of the results, as well as their aggregation and consolidation, is carried out centrally and assessed by the SCA Council Group of thyssenkrupp AG and the SCA Officer Business of thyssenkrupp Automotive Body Solutions GmbH. Identified risks are mitigated by the companies through appropriate measures.

According to the results of the risk analysis, no risks have been identified that require priority treatment

No risks were identified regarding other protected interests that go beyond a general latent residual risk. thyssenkrupp has established long-standing processes within the Group that address threats to human rights and environmental rights and interests through specific measures. For example,

- an organizational structure: for employee participation, the Sustainability Council, the International Committee for the International Framework Agreement (IFA), and the Occupational Safety and Health (OSH) Council;
- Programs / Processes: the International Framework Agreement, collective bargaining agreements, the global energy efficiency program GEEP (Groupwide Energy Efficiency Program) for the development and implementation of energy-saving measures, certified management systems in accordance with ISO 14001 and ISO 50001, We Care Day;
- Tools: Whistleblowing tools (for compliance, for the IFA), as well as other internal tools to prevent violations of protected rights and legal interests.

Preventive and Remedial Measures in Our Own Business Unit

As part of the thyssenkrupp Group, we have implemented a wide range of preventive measures within our own business unit—taking into account identified risks—to prevent or minimize human rights or environmental risks.

In addition to the implemented regulations and Group-wide standards, various other measures are being implemented at thyssenkrupp Automotive Body Solutions GmbH.

If a potential violation of human rights or environmental rights and legal interests is imminent or has occurred, the respective remedial process must be initiated. This is ensured by an established process for taking remedial measures at thyssenkrupp Automotive Body Solutions GmbH.

If an imminent or actual violation of a human rights or environmental obligation is identified, our portfolio of measures includes ad hoc measures to prevent or end the violation. This also includes informing and involving key departments, the responsible persons or committees of the respective company, up to and including the SCA Officer Business at thyssenkrupp Automotive Body Solutions GmbH, as well as a root cause analysis and a final effectiveness review. Awareness of an increased risk situation also leads to an increased

risk rating, which remains in place until remedial measures or specific preventive measures have been successfully completed in the relevant area of protection.

Together with our partners: Identifying and avoiding risks

Risk analysis of our suppliers

Based on the individual SCA risks, we conduct a basic risk analysis of our direct suppliers and identify potential risks related to our “SCA risk areas.” In addition to applying different weightings to individual SCA risks, our ongoing risk analysis takes into account, among other factors, external risk indices, the supplier’s location and industry, the scope of business activity (purchase volume), the type of goods supplied, as well as the severity and (ir)reversibility of potential events. Complaints received may also impact the supplier’s risk assessment, depending on their content.

Based on the results of the risk analysis for specific suppliers, an SCA risk category is determined for each supplier. We use this SCA risk category as the basis for implementing appropriate preventive measures to mitigate the supplier’s risk. Prioritization is based on the identified risk, our contribution to the human rights or environmental risk or to the violation of a human rights or environmental obligation, the degree of our influence, and taking into account the characteristics of the respective business. Findings regarding indirect suppliers are incorporated into our risk analysis on a case-by-case basis.

According to the results of the risk analysis, no risks have been identified that require priority treatment.

Preventive and remedial measures at our suppliers

Based on the SCA risk areas and individual risks identified in the risk analysis, thyssenkrupp has developed an appropriate catalog of measures. These measures enable us to mitigate the risk of potential violations of human rights and environmental rights and legal interests among our suppliers.

Our preventive measures include, for example, the adoption of the thyssenkrupp Supplier Code of Conduct and the conduct of supplier training sessions.

We expect all our suppliers to familiarize themselves with the thyssenkrupp Supplier Code of Conduct and to meet the expectations set forth therein. For suppliers where we have identified an increased risk potential, we expect them to contractually commit to complying with our human rights and environmental expectations and to agree to individual preventive or remedial measures, such as supplier audits.

In the event of known violations of a human rights or environmental obligation by a direct or indirect supplier, thyssenkrupp Automotive Body Solutions GmbH will immediately initiate appropriate measures⁸ aimed at ending these violations.

A particularly serious violation by a supplier may result in a temporary suspension or even the immediate termination of the business relationship.

On this basis, the identified violations will be transferred to a structured resolution process (Corrective Action Plan) and addressed by the respective thyssenkrupp business unit responsible for the supplier.

Our responsibility for implementing this policy statement

Binding Nature and Compliance

This Policy Statement applies to all Group companies as well as all executives, members of management, and all other employees of thyssenkrupp Automotive Body Solutions GmbH. We actively promote communication of the guidelines and agreements underlying our Policy Statement.

This Policy Statement is reviewed for validity by the SCA Officer Business of thyssenkrupp Automotive Body Solutions GmbH at least once a year and as needed, and is updated as necessary—e.g., based on the annual risk analysis—and approved by the management of thyssenkrupp Automotive Body Solutions GmbH.

The Policy Statement is communicated to our employees and relevant stakeholders via the intranet and other channels, and to external parties via our corporate website. We offer training to employees to raise awareness of how to address human rights and environmental

⁸ This may also include a coordinated approach with the support of trade associations and industry initiatives in order to exert the greatest possible influence on the supplier.

expectations. The training is based on the thyssenkrupp Code of Conduct, the thyssenkrupp Supplier Code of Conduct, and this Policy Statement.

Reporting of Potential Misconduct

To address violations of laws and Group-internal regulations or potential infringements of human rights and environmental rights and interests at an early stage and to minimize harm to our employees, business partners, and thyssenkrupp itself, thyssenkrupp has established a complaint procedure for all Group companies. This procedure ensures that relevant reports submitted by employees of thyssenkrupp Automotive Body Solutions GmbH as well as external parties, such as our direct and indirect suppliers or their employees, can be received and processed.

The complaint procedure allows for the anonymous, accessible, and global submission of complaints upon request.

Every whistleblower receives a confirmation of receipt, provided that all necessary information has been provided. As part of the process, we protect the interests of whistleblowers not only by establishing a secure whistleblowing system, but also by committing to treat incoming reports confidentially and to protect whistleblowers acting in good faith by all appropriate means against any disadvantages resulting from a report. You may also submit reports completely anonymously, provided this is legally permissible.

⁹ s of complaints are received centrally via various reporting channels, which can be accessed at <https://www.thyssenkrupp.com/de/beschwerdeverfahren> and <https://www.thyssenkrupp.com/de/ifa>.

Documentation and Reporting

We report annually on the fulfillment of our human rights and environmental due diligence obligations with reference to the past fiscal year. In addition, we continuously document the fulfillment of our due diligence obligations within thyssenkrupp Automotive Body Solutions GmbH. The documentation of the processes described in this policy statement is retained in accordance with legal requirements.

⁹The individuals entrusted with managing the whistleblower system guarantee impartial action, are independent, not bound by instructions, and are bound by confidentiality.

Management of thyssenkrupp Automotive Body Solutions GmbH, February 26, 2026

Three handwritten signatures in blue ink are displayed horizontally. The first signature is a stylized 'TK'. The second signature is 'Frankfurt-Land'. The third signature is a stylized 'TS'.

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