



## **How to report an environmental or human rights related issue in our supply chain.**

Information and instructions about our complaints procedure

Status: 12/2022

Version: 1

## Purpose and scope.

Aim of our complaints procedure is to enable reporting about all types of environmental or human rights related issues. These can be either caused within our own business area, or by actions of our suppliers and pre-suppliers. The procedure is receptive for all complaints and indications, regardless of whether a violation of obligations has already occurred, or if it could occur (risk). Hereby we intend to end or lower existing violations, and to prevent emerging ones. Complaints can be about:

- Child labor of all kinds
- Forced labor and slavery of all kinds
- Occupational safety and health obligations
- Missing freedom of association
- Unequal treatment
- Inadequate wages
- Environmental pollution of any kind
- Unlawful displacement
- Use of mercury and mercury compounds
- Production and use of banned chemicals
- Not environmentally sound handling, collecting, storage and disposal of waste
- Export and import of hazardous waste
- And other environmental or human rights related findings

The reporting person does not have to be personally affected by the reported matter. The procedure is available for every person having knowledge about violations or risks. This includes our and our supplier's employees as well as externals.

As our own business area, we define every activity carried out by or within our division Samvardhana MotherSON Peguform (SMP) and all of its subsidiaries worldwide.

For complaints in other fields, such as ethical or legal non-compliance, please refer to our group-level whistleblower policy: <https://www.motherSON.com/performance/samil-investors/corporate-governance>

## Channels.

In order to provide high accessibility, we established several channels through which our human rights officer can receive complaints and indications:



### Online

Link to our online complaints area:

<https://humanrightscomplaint.motherSON.com/smp>



### By E-Mail

E-Mail address of our human rights officer:

[humanrightscomplaint.smp@motherSON.com](mailto:humanrightscomplaint.smp@motherSON.com)



### By Mail

Address of our human rights officer:

SMP Deutschland GmbH  
Schlossmattenstr. 18  
79268 Bötzingen  
Germany

## How we process your complaint or indication.

To ensure that your matter is appropriately addressed, we strictly follow a seven-step approach in which our human rights officer continuously operates as your confidant.



### 1. Receipt of the complaint or the notice.

After the informant has submitted his complaint or notice via one of the provided channels, he will receive an acknowledgement of receipt from the human rights officer and additional information about the procedure as well as about the confidentiality protection without delay.



### 2. Review of the complaint or the notice.

The human rights officer reviews the complaint or notice and determines further responsibilities if necessary. If the matter is not covered by the complaints procedure, the informant will receive feedback and information about the decision, provided that contact details are available.



### 3. Clarification of the facts.

The facts of the case will be discussed and examined without delay and, if the person providing the information has provided contact details, this person will be involved in the investigation of the facts. If necessary, the human rights officer actively requests additional internal support.



### 4. Development of actions and solutions.

Building on step 3, a proposal for corrective measures is drawn up. If the human rights officer has the contact details of the person providing the information, the officer informs them adequately about the process or requests further contribution if necessary.



### 5. Implementation of corrective measures.

The defined measures are established and their effectiveness is monitored. The time required varies depending on the type and intensity of the interventions.



### 6. Verification and closing.

The results of the implementation are reviewed and evaluated for effectiveness. And if the contact details of the person providing the information are available, this person will be included in the evaluation if necessary.



### 7. Regular verification of effectiveness.

The effectiveness of the complaint procedure is reviewed annually and on an event-driven basis. If required, adjustments to the procedure or corrective measures are made.

## **Internal responsibility.**

The complaints procedure is monitored by our internal human rights officer. The human rights officer is the confident point of contact for reporting persons. In case of external complaints, the human rights officer briefs and requests measures from the Global Director Supplier Quality Management. In case of complaints within the own business unit, internal stakeholders will be briefed and requested for applicable measures tracking the progress of measures as well as keeping the reporting person informed about the complaint progress.

## **How we protect your privacy.**

To protect you from any discrimination or punishment as a consequence of your complaint or indication, we strictly ensure steady segregation of the complaints procedure and the resulting measures. This means, that only our human rights officer will be in direct contact to you. All personal information that allows conclusions to be drawn about you and your identity (especially name, contact details, physical appearance, function) will be strictly treated as highly confidential and only be known by the human rights officer. Your personal information will not be forwarded at any time, neither internally nor externally.

Additionally, you have the option of filing a complaint or indication without leaving any of your personal information. Please note, that in this case we will not be able to actively report to you about the latest progress of your complaint.

Human Rights Officer

SMP Deutschland GmbH