

1 The principles for the respect of human rights

The respect of human rights is an elementary component of our corporate social responsibility, which expresses our vision "We want to create value for people".

Since 2008, HARTING has been committed to the Code of Conduct of the ZVEI and VDMA, which is binding for all HARTING employees and managers worldwide.

In fulfilling our social responsibility, we are guided by the international ISO 26000 "Guidelines on Social Responsibility" standard and have a certified CSR management system in place for our essential companies at HARTING.

This declaration of basic principles applies to our own business activities as well as all employees worldwide.

We expect our business partners, who provide services for HARTING, to undertake compliance with the principles set out here, committing to implement appropriate processes to respect human rights and observe our Code of Conduct. In doing so, pay particular regard to the human rights aspects and in turn, pass on this explicit expectation to their own suppliers. Upon request, the business partners shall provide evidence on compliance with the aforementioned principles.

2 Guidelines and standards

HARTING respects and observes internationally recognised human rights and works to promote these rights in its sphere of influence and within the context of its business activities.

We are committed to the following internationally recognised standards:

- Universal Declaration of Human Rights of the United Nations
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- Fundamental Principles and Rights at Work of the International Labour Organization (ILO)
- OECD Guidelines for Multinational Enterprises
- United Nations Guiding Principles on Business and Human Rights
- Minamata, POPs and Basel Conventions.

3 Risk management system for the compliance with human rights due diligence

The risk management system for respecting human rights due diligence obligations comprises the following elements:

- declaration of basic principles
- risk analysis
- formulation of preventive and corrective measures
- complaints mechanism
- reporting.

The basic policy statement, risk analysis and complaints mechanisms are reviewed at least once a year, or as is required to ensure that they are up to date and further developed and refined accordingly. Adopted measures and the complaints mechanism are also assessed regarding their effectiveness. The corresponding results obtained are used to improve the risk management system.

In order to ensure that human rights are not directly or indirectly impaired, we conduct a respective risk analysis for our own business area including the direct supply chain at least once a year and on an ad-hoc basis. In this context, country indices, studies relating to child and forced labour, working conditions and environmental aspects are used for this purpose. We integrate the results of our risk analysis into relevant company processes and supplier management.

Regarding prevention, we rely on the relations of various activities such as:

- Definition of criteria for supplier selection, training measures and contractual agreements. This includes, that the approval of new suppliers only takes place, if they follow an internationally recognised Code of Conduct, the ZVEI-VDMA Code of Conduct or a comparable Code of Conduct, and are consequently committed to respecting human rights.
- Training and awareness sessions are held in the relevant business areas.
- Information and auditing of our suppliers in Germany. In addition to aspects such as quality, environmental protection and occupational health and safety, these also include issues relating to compliance and human rights.

This procedure described above – the proof of implementation of a code of conduct, training, audits - is being successively internationalised.

4 Reporting human rights violations and potential violations

HARTING has introduced a comprehensive whistleblower system through which employees and third parties can report possible violations of human rights and applicable legal provisions at any time – anonymously if desired and in numerous languages. These reports enable us to uncover and combat such abuses and prevent them in future. All reports are investigated by the compliance organization in accordance with the principle of confidentiality and fair procedure. If the investigations confirm violations of human rights or environmental law, appropriate further measures are initiated. If necessary, state authorities are informed and violations of criminal provisions are reported. Further information on accessing and using the whistleblower system and a link to the electronic reporting option is available at www.HARTING.com.

5 Transparency and sensitisation

We provide our partners insight into our approach and are open for identifying potential improvements, in particular to the further development of our respective processes. We are actively involved in associations such as the VDMA and the ZVEI in order to exchange ideas with our stakeholders and work together to strengthen the compliance with the due diligence obligations concerning human rights. We also use our involvement in the Automotive Industry Dialogue on the implementation of the “National Action Plan for Business and Human Rights” under the auspices of the Federal Ministry of Labour and Social Affairs to expand our knowledge of these topics and to contribute our experience.

HARTING attaches great importance to heightening the awareness of these issues of human rights among its employees. The human rights issues play an elemental role in the CSR training for our employees.

6 Documentation and Reporting

With this declaration, HARTING declares and documents its intention to promote compliance with aspects of human rights. HARTING will provide information on this annually in the form of a report and the measures taken are documented.

Internally, we report regularly and as required on the implementation of our human rights due diligence obligations, for example to the Management Board. We report externally on the fulfillment of our due diligence obligations, in particular through the annual report to be published in accordance with the LkSG

and within the report under the UK Modern Slavery Act. Moreover, we also respond to customer enquiries, for example by way of corresponding platforms or in individualised form.

7 Responsibilities

The Management Board of the HARTING Stiftung & Co. KG is responsible for overall compliance with and implementation of our human rights duty of care and due diligence strategy. The implementation in the individual companies of HARTING is the responsibility of the respective managing directors.

A team comprising company officers from the areas of Corporate Social Responsibility, Global Purchasing and Corporate Legal Services is responsible for monitoring the human rights duty of care and due diligence strategy set out here.

Policy statement on human rights due diligence



Pushing Performance
Since 1945

Espekamp, 20.12.2023

Philip Harting
Chief Executive Officer

Doris Höpf
Board Member for Human Resources & Legal