Webasto Group

Social & Environmental Principles Policy

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1 Introduction

1.1 Definitions

The following terms and abbreviations are used in this Social & Environmental Principles Policy.

Table 1 Definitions and abbreviations

Term	Definition
3TG3	Tantalum, tin, tungsten and gold
CCF	Corporate Carbon Footprint
CCO	Chief compliance officer
CMRT	Conflict Minerals Reporting Template
CO_2e	Carbon dioxide equivalents
EMRT	Extended Minerals Reporting Template
GHG	Greenhouse gas
HRO	Human rights officer
HSE	Health, Safety & Environment
IRMA	Initiative for Responsible Mining Association
LCA	Product Life Cycle Assessment
LCO	Local compliance officer
PCF	Product Carbon Footprint
PO	People & Organization
PPE	Personal Protective Equipment
HRO	Human rights officer
PPE	Personal Protective Equipment
R&D	Research & Development
RMAP	Responsible Minerals Assurance Process
RMI	Responsible Minerals Initiative
SCDDA	German Supply Chain Due Diligence Act
SCoC	Supplier Code of Conduct
VOC	Volatile Organic Compounds
WIMS	Webasto Integrated Management System

1.2 Purpose

Adherence to applicable laws (local, state, national, federal and/or international), rules, regulations and professional standards, and internal guidelines, policies and directives ("**Rules**") constitute a fundamental principle of the corporate culture at Webasto SE, its subsidiaries and affiliates ("**Group Entities**" or "**Webasto Group**" or "**Webasto**"). Our success depends on our compliance with all Rules. Violation of the Rules may result in serious consequences for Webasto Group, its employees, business partners, and stakeholders.

The Webasto Code of Conduct and this Webasto policy on social and environmental principles ("**Social & Environmental Principles Policy**") together form a binding guideline for the members of the management boards of the Group Entities, managerial staff and employees of the Group Entities ("**Employees**"). This Social & Environmental Principles Policy serves as an important guide for the daily conduct of business of the Webasto Group and forms minimum standards for all Employees. This Social

& Environmental Principles Policy is intended to support the Group Entities and the Employees to – to the extent legally and actually/factually possible – fulfill their obligations resulting from the applicable Rules and help avoiding violations of the Rules and associated risks in the field of social & environmental items as well as to support the Employees to adhere to essential social & environmental principles.

All Employees are on notice that breaches of any Rules and/or this Social & Environmental Principles Policy may have serious consequences. The consequences of the aforementioned breaches could and will likely result in corrective action taken against Employees, civil actions brough by third parties or government authorities, and/or criminal actions brought by government authorities. Additionally, in some circumstances governmental authorities or other third parties may take action against Webasto Group for your actions.

1.3 Scope of application, responsibilities

This Social & Environmental Principles Policy applies without exception to all Group Entities and Employees. Group Entities and Employees are required to review, understand, and abide by the requirements set forth herein. This Social & Environmental Principles Policy is effective as of the effective date as set out below and without any further action or implementation measures. It supersedes any prior policy as it relates to social and environmental principles. As a result, each Employee is on notice and required to strictly adhere to this Social & Environmental Principles Policy. Each Group Entity is encouraged to revisit and assess in its respective region prior agreements to ensure that they embody the letter and spirit of the Rules and this Social & Environmental Principles Policy.

This Social & Environmental Principles Policy can be found in the "***WIMS***" (Webasto Integrated Management System) and the **Webasto Group Policy Portal**.

This Social & Environmental Principles Policy is endorsed and adopted by the management board of Webasto SE. Each Group Entity shall adopt, implement, maintain and monitor all measures, processes and reports that have been established in this Social & Environmental Principles Policy. They are responsible for addressing all questions arising from this Social & Environmental Principles Policy and to create an environment that fosters trust and encourages the Employees to ask questions and openly address compliance issues with respect to this Social & Environmental Principles Policy. In addition, they shall support the relevant departments in charge, i.e., in particular the departments of People & Organization ("**PO**"), Health, Safety & Environment ("**HSE**"), Sustainability ("**Sustainability**"), Purchasing & Supplier Quality ("**Purchasing**"), Operations ("**Operations**"), Research & Development, PM ("**R&D**"), Quality ("**Quality**") as well as Legal & Patents ("**Legal & Patents**"). They are supported by the chief compliance officer of the Webasto Group ("**CCO Group**"), the regional chief compliance officers ("**CCO Region**") and the local compliance officers of each Group Entity ("**LCO**") (together "**Compliance Officers**").

This policy is subject to annual review and will be updated as required to reflect changes in regulatory requirements, business practices, and evolving ESG standards.

2 Social Principles

The members of the management boards of the Group Entities shall ensure that the Group Entities comply with the essential social principles as set out below in all their business operations and their day-to-day business. The same applies to all Employees. In addition, the below social principles are also regularly monitored by the Webasto Sustainability Committee, considered in the Webasto Group policies and have to be passed on to the Webasto suppliers according to the provisions of the Supplier Code of Conduct ("**SCoC**").

2.1 Human rights due diligence

Ethical behavior is a basic principle at Webasto. Webasto respects, protects and promotes human rights and complies with the applicable Rules with respect to the protection of human rights in all its business operations, including in geographical areas where human rights are not yet sufficiently protected.

Webasto works towards preventing situations of complicity or acts of collusion concerning fundamental human rights violations. Webasto complies, in particular, but not limited to, the UN Universal Declaration of Human Rights, 1948, UN Guiding Principles, relevant OECD Guidelines and Principles. Further, Webasto fulfills its responsibility towards human rights related to due diligence obligations throughout its supply chain. Among other relevant and applicable laws, also according to the provisions of the German Act on Corporate Due Diligence Obligations in Supply Chains ("**SCDDA**"). Legal & Patents is responsible for the operational fulfilment of WSE's & Webasto Group's entire human rights related due diligence obligations, in particular, but not limited to, acc. to sec. 4 para. 1 and 3 SCDDA, including the role of the supervisor in this field. Legal & Patents manages the end-to end execution of WSE`s and Webasto Group's human rights due diligence obligations in business-critical activities across the entire value chain. A human rights officer ("**HRO**") is appointed according to sec. 4. para 3 SCDDA. The HRO is part of the Legal & Patents department.

Webasto supports the protection of human rights defenders. In case Group Entities and/or Employees become aware of actual and/or potential risks to human rights defenders within Webasto and in connection with Webasto business operations, they shall oppose all forms of intimidation, threats, discrimination, harassment, defamation, and criminalization of human rights defenders and must demand the same from their suppliers within the Webasto supply chain. The relevant departments: PO, HSE, Purchasing, Legal & Patents and Sustainability within Webasto are in charge of taking care of the corresponding obligations resulting from the rules applicable to Webasto, e.g., SCDDA. Where needed further departments as well as Business Units are involved.

2.2 Freedom of association & right to collective bargaining

In compliance with applicable local laws, Webasto acknowledges the global right of all workers to form and join trade unions of their own choice and ensures that union independence and pluralism are maintained. And to protect union members and leaders as well as to refrain from all forms of anti-union discrimination. In particular, but not limited to, Webasto complies with the provisions of the following Rules:

- ILO Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87),
- ILO Right to Organize and Collective Bargaining Convention, 1949 (No. 98),
- Art. 22 of the International Covenant of 19 December 1966 on Civil and Political Rights and Art. 8 of the International Covenant of 19 December 1966 on Economic, Social and Cultural Rights, and
- ILO Workers' Representatives Convention, 1971 (No. 135).

The Employees are to be informed about the relevant rights arising from the above rules and the members of the management of the Group Entities are to be trained in such a way that the rights arising from the Rules are applied without restrictions. In addition, clear rules and framework conditions for collective bargaining shall be established or alternative procedures established if these rights are not guaranteed by law. These additional Rules must as well apply to all workers. The relevant PO departments within Webasto are in charge of taking care of the corresponding obligations resulting from the Rules applicable to Webasto, e.g., SCDDA.

2.3 Prohibition of modern slavery

Within Webasto, the usage of forced, bonded or indentured labor, involuntary or exploitative prison labor, slavery, slavery-like practices, servitude or any other forms of domination or oppression in the workplace environment, such as through extreme economic or sexual exploitation and humiliation, or trafficking of persons is not tolerated at all.

The Group Entity as well as the Employees must not implement any kind or form of unreasonable restrictions on the worker's freedom of movement in the working facilities. Each worker shall be provided with a record of the essential employment conditions agreed upon in either the respective native language or another language chosen between the parties. No financial burden shall be imposed on workers by withholding wages or expenses or charging fees in the recruitment process. The Group Entities as well as the Employees must not restrict the movement of workers by withholding identification documents or taking other measures against the workers' will. In particular, Webasto undertakes to comply with the following Rules:

- ILO Forced Labor Convention, 1930 (No 29),
- ILO Abolition of Forced Labor Convention, 1957 (No. 105),
- ILO Worst Forms of Child Labor Convention, 1999 (No. 182), and
- ILO Protocol to the Forced Labor Convention (1930) of 2014.

The Group Entities and the relevant departments have clear policies that set out implementation procedures for recruitment, promotion and termination. The Group Entities shall outline how they monitor their labor and recruitment practices both within the respective company itself and with third parties, such as employment agencies and recruiters, and how they keep appropriate records. Working conditions and employment contracts shall be clearly documented in writing. The relevant PO departments within Webasto are in charge of taking care of the corresponding obligations resulting from the Rules applicable to Webasto, e.g., SCDDA.

2.4 No child labor & protection of young workers

Child labor is not and will not be tolerated under any circumstances within Webasto and its business operations. Webasto commits itself to help eliminate child labor throughout the world, i.e., any person under the age for completing compulsory education, under the minimum age for employment in the country, or under the age of 15, whichever is higher. Any person older than the minimum legal age for employment, but younger than 18 years of age, shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Especially but not limited to, Webasto checks the age data of employees and applicants and complies with the following Rules:

- ILO Minimum Age Convention, 1973 (No. 138),
- UN Convention on the Rights of the Child, 1989, and
- ILO Worst Forms of Child Labor Convention, 1999 (No. 182).

The aforementioned Rules are considered in the contracts and agreements within Webasto and between Webasto and third parties. In case child labor and/or young workers performing health or safety relevant work should be identified in Webasto operations, Webasto will not only remove the children/ young workers from employment, but also ensure that adequate remedial measures are taken, such as enrolment in an appropriate education program. The relevant PO departments within Webasto are in charge of taking care of the corresponding obligations resulting from the Rules applicable to Webasto, e.g., SCDDA.

2.5 Working hours, wages & benefits

Webasto complies with the applicable laws on working hours and compensation. In particular, Webasto implemented procedures to ensure that working hours are not to exceed the maximum hours and minimum breaks and rest periods set by local law or set by industry standards, whichever sets the higher level of protection, are observed. Within Webasto, the compensation paid to workers is compliant with all applicable wage & benefit laws, overtime hours and legally mandated benefits. Workers shall be provided with a wage statement that includes sufficient detailed information for each pay period to verify the correct compensation for the work performed. In particular, Webasto complies with the following Rules:

- ILO Hours of Work (Industry) Convention, 1919 (No. 1),
- ILO Hours of Work (Commerce and Offices) Convention, 1930 (No. 30),
- ILO Equal Remuneration Convention, 1951 (No. 100), and
- ILO Part-Time Work Convention, 1994 (No. 175).

Wages and benefits shall be reviewed regularly to determine whether they provide an adequate standard of living, taking into account a wage for full-time employment. They shall be agreed in negotiations with trade unions or through alternative forms of participation if required according to the applicable Rules. The relevant PO departments within Webasto are in charge of taking care of the corresponding obligations resulting from the Rules applicable to Webasto, e.g., SCDDA.

2.6 Non-discrimination, non-harassment

Discrimination and harassment are not tolerated within Webasto. The Group Entities and the Employees shall not establish or entertain or engage in any discrimination and/or harassment, including sexual harassment, based on race, color, ethnic origin, gender, gender identity, religion or belief, age, disability, pregnancy, parenthood, marital status, political affiliation and sexual orientation while ensuring equal treatment.

Webasto has established a zero-tolerance policy towards all forms of violence at work, including verbal and/or physical abuse and prevent all kind of harassment, especially but not limited to in particular sexual harassment. Taking employee‘s safety into consideration, issues are identified and addressed, including safety of in particular women at work, on business trips and while traveling to and from work. Women’s leadership is promoted and recognized to ensure a sufficient representation of women within Webasto. Employees are trained on the company’s business case for equity and inclusion.

Webasto does not tolerate gender-based discrimination in compensation decisions and seeks to promote equal pay for work of equal value in line with applicable legal requirements. Further, within Webasto, equal opportunities in the workplace are guaranteed and all forms of discrimination and harassment are prohibited and Webasto follows the respective applicable Rules in this regard. In particular, but not limited to, Webasto complies with the following Rules:

- ILO Equal Remuneration Convention, 1951 (No.100),
- ILO Discrimination (Employment and Occupation) Convention, 1958 (No. 111),
- UN International Covenant on Civil and Political Rights, 1966, and
- UN International Covenant on Economic, Social, and Cultural Rights, 1966.

The management boards of the Group Entities and the Group Entities’ management have to ensure that the Employees are adequately trained to recognize and prevent discrimination and harassment, especially in personnel decisions. All Employees should be regularly sensitized to discrimination, harassment and unconscious bias and steps for reporting violations should be explained, e.g., by corresponding trainings. The relevant PO departments within Webasto are in charge of taking care of the corresponding obligations resulting from the Rules applicable to Webasto, e.g., SCDDA.

2.7 Gender rights & women's rights

Webasto respects, protects and promotes the rights of any gender including women's rights and complies with the applicable Rules in this regard. Irrespective of the aforesaid and according to the applicable Rules, Webasto observes the specific women's rights, in particular, but not limited to, with respect to the protection and support of women in case of pregnancy and maternity.

In addition, Webasto strives to increase the percentage of female leaders worldwide in the respective management levels, management and supervisory boards within the Webasto Group – local requirements may override broader policies.

2.8 Culture and Belonging

Within Webasto, diverse skills and experiences of the Employees are supported irrespective of their differences or similarities. Webasto provides its Employees with a work environment that promotes equity, fairness and respect for social and cultural diversity and inclusion, all being free of unlawful discrimination, harassment and disparagement as set out by the applicable Rules. Further, Webasto is an equal opportunity employer with all actions, duties and engagements carried out on the basis of performance and ability. The relevant PO departments within Webasto are in charge of taking care of the aforesaid obligations. In particular, Webasto complies with the following Rules:

- ILO Indigenous and Tribal Peoples Convention, 1989 (No. 169),
- UN Declaration on the Rights of Indigenous Peoples, 2007, and

2.9 Occupational health & safety

Webasto recognizes that strong HSE performance enhances product quality, production stability, employee retention, and overall wellbeing. We apply effective occupational health, safety, and environmental policies that involve employees at all levels of the organization, including labor and management representatives, with the PO and HSE departments responsible for fulfilling these obligations and embedding safety as an integral part of our culture.

Webasto uses management systems aligned with ISO 45001, ISO 14001 and ISO 50001. The management systems are designed to identify and reduce HSE risks, support legal compliance, and manage relevant environmental impacts through documented processes and corrective actions. Certifications apply to the sites and scopes covered by the respective certificates.

We also comply with international standards such as:

- ILO Occupational Safety and Health Convention (No. 155), and
- ILO Promotional Framework for Occupational Safety and Health Convention (No. 187),

and we expect our suppliers to follow comparable standards and promote a preventive approach where occupational accidents and illnesses are considered avoidable.

The relevant PO and HSE departments within Webasto are in charge of taking care of the corresponding obligations resulting from the Rules applicable to Webasto (e.g., SCDDA).

Webasto maintains documented fire-safety and emergency-preparedness procedures, including training, drills and maintenance of relevant systems, where required by applicable law and site-specific risk assessments. We are maintaining fire-protection and emergency systems in accordance with applicable legal requirements, manufacturer specifications and site-specific maintenance schedules.

Site-specific emergency response plans are implemented and regularly tested to ensure a fast, coordinated, and effective reaction to any incident. In addition, Webasto continuously invests in the

creation and improvement of ergonomic workplaces. By assessing tasks and workstation designs, implementing ergonomic solutions, and training employees in safe work techniques and postures, we aim to prevent musculoskeletal disorders and support long-term employee health.

Webasto ensures that every employee receives the Personal Protective Equipment ("**PPE**") required for their tasks, based on thorough site-specific risk assessments. PPE such as safety footwear, protective gloves, hearing and eye protection, respiratory protection, and specialized equipment is provided in compliance with regulatory standards. All PPE is properly maintained, employees are trained in its correct use and limitations, and its application is monitored as part of daily operations.

We are equally committed to machinery safety by performing risk assessments before equipment is commissioned, implementing appropriate guarding and interlock systems, maintaining equipment through structured preventive maintenance programs, and ensuring that only trained and authorized individuals operate machinery. This systematic approach minimizes mechanical risks and ensures safe and reliable operation.

Chemical safety is also a central part of our HSE commitment. Webasto ensures that chemicals are safely handled, stored, used, and disposed of according to regulatory requirements and internal procedures. Safety Data Sheets are accessible for all chemicals, and employees handling hazardous substances receive specific training. Proper labelling, secure storage, ventilation, spill prevention, and emergency response procedures are applied consistently across all sites to protect employee health and the environment.

To promote transparency and continuous learning, Webasto operates a global Incident Management Tool accessible to all employees. All accidents, near misses, unsafe conditions, and environmental incidents are reported in this system, investigated based on root causes, and followed by corrective and preventive actions to avoid recurrence. This strengthens our proactive safety culture and ensures that every incident, regardless of severity, contributes to continuous improvement.

In addition, Webasto carries out regular noise and lighting evaluations in accordance with legal requirements and recognized technical standards. These assessments ensure that workplace noise levels remain within permissible limits and that lighting conditions support safe and efficient work. If any deviations or risks are identified, corrective actions – such as engineering controls, equipment maintenance, redesign of work processes, or use of protective equipment - are promptly implemented.

Regular inspections and audits are carried out by PO, Operations and HSE departments to evaluate safety performance, maintain compliance, and identify opportunities for improvement. Webasto sets HSE targets for accident rates, lost-time incidents, fatalities and occupational illnesses. Progress is reviewed and communicated annually. All HSE-related training is documented and archived, and employees have access to health services, including on-site medical officers where applicable.

Webasto manages HSE and environmental requirements in its operations through defined responsibilities, documented processes, legal-compliance monitoring and continuous improvement measures. The relevant PO, HSE, and Operations departments within Webasto are responsible for fulfilling the obligations arising from this policy and from all applicable legal, regulatory, customer, and corporate requirements. Webasto management at all levels is responsible for providing resources necessary to guarantee its effectiveness. Every employee shares the responsibility to work safely, protect the environment, and contribute to continuous improvement.

Smoking is permitted only in designated smoking areas. All employees must comply with local fire prevention rules, including the proper disposal of smoking materials and strict adherence to designated zones. Smoking outside designated areas or in any location where fire hazards exist is prohibited

The possession, use, sale, or distribution of illegal drugs is strictly prohibited on all Webasto premises and during working hours. Individuals who display reasonable indications of drug consumption or impairment may be required to undergo appropriate testing, in line with applicable laws and company procedures. Webasto reserves the right to take necessary measures to protect workplace safety, including removing individuals from duty if impairment is suspected.

Alcohol consumption in the workplace is prohibited unless explicitly allowed under local legal regulations (e.g., controlled events or specific cultural practices, where legally permitted). Any Employee suspected of being under the influence of alcohol while on duty may be subject to testing and further investigation, following legal requirements and internal guidelines. Employees must always ensure they are fit for work and capable of performing their duties safely.

The PO and HSE departments are jointly responsible for the governance and oversight of the Smoking, Drugs, and Alcohol requirements within Webasto. They shall ensure the effective implementation of this policy, provide guidance, monitor compliance, coordinate necessary interventions and investigations, and ensure that all actions, including testing and disciplinary measures, are conducted in accordance with applicable legal requirements and company procedures.

2.10 Deployment of public & private security forces

In general, the Group Entities shall use own security forces to protect their business operations and/or sites/ plants. If private security service providers and/or public security forces are used, the Group Entities, i.e., the respective departments, must ensure that they respect internationally recognized human rights. Private security service providers and/or public security forces which disregard human rights must not be contracted. The same applies in case the departments in charge have indications that mandated private security service providers and/or public security forces do not respect human rights.

The Group Entities shall actively promote the voluntary principles on security and human rights to ensure that security forces are deployed in a manner that respects human rights. To this end, the respective Group Entities have to carry out an appropriate due diligence examination, e.g., background checks for security forces to be deployed, in order to be able to exclude their possible links to human rights violations. The relevant Purchasing and PO departments within Webasto are in charge of taking care of the corresponding obligations resulting from the Rules applicable to Webasto, e.g., SCDDA. In particular, Webasto complies with the following Rules:

- International Code of Conduct for Private Security Service Providers, 2010.

The Group Entities, i.e., the respective departments in charge, shall conduct training on human rights compliance with all recruited security personnel to be observed in the performance of their duties. Further, the Group Entities shall remedy adverse human rights impacts caused by private and/or public security forces in the context of cooperation and work with affected persons or their representation to avoid recurrence. The relevant Purchasing and PO departments within Webasto are in charge of taking care of the corresponding obligations resulting from the Rules applicable to Webasto, e.g., SCDDA.

2.11 Land, water and forest rights, forced eviction & respect of minorities and indigenous people

Webasto respects land, forest and water rights worldwide. In particular any illegal takeover/grabbing of land, forests and/or waters and any related illegal eviction and/ or forced eviction must not happen and are not tolerated.

In particular with respect to land, forest and water rights, Webasto respects the rights of minorities, local communities and indigenous peoples, specially, in case they may be affected by Webasto's business

operations at the Group Entities sites/plants. Webasto always considers the local impacts of its business activities. The Group Entities shall take appropriate measures to avoid potentially harmful impacts on the health, safety and livelihoods of minorities, local communities and/or indigenous peoples. They shall neither unlawfully force the resettlement of minorities, local communities and/or indigenous peoples nor unlawfully contribute to their involuntary resettlement.

Webasto respects the principles of free, prior and informed consent of indigenous peoples in its activities as defined in ILO Convention No. 169 on Indigenous and Tribal Peoples in Independent Countries and respects the rights of indigenous peoples and their social and cultural heritage, as well as their environmental and economic interests. This includes their connection with the land, forest and/or water including its management, and with other natural resources. The relevant Operations departments within Webasto are in charge of taking care of the corresponding obligations resulting from the Rules applicable to Webasto, e.g., SCDDA. In particular, Webasto undertakes to comply with the following Rules:

- Indigenous and Tribal Peoples Convention, 1989 (No. 169).

The Group Entities shall ensure inclusion and cultural appropriateness in all activities and communications with local communities. The relevant departments in charge shall communicate transparently and document and archive all interactions with local communities, in particular, but not limited to, minorities and indigenous people. If, as an exception, a legally allowed resettlement cannot be avoided by reasonable means, all adverse social and economic impacts shall be minimized and compensated with the aim of restoring the previous living conditions. The relevant Operations departments within Webasto are in charge of taking care of the aforesaid obligations.

Webasto has also a zero-tolerance policy towards illegal land, forest and/or water grabbing within its supply chain and requests from its suppliers' remedial measures for land, forest and/or water misappropriated in the past. In this regard, the relevant Purchasing departments within Webasto are in charge of taking care of the corresponding obligations resulting from the Rules applicable to Webasto, e.g., SCCDA.

3 Environmental principles

The members of the management boards of the Group Entities shall ensure that the Group Entities comply with the essential environmental principles as set out below in all their business operations and their day-to-day business. The same applies to all Employees. In addition, the below environmental principles are also regularly monitored by the Webasto Sustainability Committee, considered in the Webasto Group policies and have to be passed on to the Webasto suppliers according to the provisions of the SCoC.

3.1 Environmental Management and Regulatory Compliance

Webasto integrates environmental-management requirements into its production processes by identifying material environmental impacts, maintaining required permits, and implementing measures for energy, emissions, water, waste and (natural) resource management at relevant sites/plants.

The Group Entities having a production plant must ensure that their production processes and all materials and substances used in their production as well as prefabricated products comply with the respective applicable environmental regulations. Where customer, industry, certification or internal requirements apply in addition to legal requirements, the relevant Group Entity shall implement those requirements and retain evidence of compliance. They must also systematically identify environment-related risks for their own production and their supply chain and take appropriate measures to prevent or, if this is demonstrably not possible, minimize any environmental hazards, negative impacts and

potentially resulting environmental damage in accordance with the precautionary principle. The relevant Operations, HSE, Purchasing, Quality, Sustainability, and R&D departments within Webasto are in charge of taking care of the corresponding obligations resulting from the Rules applicable to Webasto, e.g., SCDDA.

Within Webasto, all Group Entities must take a systematic approach to protecting the environment and natural resources, including, but not limited to, considering biodiversity, minimizing land use, refraining from deforestation as well as striving to protect water quality, minimize water consumption and improve water management.

Group Entities delivering parts to OE customers are required to implement an environmental-management system appropriate to their operations, with documented objectives and measures for waste, emissions, water and energy.

Each Group Entity shall obtain, maintain, keep current and archive all environmental permits, approvals, certifications and registrations required by applicable local Rules as well as follow respective applicable reporting procedures. The relevant HSE departments within Webasto are in charge of taking care of the corresponding obligations resulting from the Rules applicable to Webasto.

3.2 Materials, resource efficiency, reuse and recycling requirements

The Group Entities shall use resources such as energy, raw materials, and natural resources responsibly and sparingly. In particular, they shall responsibly manage potential water withdrawal and discharge always in compliance with applicable Rules in order to protect water conservation. Webasto is especially concerned about the use of raw materials. Therefore, each Group Entity and each Employee shall support Webasto's endeavors to reduce the environmental impact of its products including the supply chain. The Group Entities and the Employees shall in particular

- promote the assessment and, where technically feasible and substantiated, the use of material alternatives with demonstrably lower environmental impacts for specified impact categories, such as greenhouse-gas emissions, recycled content, resource use or hazardous-substance reduction.
- engage in reducing their energy and water consumption and reduce their emission to environmental compartments, including reduction of greenhouse gas emissions.
- establish measures and processes to generate transparency with respect to environmental impacts, greenhouse gas emissions and material use in their business operations and in the Group Entities respective supply chain e.g., product carbon footprint, corporate carbon footprint.

Webasto supports circular-economy measures by evaluating opportunities to increase recycled or reused material content, improve material efficiency, and support recycling feasibility in selected product and process decisions, subject to technical, safety, quality and customer requirements.

Webasto seeks to integrate circularity considerations into relevant product development and business processes. This may include evaluating opportunities to increase the use of recycled materials, reuse components where technically and legally feasible, improving material efficiency, and support recycling initiatives. Relevant measures are assessed based on technical feasibility, product requirements, applicable regulations, and available data. Group Entities and Employees are encouraged to identify and propose improvement opportunities that support these objectives.

The relevant departments within Webasto, including Sustainability, Purchasing, Operations, and R&D are in charge of taking care of the aforesaid obligations, in particular resulting from the Rules applicable to Webasto.

3.3 Substances with restriction

Webasto requires Group Entities to identify substances subject to legal restrictions and to implement measures to comply with applicable prohibition, restriction, handling and reporting in accordance with the Stockholm Convention (as defined below), Basel Convention (as defined below) and the Minamata Convention (as defined below) ("**Restricted Substances**"). The relevant Operations, HSE, Purchasing, Quality, and R&D departments within Webasto are in charge of taking care of the corresponding obligations resulting from the Rules applicable to Webasto, e.g., SCDDA.

In addition, the Group Entities shall not use, produce, collect, store, dispose, export or import any Restricted Substances, in each case in compliance with the applicable Rules and limit values.

Apart from this, the Group Entities shall in particular comply with the following Rules:

- Basel Convention on March 22nd, 1989, on hazardous waste
- UN Stockholm Convention on Persistent Organic Pollutants, 2001 ("**Persistent Organic Pollutants Convention**"),
- UN Minamata Convention on Mercury, 2013 ("**Minamata Convention**") and

3.4 Material itemization

The Group Entities shall regularly and/or at request share complete material itemization of their delivered parts/components. The relevant R&D departments within Webasto are in charge of taking care of the aforesaid obligations. In addition, the Group Entities, i.e., the relevant departments in charge, shall ensure that the applicable Rules with respect to prohibition, restriction of use or traceability of substances of concern for the protection of health and safety or the environment as well as the respective applicable reporting structures are observed and followed. The relevant R&D departments within Webasto are in charge of taking care of the aforesaid obligations.

3.5 Conflict minerals and mined materials

In case Group Entities use raw materials originating from or transiting through conflict or high-risk areas and/or in case they use such raw materials in their products, such Group Entities must implement and maintain a policy on the origin of minerals used in particular form conflict zones, especially but not limited to tantalum, tin, tungsten and gold ("**3TG3**"), whereas such policy amongst transparency regulations shall comply in particular with the applicable enforced legislation on conflict minerals. The relevant Purchasing and Quality departments within Webasto are in charge of taking care of the aforesaid obligations, in particular resulting from the Rules applicable to Webasto.

Additionally, the Group Entities must effectively conduct their supply chain due diligence to minimize the risks of actual and potential adverse impacts along the supply chain. The relevant Purchasing and Quality departments within Webasto are in charge of taking care of the corresponding obligations resulting from the Rules applicable to Webasto, e.g., SCCDA. They must describe in an appropriate policy how they systematically identify and prioritize risks and initiate countermeasures. In particular, but not limited to, the Group Entities comply with the following Rules on conflict minerals:

- EU Regulation No. 2017/821 supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas, as well as the Dodd-Frank Act, Section 1502, of 2010.

  In case Group Entities use 3TG3 or uses in its products, they must identify, disclose and assess all smelters and refiners within the supply chains as to whether they have conducted an OECD-compliant due diligence process. The respective Group Entities must, as a minimum, use established procedures such as the Responsible Minerals Assurance Process ("RMAP"). In addition, they must ensure that, at the time of the start of production, these materials are sourced

exclusively from refineries and smelters that meet the requirements (status: Conformant) of the RMAP of the Responsible Minerals Initiative (RMI). As proof, the Group Entities shall – to the extent legal and actually/factually possible – ensure that their relevant suppliers provide with a Conflict Minerals Reporting Template (CMRT) and Extended Minerals Reporting Template (EMRT). As set out in the SCoC, if a used smelter or refinery does not meet this standard, the respective Group Entity may require the supplier to remove non-RMAP-compliant refineries and smelters from its supply chain destined for Webasto on a long-term basis.

- Where relevant, with respect to the use of specific and critical raw materials such as rare earth, platinum, palladium, aluminum, nickel, copper, zinc, graphite, lithium, cobalt, chrome, mica, 3TG3, steel, glass, plastic, leather and natural rubber, suppliers may be requested to provide evidence of responsible-mining due diligence, such as recognized third-party assessment or certification documentation e.g. certification of the Initiative for Responsible Mining Association (IRMA), including its scope, validity period and covered materials/sites.

3.6 Ecosystems, soil and water protection

Group Entities are required to implement due-diligence measures designed to identify and address risks of illegal ecosystem conversion, deforestation and adverse impacts on biodiversity, water, soil and air in their own operations and, where relevant, supply chains. If in their value chains of their products are risks of conversion of natural forests or other natural ecosystems or risks with respect to biodiversity, the quality of water, soil and air, the respective Group Entities must take appropriate due diligence measures to support the long-term protection of these natural ecosystems, including the protection of natural and cultural values.

Each Group Entity, i.e., the relevant departments in charge, must check the environmental compatibility of injections and soil impairments in order to prevent the contamination of surface/soil, water and/or groundwater. In particular, Group Entities shall define measures to reduce water-related risks and improve water-management practices where material, taking into account local water stress, legal requirements and operational feasibility. The relevant Operations, HSE and Purchasing departments within Webasto are in charge of taking care of the aforesaid obligations, in particular resulting from the Rules applicable to Webasto.

Webasto implements measures designed to prevent soil contamination and land degradation at its sites, including chemical-handling controls, secure storage, preventive maintenance, spill-prevention measures and incident-response procedures. We comply with all applicable legal requirements related to soil protection, including national and local regulations governing land use, pollution prevention, and environmental monitoring. In line with these obligations, Webasto undertakes to prevent the release of hazardous substances to soil through proper handling of chemicals, secure storage systems, preventive maintenance of equipment, spill prevention measures, and immediate response procedures in the event of any unintentional release.

Where required by legal regulations, environmental permits, or competent authorities, soil analyses and environmental assessments are conducted to verify compliance with applicable soil-protection requirements and to identify whether further measures are needed. Additional sampling, measurements, or remediation actions will be performed whenever there is suspicion of soil contamination or when operational changes create a potential risk. The relevant HSE and Operations departments within Webasto are responsible for fulfilling the obligations arising from soil protection requirements and all applicable legal, regulatory, and corporate standards.

3.7 Hazardous substances and waste

When handling chemicals and other hazardous substances that are stored or processed on their premises or are generated during production, the respective Group Entities must carry out appropriate

identification and labelling and ensure the provision of suitable storage areas and processing procedures as well as the instruction of the Employees. Hazards from these substances, such as air and soil pollution, water pollution and other harmful effects, must be prevented as far as technically possible. The respective Group Entities shall establish appropriate waste management systems and procedures to carefully classify, appropriately collect, store, condition and dispose of hazardous waste generated on site. They must as well ensure that no waste is illegally disposed of during the disposal route. The relevant Operations and HSE departments within Webasto are in charge of taking care of the corresponding obligations resulting from the Rules applicable to Webasto.

3.8 Greenhouse Gas Emissions

Webasto's climate targets are intended to contribute to greenhouse gas ("**GHG**") reductions consistent with global climate objectives. Webasto has set quantified greenhouse gas reduction targets: Scope 1 and 2 emissions are targeted to be reduced by 50% by 2030 versus 2021; Scope 3 upstream emissions are targeted to be reduced by 25% by 2030 versus 2021; Webasto targets net-zero Scope 1 and Scope 2 GHG emissions by 2045. Progress is monitored annually against a 2021 base year. Webasto targets 100% renewable electricity for its own operations by 2030, covering all sites. Renewable electricity may include on-site generation, power purchase agreements and/or recognized energy attribute certificates, disclosed in accordance with the applicable GHG accounting methodology. Each Group Entity and all employees shall support the Webasto climate targets.

Each Group Entity shall strive to improve its energy performance and to reduce its energy consumption. Wherever possible and feasible, the Group Entities shall prefer renewable energy resources, e.g., electricity from solar, wind, hydro, tidal, geothermal and/or biomass, over other non-renewable energy sources, e.g., fossil energy sources and aim for 100% renewable energy supply. The Group Entities, i.e., the relevant departments in charge, shall regularly review renewable energy options, ensure that opportunities and risks, ambitions and progress are kept up to date and that competent employees operate the energy systems. Sustainability department as well as Operations department (Scope 1 and 2) and Purchasing department together with R&D department (both Scope 3 upstream) have to take care of aforesaid obligations, in particular resulting from the Rules applicable to Webasto.

Webasto calculates its GHG emissions (Scope 1, 2 and 3) based on the GHG Protocol and reports them annually in its sustainability report. The Sustainability team coordinates the Webasto sustainability program on material sustainability fields of action and leads, among other responsibilities, the creation of the annual sustainability report. To ensure consistency and comparability, Webasto reports greenhouse gas emissions in carbon dioxide equivalents (CO_2e). This converts different greenhouse gases into a common metric based on their global warming impact. Webasto includes all relevant greenhouse gases covered by the Kyoto Protocol (2005) and, unless otherwise specified, reports emissions as CO_2e in accordance with the applicable reporting methodology.

Each Group Entity shall regularly, and upon request, report to the HSE and Sustainability Department accurate, complete, and verifiable activity data, including, where applicable, energy consumption, energy sources, and other relevant environmental performance data. The reported information shall be based on primary data, documented methodologies and retained supporting evidence. Based on these activity data, GHG emissions, shall be calculated at entity level using recognized and documented calculation methodologies and tools.

Each Business Unit shall also regularly, and upon request, determine and report the Product Carbon Footprint (PCF) and/or a Product Life Cycle Assessment (LCA), as appropriate, using recognized methodologies and documented assumptions. Where relevant, each Business Unit shall report the percentage of recycled and/or reused material content, as well as the use of emission-intensive materials such as steel, aluminum, plastics, and glass, supported by verifiable records. Sustainability data collected under this policy shall be maintained in a manner that enables appropriate substantiation.

The Corporate Carbon Footprint (CCF) for the Webasto Group is created annually according to the GHG protocol. The Webasto CCF is published in the annual sustainability report. Furthermore, other material figures such as waste and energy figures are reported via the sustainability report. The relevant HSE, Operations, Purchasing, R&D and Sustainability departments within Webasto are in charge of taking care of the aforesaid obligations, in particular resulting from the Rules applicable to Webasto.

To support the reduction of greenhouse gas emissions associated with products, the relevant Business Units and R&D departments shall evaluate opportunities to increase the proportion of recycled and/or reused materials in significant material categories, such as steel, aluminum, plastics, and glass, where technically feasible, commercially appropriate, and supported by environmental assessment. Such measures should be evaluated based on their overall environmental performance and shall not be presumed to reduce environmental impacts without appropriate evidence. The Group Entities shall evaluate alternatives that may reduce GHG emissions for defined applications, where reductions are demonstrated through documented PCF, LCA or equivalent evidence compared with a defined baseline.

Webasto does not count emission compensation or offsetting through climate protection or removal projects toward its Scope 1 and 2 reduction targets. No Webasto product or activity may be described as 'carbon neutral', 'climate neutral', 'CO_2-neutral' or as having a neutral, reduced or positive environmental impact based on offsetting unless expressly permitted by applicable law and approved by Legal and Sustainability department.

The relevant Business Units, HSE, Operations, Purchasing, R&D and Sustainability departments within Webasto are in charge of taking care of the aforesaid obligations, in particular resulting from the Rules applicable to Webasto.

Apart from this, the Group Entities shall in particular comply with the following Rules:

- Greenhouse Gas Protocol ("**GHG Protocol**"), jointly convened in 1998 by World Business Council for Sustainable Development (WBCSD) and World Resources Institute (WRI),
- UN Paris agreement from 2015 ("**Paris Agreement**").

3.9 Air Quality

Webasto is committed to protecting human health and the environment by preventing and controlling air emissions arising from its operations. We ensure compliance with applicable legal requirements and standards and implement appropriate monitoring, maintenance, and operational controls.

To safeguard air quality, Webasto conducts measurements of Volatile Organic Compounds ("**VOC**") in accordance with the frequencies, methodologies, and standards defined by relevant regulations and environmental permits. Webasto applies monitoring and control measures designed to keep VOC concentrations within applicable legal exposure limits and implements corrective actions where measurements indicate deviations or increased risk. Where required or where emissions could approach regulatory thresholds, Webasto implements technical and organizational measures – including improved ventilation, optimized processes, substitution of hazardous substances, and emissions reduction technologies - to reduce VOC emission into the atmosphere as well as to comply with applicable air-emission limits.

Webasto maintaining processes designed to support compliance with applicable regulatory obligations and, where appropriate, recognized technical standards to ensure responsible air emissions management, protects employees from excessive noise exposure, and supports a healthy and safe working environment.

The HSE function is responsible for overseeing the implementation, monitoring, and continuous improvement of air emissions management processes, while managers are responsible for ensuring compliance within their areas of responsibility.

4 Communication & Training

It is very important to Webasto that all Employees understand and comply with this Social & Environmental Principles Policy and have an awareness of the aforesaid social and environmental principles and observe the required measures, processes, and reports. For this reason, the respective management of the Group Entities and each Employee, in particular the relevant departments concerned, e.g., PO, HSE, Purchasing, Operations, R&D, Legal & Patents, Sustainability, shall participate in corresponding e-learnings and/or classroom training on a regular basis. The relevant R&D, PO, HSE, Operations, Sustainability, Purchasing and Legal & Patents departments of the Group Entities shall implement corresponding and appropriate measures, processes and training to ensure compliance with the Rules and as set out in this Social & Environmental Principles Policy. The relevant Sustainability department within Webasto shall take care of the aforesaid obligations, in particular resulting from the Rules applicable to Webasto.

5 Consultation, reporting of misconduct & contact people

Employees must be conscious of the fact that breaches of the Rules and/or principles as set out herein lead to considerable damage to the reputation of Webasto Group, the Employees, and the business partners. The interests and rights of everyone at Webasto Group can only be protected and preserved from harm if suspected or actual breaches of the Rules and the principles as set out herein are quickly and swiftly addressed.

Employees that detect and actual or potential infringement of the Rules and/or the and the principles as set out herein or that are uncertain what the proper conduct is in their day-to-day business or a particular situation, should speak to their direct supervisor or a Compliance Officer, PO, HSE and/or Sustainability department for advice and assistance.

In case Employees do not wish to discuss a specific compliance item/issue hereunder or intend to disclose any violations of the Rules and/or the principles set out in this Social & Environmental Principles Policy, they should report the relevant incident by giving Notice. This can be done by contacting the relevant departments in charge as set out herein and/or the CCO Region or CCO Group (compliance@webasto.com) or the Sustainability department via sustainability@webasto.com. In addition, Employees have the option to anonymously report a compliance incident by using the Webasto whistleblowing system which can be found at Home - BKMS System. All incident reports are consistently followed up, and proven misconduct is delt with swiftly and appropriately.

6 Consequences of violations

Employees must comply with this Social & Environmental Principles Policy. In the event of violations of this Social & Environmental Principles Policy, which also includes involvement in the concealment of violations, Employees should expect consequences under the relevant labor laws (e.g., disciplinary actions and, in the case of serious violations, termination without notice), possible criminal and/or civil penalties, and any other appropriate remedies available by law.

Webasto Group reserves the right to make a criminal complaint to relevant authorities and or bring civil actions against the employees responsible.