



Rules of Procedure

of

Joyson Safety Systems

For Complaints Proceedings pursuant to § 8 (2) of the German Supply Chain Due Diligence Act

(Lieferkettensorgfaltspflichtengesetz)

I. Doing Business With Integrity

1. About Joyson Safety Systems

Joyson Safety Systems is a global leader in mobility safety. We are responsible for designing and manufacturing some of the world's most advanced mobility safety components, systems and technology. Joyson Safety Systems employs about 43,000 employees at 62 locations in 25 countries generating annual sales exceeding USD 5 billion.

2. Our Commitment to Ethics and Integrity

At Joyson Safety Systems, we are committed to ethics and integrity in everything we do. Our business conduct and the conduct of those acting on our behalf must at all times conform to applicable laws and regulations, our internal policies and procedures, as well as ethical business principles. We recognize our environmental and societal responsibilities, including our responsibility to respect human rights and related environmental standards. For us, respecting human rights and related environmental standards is key to long-term economic success and is considered an integral part of how we do business.

3. Our Reporting Policy

We believe that these goals are best achieved in an environment that promotes open communication, including open and candid discussion of concerns about compliance with applicable laws and regulations as well as Joyson Safety Systems' company policies and procedures. Open dialogue and a healthy reporting mechanism helps to identify risks and potential compliance concerns at an early stage and in doing so protect the company, our employees, and other affected stakeholders. Everyone at Joyson Safety Systems is responsible for creating and maintaining a work environment that encourages asking questions or reporting about any legal, regulatory, or business conduct issue. When concerns are reported, we take swift action to evaluate the report and investigate any indication of compliance violations. We encourage and expect that employees and business partners will timely report any actual or suspected violations of applicable laws or regulations or company policies, including without limitation violations of human rights and related environmental standards, where Joyson Safety Systems or any of its representatives or any of our suppliers are believed to be involved. To this end, it is Joyson Safety Systems' policy to provide an effective process for all employees, business partners and other third parties to express concerns or report any such actual or potential violations.

We prohibit all forms of retaliation against people who report concerns in good faith. Where a reporter identifies themselves, every reasonable effort will be made to keep their identity strictly confidential on a "need-to-know" basis within the company.



II. Complaint Procedure

1. Our Reporting System

Joyson Safety Systems operates a company-wide, publicly available and generally accessible complaint and reporting system.

Any actual or potential violation of law or regulations, our [Code of Ethics and Business Conduct](#) (the “Code”), our [Supplier Code of Conduct](#) (the “Supplier Code”) or other company policies and procedures, including those related to human rights and related environmental standards, can be reported through internal and publicly available grievance channels described in our Code and our Supplier Code, including but not limited to the Joyson Safety Systems Compliance Hotline (see below under Section II.2). Reports can be filed by employees, business partners and any other third parties. Concerns may be raised anonymously wherever permitted by local law. All reports will be treated equally whether submitted anonymously or not, and whether received from employees, business partners or third parties (to the extent legally permitted).

2. The Joyson Safety Systems Compliance Hotline

Complaints and reports can be submitted through the Joyson Safety Systems Compliance Hotline (the “JSS Compliance Hotline”). The JSS Compliance Hotline is a service run by an independent third-party provider of corporate compliance services and is available in many different languages 24 hours a day, seven days a week.

The JSS Compliance Hotline can be contacted by phone or internet (for more information go to <https://jss-speakup.com>). If contacted by phone, trained specialists from the independent third-party provider of corporate compliance services will answer the call, document the concerns, and forward an electronic case report to our Compliance Department for review. Reports submitted through the web-intake of the JSS Compliance Hotline will be directly forwarded to our Compliance Department for review.

Reporters may also contact Joyson Safety Systems directly and talk to any of our Compliance Department team members or local Compliance Representatives. They can also contact our Legal Department, company managers, the Human Resources Department, or the Chief Compliance Officer.

3. Processing Received Reports

Our Compliance Department is responsible for processing all complaints and other reports received, regardless of how they were submitted. The Compliance Department reports directly to the Chief Compliance Officer, who reports to the Board of Directors of the company. Employees of the Compliance Department are subject to a duty of confidentiality, are impartial, and have the necessary expertise to professionally handle complaints and reports.

Within seven days of receipt of a complaint or other report, the reporter will receive an acknowledgement of receipt from Joyson Safety Systems.

Joyson Safety Systems takes all complaints and other reports seriously. The Compliance Department reviews each report to clarify whether there is sufficient information to process the matter. If needed, the Compliance Department will reach out to the reporter and other relevant individuals to discuss the facts and/or request additional information.

Thereafter, the Compliance Department will determine the appropriate next steps, including: (i) whether a formal investigation shall be conducted, (ii) if there is need for other functions to be involved in the investigation and/or notified of the issue, (iii) if regulatory bodies (authorities) must be informed, (iv)

whether less formal measures by relevant functions or departments may suffice, (v) if any preventive action may need to be implemented while the investigation is conducted, or (vi) whether the case can be closed without further investigation required (e.g., in case of obviously unsubstantiated or frivolous complaints).

If an internal investigation is conducted by the Compliance Department, the Compliance Department will develop an investigation plan, conduct the investigation (including, e.g., reviewing relevant documents and other data and interviewing witnesses and involved persons), and document the results of the investigation. The results of the investigation will be summarized in an investigation report. The results of the investigation will be communicated to relevant stakeholders. Results may include recommendations for disciplinary action or other remedial measures, such implementation of new controls, policies and procedures, and trainings.

To the extent feasible and legally permissible, Joyson Safety Systems we will inform the reporter in due course of the measures taken.

4. Our Investigative Principles

All investigations shall be conducted in accordance with the following investigative principles :

- *Confidentiality*: Maintaining confidentiality is critical to the integrity of our investigations. The identity of the reporter, the fact that an investigation is underway or is being considered, the subject matter of it, the process followed, the materials or information gathered, and the results of the investigation shall in general be treated confidentially and shared only on a need-to-know basis.
- *Professionalism*: All investigations will be conducted in a professional manner. The essence of professionalism is that our investigators act with integrity, fairness, and diligence.
- *Competence*: The quality of an investigation depends largely on the competency of the investigator, and for this reason, only qualified personnel shall be assigned to conduct investigations.
- *Impartiality*: Investigations must be conducted impartially. Impartiality means that everyone gets a fair chance, and that all subjects are investigated in the same manner, with the same professional, objective and impartial treatment. Individuals will not be assigned to conduct or participate in investigations if they have a personal interest in the result, may be called upon as an interviewee or to provide information, or have a close personal or working relationship with the subject of the investigation.
- *Objectivity*: Investigations must be objective, i.e., free of personal opinion and bias. All information shall be reviewed and analyzed using the same standards, and the findings in an investigation must be based upon facts.
- *Timeliness*: Investigations need to be carried out promptly. Investigators shall make reasonable efforts to commence and conclude investigations in a prompt and reasonable timeframe, depending upon the nature of the allegations being investigated, the scope of the investigation, and other factors bearing on the scope of the investigation.

5. Our Non-Retaliation Policy

Joyson Safety Systems strictly prohibits and does not tolerate any form of retaliation against anyone who in good faith makes a complaint or report, provides information, or otherwise assists Joyson Safety Systems in an internal investigation regarding any conduct that the reporter reasonably believes to be in violation of the law or regulations, the Code, the Supplier Code or other company policies or procedures, including without limitation any violations of human rights or environmental standards by Joyson Safety Systems or its suppliers.



Persons should immediately contact the Compliance Department or the JSS Compliance Hotline (go to jss-speakup.com) if they suspect that they or someone else has been retaliated against for making a good faith complaint, raising a concern, providing information or otherwise assisting in an investigation.

6. Periodic Review and Evaluation

The effectiveness of the compliance procedure is reviewed at least once a year and, when needed, on an ad hoc basis.
