

**HELLA Australia**

**Modern Slavery Statement**

01 July 2021 to 30 June 2022

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## 1. Introduction

This statement covers the reporting period of HELLA Australia from July 1, 2021, to June 30, 2022, and is made pursuant to Part II, section 14 of the Australian Modern Slavery Act 2018 and has been prepared in consultation with all reporting entities registered in Australia, as listed below:

- HELLA Asia Pacific Pty Ltd. ABN 46 004 516 947
- HELLA Asia Pacific Holdings Pty Ltd. ABN 59 007 958 787
- HELLA Australia Pty. Ltd. ABN 77 006 245 524

In this statement “HELLA Australia” refers collectively to all the reporting entities above registered in Australia. HELLA Australia is part of the HELLA group (HELLA) and has locally incorporated global standards issued by the parent company HELLA.

HELLA is a listed, internationally positioned automotive supplier operating under the umbrella brand FORVIA. Within this de facto group, HELLA stands for high-performance lighting technology and automotive electronics. At the same time, the company covers a broad service and product portfolio for the spare parts and workshop business as well as for manufacturers of special vehicles with its Lifecycle Solutions business group. HELLA has 36,000 employees at over 125 locations worldwide and generated sales of 6.3 billion euros in the 2021/2022 financial year.

This statement details the actions HELLA Australia has taken to assess and address modern slavery risks in its own operations and supply chains.

HELLA continuously adapts its company-specific regulations to changing conditions. We strive to continuously improve the transparency of our procurement processes and our measures to extend the duty of care.

## 2. HELLA Values

Our corporate culture is rooted on seven basic values: entrepreneurial spirit, teamwork, sustainability, focus on performance, innovation, integrity, and exemplary conduct of all parties concerned. These

values shape our quest to meet and exceed the expectations of our customers, suppliers, business partners and shareholders, in all daily operations.

HELLA is committed to respect human rights in its own business and rejects all forms of forced or compulsory labour, modern slavery and human trafficking and does not make use of any forms of forced and compulsory labour in its activities. All practices shall be in line with the Core ILO Conventions on Forced Labour.

We are aware that forced and compulsory labour can manifest in various forms including modern slavery and human trafficking. Forced or compulsory labour means any work or service which is obtained from a person under the threat of any penalty and which the person has not offered voluntarily. Forced or compulsory labour practices can include among others servitude, withholding original identity documents, movement restrictions, debt bondage work or other types of coercion.

### **3. Our Structure, Operations and Supply Chain**

#### **Our Structure and Operations**

HELLA has been operating in Australia since 1961.

**HELLA Asia Pacific Pty. Ltd.** is a company of the HELLA group and is responsible for the local operations and non-operating subsidiaries. It is the leading reporting and tax entity in Australia. The primary subsidiaries of HELLA Asia Pacific Pty Ltd. are HELLA Asia Pacific Holdings Pty. Ltd., HELLA Australia Pty. Ltd., HELLA New Zealand Limited and HELLA India Electronics Pvt. Ltd.

**HELLA Asia Pacific Holdings Pty Ltd.** owns the local operating and non-operating subsidiaries.

**HELLA Australia Pty. Ltd.** is the responsible sales entity.

#### **Supply Chain**

The HELLA purchasing department is responsible for an annual worldwide purchasing volume of more than 4 billion for production materials, capital goods and services in the fiscal year 2021/2022.

Production materials account for the largest share. At HELLA, we are convinced that working in a

trusted partnership with our suppliers is a key factor for success. We rely on partnerships and cooperating with our suppliers to fulfil our customers' high expectations. We thus strive to build close relationships with suppliers and incorporate them in our business processes.

The HELLA group maintains supplier relationships with several thousand strategic suppliers worldwide. This complex structure entails a certain risk that violations of human rights in the supply chain may occur.

HELLA Australia works with around hundred suppliers. The majority (83%) of HELLA Australia's suppliers are Australian based companies providing goods or services in the following categories:

- Component parts
- Rental
- Electricity, gas and water services
- Local freight and customs clearance services

Approximately 40% of the HELLA Australia sales emanate from products imported from HELLA New Zealand with imports from Europe, USA, India, and China accounting for the balance.

## **4. Risks of Modern Slavery in Operations and Supply Chain**

### **Operations**

HELLA has designed a new human rights risk assessment approach, which is stepwise being rolled out withing the company sites . This human rights risk analysis is to be performed yearly or on ad-hoc basis. HELLA's Management Board and other involved departments will be informed about the results of the risk analysis on a regular or ad hoc basis.

### **Supply Chain**

To ensure that HELLA's suppliers respect international human rights standards, including the prohibition of any form of forced labour, HELLA has rolled out the binding "HELLA Code of Conduct for Suppliers and Service Providers" throughout its supply chain. Furthermore, HELLA plans to introduce

its first Human Rights Policy in the next fiscal year which will detail the efforts that our company takes to avoid any violations of human rights in its supply chain.

## **5. Actions taken to assess and address Modern Slavery risks**

### **Policies to Address Modern Slavery**

HELLA is committed to comply with global laws and regulations and to conduct business with integrity and in an ethical manner. All HELLA companies are subject to HELLA policies and guidelines. They include the HELLA Code of Conduct, 8 HELLA Labour Principles, as well as the HELLA Code of Conduct for Suppliers and Service Providers, which incorporates compliance requirements in the supply chain.

#### **HELLA Code of Conduct**

All HELLA employees are bound by HELLA's Code of Conduct<sup>1</sup> worldwide. It serves to distinguish right from wrong behaviour and to master the legal challenges that arise in our everyday cooperation with colleagues, customers, suppliers, other business partners and third parties. It sets out, for example, provisions of labour law and social principles by which HELLA clearly rejects all forms of forced labour, including slavery and human trafficking.

#### **HELLA Code of Conduct for Suppliers and Service Providers**

The HELLA Code of Conduct for Suppliers and Service Providers<sup>2</sup> is intended to ensure that business activities along our value creation chain comply with international standards and conventions. This document summarizes our expectations towards suppliers and service providers in terms of working conditions, occupational health and safety, business ethics and the environment.

We expect our suppliers to conduct their business activities in a socially and ecologically responsible manner and to adhere to our Code of Conduct for Suppliers and Service Providers. HELLA procures a significant proportion of its overall purchasing volume from major suppliers in OECD countries with standards and processes related to respecting human rights.

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<sup>1</sup> [https://www.hella.com/hella-com/assets/media\\_global/Englisch-HELLA\\_CODE\\_OF\\_CONDUCT.pdf](https://www.hella.com/hella-com/assets/media_global/Englisch-HELLA_CODE_OF_CONDUCT.pdf)

<sup>2</sup> [https://www.hella.com/hella-com/assets/media\\_global/Suppliers\\_Code\\_of\\_Conduct\\_English.pdf](https://www.hella.com/hella-com/assets/media_global/Suppliers_Code_of_Conduct_English.pdf)

## **HELLA Human Rights Policy**

As Hella operates globally and has global supply chains, HELLA is committed to respect internationally recognized human rights. The first HELLA Human Rights Policy was issued in May 2022 by the HELLA Management Board. The policy describes the fundamental human rights respected and protected at HELLA which are related to working conditions and environment, including free choice of employment, prohibition of child labour, forced labour, modern slavery, human trafficking and rejects any form of harassment or torture. The policy describes the human rights due diligence approach HELLA has adopted within our company and supply chains, measures in place to avoid human rights violations, risk assessment procedures, remedial actions, complaint procedure and how we document the entire process. The HELLA Human Rights Policy applies to all employees, business partners and suppliers and complements other HELLA policies and guidelines which refer to human rights and the environment.

HELLA is committed to support the internationally recognized human rights based on the principles contained in the following international standards:

- International Bill of Human Rights
- The Fundamental ILO Conventions, including ILO C29 - Forced Labour Convention (1930), ILO C105 - Abolition of Forced Labour Convention (1957) and Protocol of 2014 to the Forced Labour Convention (1930)
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises

## **Contractual Clauses**

By accepting the HELLA Code of Conduct for Suppliers and Service Providers and the Human Rights Policy, HELLA's strategic suppliers commit themselves to act responsibly and adhere to the principles outlined above. We expect our suppliers to ensure that their own suppliers and service providers likewise observe and follow these principles.

## **Due Diligence**

We endeavour to avoid adverse effects on human rights which may be caused by our business activities throughout the value creation chain.

HELLA verifies compliance with the HELLA Code of Conduct for Suppliers and Service Providers by means of spot checks and plans to introduce a sustainability self-assessment for selected strategic suppliers. Information on environmental performance and sustainability is obtained through risk-based sustainability assessments of selected strategic suppliers and through other measures such as self-disclosure for specific topics. For suppliers with deficits, action plans with corrective measures are drawn up to ensure that expectations are met within a reasonable timeframe. HELLA reserves the right to terminate relationships with suppliers in the event of persistent serious violations.

### **Reporting Tool**

HELLA does not tolerate any violations of the Human Rights policy or the Code of Conduct or regulations. Misconduct must be reported to superiors, managing directors or compliance and legal officers. Our web-based reporting system “tellUS!” is available not only to employees, but also to business partners and other external stakeholders worldwide, who can use this reporting channel to report possible violations of laws and other serious misconduct anonymously and in mother tongue, if required. The reporting portal can be accessed directly via the HELLA intranet site as well as via the HELLA website at all times.

### **Training**

To further raise awareness among employees, we rely on targeted training measures. This includes training on the Code of Conduct as well as extensive communication measures. The communication and confirmation of the Code of Conduct is also anchored in the HELLA onboarding process.

## **6. Assessing Effectiveness**

HELLA approaches the mitigation of risks related to modern slavery in our own operations and in our supply chains in various ways. We are currently establishing further measures to address modern slavery risks in our supply chains. Any such measures will also be implemented on a local level in HELLA Australia.



## **7. Process of Consultation with the group and subsidiary entities**

In drafting this statement, HELLA Australia has consulted with central stakeholders at HELLA group level, as coordinated global and local measures and controls are needed in complex international supply chains.

This statement has been approved by the boards of each of the three reporting entities covered by this statement.

### **Darren Robinson**

Managing Director HELLA Asia Pacific Pty Ltd.

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