

**Position of
HellermannTyton Germany,
Tornesch, on human
rights and environmental
protection**



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❖ The company

HellermannTyton is a leading manufacturer and supplier of products for bundling, fastening, processing, connecting, insulating, protecting and labelling cables, wires and connectivity solutions for data networks. We also develop products for customised industrial applications. Our mission is to develop customised solutions for all cable management requirements. In doing so, we enable effective collaboration and joint growth together with our business partners. We value working environments in which talent can develop and we act responsibly in an ecological, economic and social sense.

We operate 18 production sites worldwide as well as product development in 13 countries. More than 7,000 employees work for HellermannTyton in 40 countries.

HellermannTyton Germany's production site in Tornesch, with around 940 employees, to which the following remarks refer, is a central location of the Group.

❖ Respect for human rights

As a global manufacturer of cable management solutions enabling a safer, more sustainable and better connected future, it is essential for HellermannTyton to act responsibly, comply with relevant laws and regulations, respect human rights and the environment.

The protection of human rights is a central element of our corporate responsibility. We base our commitment to respecting human rights on the United Nations Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We are committed to respecting internationally recognised human rights and upholding them in our business activities and along our value chains. We are also guided by the United Nations Guiding Principles on Business and Human Rights.

Our commitment to respecting human rights is already reflected in other company guidelines. The Code of Business Ethics serves as a guideline here and describes the corporate values. The [Supplier Code of Conduct](#) applies to our business partners; the roll-out process at the Tornesch site started in 2024.

As a management team, we are responsible for respecting human rights in our business activities.

All HellermannTyton employees are obliged to comply with the legal provisions and to respect the company values in their daily work and in all business decisions. Managers have a role model function here.

We reject all forms of discrimination and are committed to equality. We offer equal employment opportunities to all persons regardless of their circumstances. We do not discriminate against employees or applicants on the basis of national and ethnic origin, social background, gender, sexual orientation, religion, age, disability, health status, trade union activity, political principles, partnership or pregnancy. We respect the rights of minorities.

We do not tolerate forced or slave labour and strictly reject any form of human trafficking. We comply with all relevant laws in the jurisdictions in which we do business and, in accordance with ILO standards, do not employ anyone under the age of 15.

We ensure fair working conditions in accordance with the provisions of labour law, the applicable labour standards and labour laws with regard to remuneration, working hours and the general employee rights of our employees. We are committed to paying appropriate salaries in accordance with the collective bargaining system.

We recognise the right of employees to join organisations in compliance with applicable laws and the right to collective bargaining. Employees must be able to communicate openly and regularly with management about working conditions without risk of retaliation in any form.

❖ Health and safety in the workplace

Health and safety are among the basic principles of our company. Our primary goal is an accident-free workplace for all employees, service providers and visitors. Health and safety in the workplace are considered and managed holistically in our certified management system in accordance with ISO 45001, also in order to be able to take precautionary measures against accidents and damage to health. We are constantly working to improve our safe and healthy working environment. Our employees take part in regular training courses to promote safety-conscious behaviour.

We employ external security guards to protect our operations at the site. They respect internationally recognised human rights.

❖ Holistic environmental protection

Our aim is to operate in such a way that we minimise the environmental impact of our business activities and thus enable the environmentally friendly and safe manufacture of our products.

Our production operations fully comply with the applicable environmental regulations, including authorisation conditions. The aspects of environmental protection are considered, controlled and further developed holistically in our certified management system in accordance with ISO 14001. We follow the precautionary principle and work to maximise the efficient use of resources, including soil, air, water and energy, and to reduce our emissions and waste, e.g. by recycling or reusing materials. For example, our packaging management is constantly working on reducing the amount of packaging material. In particular, we are taking measures to reduce our greenhouse gas emissions and our carbon footprint by increasing the proportion of renewable energy, using energy-efficient technology, working to reduce energy consumption, developing innovations and promoting best and proven practices. We have a waste management system whereby we minimise, separate and properly recycle waste. We comply with the ban on the export of hazardous waste and other obligations under the Basel Convention. Our products fully comply with applicable environmental regulations, including licence conditions, and we continuously review the safety of our products in relation to health and environmental risks. We are committed to the Minamata and POPs Conventions with regard to mercury and persistent organic pollutants.

❖ Responsibility in the supply chain

Our business relationships are characterised by appreciation, honesty and fairness. Suppliers are selected on the basis of criteria such as quality, service, technology, price and their willingness to share our ethical values. They are subject to our [Supplier Code of Conduct](#), which sets out our standards, including labour law and human rights,

health and safety, environmental protection, fair competition, anti-corruption laws and responsible procurement. The roll-out process started at the Tornesch site in 2024.

We see our responsibility not only in our own production and in our own actions, but also in our supply chain. We therefore expect our suppliers and other business partners to also undertake to comply with the principles set out here and to implement appropriate processes to respect human rights. We are committed to the prohibition of unlawful forced eviction and the unlawful seizure of land, forests and water.

The HellermannTyton Group has also developed sustainability goals for HellermannTyton Germany that emphasise the topics of people, planet, product and corporate governance. The aspect of responsible procurement of materials, goods and services is part of this and is anchored in the topic area of corporate governance.

❖ Risk analysis

We consider it an integral part of our duty to recognise human rights and environmental risks and the impact of our business activities on people and the environment along the value chain. To this end, we are expanding our company-wide risk assessment to include human rights and environmental risks on the supplier side.

The mapping of risks arising from human rights due diligence is being continuously developed and integrated into our risk management. In this way, we aim to systematically identify and assess human rights issues and those potentially affected by our business activities and our direct and indirect business relationships. Appropriate preventative measures are to be taken on this basis in the event of identified risks.

If corresponding risks are identified in procurement, we do everything in our power to ensure that HellermannTyton works with its suppliers and, if necessary, other stakeholders to improve the situation and minimise these risks along the supply chain.

We expect our suppliers to commit to the responsible sourcing of all their materials and to comply with regulations that may apply to their business in relation to the extraction and trade of minerals originating from conflict-affected and high-risk areas such as the Democratic Republic of Congo and neighbouring countries. We also expect transparency throughout their supply chain to demonstrate the responsible sourcing of all products, materials and services and compliance with all applicable laws and regulations.

HellermannTyton will suspend or terminate co-operation with upstream suppliers if attempts to mitigate any of the risks defined above fail.

❖ Remedial measures

We encourage all employees to report any reasonable suspicion of discrimination, disadvantage or other human rights violations, e.g. via the Compliance Manager, the Human Resources Department, the Works Council or the ethics helpline of our parent company Aptiv, the Aptiv Drive Line (driveline.aptiv.com). Our business partners can also contact the HellermannTyton Purchasing Team or the Aptiv Drive Line with questions or concerns, as stated in the Supplier Code of Conduct. Reports can be made anonymously and every report will be investigated.

Whistleblowers will not suffer any disadvantages as a result of a report.

The protection of whistleblowers is important to us and we support the Whistleblower Protection Act.

Should we become aware of possible imminent or actual violations of our Code of Conduct for Suppliers and the Code of Business Ethics for our own business operations, we will initiate remedial measures to prevent, eliminate or minimise such violations. In cases where, despite all our precautions and efforts, actual human rights violations occur or we - even unknowingly - contribute to them, we are committed to implementing effective remedial measures.

We will amend this declaration accordingly over time.

HellermannTyton GmbH & Co. KG

Axel Boywitz

Managing Director

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Commercial Managing Director

Tornesch, May 2024

The company's guidelines and ethics helpline:

- ❖ HellermannTyton Supplier Code of Conduct, see [Services | Downloads | Guidelines and Commitments](#) (hellermanntyton.de), [Link](#)
- ❖ Aptiv Code of Ethical Business Conduct, [Link](#)
- ❖ Aptiv Drive Line, see driveline.aptiv.com, [Link](#)

This position paper is based on current international reference documents and standards such as

- ❖ the [United Nations Universal Declaration of Human Rights](#),
- ❖ the ILO Declaration on Fundamental Principles and Rights at Work ([International Labour Organization of the United Nations](#))
- ❖ [UN Guiding Principles on Business and Human Rights](#)
- ❖ the United Nations Convention against Corruption, [Link](#)