

Modern Slavery statement

Introduction from the Senior Vice President & General Counsel

At Gentherm, it is a priority for us to ensure that we conduct business ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement highlights the key activities we have undertaken during the last twelve months, as well as ongoing activities, to combat modern slavery in our organisation and supply chain, including the following:

- As part of our Annual Sustainability Survey, every Gentherm Group location is required to submit documentation addressing how they work to prevent and/or identify issues such as human trafficking and child labor.
- Once a year, every professional employee is required to complete a Conflict of Interest and Business Conduct assessment, which asks about a variety of topics related to Gentherm Group's Code of Conduct and operating policies. This Conflict of Interest process allows every professional employee a chance to report concerns or issues directly to our Global Compliance Director.
- In early 2022, Gentherm Group launched a global, online training program to all professional employees at Gentherm Group which included information on why there is a risk to the organisation and how to identify potential issues. This training program is mandatory for approximately 3,000 employees within Gentherm Group.

Organisation's structure

We are a supplier of automotive parts.

We are part of Gentherm Group (the **Group**) and the parent company is Gentherm Incorporated. The Group consists of 28 legal entities:

- Gentherm Incorporated,
- Gentherm Properties I., LLC,
- Gentherm Properties II., LLC,
- Gentherm Medical, LLC,
- Gentherm Equity, LLC
- Gentherm Licensing Limited Partnership,
- Gentherm (Texas), Inc.
- Gentherm Canada ULC,
- Gentherm de Mexico S.A. de C.V.,
- Gentherm GmbH,
- Gentherm Enterprises GmbH,
- Gentherm Licensing GmbH,

- Stihler Electronic GmbH,
- Gentherm U.K. Ltd.,
- Gentherm Luxembourg II,
- Gentherm North Macedonia DOOEL Prilep,
- Gentherm Ukraine TOV,
- Gentherm Hungary Kft.,
- Gentherm Holding (Malta) Ltd.,
- Gentherm Automotive Systems (Malta) Ltd.,
- Gentherm International Holdings (Hong Kong) Ltd.,
- Gentherm Electronics (Shenzhen) Ltd.,
- Gentherm Vietnam Co. Ltd.,
- Gentherm Japan Inc.,
- Gentherm Korea Inc.,
- Gentherm Automotive Systems (China) Ltd.,
- Gentherm Technology (Shanghai) Co. Ltd.,
- Gentherm Automotive Technologies (Shanghai) Co. Ltd.

The Group operates globally and has a global annual turnover in excess of £36 million.

Our supply chains

The Group is a global company with major manufacturing locations in the United States, Mexico, North Macedonia, Ukraine, China and Vietnam. The Group also has office, lab and testing facilities in the United States, Hungary, Germany, the United Kingdom, Korea, and Japan.

Our supply chain includes suppliers of automotive parts, those who work in the automotive sector, as well as professional advisers.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our organisation. We have appropriate policies in place that underpin this. We continuously review and update all our policies.

Our Human Rights Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains ([Gentherm Human Rights Policy](#)). We also have the following policies and procedures in place relevant to modern slavery, which we continuously review and update:

- Code of Conduct
- Annual Sustainability Survey
- Supplier Code of Conduct
- Supplier Requirements Manual
- Global Terms and Conditions of Purchase

We also focus on compliance through our in-house Legal team, which includes a lead compliance role that reports directly to our Senior Vice-President and General Counsel.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Our risks and how we manage this

As a global manufacturer, our supply chain includes many countries, regions, and product groups that may be considered at higher risk for human rights issues or concerns. We ensure, as far as we can, that we select reputable suppliers, who are appointed following a process to ensure that they align with Gentherm's values. All new suppliers added to our vendor database are reviewed and rated by the responsible member of our Purchasing team. Vendors with a higher risk-profiles are required to be sent to our Global Director of Compliance for review prior to initiating business with that vendor.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance program. This includes multiple documented instances of providing requirements and guidance to our supply base. These documents include our Supplier Code of Conduct, our Supplier Requirements Manual, our global Terms and Conditions of Purchase, and our Human Rights Policy, which explicitly states that "we will strive to ensure that these principles are followed throughout our entire supply chain." These documents are available [here](#) and [here](#).

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide mandatory training to our staff, covering our Code of Conduct and in 2022, a course specifically focused on Human Trafficking and Modern Slavery.

Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains in the next 12 months, Gentherm believes we are operating in full compliance with applicable laws and regulations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 31st, 2021.

Signed: 

Wayne Kauffman, SVP & General Counsel

Gentherm UK Ltd

Date: *July 21, 2022*