



LEONI

UK Modern Slavery Act Statement 2024

February 2025



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1. Foreword

LEONI is a global provider of products, solutions and services for energy and data management in the automotive sector. Its value chain ranges from standardized cables and special cables through to highly complex wiring systems and related components. By developing next-generation cable and wiring systems, LEONI supports its customers as an innovation partner and solutions provider with pronounced development and systems expertise on the way to increasingly sustainable and connected mobility concepts. The group of companies employed about 85,500 people in 26 countries at the end of 2024.

2. Responsibility to respect human rights and to protect the environment

LEONI strongly believes that social responsibility is a key factor in terms of the company's long-term success. Respecting human rights and observing fundamental social principles have always been essential elements of LEONI's value-based approach to corporate governance.

LEONI does not tolerate human rights violations, and violations are unequivocally sanctioned. LEONI's management, all employees and its suppliers are required to prevent such human rights violations as modern slavery and human trafficking in business activities. We are committed to the international principles with respect to protecting human rights and the environment. In particular, this involves

- adhering to the prohibition of child labor and forced labor
- the right to health and safe working conditions
- appropriate compensation for the work performed
- working hours
- freedom of assembly and association
- the right to collective bargaining
- protection against discrimination and harassment
- equal opportunities, diversity and inclusion
- prohibition of unlawful eviction and the confiscation of resources which secure livelihoods
- respect of data protection and data security
- security resources and human rights protection
- rights of local communities and indigenous peoples
- human rights and the environment
- environmental responsibility and
- use of conflict minerals.

3. Risk analysis

In 2024, LEONI conducted a human rights risk analysis, which also covered the prohibition of forced labor, as well as its environment-related obligations at its facilities and along the supply chain to be able to identify, assess and prevent potential and actual negative effects in time. From the findings, we extrapolated measures to reduce these risks, by means for example of training sessions on human rights.

In our own area of business and in all associated companies, risks are evaluated with the support of responsible departments, each of which submit assessments on the risk situation in their segments.

The risk analysis along our supply chain is performed by means of a multi-stage analysis of our direct suppliers. It is based on assessing them especially with respect to their country of origin and the product group of the shipments, drawing on publicly accessible databases. The findings thereby acquired are tested for plausibility. The assessment is furthermore subjected to random checks in individual cases. If the risk analysis reveals any increased human rights or environment-related risk, the suppliers concerned are subjected to a more in-depth review and, if required, appropriate remedial and preventive measures are taken.

4. Preventive measures

In 2024, we established and updated guidelines that integrate our commitment in our everyday activity, for example updating our Policy on Human Rights and Working Conditions and LEONI's internal Code of Conduct, that creates a common understanding among all employees of what it means to behave in a morally correct manner and to be able to rely on common and shared values as the basis for doing business. To this end, the LEONI Code of Conduct contains regulations on values and integrity, integrity towards society and the environment, integrity in the workplace, integrity and compliance, and leadership with integrity.

Employees are offered corresponding training sessions to convey these principles. In 2024, a Group-wide awareness campaign was conducted to bring the topics covered by the Code of Conduct even more into focus globally. Since 2023, furthermore, LEONI has conveyed the key principles of its Code of Conduct for Business Partners by means of an online available e-learning training that is free of charge.

While our policies and guidelines form the basis, this statement serves to present the latest developments regarded processes to identify, combat and prevent modern slavery at LEONI facilities and in its supply chains. It serves to fulfil the requirements of the UN's Guiding Principles on Business and Human Rights and the resulting, national standards such as the UK Modern Slavery Act.

LEONI's ReWire sustainability program presents our commitment to sustainability and the key sustainability-related topics. ReWire has three focal areas: climate protection, material efficiency & resource conservation as well as decent work. The latter contains social sustainability such as good working and living conditions and respect for international human rights for LEONI employees and throughout the supply chain.

As a preventive measure, we conduct a careful due diligence of our direct suppliers before entering into new business relationships in order to keep the risk of human rights violations low.

5. Remedial action

In the event of identified potential or actual human rights violations, including violations of the prohibition of forced labour, to which LEONI contributes or is indirectly connected, LEONI shall seek appropriate remedial action by establishing internal processes for detecting grievances and defining appropriate remedial and remediation measures in its own business area and with direct and indirect suppliers. If LEONI has a well-founded suspicion or concrete indication of possible human rights violations in its own business area, it immediately takes measures that lead to an end to the violation or risk. If a legal position

relating to human rights or the environment has been violated at a business partner, appropriate measures will be determined. Such action could, depending on the seriousness of the violation, go as far as termination of the business relationship.

LEONI furthermore requires its suppliers to conduct themselves sustainably and with integrity, to observe national and international rules and especially to respect human rights. Both our General Terms and Conditions and LEONI's Code of Conduct for Business Partners oblige our suppliers to observe the corresponding policies and principles of the UN Global Compact.

LEONI follows the principle enshrined in its Code of Conduct for Business Partners that violations by existing suppliers, especially of internationally recognized human rights such as modern slavery and human trafficking, will not be tolerated. LEONI will reject any business relationship with business partners if they are embroiled in slavery or human trafficking. LEONI did not have any confirmed cases of violations of social or ecological standards in 2024.

6. Complaints procedure

At LEONI, we have a whistleblower system for employees as well as for third parties along the entire supply chain, which enables them to report, among other things, human rights violations or breaches of our Code of Conduct for Business Partners or of the prohibition of forced labor.

7. Conflict minerals and copper in the supply chain

LEONI endeavours to avoid the use of such conflict minerals as gold, tantalum, tin or tungsten, which are extracted in disregard of human rights and calls on its suppliers to do likewise. This is set out in a group-wide guideline on conflict minerals. Since 2014, LEONI has been voluntarily informing customers, using a standardised template (CMRT) in accordance with the Dodd-Frank Wall Street Reform and Consumer Protection Act, to what extent LEONI products contain conflict minerals originating from mines or smelters in certain countries.

In order to identify and minimise sustainability risks, LEONI expects its business partners to introduce due diligence processes and provide the necessary information along the entire supply chain. This also includes annual participation in the survey by the CMRT to ensure that LEONI's business partners do not support conflict regions, child labour or unsafe working practices.

LEONI is contributing to attaining the goals under its ReWire sustainability program by having joined the voluntary Copper Mark initiative as a partner. Within this assurance framework, companies and other organizations have together committed themselves to responsible copper production and to upholding corresponding standards in their supply chains. As LEONI only processes copper and does not have its own mines, the company cannot be officially certified by Copper Mark, but it does contribute to the initiative's success by being a committed partner and an example to its suppliers.

8. Contact

Contact for questions and comments on this statement

Please refer to compliance@leoni.com if you have any questions or comments on this policy statement or on other human rights-related matters.

Contact for information on violations

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Nuremberg, February 2025



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