



MoldTecs Group Human Rights Policy

MORE THAN YOU EXPECT

1. Purpose and Commitment

MoldTecs Group is a global automotive supplier specialized in the development and manufacturing of high-performance plastic components and complex molded systems. With a strong international footprint and close partnerships with major OEMs, the company provides innovative solutions for air management, thermal systems, and fluid handling across a wide range of mobility applications.

Driven by innovation, MoldTecs is actively supporting **the transition toward more sustainable mobility**. The Group is increasingly focused on technologies for electric and hydrogen powertrains, including advanced thermal management systems that improve battery efficiency, vehicle performance and driving range.

Through its expertise in lightweight, high-performance materials and its commitment to continuous innovation, MoldTecs contributes to **the development of cleaner, more energy-efficient mobility solutions for the future**.

In line with this commitment to sustainable and responsible mobility, MoldTecs Group is committed to respecting, protecting, and promoting internationally recognized human rights across all its activities and throughout its value chain. This commitment reflects our ambition to prevent, mitigate, and remediate any adverse human rights impacts linked to our operations, products, or business relationships.

As part of our CRS strategy, MoldTecs integrates human rights considerations into decision-making processes in line with CSRD requirements and international best practices.

Compliance officer is available to answer any questions regarding this policy. In case of doubt, further advice should always be sought.

2. Reference Frameworks

In addition to our Code of Conduct, this policy aims to uphold, respect and promote the principles of Human Rights.

This policy is aligned with :

- United Nations Global Compact (UNGC) - membership since 2022
- Universal Declaration of Human Rights
- International Labour Organization (ILO) Conventions

- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights (UNGPs)
- Applicable national and European regulations (including CSRD expectations)

3. Scope

This policy applies to all MoldTecs entities, employees, and business partners. Suppliers are required to comply with these principles through **the Supplier Code of Conduct**. Accordingly, all stakeholders are expected to respect internationally recognized human rights and adhere to these principles in their interactions with colleagues, partners, and communities.

Human rights expectations are embedded in our Supplier Code of Conduct and contractual requirements. We therefore expect our partners to implement appropriate measures to prevent, address, and remediate any human rights impacts they may cause or contribute to, and to uphold these standards throughout their value chains.

The Supplier Code of Conduct establishes the fundamental and binding principles governing our relationships with business partners and supports their effective implementation in day-to-day operations. Its standards form an integral part of our cooperation with suppliers.

4. Human Rights Due Diligence

MoldTecs applies a risk-based human rights due diligence approach aligned with UNGPs. This approach enables us to identify environmental and human rights risks in our own group and our supply base. Risk management includes measures for risk analysis and reduction or prevention.

4.1. Child Labor and Forced Labor

MoldTecs strictly prohibits child labor and all forms of forced or compulsory labor across its operations and value chain. Compliance with this principle is mandatory for all entities, employees, and business partners. The Group adheres to national laws and to international standards, including :

- The provisions of **ILO Convention NO. 138** concerning the minimum age for employment of young workers between 15 and 18 years.
- The provisions of **ILO Conventions No. 29 and No. 105** (on forced labor)

Employment of young workers is strictly regulated to protect their health, safety, and education, and all forms of forced labor, including bonded or trafficked labor, are strictly forbidden.

Suppliers and partners are expected to implement appropriate measures to prevent, identify, and address any risks related to child or forced labor throughout their value chains.

4.2. Diversity and Inclusion

4.2.1 Employment of people with Disabilities

MoldTecs is committed to complying with all applicable national laws and regulations regarding the employment of persons with disabilities. The Group actively supports initiatives aimed **at promoting equal employment opportunities for individuals with disabilities.**

4.2.2 Anti-Discrimination

MoldTecs prohibits any form of discrimination in recruitment, career development, training, remuneration, promotions, job assignments, or contract renewals. Decisions affecting employees or candidates must never be based on factors such **as origin, ancestry, gender, sexual orientation or identity, age, family situation, genetic characteristics, ethnic or racial background, political opinions, union or mutual association activities, religious beliefs, physical appearance, place of residence, pregnancy, or surname.**

MoldTecs also ensures **equal treatment and respect for all its employees, whether temporary, part-time, or full-time.**

All employees must receive **wages and benefits that meet or exceed the legal minimum standards** and allow for a dignified standard of living. We are committed to fair pay practices and ensuring that overtime is voluntary, limited, and compensated in accordance with applicable law.

Working hours must comply with national regulations and international standards. Employees are entitled to regular rest periods, paid leave, and breaks during the workday. HR department regularly reviews wage structures and employment conditions to promote fair and equitable treatment.

Employees are protected from any adverse actions, including disciplinary measures or dismissal, for reporting or participating in investigations of discriminatory behavior in good faith.

4.3 Sexual and Workplace Harassment

MoldTecs ensures a safe and respectful work environment, **free from sexual harassment, intimidation, physical, psychological, or verbal violence, or any other form of unlawful harassment**. MoldTecs strictly prohibits such behavior and expects all employees and business partners to uphold these standards.

Any individual at MoldTecs found to engage in discriminatory actions or harassment may be subject to disciplinary measures.

4.4. Fair Working Conditions

4.4.1 Freedom of Expression and Social Dialogue

All MoldTecs employees have the right to freely organize, form, and join groups, whether formally or informally. They can express themselves freely to help improve their work environment. This contributes to a responsible social dialogue. To this end, the Group provides its employees or their representatives with timely information about its activities and organizational matters, in compliance with the laws and regulations governing employee information and consultation.

No employee shall be subject to discrimination, intimidation or retaliation for exercising these rights.

The Company is committed to maintaining **a constructive and ongoing dialogue with employee representatives** to support effective collective bargaining processes, in the best interests of all employees.

MoldTecs engages employees, suppliers, and stakeholders through dialogue, surveys, and responsible sourcing practices while **respecting freedom of association**.

4.4.2 Equity

We are committed to ensuring fair labor conditions, including equitable pay and reasonable working hours, in line with international standards such as ILO conventions.

MoldTecs Group ensures that compensation meets at least the legally prescribed minimum and/or the minimum guaranteed for the profession, or as specified in applicable collective agreements. The Group also upholds the principle of equal pay for work of equal value, particularly between men and women, in accordance with ILO Convention No. 100. We also expect our business partners to uphold the same principles.

Furthermore, MoldTecs is committed to promoting key workplace matters by **fostering a healthy work-life balance** (remote work), upholding the right to disconnect, regularly conducting **employee satisfaction surveys**, and providing **comprehensive and competitive social benefits**.

5. Health and Environment Safety

According to MoldTecs HSE Policy and HSE management system, MoldTecs is committed to ensuring a safe and healthy environment for all employees. This includes proactive identification and mitigation of workplace hazards, provision of appropriate training and equipment, and compliance with relevant health and safety legislation.

Managers are responsible for fostering a culture of safety and reporting unsafe conditions. Employees are expected to take responsibility for their own safety and that of others. All incidents, near-misses, or violations are to be reported immediately to Compliance Officer.

5.1 Efficient Use of Resources and Environmental Responsibility

Resources are used responsibly and efficiently. MoldTecs defines and implements business processes that address significant environmental aspects, including material usage, energy consumption, greenhouse gas emissions, water quality and consumption, air quality, waste management, and other natural resources.

The company minimises waste throughout product development, manufacturing, reuse and recycling. We are committed to continuous improvement initiatives aimed at reducing energy consumption and the carbon footprint of our sites.

MoldTecs strictly complies with all applicable environmental protection laws and regulations.

5.2 Health, Safety & Environmental Initiatives of Partners

MoldTecs encourages its business partners to implement structured health, safety and environmental programs across all countries and sites where they operate.

5.3 Rights of Minorities and Indigenous Peoples

In line with internationally recognized human rights standards, MoldTecs takes measures to minimize, mitigate, and remediate any adverse impact its activities may have on local communities.

5.4 Respect for Land, Forest, and Water Rights

MoldTecs ensures that no forced evictions or unlawful deprivation of land, forests, or water occur during land acquisition, development, or any other use, respecting the rights of local populations.

6. Risk Management

MoldTecs risk management system identifies environmental and human risks within the group and the supply chain. This process implements measures for risk analysis, prevention or control.

7. Supply Chain and Business Partners

Human rights responsibilities extend throughout our value chain. MoldTecs requires all suppliers, contractors, and business partners to uphold similar human rights standards and comply with applicable laws. These expectations are communicated through contractual terms, codes of conduct, and supplier onboarding processes.

We reserve the right to conduct audits, assessments, or other forms of due diligence to verify compliance. Where violations are identified, purchasing department engages with suppliers to develop corrective action plans and monitor progress. In cases of persistent or severe non-compliance, we may suspend or terminate the business relationship.

8. Training, Communication & Awareness

Compliance Officer provides human rights **trainings to all employees** appropriate to their role and responsibilities.

This includes **onboarding for new employees and regular refresher sessions for existing staff**. Topics covered include identifying risks, reporting concerns, and fostering a respectful work environment. Compliance Officer also raises awareness **through internal communications, campaigns, and manager-led discussions**.

Training materials are reviewed and updated regularly to reflect legal developments, operational experience, and stakeholder feedback.

9. Whistleblowing system

MoldTecs provides a **whistleblowing system** accessible to employees and external stakeholders. This system enables reporting of concerns, ensures protection against reprisals, and guarantees investigation and remediation procedures.

Complaints may be submitted through various channels, e.g. via the whistleblowing portal **Integrity Line**: [moldtecs](#) provided by MoldTecs. All reports are thoroughly investigated and managed with the utmost seriousness.

When human rights violations are substantiated, MoldTecs will take appropriate corrective and disciplinary measures. This may include revising processes, terminating business relationships, or offering restitution to affected individuals. We strive to learn from each case to strengthen our systems and prevent recurrence.

10. Responsibilities

The CEO and Compliance Officer hold ultimate responsibility for the endorsement and oversight of this Policy.

Team leaders must promote adherence to this Policy within their teams, and all employees are expected to uphold its principles in their daily work.

We maintain internal controls to monitor adherence and track key indicators. Significant breaches or risks are reported to senior leadership and may trigger further review or escalation.

11. Further development

This policy is regularly reviewed and improved based on KPI results, reporting, audits and alignment with evolving regulations.

Cédric RAUCY
Chief Executive Officer
MoldTecs Group