

We pioneer motion

SCHAEFFLER

Schaeffler Group Modern Slavery and Transparency Statement 2025



Table of contents

Board of Director's Approval	3
Chapter 1 – Organizational structure and operations of the Schaeffler Group	4
Chapter 2 – Policies and Procedures	6
2.1 Schaeffler Group Code of Conduct	6
2.2 Schaeffler Group Business Partner Code of Conduct	7
2.3 Schaeffler Group Human Rights Statement	8
2.4 Schaeffler Group Human Rights Compliance Policy	8
Chapter 3 – Human Rights Compliance Management System	9
3.1 Impact Assessment and Prioritization	9
3.2 Impact Mitigation and Preventive	10
3.3 Ad Hoc Impact Assessments	11
3.4 Stakeholder engagement	12
Chapter 4 – Complaint Mechanism and Remediation	13
Chapter 5 – Effectiveness Control	14
Outlook	14
Contact	14
Annex 1	15

Board of Director's Approval

The Schaeffler Group is a globally operating family business with a strong value base and commitment to respecting and protecting fundamental human rights in all its business activities and to not tolerate any violations thereof. This includes the prohibition of any form of Modern Slavery¹.

The Schaeffler Group adheres to all applicable laws and operates in close alignment with international standards, such as

- International Bill of Human Rights,
- United Nations Guiding Principles on Business and Human Rights,
- Core Labor Standards of the International Labor Organization,
- OECD Guidelines on Responsible Business Conduct,
- the Ten Principles of the UN Global Compact, of which the Schaeffler Group is a signatory party.

This Statement outlines the commitment and provides transparency on activities taken by the Schaeffler Group² to respect and protect human rights, and combat Modern Slavery during the financial year 2025, ending 31 December 2025.

The Statement was prepared in accordance with

- Part 6 of the United Kingdom Modern Slavery Act 2015,
- Section 5 Norwegian Transparency Act,
- Section 14(1) of the Australian Modern Slavery Act 2018,
- Section 11(4)(b)(ii) of the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act,
- California Transparency in Supply Chains Act which are collectively referred to as the "Relevant Reporting Laws" in this Statement.

This Statement covers the activities of the Schaeffler Group, and particularly the following Schaeffler Group Companies:

- Schaeffler (UK) Ltd.
- Schaeffler Vehicle Lifetime Solutions UK Ltd.
- Schaeffler Norge AS
- Schaeffler Australia Pty. Ltd.
- Schaeffler Aerospace Canada Inc.
- Schaeffler Canada Inc.
- Vitesco Technologies Canada

which are collectively referred to as "Reporting Group Companies" in this Statement.

Regarding the California Transparency in Supply Chains Act, and its scope of application as "doing business" in accordance with the California Revenue and Taxation Code, this Statement is made on behalf of the Schaeffler Group as a whole.

This is the Schaeffler Group's first consolidated Statement for the above-mentioned Relevant Reporting Laws and Reporting Group Companies, replacing previous individual Statements. This Statement was prepared by the Group's Human Rights Compliance department at group level.

The Schaeffler Group Executive Board, as the governing body of the Schaeffler Group, has approved this Statement on its own behalf and on behalf of the Reporting Group Companies of the Schaeffler Group, on 12 January 2026, to meet the requirements of the United Kingdom Modern Slavery Act 2015, Norwegian Transparency Act, Australian Modern Slavery Act 2018, Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act, as well as California Transparency in Supply Chains Act³.

This Statement is signed by the Chief Executive Officer, on behalf of the Schaeffler Group Executive Board, as well as by the Chief Human Resources Officer, and Group Chief Compliance Officer in his role as monitoring and governance function of the group-wide Human Rights Compliance Management System.



Klaus Rosenfeld
Chief Executive
Officer (CEO)
Schaeffler AG



Astrid Fontaine
Chief Human
Resources Officer
Schaeffler AG



Eric S. Soong
Group Chief
Compliance Officer

1 Throughout this Statement, the term "Modern Slavery" is defined as including servitude, human trafficking, forced, debt-bonded, indentured, child, slave or any other kind of involuntary labor covered by the Relevant Reporting Laws.
2 For this Statement, "Schaeffler Group" is defined as, Schaeffler AG and all Group Companies in which the Schaeffler AG directly or indirectly holds a majority stake.
3 This approval is understood as aligning with the reporting requirements of the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act under subparagraph 11(4)(b)(i).

1 Organizational structure and operations of the Schaeffler Group

The Schaeffler Group has been driving forward groundbreaking inventions and developments in the field of motion technology for over 75 years.

With innovative technologies, products, and services for electric mobility, CO₂-efficient drives, chassis solutions, and renewable energies, the company is a reliable partner for making motion more efficient, intelligent, and sustainable – over the entire life cycle. With around 120,000 employees and more than 250 locations in 55 countries, Schaeffler is one of the world's largest family-owned companies and ranks among Germany's most innovative companies.

Motion is at the core of the Schaeffler Group and serves as the connecting element for its eight product families ranging from bearing and linear guidance systems to transmission and engine components, control units and sensors, actuators, power electronics, electric motors and electric drives, bipolar plates and stacks in the hydrogen field, as well as repair and maintenance solutions.

The Schaeffler Group is organized around four business divisions, including:

- The **E-Mobility division** develops, manufactures, and distributes a broad portfolio of mechanical, mechatronic, and electronic components and systems for powertrain electrification.
- The **Powertrain & Chassis division** develops, manufactures, and distributes components and system solutions for vehicles with powertrains based on an internal combustion engine and for hybrid and battery electric vehicles.
- The **Vehicle Lifetime Solutions division** is responsible for the Schaeffler Group's global business with spare parts and provides repair solutions.
- The **Bearings & Industrial Solution division** develops, manufactures, and distributes rotary and linear bearing solutions, drive components and systems, as well as service solutions.



1 Organizational structure and operations of the Schaeffler Group

As a global technology leader, the Schaeffler Group maintains a complex supply chain network, collaborating with over 50,000 tier-1 suppliers across 75 countries. Our diverse portfolio spans over 100 categories for both production and non-production materials.

The Schaeffler Group is characterized by a three-dimensional organizational and leadership structure which differentiates between divisions, functions, and regions. The Schaeffler Group is managed by the Board of Managing Directors of the Schaeffler AG.

The Board of Managing Directors of the Schaeffler AG consists of the CEO and the members of the Board of Managing Directors responsible for the divisions and functions. Jointly with the Regional CEOs, it represents the Schaeffler Group's Executive Board.

Within the Executive Board of the Schaeffler Group, the Chief Executive Officer is responsible for the topic of sustainability and compliance, including human rights. The Chief Executive Officer has assigned subject-matter responsibilities to Senior Management level and convened various Committees and Councils to steer and oversee activities and ensure direct reporting lines to the Board of Managing Directors.

The subject-matter responsibility for the topic of human rights lies with the Group Chief Compliance Officer. The Group Chief Compliance Officer chairs the Human Rights Compliance Council as the respective steering and oversight body for the topic of human rights including Modern Slavery. In this regard, the Schaeffler Group maintains a group-wide Human Rights Compliance Management System, governed by the Group Chief Compliance Officer.

To further strengthen ESG-related activities, the Group's ESG strategy was realigned as of January 1, 2025. This included the appointment of a Group Head of Strategic Sustainability and convening of the Sustainability Committee. The Sustainability Committee is chaired by the Chief Executive Officer and is responsible for defining and adjusting the overall ESG strategy and projects, including activities relating to social aspects.

A detailed description of the organizational and leadership structure is included in the [Schaeffler Group Annual Sustainability Report⁴](#)



Figure 1 - Schaeffler Group organizational and leadership structure.

⁴ The Schaeffler Group publishes its Sustainability Report every year. Since the financial year 2024, the CSRD conformant Sustainability Report has been integrated into the Annual Report. The Sustainability Reports are publicly available on the Group website.

2 Policies and Procedures

The group-wide approach to respect and protect human rights within its business activities is firmly anchored in a set of policies and procedures detailing our commitment, principles of conduct and expectations towards our own conduct and business partners relating to respecting and protecting human rights.

This includes the
Schaeffler Group Code of Conduct >
Schaeffler Group Business Partner Code of Conduct >
Schaeffler Group Human Rights Statement >

In addition, the Schaeffler Group has additional internal policies and instructions for specific due diligence activities, such as impact assessment or derivation of preventive impact-addressing measures.

Fully integrated Schaeffler Group companies must implement the policies, instructions and processes set out in the central Schaeffler Group Management Handbook. Other Schaeffler Group companies are required to meet minimum standards and establish their own policies, instructions and guidelines defined in specific Management Handbooks.



2.1 Schaeffler Group Code of Conduct

The **> Schaeffler Group Code of Conduct** describes the values and principles of conduct that represent a mandatory basis for the Group's global business conduct whose letter and spirit must be observed by all employees.

The defined values and principles are consistent with applicable laws and operate in close alignment with established international standards aimed at protecting human rights and upholding environmental standards, as well as ensuring adequate and safe working conditions.

Any kind of Modern Slavery or other violations of recognized human rights are not tolerated within the Schaeffler Group. The **> Schaeffler Group Code of Conduct** specifically includes provisions prohibiting Modern Slavery, including child labor, as follows:

4.2 "Prohibition of child labor: The Schaeffler Group does not tolerate any form of child labor. Applicable local laws and established international standards for the protection of children must be complied with. The Schaeffler Group adheres to minimum employment ages that must not be lower than the school leaving age or below 15 years. Children under the age of 18 enjoy special protection. Work that deprives children of their childhood, which hampers their potential, dignity, and education as well as work that is harmful to their physical and mental development is inconsistent with the Schaeffler Group values."

4.3 "Prohibition of forced labor and modern slavery: The Schaeffler Group does not tolerate forced or compulsory labor, modern slavery, involuntary or exploitative labor, bonded labor, human trafficking, or other forms of exploitation defined as work required of a person, under penalty of punishment, for which the person has not volunteered. The Schaeffler Group promotes secure employment and undertakes to align its hiring and recruiting practices with applicable international standards. Especially, the Schaeffler Group ensures that the employees' freedom of movement is not impaired by withholding their identity documents or by any other means."

2 Policies and Procedures

2.2 Schaeffler Group Business Partner Code of Conduct

The **› Schaeffler Group Business Partner Code of Conduct** translates the Group’s commitments regarding its own business conduct defined in the **› Schaeffler Group Code of Conduct** into expectations and requirements for its Business Partners⁵. The expectations and requirements of conduct are consistent with applicable laws and operate in close alignment with established international standards aimed at protecting human rights, upholding environmental standards, as well as ensuring adequate and safe working conditions. Any kind of Modern Slavery or other violations of recognized human rights are not tolerated in business relations with the Schaeffler Group.

The **› Schaeffler Group Business Partner Code of Conduct** specifically includes provisions prohibiting Modern Slavery, including child labor, as follows:

4.2 “Prohibition of child labor and protection of young workers: Business Partners do not tolerate child labor of any kind within its own operations or value chain. Business Partners observe the minimum employment age, which must not be lower than the school-leaving age of the country of business activities or be below 15 years of age. Persons under the age of 18 are in need of special protection and must not be hampered in their development and education. Business Partners ensure that persons under the age of 18 do not perform work which, due to its nature or the circumstances in which it is performed, would endanger their safety, health, or morals.”

4.3 “Prohibition of forced labor and modern slavery: Business Partners do not tolerate forced or compulsory labor, modern slavery, involuntary or exploitative labor, bonded labor, human trafficking, or other forms of exploitation defined as work required of a person, under threat of punishment, or for which the person has not volunteered as well as human trafficking. Business Partners prohibit physical punishment and do not violate a person’s right to freedom of movement. Employees must be able to leave factory premises at any time without giving reasons. The Schaeffler Group expects its Business Partners to implement adequate measures to identify, prevent, mitigate, and monitor forced labor risks and violations and to support the Schaeffler Group in meeting applicable reporting, disclosure and import requirements.”

4.4 “Ethical recruiting: Business Partners do not mislead or defraud potential employees. This includes providing false information regarding the nature of work, working conditions,

benefits, working location, accommodation, as well as associated costs. Business Partners must not require recruiting fees prohibited by applicable local laws and should align their recruiting practices with international standards. Employees’ identity documents must not be confiscated, manipulated, or destroyed or restricted employees by other means in accessing their identification documents. Employees of Business Partners receive a written contract or employment notification containing an accurate and truthful description of their rights and responsibilities. The document must be provided in a language that is accessible to the employee according to local law. The Schaeffler Group expects its Business Partners to provide the document before any activities that are related to the assumption of work, at the latest on the day of commencement of work.”

Business Partners are expected to establish a due diligence process and management system appropriate to its size and business activities, for their own operations and value chain. Thereby identifying, preventing, or mitigating potential or actual adverse impacts on human rights and environmental standards material to their business activities. The Schaeffler Group expects the Business Partner to make a best and risk-based effort to cascade the defined standards and minimum requirements throughout their supply chain, including their subcontractors and providers of contract labor.

Business Partners are asked to acknowledge the **› Schaeffler Group Business Partner Code of Conduct** and its therein defined expectations and minimum requirements or confirm that their own Code is equivalent in scope. An acknowledgment of the Group’s Business Partner Code of Conduct is requested for any Business Partner participating in a Schaeffler sourcing.

The **› Schaeffler Group Business Partner Code of Conduct** can be found here.



⁵ This Business Partner Code of Conduct applies to all natural or legal persons who sell or provide products, processes, or services to the Schaeffler Group, either directly or via third parties, e.g., affiliated companies, distribution partners, subcontractors, and agents (hereinafter referred to as “Business Partner”).

2 Policies and Procedures

2.3 Schaeffler Group Human Rights Statement

The **Schaeffler Group Statement on Respect for Human Rights** is adopted by the Group's senior management and outlines the Group's strategy regarding respecting and protecting human rights in the Group's business activities.

It includes a description of the procedure by which the Group fulfills its human rights due diligence requirements as required by the German Supply Chain Due Diligence Act, annually prioritized human rights and environmental impacts identified based on regular and ad hoc risk analysis, and the expectations of its own employees and suppliers.

Any need for amendment and update of the Schaeffler Group Statement on Respect for Human Rights is identified regularly and on an ad hoc basis.

2.4 Schaeffler Group Human Rights Compliance Policy

Our internal Group Human Rights Compliance Policy further details the values and principles of conduct defined in the Group Code of Conduct and Business Partner Code of Conduct and defines the scope of our group-wide Human Rights Compliance Management System (see Chapter 4). The Policy defines clear operational expectations and guidelines for complying with national laws, such as the German Supply Chain Act and considers where necessary the requirements of the Relevant Reporting Laws.

The Human Rights Compliance Policy states that all forms of forced and compulsory labor, human trafficking and modern slavery are not tolerated. Therefore, as appropriate prevention of impacts, according to the Policy it must be ensured that

- Employees are not denied access to their identity or immigration documents, such as passports or driver's licenses, through destruction, concealment, confiscation, or any other means.
- During the recruitment of employees, no misleading or fraudulent practices are used, such as:
 - *Failing to disclose basic information in a format and language accessible to the employee.*
 - *Making material misrepresentations regarding key terms and conditions of employment, including wages, fringe benefits, location of work, living conditions, housing and associated costs, significant costs to be charged to the employee, or the hazardous nature of the work.*
- Recruiters and recruitment companies comply with applicable local laws at all times.
- Employees are not charged recruitment or onboarding fees, even if permitted or tolerated under local law.
- Employees who are not residents of the country in which the work is performed are paid return transportation costs at the end of employment unless they are legally permitted to remain in the country and choose to do so.
- An employment contract, recruitment agreement, or other legally required work document is provided in writing, in a language the employee understands, if needed in the official language of the country of origin or an officially recognized sublanguage. This document must contain a detailed description of the terms and conditions of employment and be submitted to the employee at least five days before the employee relocates across borders to perform work.

The Policy is mandatorily applied by all employees. The Human Rights Compliance Policy is supplemented by internal instructions and guidelines relating to specific due diligence activities, such as impact assessment or derivation of preventive measures.



3 Human Rights Compliance Management System

To ensure adherence to relevant legal requirements, self-commitments, as well as internal rules and procedures defined in this regard, the Schaeffler Group maintains a group-wide Human Rights Compliance Management System. Group companies, on which Schaeffler AG has decisive influence, are expected to follow the framework by either directly applying the rules defined in the Schaeffler Group documents or deploying similar internal policies.

The Human Rights Compliance Management System is governed by the Group Chief Compliance Officer and structured in accordance with IDW AsS 980. The Human Rights Compliance Management System follows a risk-based approach aligned with the due diligence requirements of the German Supply Chain Due Diligence Act. It focuses on potential or actual adverse impacts on human rights and environmental standards related to the Schaeffler Group's own business operations and direct supply chain. In selected cases, an ad hoc risk assessment is also conducted for the Schaeffler Group's indirect supply chains.

3.1 Impact Assessment and Prioritization

The annual impact assessments for the Group's own organization and direct suppliers form the basis of the Group's annual activities. The annual impact assessment is conducted at central level for all Group companies and depends on an initial scoping according to, inter alia, size, location, and type of business.

The impact assessments include an abstract and concrete assessment of potential adverse impacts on human rights, including Modern Slavery, and environmental standards. The basis for the abstract impact assessment are publicly available indicators for human rights and environmental standards relating to industry and country risk profiles. The methodology of the abstract impact analysis considers the level of severity and likelihood as well as confirmed human rights violations for each location and / or direct supplier. The concrete impact assessments consider additionally either location specific or supplier specific factors, such as the results of questionnaires, certificates, or findings in internal or external controls and reviews.

The potential adverse impacts on human rights and environmental standards are prioritized according to their level of severity (scope, scale, irremediability), likelihood, and level

of influence and contribution of the Group to the adverse impact. Prioritized potential impacts are addressed with preventive measures.

In addition, the Group conducts an ad hoc impact assessment in case of substantial changes to its business activities, addressing the introduction of significant new products, projects, production or business fields, or in case of substantiated knowledge of potential or mitigating actual adverse impacts on human rights and environmental standards among its indirect suppliers.

Generally, the validation and prioritization of impacts take place until Q3 of each year. Prioritized impacts are addressed with measures immediately after the assessment or throughout the next year. Therefore, this Statement outlines the prioritized impacts identified in Financial Year 2024 which have been addressed with measures throughout the Financial Year 2025. The Statement also provides an overview of the newly prioritized impacts identified until Q3 2025, which will be addressed by measures throughout the Financial Year 2026.

Impact Analysis for Schaeffler Group's own organization

The prioritized impacts of the **2024** impact analysis were

- **Discrimination,**
- **Violation of Freedom of Association,**
- **Inadequate Working Hours.**

The FY2024 impact assessment did not identify any potential impacts related to Modern Slavery, as covered by the Relevant Reporting Laws.

The prioritized impacts of the **2025** impact analysis are

- **Discrimination,**
- **Forced Labor and Human Trafficking,**
- **Inadequate Working Hours.**

The FY2025 impact assessment did identify Human Trafficking and Forced Labor as potential impacts related to Modern Slavery, as covered by the Relevant Reporting Laws. In the following year, adequate measures will be derived to mitigate potential negative impacts on affected stakeholders.

3 Human Rights Compliance Management System

Impact Analysis for Schaeffler Group's direct suppliers

The prioritized impacts of the 2024 impact analysis were

- **Forced Labor and Human Trafficking,**
- **Disregard of Occupational Health and Safety,**
- **Violation of Freedom of Association.**

The FY2024 impact assessment has identified and prioritized forced labor as a potential impact relating to Modern Slavery, due to complex supply chains.

The prioritized impacts of the 2025 impact analysis are

- **Destruction of natural living conditions due to environmental pollution,**
- **Lack of instruction or control on the part of a company regarding the employment of private or public security forces.**

The FY2025 impact assessment has not identified potential impacts related to Modern Slavery, as covered by the Relevant Reporting Laws.

3.2 Impact Mitigation and Preventive Measures

The derivation of preventive measures within the Schaeffler Group follows a risk-based approach. This means that the prioritized impacts of the annual impact assessment, direct suppliers with a potential high-risk exposure and Schaeffler Group locations with a potential high-risk exposure are addressed with impact mitigating measures.

In this regard, the Schaeffler Group differentiates between general and individual location/supplier specific impact addressing measures for its own organization and direct suppliers.

General measures are derived at central level and target Schaeffler Group's own organization or direct suppliers in an overarching manner. This includes inter alia

- the definition of clear expectations and requirements towards its own employees and direct suppliers via its Code of Conduct, Business Partner Code of Conduct and Human Rights Compliance Policy,
- the definition and roll-out of adequate training for its own employees, such as the Schaeffler Basic Human Rights Training, and for direct suppliers through an e-learning platform,

- the utilization of internal and external human rights related reviews and controls, such as audits by the **> Responsible Supply Chain Initiative (RSCI)** for high-risk direct suppliers,
- awareness campaigns aiming to improve the identification of potential impacts relating to Modern Slavery in daily business activities.

Key Activities in the Financial Year 2025:



updated training concept for own employees to raise awareness and understanding of human rights and environmental due diligence, including Modern Slavery, as defined in our Code of Conduct and Business Partner Code of Conduct,



assigned risk specific trainings, including trainings on Modern Slavery to selected high risk direct suppliers,



developed and started to execute additional internal reviews and controls, including its new internal Human Rights reviews and controls for its own organization covering Modern Slavery.

In FY2025, four pilot locations in four regions of the Schaeffler Group have been reviewed.

Where necessary, the Schaeffler Group derives individual impact addressing measures regarding specific human rights or environmental topics, including Modern Slavery.

FY2025 Individual Measures addressing Modern Slavery for Schaeffler Group's own operations:

As the FY2024 impact assessment did not prioritize any potential, or identify actual impacts related to Modern Slavery, no individual impact addressing measures have been derived in FY2025.

FY2025 Individual Measures addressing Modern Slavery for Schaeffler Group's direct supply chain:

During an RSCI Audit at a direct supplier, a finding related to Modern Slavery, namely restriction of freedom, has been identified. Therefore, an individual impact addressing measure has been derived. The supplier has worked on corrective actions and has proven its implementation by a follow-up RSCI audit.

3 Human Rights Compliance Management System

3.4 Stakeholder Engagement

Engaging with stakeholders and taking their interest into account, supports the Schaeffler Group and the Human Rights Compliance Management System in adequately understanding the potential or actual adverse impacts on human rights and environmental standards that it may cause, contribute to, or is directly linked with.

Where appropriate, the Schaeffler Group engages with relevant stakeholders, including those representing rights-holders, such as employees, workers along the value chain as well as affected communities and / or their legitimate representatives in accordance with its internal Guideline on Stakeholder Engagement.

To support innovative solutions and collaboration to combat Modern Slavery, the Schaeffler Group is an active member of multi-stakeholder initiatives, industry associations and respective working groups, such as **› German Association of the Automotive Industry (VDA)**, the **› Responsible Supply Chain Initiative (RSCI)** and **› Responsible Business Alliance (RBA)**. In particular, the Schaeffler Group

- is a founding member of the **› German Automotive Sectorial Dialogue**. The sector dialogue is a multi-stakeholder forum launched by the German Federal Ministry of Labor and Social Affairs in 2020. It comprises representatives of the automotive industry and civil society and provides for the exchange of knowledge and best practices regarding the implementation of adequate human rights due diligence including pilot projects⁶.
- is a signatory party to the **› UN Global Compact Germany**. As a special initiative of the United Nations Secretary-General, the United Nations Global Compact is a call to companies worldwide to align their operations and strategies with Ten Principles in the areas of human rights, labor, environment, and anti-corruption. Its ambition is to accelerate and scale the global collective impact of business by upholding the Ten Principles and delivering the Sustainable Development Goals through ambitious, accountable companies, and environments that enable change.
- is a member of the **› Responsible Minerals Initiative (RMI)** and has been involved with the **› Initiative for Responsible Mining Assurance (IRMA)** since 2021.
- has been a supporting member of the **› Responsible Business Alliance (RBA)** since 2024 which continues Vitesco Technologies original affiliate membership of RBA post-merger.

- is a founding member of the **› Responsible Supply Chain Initiative (RSCI)**. The RSCI supports its members with a tool to meet corporate due diligence obligations, including those relating to Modern Slavery, and improve transparency along the automotive supply chain. Auditees benefit from a streamlined assessment with a single, unified assessment standard that reduces multiple assessments and provides easy-to-use tools for an efficient assessment process.

In addition, an update of the Schaeffler Group's activities regarding human rights and sustainability is presented at the annual Schaeffler Group Stakeholder Dialogue. Participants included Schaeffler Group's employee representatives, customers, suppliers, academia, as well as civil society organizations. During the dialogue, participants i.e., reflected upon the results of the annual human rights impact assessments and measures derived.



⁶ The sector dialogue is a multi-stakeholder forum comprising representatives of the automotive industry and civil society that have expertise on human rights risks in automotive supply and value chains. Since 2020, representatives of German car manufacturers, suppliers, business associations, NGOs, trade unions, the German Institute for Human Rights and the Federal Government have been working together in the sector dialogue automotive industry. More information can be found here [Automotive Industry - CSR](#)

4 Complaint Mechanism and Remediation

The Schaeffler Group provides various reporting options to its employees, workers along the value chain, as well as other external parties to report concerns relating to, inter alia, human rights violations, including Modern Slavery.

The Schaeffler Group provides confidential, encrypted, and anonymous reporting via its group-wide electronic and public complaint mechanism › **Schaeffler SpeakUp Line**.

Besides that, the Schaeffler Group offers additional reporting channels, including an e-mail inbox, a 24/7 phone hotline, a postal address, and a channel for reports to be made in person. More information can be found in the › **Schaeffler Group Code of Conduct**.

The Schaeffler Group is committed to protecting anyone from retaliation who raised a concern in good faith or assisted in investigations of suspected violations. All Schaeffler Group employees are informed of the various reporting channels via the Group Code of Conduct, as well as group-wide communication and training formats. Employees' awareness of and trust in the complaints mechanism is assessed via the group-wide Global Engagement Survey.

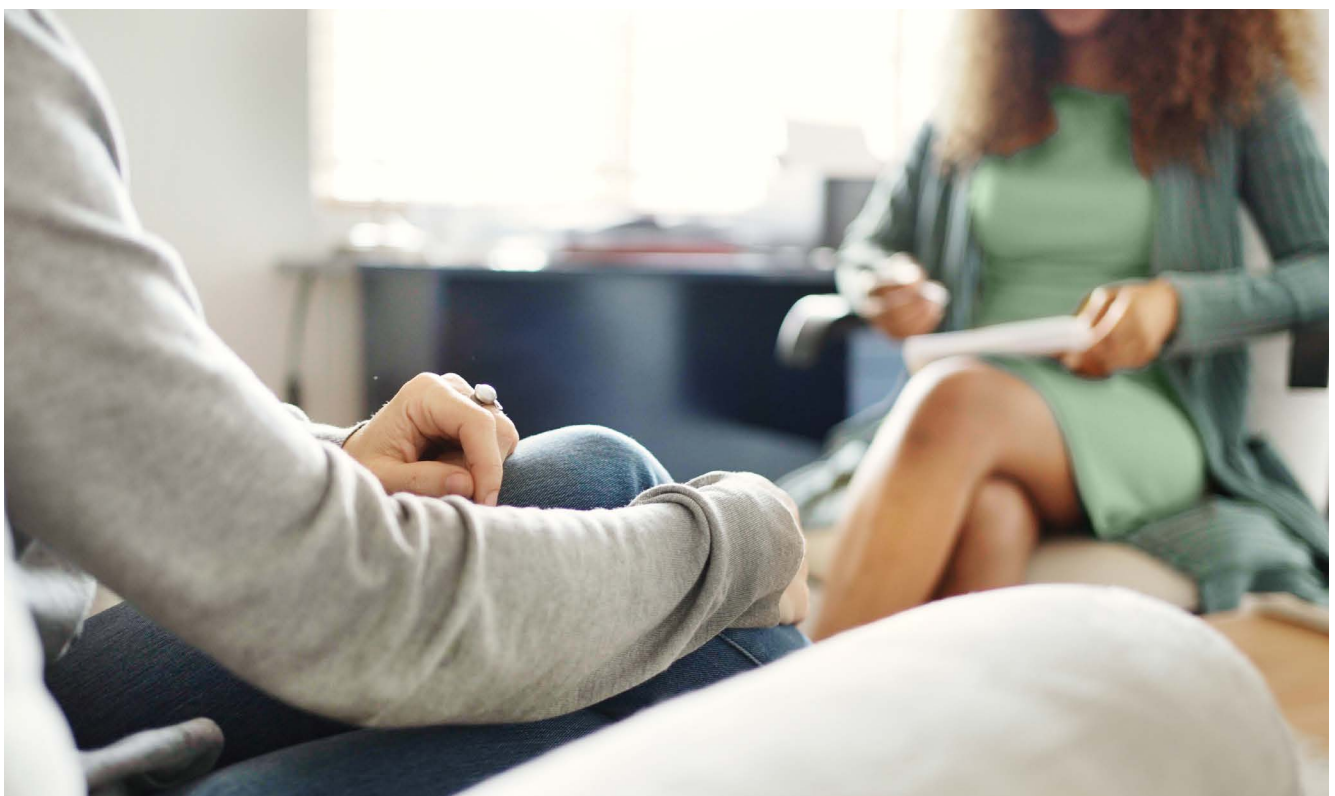
If the Schaeffler Group identifies that it is linked to, has contributed to or has caused an actual adverse impact on

human rights and international environmental standards due to its business activities, it endeavors to address such adverse impacts by providing appropriate remediation. Via its Group Business Partner Code of Conduct, the Schaeffler Group communicates its complaint mechanism to its suppliers which in turn are required to forward the standards and minimum requirements, including the requirement to provide their own complaint mechanism or to refer to an existing business partner's complaint mechanism.

In compliance with the US FAR Clause 52.222-50 Combating Trafficking in Persons, employees also have the possibility to resort to the Global Human Trafficking Hotline of the US Government at (US) 1-844-888-FREE (When calling from outside the U.S., first dial the origin country's exit code) and its email address at help@befree.org to report possible incidents of Human Trafficking as covered under the Federal Acquisition Regulation (FAR) Clause 52.222-50 Combating Trafficking in Persons.

Schaeffler SpeakUp Line

To contact the complaints mechanism, you can use the QR-Code provided. Please use the Company Code 129150.



5 Effectiveness Control

Tracking and measuring the effectiveness of the Schaeffler Group's activities and derived measures is a key element of the Group's due diligence process which in turn supports a continuous improvement of the Human Rights Compliance Management System.

According to the implemented concept of the Group, the effectiveness of the derived impact addressing measures as well as the Human Rights Compliance Management System are reviewed once a year, or on an ad hoc basis.

The Schaeffler Group utilizes inter alia questionnaires and surveys, such as its group-wide Global Engagement Survey, as well as internal and external reviews and controls, such as the internal Human Rights review and controls. In case shortcomings are identified, corrective actions are initiated.

6 Outlook

The Schaeffler Group remains committed to improving its efforts to prevent potential negative impacts relating to Modern Slavery and mitigate, where necessary, incidents relating to Modern Slavery in its own organization or supply chains. In the next year, we plan to:

- expand the scope of internal Human Rights reviews and controls to additional regions and locations to better understand implications of adverse effects of own operations on human rights, including Modern Slavery and inform continuous improvement,
- expand efforts to identify and address potential or actual impacts relating to Modern Slavery, including forced labor in our production material supply chains.

7 Contact

If you have questions or comments regarding this Statement, please reach out to the Schaeffler Group Human Rights Compliance department via compliance@schaeffler.com.

Complaints or reports of non-compliance with the Schaeffler Group Code of Conduct or applicable legal requirements can be made under the complaint channels mentioned in Chapter 4. Official inquiries by national authorities regarding compliance with the herein addressed Relevant Reporting Laws may be addressed to the Group Chief Compliance Officer.

In addition to the specified local contact partners, employees of the Schaeffler Group can also contact Compliance & Corporate Security directly.

Eric S. Soong, Group Chief Compliance Officer



Compliance & Corporate Security
Industriestrasse 1 – 3
91074 Herzogenaurach
Germany



compliance@schaeffler.com

Description of Reporting Group Companies covered by this Statement (Annex 1)

This section provides a brief description of each of the Reporting Group Companies. All Reporting Group Companies fall under the governance structure of the Schaeffler Group and adhere to the below detailed group approach to respecting and protecting human rights, including combating Modern Slavery.

Reporting Group Companies falling under the UK Modern Slavery Act

Schaeffler (UK) Ltd.

Schaeffler (UK) Ltd. is an operative part of the Schaeffler Group. Their head office is located in Sheffield. It employs approximately 280 employees. Schaeffler (UK) Ltd. maintains an active production site and sales offices.

Schaeffler Vehicle Lifetime Solutions UK Ltd.

Schaeffler Vehicle Lifetime Solutions UK Ltd. is an operative part of the Schaeffler Group. Their head office is located in Hereford. It employs approximately 102 employees. Schaeffler Vehicle Lifetime Solutions UK Ltd. maintains a warehouse and a sales office.

Reporting Group Companies falling under the Norwegian Transparency Act

Schaeffler Norge AS

Schaeffler Norge AS is a Norwegian limited liability company and an operative part of the Schaeffler Group. Their head office is located in Sandnes. It employs approximately three employees with remote working contracts. Schaeffler Norge AS only maintains sales offices; it does not maintain an active production site.

Reporting Group Companies falling under the Australian Modern Slavery Act

Schaeffler Australia Pty. Ltd.

Schaeffler Australia Pty. Ltd. is an operative part of the Schaeffler Group. Their head office is located in Belrose, New South Wales. It employs approximately 59 employees across the Pacific region. Schaeffler Australia Pty. Ltd. only maintains sales offices located in Brisbane, Melbourne, Perth, Adelaide, and Auckland; it does not maintain an active production site.

Reporting Group Companies falling under the Canadian Fighting Against Forced Labor and Child Labor in Supply Chain Act

Schaeffler Aerospace Canada Inc.

Schaeffler Aerospace Canada Inc. is an operative part of the Schaeffler Group. Their head office is located in Stratford, Ontario. It employs approximately 590 employees. Schaeffler Aerospace Canada Inc. maintains an active production site, sales offices, and service department.

Schaeffler Canada Inc.

Schaeffler Canada Inc. is an operative part of the Schaeffler Group. Their head office is located in Stratford, Ontario. It employs approximately 330 employees. Schaeffler Canada Inc. maintains an active production site, sales offices, and service department.

Vitesco Technologies Canada Inc.

Vitesco Technologies Canada Inc. is a manufacturing company and part of the Schaeffler Group. Their head office is located in Chatham-Kent, Ontario. It employs approximately 181 employees. Vitesco Technologies Canada Inc. maintains an active production site, sales offices, and service department.

Schaeffler AG

Industriestrasse 1 – 3
91074 Herzogenaurach
Germany

www.schaeffler.com
info@schaeffler.com

In Germany:

Phone 0180 5003872

From other countries:

Phone +49 9132 82-0

Every care has been taken to ensure the correctness of the information contained in this publication but no liability can be accepted for any errors or omissions. We reserve the right to make technical changes.

© Schaeffler AG

Issued: February 2026 – Version 1.0

This publication or parts thereof may not be reproduced without our permission.