

The logo for comocom, featuring the word "comocom" in a lowercase, sans-serif font. The letter "o" in the middle is colored red, while the other letters are dark blue.

comocom

**HUMAN RIGHTS AND WORKING
CONDITIONS POLICY**

1. Introduction

comocom is committed to responsible corporate practices in the area of human rights and working conditions and aligns with practices recommended by industry standards such as the Global Automotive Sustainability Practical Guidance and the RBA Code of Conduct, which incorporates the International Bill of Human Rights, namely the Universal Declaration of Human Rights (1948), the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights and its two Optional Protocols (1966). comocom also adheres to the principles set forth in the fundamental ILO Conventions, namely the Forced Labor Convention (1930), the Minimum Age Convention (1973), the Worst Forms of Child Labor Convention (1999) and ILO Declaration on Fundamental Principles and Rights at Work (1998). comocom's human rights expectations apply to all of our personnel, business partners and other parties directly linked to our operations, products or services; as such, comocom is committed to respecting the United Nations Guiding Principles for Business and Human Rights (2011) and its principles within our operations and supply chains. The working conditions of our employees are, at minimum, in compliance with internationally recognized labor standards and the laws of the countries we operate in. When national law directly conflicts with international human rights standards or does not fully comply with them, comocom will seek ways to respect internationally recognized human rights, such as those enshrined in the conventions mentioned above.

2. No Child Labor

comocom will not employ children below the minimum age for employment according to applicable regional law, in any case not under the age of 16. Furthermore, comocom shall ensure that persons under the age of 18 do not perform any offshore duties or undertake any hazardous work that could jeopardize their health or safety, including night shifts and overtime. "Child labor" means any work by a child or young person, unless it is considered acceptable under the ILO Minimum Age Convention 1973 (C138). comocom supports the use of legitimate workplace learning programs that comply with all laws and regulations, provided that these laws and regulations are aligned with international standards. comocom will ensure proper management of student workers through effective maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. In any case, appropriate support and training shall be provided to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

3. No Forced Labor

comocom does not tolerate any form of forced labor, including debt bondage, indentured labor or involuntary prison, nor any involvement in human trafficking in its business activities. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. comocom will not unreasonably restrict workers' freedom of movement throughout company-provided facilities nor unreasonably restrict workers' entering or exiting company-provided facilities. comocom will engage with suppliers to eradicate modern slavery, forced labor and human trafficking in its supply chain.

4. Prohibition Of Human Trafficking Related Activities

comocom rejects any activities or processes that may encourage or support any kind of Human Traffic Activity.

5. Working Conditions

Working hours, breaks, holidays and leave periods will be established in compliance with local laws and agreements, and in any case, a workweek should not be more than 40 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days. comocom shall ensure that all employees are provided with written agreements of employment and are free to leave their work after giving reasonable notice. Furthermore, compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law. Imported and migrant workers are to be provided equal wages, benefits and working conditions. As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees have been paid by workers, such fees shall be repaid to the worker.

6. Health And Safety

comocom consistently complies with applicable environmental, safety and health (ESH) regulations as well as customer, community and other requirements. comocom furthermore commits to continual improvement of its operations, progressively reducing the potential ESH impact of its activities, by focusing on: the health, safety and productivity of employees and processes; efficient use of natural resources; and prevention of pollution. comocom sets and reviews relevant ESH objectives and targets for its operations worldwide and on a regular basis.

7. Freedom Of Association & Collective Bargaining

All workers have the right to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly. comocom will respect the right of workers to refrain from such activities, and respect their freedom of opinion and expression. Additionally, workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices, both without fear of discrimination, reprisal, intimidation or harassment.

Finally, where employees participate in a strike for a lawful object, comocom shall not interfere with, impede or diminish their right to strike, or to affect the limitations or qualifications on that right.

8. Non-Discrimination & Anti-Harassment

comocom ensures equal opportunity for all without discrimination or harassment on the basis of sex, race, age, color, disability, ethnic or national origin, sexual orientation, religion, social or marital status, or other status protected by applicable law. comocom respects employee's and business partners' freedom of thought, conscience and religion. comocom does not tolerate any acts of sexual harassment or other forms of discrimination or harsh treatment comocom encourages all employees and business partners to report and remedy harassing workplace conduct with the goal of eliminating such conduct quickly and effectively, even in cases in which the reported conduct may not be severe and pervasive so as to constitute a violation of federal law. comocom has established an Ethics Line, which is available for use twenty-four hours per day. comocom is committed to gender equality, and believes that equal work deserves equal pay.

9. Contractor And Supplier Requirements

Beyond observing these requirements in its own operations, comocom requires that its contractors, subcontractors, suppliers and their sub-suppliers adhere to the requirements of this Policy. Suppliers that fail to adhere to these requirements may be subject to sanctions, including, but not limited to, termination of their agreements with comocom for default.

10. Verification of Compliance & Measures to Address Non-Compliance

Compliance with this Policy at comocom facilities will be reviewed and documented by periodic internal audits. comocom supply chain compliance efforts will focus on direct suppliers, and their employees and contractors, all of which are required to comply with applicable laws and to acknowledge and agree to comocom's Code of Ethics and Conduct, and this Policy. comocom will conduct periodic audits of its suppliers. Subcontractors or suppliers that pose potentially greater risks may be subject to more detailed risk assessments and additional verification. Non-compliance with this Policy or relevant laws and regulations may lead to sanctions or penalties, including, but not limited to, termination.

11. Relationship to comocom's Code Of Ethics and Conduct

This Policy is intended to supplement and strengthen comocom's commitment to human rights under its existing Code of Ethics and Conduct. All comocom employees and contractors are reminded, at least annually on the provisions of the Code of Ethics and Conduct, and the training of employees, contractors, and suppliers will cover the provisions of this Policy. To support compliance with this Policy, comocom encourages its employees to report any concerns regarding potential violations of this Policy, or any related law or regulations using its Ethics Line at www.comocom.com, which is available for use twenty-four hours per day. Reports can be made without fear of retaliation.

Carlos Valero

Managing Director

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