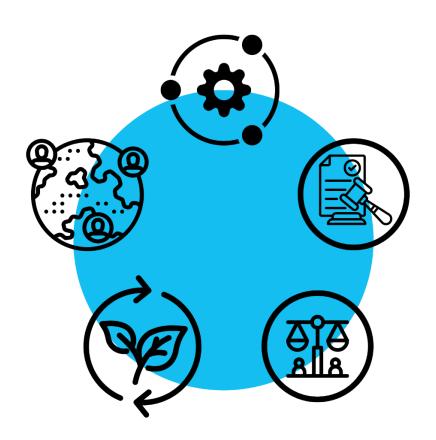
# GHSP Sustainability Guidelines

**JUNE 2024** 





# A Shared Commitment to Sustainability

At GHSP, we believe in building a better future for everyone. This commitment extends beyond our products and services — it's about earning the trust of our stakeholders, customers, and communities, protecting the environment for generations to come, and preserving the legacy of our founders.

These values guide our sustainability efforts. They motivate us to take meaningful action and continuously improve. We can't achieve this alone – collaboration with our employees, suppliers, and business partners is key. Together, we can create a more sustainable and prosperous future for all.

# Stewarding Our Legacy: A Responsibility We Share

Since 1924, our enduring values – Earn Trust, Learn by Doing, Working Together, and Steward Our Legacy – have defined who we are and how we operate. "Steward Our Legacy" encompasses preserving our founders' vision while reinventing the business for future generations.

#### Building a Sustainable Future Together

GHSP is committed to the highest standards of human rights, environmental management, and ethical conduct and compliance. We expect the same from our employees, suppliers, and business partners. Responsible practices that integrate these values are essential for all.

#### Supplier Selection with a Purpose:

Our partnerships extend beyond financial considerations. During the selection process, we closely evaluate a company's commitment to:

- Environmental Protection
- Human Rights
- Labor and Social Standards
- Anti-discrimination
- Anti-Corruption Practices

Together, we can make a difference. Let's embrace the shared responsibility for creating a more sustainable tomorrow.

Sincerely,

Dan Dawiedczyk President, GHSP



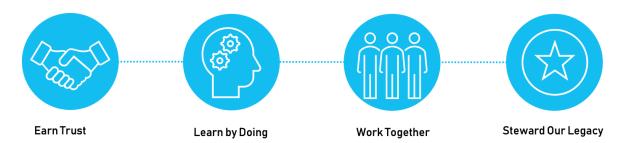
# **SCOPE**

This policy applies to all global employees in GHSP and our business partners.

# **PRINCIPLE**

Since our founding in 1924, the people of GHSP have been known for our enduring values. Our values, Earn Trust, Learn by Doing, Working Together and Steward our Legacy, determine who we are and how we do business.

#### **OUR VALUES**



"Personally earn the trust of colleagues, customers, suppliers, partners, shareholders, and your community - in every interaction."

- Begin with trust, expecting people to act in good faith
- Be open, fair and honest
- Honor commitments and be accountable to each other, adultto-adult

"Have a bias toward action and look at every experience as a learning opportunity."

- Get results; a good plan today is better than a perfect plan tomorrow
- Be curious and continuously learn and grow
- Seek out new challenges and take calculated risks
- Lead by example and provide opportunities for others to learn

"Be a team player; place our shared fate above personal ambition."

- Embrace a diversity of thinking and respect each person's unique contribution
- Create an environment free of fear, where healthy conflict leads to better solutions
- Be open to the unknown and the possibility of being uncomfortable
- Recognize others' contributions to the team's success

"Preserve the legacy of our founders while reinventing the business for the next generation."

- Celebrate our shared heritage
- Make a difference by creating something better than what you begin with
- Invest in businesses, people, and communities for the long term
- Take personal responsibility for health, safety, and our environment



The 'Steward our Legacy" core value is defined as preserving the legacy of our founders while reinventing the business for the next generation. Two ways we live and demonstrate this value are by investing in businesses, people, and communities for the long term, and by taking personal responsibility for health, safety, and our environment. From this, it becomes clear that social and environmental responsibility are foundational elements of who we are.

In keeping with the value of "Steward our Legacy," our expectations of ourselves and our business partners include the following:

# 1. Supply Chain Management and Due Diligence

# Supply Chain Due Diligence

Consider establishing and implementing a Supply Chain Due Diligence Process, which includes actions such as:

- Strengthen risk management procedures to ensure compliance with relevant due diligence laws and regulations.
- Appointing a designated individual to oversee supplier risks and recommend continuous improvement (kaizen) for current processes.
- Creating a system to consistently enhance internal preventive measures and promptly implement corrective actions in response to disruptions or violations to prevent future occurrences.

# Developing & Deploying Policies & Guidelines

- Foster and extend sustainability initiatives with business partners by formulating and implementing sustainability policies and guidelines that encompass the topics mentioned in this section.
- Promote the activities below throughout the supply chain.

# 2. Business Ethics and Legal Compliance – we expect that GHSP and its suppliers will:

Legal Compliance



- Adhere to all relevant laws and regulations in every country and region where applicable, encompassing trade, human rights, due diligence, and environmental matters.
- Set up policies, structures, and mechanisms to ensure and verify compliance with both the technical requirements and the underlying principles of applicable laws. GHSP has developed and implemented a Corporate Compliance Code and training.

#### **Confidential Information**

- Manage confidential information in a manner that aligns with relevant laws, rules, and requirements to safeguard its confidentiality status while handling and protecting it.
- Collect confidential and personal information pertaining to employees, customers, business partners, and other companies solely through permissible and lawful means. Safeguard and manage such information securely, using it only within authorized boundaries.

# Intellectual Property

- Refrain from violating the intellectual property rights of others, including
  patents, designs, trademarks, and trade secrets. Avoid unauthorized usage of
  such intellectual property or creating illicit copies of software, publications, or
  copyrighted materials.
- Realize a monitoring and safeguarding procedure to protect the company's intellectual property from any unauthorized use, infringement, or misappropriation by external parties.

# **Competition Laws**

 Adhere strictly to the competition laws and regulations of all relevant countries and regions. Avoid engaging in any illegal activities, such as private monopolies, actions that obstruct free competition (e.g., cartels, collusive bidding), or unfair trade practices.

Export Controls, Trade, and Economic Sanctions



- Abide by the relevant export controls, sanctions, anti-bribery laws (e.g., Foreign Corrupt Practices Act), and other trade-related requirements, ensuring their proper implementation and adherence.
- Assist with GHSP's involvement in trade agreements by providing pertinent information upon request.
- Develop procedures to verify whether products, technology, or other exports are subject to regulations. Create and furnish documentation to demonstrate compliance with these regulations.

# **Anti-Corruption Methods**

- Adhere to relevant laws and regulations regarding political donations or contributions, while actively working to foster transparent and equitable relationships with political parties or administrative bodies.
- Refrain from offering or accepting gifts, entertainment, or monetary benefits with customers, suppliers, and other business partners to gain or maintain unjust advantages or preferential treatment.
- Avoid engaging in off-the-book, fictitious, or any other deceptive transactions
  that could be perceived as such. Maintain accurate and fair books, records,
  and accounts (such as ledger sheets and account ledgers) that provide a
  reasonable level of detail, correctly reflecting the transactions and asset
  dispositions.

#### **Counterfeit Parts**

 Implement measures to reduce the risk of incorporating counterfeit parts and materials into the final products.

# 3. Labor and Human Rights

# Human Rights Due Diligence

 Commit to supporting, respecting, and protecting the human rights of colleagues, customers, suppliers, partners, shareholders, and our community.
 We align with the United Nations Guiding Principles on Business and Human Rights, our Corporate Compliance Code, other GHSP Policies that address human rights within their scope, as well as applicable local laws and regulations.



- Any suspected violation of human rights should be reported and investigated. Take appropriate corrective action based on the results of the investigation.
- Our supply base is an integral part of our business and team and reflects
  GHSP, our values, and our way of doing business. It is our expectation that our
  business partners and suppliers understand and agree with GHSP human
  rights expectations and conduct their operations in a socially and
  environmentally responsible manner that complies with all applicable laws
  and regulations.

#### Discrimination

• Every person coming in contact with the Corporation as an employee, customer, supplier, candidate for employment or other third party, shall be treated fairly, courteously and respectfully. The Corporation is committed to providing a workplace free of discrimination and harassment. The Corporation shall not discriminate against any person on the basis of race, color, religion, national origin, age, sex, disability, marital status, service in the military or uniformed services, veteran status, height, weight or any other legally protected characteristic. This prohibition on discrimination applies to practices in recruiting, employment, training, promotion, working conditions, compensation, benefits, job rules, discipline and all other aspects of employment and employee relations.

#### Harassment

- Every employee is free to perform his or her job duties and responsibilities and
  participate in the benefits of employment with the Corporation without
  harassment or interference from any co-worker. The Corporation will not
  tolerate undue influence, offensive behavior, harassment, intimidation, or
  other disrespectful conduct from one employee toward another.
- A work environment free of unlawful harassment, in all forms, is essential to
  ensure personal dignity, effective employment relationships, and productivity.
  Expect all team members to conduct themselves in a professional manner
  with respect and concern for fellow team members. Conduct, whether
  intentional or unintentional, which results in any form of unlawful harassment
  or hostile environment will not be tolerated and will be subject to immediate



corrective action. Any suspected violation should be reported and will be investigated. All matters will remain confidential, except to the extent of investigation and correction of the prohibited conduct.

# Diversity & Inclusion

- Commit to working in partnership with our suppliers to develop, sustain, and grow a diverse supply base that is world class and adds value to your operations and your customers.
- Recognize that all employees are unique and have different experiences. This creates strength if we embrace these experiences and help employees bring their authentic self to work every day. We want all employees to work in an environment that is safe, respected, and empowering. As we welcome one another's differences, we have an incredible opportunity to strengthen our company culture while continuing to foster innovative thinking. We believe our people are at their best when they are valued, included, and heard. Their diverse perspectives power our growth and innovation. We strive for institutional change to foster an inclusive organizational culture that accelerates growth and innovation.

#### Child Labor

Do not use unlawful child labor, which deprives children of a childhood, access
to education, and restricts their development. Ensure the age of employment
is in accordance with applicable local laws and regulations. (other than bona
fide job training or apprenticeship programs permitted under applicable local
law).

# Migrant Labor & Forced Labor

- Prohibit the use any form of forced labor or modern slavery, including prison labor, indentured labor, bonded labor, and any form of human trafficking.
- All work at and for GHSP is voluntary, and employees are free to terminate their employment at their discretion.

# Hiring & Onboarding

 Establish protocols to ensure that team members are hired legally and ethically, which includes labor and human rights policies, utilization of security resources (E-Verify) and requirement of in-person and physical document



- review. Employees shall not be forced to hand over government issued identification, passports, or work permits as a condition of employment unless required by local law.
- GHSP will not and does not condone external vendors/agencies to charge workers or potential workers recruitment fees.

# Wages & Benefits

 Compensate employees competitively relative to the industry and labor market, and in compliance with applicable federal, state, and local laws and regulations. This includes those relating to minimum wages, overtime hours, deductions from wage, piece rates, and other elements of compensation.

# **Working Hours**

 Comply with applicable federal, state, and local laws and regulations governing employees' working hours, including overtime, bonuses, and rest and meal breaks.

#### Freedom of Association

- Respects employees' right to freely associate or not to associate, while complying with the applicable laws and regulations of the countries in which they live and work.
- Strives to maintain a positive and professional work environment for all GHSP employees and encourages them all to report work related concerns. By listening to its employees, the company can improve, address complaints, and foster employee understanding of practices, processes, and decisions.

# Safe & Healthy Working Environment

- Commit to provide an environment that will protect the health, safety, and well-being of our employees, globally. Commit to identify and reduce the safety risks and hazards through employee participation, safety procedures and programs.
- Comply with all the applicable regulations and governmental requirements; set and review safety objectives to continuously promote a proactive approach to workplace safety.



- Commit to safety through a robust Safety Process which creates an environment that values and promotes safe work with procedures, work instructions and forms.
- Establish and maintain an emergency plan which identifies workplace emergency practices and procedures. Work as a team to respond quickly to safety hazards, safety risks and ergonomic issues.
- When risks to employee health and safety cannot be controlled through elimination of a hazard or through engineered controls, PPE (personal protective equipment) shall be provided to ensure the health and safety of employees, and requiring the use of PPE will lessen the likelihood of occupational injury and/or illness.
- Provide the safest practical workplace from potential fires by instituting a fire
  prevention program that includes fire prevention measures, emergency
  response plans, facility fire safety & response training and appropriate regular
  inspections
- Any machine part, function or process that has the potential to cause human injury by striking, capturing, pinching, pulling or any other type of potential human contact shall be properly safeguarded and controlled; or the hazard eliminated.
- Complete audits to identify safety hazards and use problem solving to develop and implement corrective actions for findings from safety audits.
- Empower all employees to suggest safety improvements and participate in a safety committee to identify safety issues and implement solutions.

#### 4. Environment

#### Reporting Requirements

- Meet requirements and strive to accomplish guidelines detailed within GHSP's Supplier Requirements.
- Make every effort to ensure that relevant representatives from your company are well-informed about these requirements and reporting responsibilities.

# **Environmental Management System**

- Comply with the environmental laws and regulations of each applicable country and region.
- Promote a sustainable relationship between society and our planet by undertaking activities such as establishing and continually enhancing an



- Environmental Management System and executing initiatives that optimize environmental performance.
- See Annex 1 for GHSP's Environmental Policy

# Reduction of Greenhouse Gas (GHG) Emissions

- Actively seek opportunities to decrease energy consumption and CO2
  emissions while exploring the possibility of utilizing renewable energy sources.
- Strive to attain carbon neutrality by identifying operational and material challenges, tracking GHG emissions, and fostering proposals for potential reduction measures. These measures may encompass energy savings, equipment enhancements, alternative materials, and the adoption of renewable energy. Collaborate with suppliers under a unified effort to achieve this goal.

# Reduction of Impact on Water Environment

- Maintain tracking of water withdrawal, discharge, and consumption data.
- Consider initiatives to reduce water usage and improve wastewater management.

# Contribution to Establishing a Recycling-Based Society and Systems

- During the design and development of products, prioritize strategies to diminish the consumption of exhaustible resources and single-use materials.
   Endeavor to incorporate recycled materials whenever suitable, while also contemplating their proper disposal methods and recyclability throughout the cradle-to-grave lifecycle.
- Consider implementing initiatives to minimize waste generation and promote recycling practices throughout the operations, including logistics.

# Management of Chemical Substances

 Adhere to relevant automotive industry guidelines, federal, state, and local laws, as well as GHSP policies pertaining to the management of chemical substances. This includes eliminating or reducing hazardous or toxic chemicals and ensuring that prohibited substances are not utilized in products or production processes.



- Submit environmental and chemical data accurately to governmental agencies in accordance with the required laws and regulations. Additionally, provide the necessary information to GHSP as requested.
- Minimize chemical waste and explore technology and best practices to mitigate adverse impacts on the environment.

# Establishment of a Society in Harmony with Nature

Recognize that biodiversity and resource management are essential for the
continuity of business operations. Consider, monitor, and control the wider
global impact of company activities with respect to the air, water, soil, subsoil,
native flora, fauna (animal welfare), people, noise, light, other natural
resources; and the various ways these inter-relate with one another; to
minimize harm to ecosystems in the vicinity of facilities and throughout the
value chain.

# 5. Local/Global Community

# Supply Chain Visibility

 Ensure full visibility into supply chains by regularly monitoring sub-tier supplier plants and locations for all parts and products. Provide lower-tier data for each commodity supplied to GHSP when requested.

# Responsible Material Procurement

- Refrain from procuring and using materials that are unlawful or obtained through unethical means, including Conflict Minerals, cobalt, and natural rubber. In the event of detecting the use of such materials, take necessary actions to cease their procurement promptly and appropriately.
- Fulfill GHSP's reporting obligations concerning Conflict Minerals, in accordance with the Conflict Minerals Provision or Section 1502 of the Dodd Frank Act (2010).

# **Social Contribution**

 Make an effort to recognize societal challenges at the local community level and actively participate in activities that promote prosperity and development in the area.



# Minorities and Indigenous Groups

- Make a dedicated effort to honor and adhere to international norms, such as
  the rights to Free, Prior, and Informed Consent (FPIC) for indigenous groups
  and the United Nations Declaration on the Rights of Indigenous Peoples
  (UNDRIP). Consider fostering activities aligned with these principles, in
  accordance with applicable laws, in the regions where team members live
  and work.
- Take proactive measures to prevent contributing to the displacement of
  indigenous and/or vulnerable groups residing in land, forests, and waters.
   Contemplate setting up a hotline or reporting mechanism to receive inquiries
  and address existing or potential injustices faced by those in neighboring
  communities such as: challenges to land, forest and water rights, or instances
  of forced eviction.

#### Disclosure of Information to Stakeholders

Make every effort to provide stakeholders with relevant information that
pertains to their interests, such as management, financial condition,
environmental preservation, community involvement, and social contributions.
Ensure timely and equitable disclosure of this information and foster positive
relationships with stakeholders through transparent and fair communication
practices.

#### **References:**

- GHSP's Corporate Compliance Code
- GHSP's Integrity Reporting System
- GHSP's Environmental Policy (Annex 1)
- GHSP Supplier Manual
- Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights (UNGP)
- Counterfeit Part Risk procedure



#### Annex 1



GHSP is a global supplier to the automotive and appliance industries, utilizing processes that include plastic molding equipment, robotics, surface mount technology, wave, select and hand soldering operations, and mechanical assembly equipment.

GHSP's EMS: Applies to the Environmental Management System, including its facilities, properties, and all persons working for, or on behalf of, GHSP; including the activities, products, and services.

GHSP believes in a robust and wide-ranging environmental management approach with a focus on continual improvement of our policies and processes, which will enhance our understanding and control of our environmental aspects that impact our environment, organization, markets, and the community where we work and live. GHSP commits to:

#### 1. Protect the Environment

- Prevent pollution, reduce waste, reduce the use of hazardous materials, and minimize the consumption
  of resources through water & energy conservation, air and chemical management, and robust
  recycling processes.
- Consider the wider global impact of all our activities with respect to the air, water, soil, subsoil, natural
  resources, flora, fauna (animal welfare), people, noise, and the various ways these inter-relate with one
  another.
- Sustainable resources management
- Understand and reduce carbon emissions throughout the value-chain.

#### 2. Fulfill its Legal and Compliance Obligations

- Comply with applicable legal requirements and other requirements to which the Company subscribes which relate to its environmental aspects.
- To the extent possible consider life cycle impacts of the aspects and activities throughout the value stream.

# 3. Continually Improve the Environmental Management System to Enhance Environmental Performance

- GHSP senior management are committed to setting direction and establishing targets to ensure protection of the environment.
- Include the consideration of environmental issues in business strategies and initiatives.
- Educate, train, and motivate employees to carry out tasks in an environmentally responsible manner and ensure that a professional development strategy remains core to our business goals.

This Policy, owned by the Director of Operations, will be communicated to all staff, contractors, and suppliers, and be available to the public upon request and/or through selected media.

