

## Modern Slavery Statement of the BENTELER Group

August 2025

The United Kingdom Modern Slavery Act 2015 and the California Transparency in Supply Chains Act 2010 require certain globally operating corporations to disclose their efforts to address Modern Slavery in their supply chains. Such statements are intended to foster transparency and to enable customers to take better, more informed decisions on the products and services they source and companies they cooperate with.

### Introduction

The BENTELER Group (BENTELER) is a fifth-generation family-owned and independent corporation operating successfully since almost 150 years. Our more than 23,000 employees at approximately 90 locations worldwide provide first-class manufacturing and distribution expertise. The BENTELER Group is organized into four divisions: BENTELER Automotive Components, BENTELER Automotive Modules, BENTELER Steel/Tube and HOLON. The holding company, BENTELER International AG, headquartered in Salzburg, Austria, controls the strategic orientation of the group. In addition, BENTELER Business Services GmbH, based in Paderborn, Germany, performs additional holding functions.

As a supplier, the BENTELER Group is part of many global value chains in the automotive, industrial and energy sectors. BENTELER manufactures an extensive range of products for automotive engineering, steel tube production and mechanical engineering. Key suppliers for the Automotive Divisions and BENTELER Steel/Tube include steel and aluminum manufacturers as well as the processing industry and raw material suppliers. HOLON itself is a manufacturer (OEM). Its key suppliers are engineering and software service providers, which will be expanded in the future to include suppliers of components and modules to produce the HOLON vehicle.

Our responsibility does not end at the boundaries of our Group but rather encompasses our entire value chain. Therefore, we are fully committed to establishing, maintaining, and improving systems and processes to prevent Modern Slavery in our own business as well as in our external supply chains. BENTELER realizes that today Modern Slavery can occur in many different forms such as coerced, forced or compulsory labor, child labor, domestic servitude, human trafficking, sex trafficking and workplace abuse. Therefore, throughout this statement we use the term Modern Slavery<sup>1</sup> to encompass these various forms of coerced labor.

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<sup>1</sup> Please refer to Transparency in Supply Chains etc. – A practical guide, annex A, page 17.

As stated in more detail below, we undertake several steps during the fiscal year to ensure that Modern Slavery does not take place in our supply chain or other parts of our business. For this purpose, BENTELER has developed an integrated approach.

## Value-based Leadership and Corporate Philosophy

We are conscious of our social responsibility and act accordingly. We observe the principle of legality and respect the generally accepted customs of every country in which we are active, together with our own internal rules, guidelines, and obligations ("BENTELER-Standards"). Integrity and respect for the rights of third parties are the key principles that define our interactions with employees, business partners, and society. We respect and promote compliance with internationally recognized human rights and children rights, particularly the UN Guiding Principles on Business and Human Rights and the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO). We strongly reject Modern Slavery, i.e. all forms of forced and child labor as well as involuntary or exploitative prison labor and human trafficking. Our employees are paid fairly and appropriately for their work. We follow the applicable rules on work times in each respective country, though this is only our minimum standard. This is explicitly postulated by the [BENTELER Code of Conduct](#) available in English, German and 13 language versions, the [BENTELER Supplier Code of Conduct](#) as well as the [Policy Statement of the BENTELER Group according to the Act on Corporate Due Diligence Obligations in Supply Chains](#).

Our Code of Conduct is based on internationally recognized standards and applies to all employees of the BENTELER Group worldwide. These principles determine our long-term and successful cooperation. Therefore, we encourage our business partners to establish and implement similar principles. We expect our employees to comply with legal requirements and rely on them, especially managers, to implement them in their area of responsibility. Our corporate culture is at the core of all our activities. Our aim is to achieve excellence together – actively embodying our three corporate values of Courage, Ambition and Respect.

## Social responsibility and protection of our employees

We promote and demand responsible action within the BENTELER Group.

All our interactions with employees are based on respect. All employees must work actively for the good of the company. They must safeguard its resources and be willing to engage in further training. Accordingly, our management practices rely on the delegation of responsibility and on trusting collaboration.

In particular, we focus on the safety of our workforce and employee training. We are committed to preventing accidents by continuously eliminating risks and empowering our employees and contractors to behave safely. We are convinced that all accidents at work are preventable, which is why we are establishing a "Think Safety First" culture. We have occupational safety programs in place and are constantly working on the prevention of accidents and unsafe conditions by measuring the number of accidents and other health and safety indicators on a monthly basis, publishing them and having a plan for corrective and preventive measures. Through technical measures as well as through employee training, we reduce the frequency of accidents and thus increase the safety of our employees.

In line with our strategic direction, we prioritize equal treatment in employment. Equal treatment and equal opportunities are firmly anchored in our self-image. No one may be personally disadvantaged – neither because of national origin, skin colour, gender, age, religion, disability, sexual orientation, political activity, or trade union activity. We have established appropriate policies, such as our Global HR Governance Policy, which also contains regulations on the prevention of child labor, modern slavery, and human trafficking, as well as organizational precautions and various measures to ensure respectful interaction within the company itself and with business partners.

To promote compliance in the entire group, BENTELER offers training on the BENTELER Supplier Code of Conduct in many areas, which also includes the topic of social responsibility. We use e-learning to provide our employees with target group-specific training on the topics of "Diversity, Equality, Inclusion" and "Human Trafficking".

## Risk Management and Risk Analysis

BENTELER has established a comprehensive risk management system to identify, assess and manage defined risks. This risk-management system is integrated into the group's strategy-, planning- and information processes and is subject to regular review and continuous development.

Risk management at the BENTELER Group is an integral part of strategic corporate management and is the responsibility of the Executive Board of BENTELER International AG and of division management. It is explained in detail in our [Annual Report 2024](#). Risk management covers all Group companies worldwide and is described in the risk management guidelines. These guidelines cover going concern risks, corporate planning risks and material ESG-related risks - and thus implicitly risks regarding human rights. The ongoing risk management process consists of the following four phases: risk inventory, risk analysis, risk management, and risk monitoring. A risk officer from management is responsible for risk analysis and for defining countermeasures.

ESG risks are subject to an upstream materiality assessment and are assessed based on the same principles as inventory risks. All impacts, risks and opportunities above the threshold are material. Furthermore, the extent of potential negative impacts on human rights was rated higher than the probability.

In particular, we are analyzing and prioritizing human rights to comply with our due diligence obligations regarding internationally recognized human and children's rights. This applies to BENTELER itself as well as our direct suppliers and, if necessary, our indirect suppliers.

The analysis of risks within our supply chain follows a risk-based approach, taking into account country-specific risks and the revenue-based relevance of our business partners. For the analysis, we use a digital tool that compares our (potential) business partners with different data sources based on defined parameters. The results are evaluated by the system and the corresponding risks are evaluated and prioritized by our purchasing department. Furthermore, and among other things, we review the selection of suppliers and the according process specifications. Procedurally, we have established that suppliers adhere to the Supplier Code of Conduct, which implies, among other things, compliance with human rights and therefore the prevention of modern slavery.

The risk management concept is regularly reviewed by our Supply Due Diligence Committee regarding internationally recognized human rights and children's rights and the results are reported to our Sustainability Steering Committee.

## Supplier Management

Considering the volume of our purchasing budget and the importance of close partnerships with our customers, a systematic supplier management is of the essence.

Besides regular and open communication, BENTELER actively reviews suppliers with business partner due diligences regarding sanction lists checks. All new suppliers of production materials, non-production materials and capital goods must also answer a detailed self-assessment questionnaire from BENTELER as part of the supplier evaluation and approval process, including among other information on the prohibition of modern slavery, i.e. forced and child labor as well as other sustainability topics. In addition, around 6,000 of our suppliers are continuously and automatically checked for risks in the supply chain using a risk-based approach, which particularly takes account of countries of origin and precursors. In addition, if necessary, we are working on checking existing suppliers by topic-related questionnaires.

We also conduct regular quality audits with our suppliers which may comprise social responsibility topics. Special ESG audits can also be carried out based on our BENTELER Supplier Code of

Conduct. The results from our audits can range from a supplier's action plan and further escalations to terminating the business relationship.

### Our expectations of suppliers

We expect our business partners, direct and indirect suppliers to respect the applicable legal systems, in particular human rights, and children's rights, in their business activities and decisions. All our business partners must commit themselves to compliance with human rights and with applicable labour regulations, in particular the UN Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work, as well as to compliance with the applicable relevant environmental laws, our BENTELER Code of Conduct and our BENTELER Supplier Code of Conduct.

In particular, forced labour or labour based on human trafficking must not be used. The freedom of movement of workers within the workplace must not be unduly restricted and there must not be unreasonable restrictions on entry or exit from the workplace. Child labour is unacceptable to us. The relevant provisions laid down in the ILO conventions on the legal minimum age for the employment of children must be complied with. The weekly working time of employees must not exceed the maximum number of hours applicable under local law. The remuneration paid to workers must comply with local laws on remuneration. Brutal or inhumane treatment of workers is forbidden. Our suppliers must not tolerate harassment or unlawful discrimination in their workforce, and they must respect further contractual obligations. Companies must respect the right of all employees to form trade unions and/or works councils or to join trade unions of their choice, in accordance with local legislation. If its workers are exposed to possible safety risks, the supplier must take appropriate countermeasures to prevent these risks.

### Complaint management and violations

All persons have the opportunity to report complaints in connection with human rights and environmental risks via our digital whistleblower system, which, together with the corresponding applicable rules of procedure, is made available on the BENTELER website under "Contact". Where possible under the applicable regional legal provisions, breaches may be reported anonymously upon request. Information received will be treated confidentially and in accordance with the need-to-know principle and checked by our responsible relevant department. Further information can be found in the BENTELER Whistleblower Policy, which also contains information on the plausibility check and investigation of complaints as well as the rules for procedure for the processing of reports.

If necessary, our Supply Due Diligence Committee discusses about human rights-related and corresponding environmental rights-related incidents. The results of investigations are used to evaluate our risk management and for preventive measures. The effectiveness of the complaint management is reviewed annually and, where appropriate, on a case-by-case basis. If we detect violations of the protected rights listed in this statement, appropriate remedial action will be taken immediately. These depend on the seriousness of the infringement.

With regard to our suppliers, according to our processes we focus on communication with them in order to work towards demonstrable conformity with our internal and legal regulations. If necessary, we carry out an ESG audit including the BENTELER Code of Conduct requirements for Suppliers which may result in an action plan of the supplier including an appropriate time window for implementation. As a further escalation, there is the option of interrupting the business relationship and blocking new orders and, if necessary, terminating the business relationship.

## Reporting

As a family-owned company that can look back on a successful business tradition since 1876, BENTELER embraces its corporate responsibility for helping to master future challenges. We contribute to sustainability and work hand in hand together with our business partners as a proactive partner jointly shaping the future. Mutual trust and respect are of utmost importance also regarding all people we encounter in the regions where we are conducting our business.

All opportunities and risks, including ESG-related opportunities and risks, which are thus relevant to human rights, are recorded in a software program, reported to the Executive Board and the Audit Committee every six months in the risk report, and integrated into the strategy process.

In addition, our Supply Due Diligence Committee reports regularly to our Sustainability Steering Committee on the results of monitoring our risk management in accordance with the Act on Corporate Due Diligence Obligations in Supply Chains. A report on the fulfilment of our due diligence obligations is prepared annually for the previous financial year within the framework of the legal regulations and will be made available on our company's website.

Moreover, we are convinced that with this BENTELER Modern Slavery Statement and the steps and measures described herein we contribute to transparency and enable our business partners to take better, more informed decisions on our products and services – underlining BENTELER's strong commitment to sustainability, social responsibility, and compliance.

**Ralf Göttel**  
Chief Executive Officer

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Chief Financial Officer