



## **Rules for the complaint procedure pursuant to the German Supply Chain Due Diligence Act (GSCDDA)**

This document contains Adient's rules of procedure for complaints under the GSCDDA.

### **What is the purpose of the complaint procedure?**

The complaint procedure is meant to enable individuals to report violations of law or of Adient's Ethics Policy, including potential human rights or environmental violations that have occurred in Adient's own business area or in the supply chain.

### **Who can submit reports through the complaint procedure?**

The complaint procedure can be used by anyone who wishes to report risks and violations of human rights or environmental obligations in Adient's own business area or in the supply chain, regardless of whether these occur within Germany or abroad.

### **How can I submit a complaint or report?**

Adient provides an easily accessible electronic reporting system called the Integrity Helpline. Complaints and reports can be submitted at <https://adient.ethicspoint.com>. The Integrity Helpline is available 24 hours a day / 7 days a week in 27 languages. The individuals who submit a complaint or report, receive a unique report key code. This report key code is only provided to the reporter and can be used to correspond anonymously with the investigator and check the status of their case.

### **Who is handling the complaints and reports?**

We ensure that reports are handled confidentially. Complaints and reports are processed by select and specially trained Adient employees.

### **How are reporting persons protected from disadvantages and reprisals?**

Persons who make a report in good faith have no reason to fear any disadvantages or reprisals. Such retaliation measures are strictly prohibited by Adient's Ethics Policy. We strongly encourage and promote

the submission of reports. There is also the option to submit reports anonymously via the Integrity Helpline.

### **What happens after I have submitted a report?**

#### Reception of the report

Once a report has been received, the receipt is documented internally and the person submitting the report receives a confirmation of receipt within one business day.

#### Assessment of the report

The Legal Compliance department then triages the report and assigns it to the appropriate investigator.

#### Rejection/Pursuit of the report

Adient investigates all good faith reports.

#### Investigation of the facts

All good faith reports are assigned for investigation to the appropriate department/investigator. The investigation, *inter alia*, includes reviewing of applicable laws, internal policies, standards, contracts, and other relevant information as well as interviewing individuals who may have information, including interviewing the person that submitted the report as a witness, where possible.

#### Development of a solution

If, at the end of the investigation, the investigation reveals that there is a human rights or environmental risk or a violation of human rights or environmental obligations, necessary remedial actions will be recommended and taken.

#### Implementation

Once the remedial actions have been recommended, they become implemented by the appropriate internal stakeholders and, if necessary in cooperation with, our suppliers.

#### Conclusion of the procedure

Once the remedial actions have been implemented, the procedure is concluded. The reporting person will be informed that the investigation is concluded and the issue addressed. Individuals who reported the complaint anonymously, can log in with their unique report key code to inform themselves about case status.

The time required for handling a complaint and therefore the duration of the complaint procedure depends on the individual case. However, we strive to carry out all steps of the complaint procedure as quickly as possible and usually not longer than 60 days.

#### Documentation and storage

The respective complaint process is documented and stored in accordance with legal requirements.

Review of the effectiveness of the complaint procedure

The effectiveness of the complaint procedure is reviewed annually and on an ad hoc basis and, if necessary, the complaint procedure is adjusted.

**Will I incur any costs if I participate in the complaint procedure?**

No, the procedure does not incur any costs for the reporting person.