

Global Policy	Policy on Global Human Rights	
	LCPOL-16-GL	REV: B

PURPOSE:

This Policy reinforces our values, policies, and practices and acknowledges internationally recognized human rights. This Policy is guided by international human rights principles encompassed by the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labor Organization’s 1998 Declaration on Fundamental Principles and Rights at Work. It is designed to supplement and not amend the Company’s Code of Conduct.

SCOPE:

This Policy applies to the Company globally, including all of its worldwide subsidiaries, affiliates, partnerships, ventures and other business associations that are effectively controlled by the Company. All Company directors, officers, and employees, including part-time, temporary, and other personnel working for or on behalf of the Company, are subject to this Policy.

Our suppliers, contractors and other business partners with whom we do business, are expected to adhere to our standards, including, but not limited to, human rights and labor practices. These expectations are set forth fully in our [Supplier Code of Conduct](#).

RESPONSIBILITIES:

- All directors, officers, and employees of the Company are responsible for ensuring compliance with this Policy and applicable law.
- The Global Ethics and Compliance Committee (“GECC”), including but not limited to the Chief Compliance Officer and Chief Human Resources Officer, is responsible for enforcing this Policy.
- All individuals governed by this Policy must report suspected violations of this Policy or the law by the Company or by any fellow employee or third party (refer to the Reporting Section at the end of this Policy). As permitted by law, an employee’s failure to report known or suspected wrongdoing of which the employee has knowledge may, by itself, subject that employee to disciplinary action. The Company will not permit retaliation of any kind against any employee who in good faith reports suspected misconduct.

POLICY:

Child Labor, Forced Labor, Human Trafficking and Modern Slavery:

Forced labor and modern slavery in all forms, including child labor and human trafficking, is prohibited in our business and in our supply chain.

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Child labor is employment of persons younger than the legally permissible age for work of the location/geography in which the work is carried out, in any case not younger than 15 years of age unless an exception is expressly supported by international conventions, including regulations related to training or apprenticeship programs for students younger than 15. Legally young workers, under 18 years of age, are not permitted to perform hazardous work, overtime, or night shift work. We expect our suppliers to comply with these expectations

We do not tolerate any improper worker treatment, such as the exploitation of children, physical punishment, abuse or involuntary labor. No employee should tolerate any form of unacceptable treatment of workers in our operations or facilities or in our supply chain.

We act with integrity in all our business transactions and ensure that forced labor does not take place anywhere within our business transactions or relationships, including our supply chain. We make sure to include language that prohibits all types of forced labor whenever we enter agreements with suppliers and business partners, and we monitor these relationships and speak up when there is an actual or suspected violation of this Policy or something doesn't seem right.

Diversity and Inclusion:

Our world-class team thrives because we each bring our own unique experiences and perspectives to our work. Diversity and inclusion are important at Cooper Standard, and diversity of thought makes our Company stronger. We provide equal opportunities to our employees and prohibit unlawful discrimination. We will not tolerate any kind of harassment, including bullying, intimidation or sexual harassment, of our employees by managers, co-workers or by our customers or suppliers. We make employment decisions based on skills and experiences. This applies to all terms and conditions of employment, including but not limited to hiring, placement, promotion, termination, layoff, recall, transfers, leave of absence, compensation, and training. No one shall be treated differently because of their looks, their religion, where they come from or other characteristic protected by applicable law, including but not limited to gender. We are inclusive and value and respect the thoughts and opinions of coworkers who may have experiences and perspectives different from our own. And we work with suppliers who value diversity and inclusion.

Employment Status:

We employ only workers who are legally authorized to work in their location and facility and are responsible for validating employees' eligibility to work through appropriate documentation.

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Environmental Stewardship:

We support a precautionary approach to the materials used in our products, strive to conserve energy, water, and other natural resources, and work to reduce the environmental impact of waste generation and emissions to the air, water and land. Our commitment to environmental stewardship is embodied in both our Health, Safety and Environmental Policy and in our Code of Conduct. We recognize that water is a critical natural resource that is of strategic importance to our business and the communities in which we operate. We will work constructively with recognized representatives of these communities who have an interest in the Company’s projects and activities, including implementation of sustainable water strategies.

Freedom of Association and Collective Bargaining:

We support freedom of association and allow employees to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment. We respect the right to collective bargaining and expect our suppliers to do the same. We recognize and respect the rights of employees to associate or not to associate with any group, as permitted by law and in accordance with all applicable laws and regulations.

Privacy and Data Security:

We are committed to respecting the privacy of individuals, including employees, suppliers and customers. We follow globally recognized privacy principles and strive to implement reasonable and appropriate practices in our collection, use, and sharing of personal information about individuals.

Safe Work Environment:

We are committed to providing a safe and secure workplace for all employees that meets or exceeds applicable local laws and industry standards for safety and occupational health. We provide a safe, respectful, clean and healthy work environment and we maintain a continuous improvement program related to workplace safety. We do not tolerate violence, threats of violence, or physical intimidation in the workplace. We depend upon our employees to be responsible, to look out for their coworker’s safety, and to support our Total Safety Culture. We expect the same standard of safety from our suppliers.

Working Hours:

We follow all applicable laws and honor all agreements to which we are a party concerning working hours, including maximum number of working hours and overtime, and we ensure employees have the holiday and rest hours required by law.

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Wages and Benefits:

We provide employees with compensation that includes wages, overtime pay, premium pay and benefits that meet or exceed the legal minimum standards. We pay employees equal pay for equal work without discrimination and we pay employees in a timely fashion and make no deductions from pay for disciplinary reasons.

REPORTING SUSPECTED VIOLATIONS OF THIS POLICY AND OBTAINING GUIDANCE:

Employees are required to report known or suspected violations of this Policy. The Company has established a number of ways in which employees and non-employees can report violations or suspected violations of the Company's policies and obtain guidance on legal compliance matters. To make a report, ask questions or express a concern, contact one of our ethics reporting resources:

- Your supervisor or manager
- Any member of the human resources team
- The legal department or the ethics and compliance office (ethicsandcompliance@cooperstandard.com)
- Any member of the global ethics and compliance committee (www.cooperstandard.com/ethics)
- The Cooper Standard IntegrityLine at www.CSIntegrityLine.com

ADDITIONAL GUIDANCE:

No policy can anticipate every possible situation that may arise. Any questions regarding this Policy may be directed to the Company's Chief Compliance Officer or any member of the Global Ethics and Compliance Committee. In cases where there is any doubt or uncertainty about the legality of conduct or situations, the individuals who are involved or have knowledge of the matter should contact the Legal Department.

FLOW CHART: None.

RELATED DOCUMENTS:

1. [Code of Conduct](#)
2. [Ethics Reporting Response Policy](#) (LCPOL-02-GL)
3. [Supplier Code of Conduct](#)
4. [Diversity, Inclusion and Belonging Policy](#)
5. [Global Health, Safety and Environmental Policy](#) (HSEP-01-GL)

RECORDS: None.

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GLOSSARY / DEFINITIONS:

“**Company**” means Cooper-Standard Holdings Inc. and all of its worldwide subsidiaries, affiliates, partnerships, joint ventures, and other business associations that are effectively controlled by Cooper-Standard Holdings Inc.

“**GECC**” means the Global Ethics and Compliance Committee.

REVISION SUMMARIES:

Revision Level	Revision Date	Change Description
A	9/14/18	<ul style="list-style-type: none"> • New release
B	3/17/21	<ul style="list-style-type: none"> • Revised to include additional sections on Environmental Stewardship, Privacy and Data Security, and Working Hours
		<ul style="list-style-type: none"> •