

Cooper-Standard Holdings, Inc. Modern Slavery and Human Trafficking Transparency Statement for the Financial Year Ending December 31, 2021

Cooper-Standard Holdings Inc.'s (together with its consolidated subsidiaries, the "Company," "Cooper Standard," "we," "our," or "us") Modern Slavery and Human Trafficking Statement (the "Statement") is made in compliance with the United Kingdom's Modern Slavery Act 2015 and covers the financial year January 1, 2021 – December 31, 2021. This Statement sets forth the steps we are taking to ensure that slavery and human trafficking are not taking place in our supply chains or any other part of our business.

Company structure, business and supply chain

Cooper Standard is a leading global supplier of sealing and fluid handling systems and components. Utilizing our materials science and manufacturing expertise, we create innovative and sustainable engineered solutions for diverse transportation and industrial markets. Cooper Standard's approximately 23,000 employees across 21 countries are at the heart of our success, continuously improving our business and surrounding communities.

Like other automotive suppliers, Cooper Standard's supply chain is highly complex and consists of a substantial number of suppliers globally in any given year. The structure, size and breadth of our supply chain presents inherent challenges in efficiently assessing and addressing supply chain issues, such as human rights risks. As a result, our primary efforts to address slavery and human trafficking risks within our supply chain is focused on our direct suppliers

Our policies in relation to modern slavery and human trafficking

At Cooper Standard, Integrity Drives Us to be honest, ethical and responsible. We maintain internal policies to ensure our requirements on modern slavery and human trafficking are well communicated, integrated into our procedures and contractual framework, and agreed upon by all employees and business partners. These include:

For our own operations

Our [Code of Conduct](#) ("Code") defines the honest, ethical and responsible business behaviors that we expect and applies to all directors, officers, and employees of the Company and other personnel working on our behalf. It clearly and unequivocally expresses our zero tolerance for the use of forced labor and modern slavery in all forms, including child labor and human trafficking, in our business and throughout our supply chain (Code, p. 33).

Our Policy on Global Human Rights was revised in 2021 to reflect updated international standards and was reviewed by our Board of Directors. It sets forth our values, requirements and practices regarding global human rights, including those relating to child labor, forced labor, human trafficking, and modern slavery. All Company directors, officers and employees and other personnel working on our behalf are subject to this Policy.

Our Ethics Reporting Policy and Response Procedure requires all managers to respond to employee concerns seriously – including those related to violations of our Code or Policy on Global Human Rights - address them promptly and monitor for and prevent retaliation against the employee voicing the concern and those participating in the investigation. We promote our ethics reporting resources internally and externally to our suppliers to ensure all concerns are elevated without retaliation.

For our supply chain

Our [Supplier Code of Conduct](#) ("Supplier Code") requires that our suppliers, contractors and other business partners adhere to our standards, including those relating to human rights and labor practices, as set forth in our Code and in our Policy on Global Human Rights. In early 2021, we updated our Supplier Code to align with customer expectations and world-class standards of conduct. We expect suppliers to hold their supply chain, including subcontractors, third party labor agencies and any contract and seasonal workers, to the same standards contained in our Supplier Code. In addition, our [General Terms and Conditions of Purchase](#) require our suppliers to comply with all applicable laws, regulations and standards, including those relating to wages, hours and conditions of employment, discrimination and occupational health and safety. We expect the standards set out in our Supplier Code to be met by our suppliers, and a failure to do so can result in our termination of the supply relationship. Our expectations of suppliers with respect to sourcing components and materials are further detailed in our [Responsible Minerals Policy Statement](#).

Due diligence: The parts of our business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps taken to manage that risk

Risk assessment

Our Human Rights Working Group is in the process of developing a risk-based assessment of our operations as well as our supply chain, to identify the human rights issues at risk of the most severe negative impacts.

When considering these risks, we reference the *UN Guiding Principles on Business and Human Rights* and the accompanying *UN Guiding Principles Reporting Framework*.

Since 2013, we have worked to trace our Conflict Minerals to source, performing Reasonable Country of Origin Inquiries (RCOI). Through our membership in the [Responsible Minerals Initiative](#) (RMI) we have expanded our priorities to support responsible sourcing of all minerals from conflict affected and high-risk areas.

We network with peers and other businesses working together to improve our Human Rights management systems, as well as other material topics of ESG. We participate in a variety of sustainability work groups, including:

- [Automotive Industry Action Group](#) (AIAG) - Corporate Responsibility Steering Committee co-chair; Forced Labor/Human Rights Working Group participant
- [European Association of Automotive Suppliers](#) (CLEPA) - invited participant
- [Manufacturers Alliance](#) (MAPI) - Sustainability Council member

Due diligence for our own operations

Cooper Standard primarily produces original equipment components for vehicle manufacturers. Our production workforce, ranging from medium to highly skilled, produces high volumes of complex technical products under stringent quality requirements. We believe our business does not match the criterion of activities highly exposed to forced labor risk.

Our Human Resources (HR) department systematically checks employee work permits and immigration documents at the hiring stage in every country where this is a legal requirement. This includes all employee classifications including contingent employees, employees of offshore companies and employees of joint ventures where Cooper Standard is a partner. Our regional HR Business Services Centers work collaboratively with local HR teams to review and enter appropriate

employee information into our HR Information System (HRIS). This ensures proper collection and maintenance of necessary documentation. Local HR teams in each country ensure compliance and escalate matters where appropriate to our Legal Department.

Due diligence for our supply chain

The expectation for compliance with our Supplier Code is stated explicitly in our Global [General Terms and Conditions of Purchase](#). These appear as standard language for our Purchasing Orders and New Business Awards. Our Code is also referenced in our [Global Supplier Quality Manual](#) which guides suppliers to the online supplier portal where Company policies and procedures can be accessed.

To ensure compliance with our Supplier Code and performance expectations for our key suppliers, we conduct onsite audits of a portion of key suppliers each year. All new suppliers will require an onsite audit and our current key suppliers will be required to perform a self-assessment. Any medium or high-risk responses will prompt an onsite audit. In 2021, we added an evaluation of suppliers' compliance with our Human Rights Policy to the audits.

In the event a supplier is not up to par with our human rights standards – through our screening phase or an audit – we will require them to provide a corrective action plan to continue working with them. Through our auditing process, we will monitor their progress to ensure they reach compliance. Non-compliance with our Policy on Global Human Rights will result in terminating their status as a key supplier.

Business grievance mechanism

We hope that ethical misconduct never happens at Cooper Standard, but if it does, we need to know about it so we can work to resolve it. We believe it is everyone's responsibility to bring forward issues or concerns that they are aware of that may impact the Company, including those related to slavery and human trafficking. We maintain a "Speak Up" culture that encourages the [reporting of unethical behavior](#) and provide several avenues for both employees and suppliers to report concerns. These avenues include

- An Open-Door policy for employee communication with managers as outlined in our *Manager's Guide to Responding to Employee Questions and Concern about Business Conduct*
- A dedicated Ethics & Compliance email inbox (ethicsandcompliance@cooperstandard.com), and
- Our confidential and anonymous whistle-blower hotline www.CSIntegrityLine.com. IntegrityLine is available for employees and other stakeholders including customers and suppliers to report 24/7 online or by phone in 18 languages. Submissions are received and tracked by an independent third-party service provider and reviewed by our Legal Department. Reports are always investigated, and we follow up when further action is appropriate.

Our Non-Retaliation Policy forbids retaliation in any form against anyone who makes a good faith report or participates in an investigation. Company employees who are responsible for or who participate in retaliation will be subjected to disciplinary action, up to and including termination. Our [Supplier Code](#) prohibits suppliers from retaliating against their employees who report any compliance or ethical concern learned during their work for us or who cooperate in good faith with the investigation of a complaint. We work with our suppliers and our employees to uphold our values and integrity by elevating any potential concerns that conflict with our Human Rights Policy. Human

rights concerns, if any, are immediately elevated to our Global Leadership Team and communicated to the Senior Vice President and Chief Human Resources Officer.

Effectiveness of steps we are taking to combat modern slavery as measured against key performance indicators

For our own operations

Key performance indicators we use to measure the effectiveness of our efforts to ensure no modern slavery takes place in our business include:

- Number of cases of modern slavery identified in 2021 via internal audits: 0
- Number of cases of modern slavery reported in 2021 via our IntegrityLine (available to all stakeholders): 0
- Rate of completion of Code of Conduct training: 99% of salaried workforce; 100% of new hires

In addition, we conduct employee engagement survey of all salaried employees (latest, 2021), biennial Company-wide ethical culture surveys, and in each of our manufacturing facilities an annual fraud risk survey, providing multiple opportunities for employees to report any workplace issues of concern, including those related to human rights. No reports of modern slavery were identified via any of these surveys during 2021. In 2021, we earned recognition by Ethisphere Institute as being among the [World's Most Ethical Companies®](#) for the second time.

For our suppliers

We expect 100% of our suppliers to comply with our Supplier Code which outlines the requirements for ethical business practices in compliance with our policies and the law. All suppliers which have strategically been identified for growth must complete an additional audit covering the topics of Integrity, Human Rights, Safety and Corporate Responsibility. Approximately 50% of the targeted supply base has completed the assessment. All responses are due for submission by the close of 2023.

Training

For our own operations

At Cooper Standard, all salaried employees receive annual training on our Code, which includes prohibitions on slavery and human trafficking. New hires also receive this training as part of the on-boarding process. We encourage a “speak up” culture and provide annual training to our workforce on the importance and means of reporting ethical violations. Recognizing the importance of their role in a speak up culture, managers receive additional training and resources. We are currently developing Company-wide Human Rights training which deals specifically with the issue of modern slavery and how to address it in our own operations and in our supply chain. We expect to deploy this training in Q2 of 2022.

For our supply chain

Our Supplier Development, Supplier Quality, Management System, and Plant Quality teams provide resources for, and where appropriate, conduct specific training for suppliers as needed.

This Modern Slavery and Human Trafficking Statement has been reviewed and approved by the Board of Directors on May 5, 2022.

Signed:

J.S.E.

Jeffrey S. Edwards
Chairman and CEO
Cooper Standard Automotive, Inc.

Date: May 5, 2022