

## Cooper-Standard Holdings, Inc. Modern Slavery and Human Trafficking Transparency Report for the Financial Year Ending December 31, 2023

Cooper-Standard Holdings Inc.'s (together with its consolidated subsidiaries, the "Company," "Cooper Standard," "we," "our," or "us") Modern Slavery and Human Trafficking Transparency Report (the "Report") is made in compliance with the United Kingdom's *Modern Slavery Act 2015* and Canada's *Fighting against Forced Labour and Child Labour in Supply Chains Act* (the "Act") and covers the financial year January 1, 2023 – December 31, 2023. This Report sets forth the steps we are taking to ensure that forced labor and modern slavery in all forms, including child labor and human trafficking, are not taking place in our supply chains or in any other part of our business.

### Company structure, activities and supply chain

Cooper Standard, a corporate entity operating in the manufacturing sector and headquartered in Northville, Michigan, USA, is a leading global supplier of sealing and fluid handling systems and components, with a business presence in Canada (Cooper-Standard Automotive Canada Limited) and meeting the Act's size-related threshold for assets, revenue and employees.

We produce, sell and distribute our systems and components both inside and outside of Canada, and also import into Canada goods produced outside of Canada. Utilizing our materials science and manufacturing expertise, we create innovative and sustainable engineered solutions for diverse transportation and industrial markets. Cooper Standard's approximately 21,000 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 human rights risks within our supply chain is focused on our direct suppliers.

### Our policies in relation to modern slavery and human trafficking

At Cooper Standard, our core value of ***Integrity Always*** inspires us to be honest, ethical and responsible in all our business practices. We maintain internal policies to ensure our requirements on child labor, modern slavery in all its forms, 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") applies to the Company globally, including to our subsidiaries, and defines the honest, ethical and responsible business behaviors that we expect. It 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.

Our [Policy on Global Human Rights](#) was revised in 2023 and reflects updated international standards and is regularly 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. This Policy applies to the Company globally, including all of our subsidiaries. All Company directors, officers and employees and other personnel working on our

behalf 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, those relating to human rights and fair labor practices.

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”) was updated in 2023 to align with internationally recognized human rights and labor standards and requires that our suppliers, contractors and other business partners adhere to our values, including those relating to human rights and labor practices, as set forth in our Code and our Policy on Global Human Rights. We expect suppliers to hold their own 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](#).

#### **The parts of our business and supply chains where there is a risk of child labor, slavery and human trafficking taking place, and the steps taken to manage that risk**

Through our annual Enterprise Risk Management (ERM) process and our Human Rights Risk Assessment process, we have identified those parts of our activities and supply chains that carry a risk of forced labor and child labor as including: the sectors / industry in which we operate (automotive, manufacturing, mining, transportation and warehousing); the locations of our operations; the raw materials used in our products and supply chain; our Tier one (direct) suppliers, and the use of outsourced labor.

Steps we have taken to assess and manage these risks: Our due diligence processes in relation to human rights, including forced labor and child labor

#### Risk assessment

Our internal, cross-functional Human Rights Corporate Responsibility Working Group has developed the Cooper Standard Human Rights Management System in line with the UN Guiding Principles on Business and Human Rights. We annually conduct an internal, risk-based assessment of our operations as well as our supply chain and business relationships. We identify, rate, prioritize and develop management plans for those salient human rights issues, including forced labor and child labor, most at risk of severe negative impacts on people through our own operations or business relationships. Each year, we monitor for changes in the human rights context and update our Human Rights Topic Register accordingly.

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 System, as well as other sustainability topics. We participate in a variety of sustainability work groups, including:

- [Automotive Industry Action Group \(AIAG\)](#) - Forced Labor/Human Rights Working Group and Child Labor sub-group member
- [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 and child 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 to ensure that all workers are recruited voluntarily. This includes all employee classifications, including contingent employees, employees of offshore companies and employees of joint ventures where Cooper Standard is a partner. Legally young workers under 18 years of age are not permitted to perform hazardous work, overtime, or night shift work. Our hiring protocols include face-to-face interviews to review age status and we request original birth certificate, national ID certification, or a passport. 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.

As a U.S. Customs and Border Protection Customs-Trade Partnership Against Terrorism (C-TPAT) member, our supply chain security measures include procedures to ensure truck seals are not removed during transit and for reporting any suspicious activity, including human trafficking.

#### 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 Supplier 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 are required to perform a self-assessment, which includes a ranking to the human rights elements (including forced labor and child labor) of our Supplier Code. Any responses that do not meet our established threshold will prompt an onsite audit. Audits include an evaluation of a supplier's compliance with our [Policy on Global Human Rights](#).

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 time-bound corrective action plan to continue working with us. We actively monitor their compliance progress and reevaluate their status as a key supplier if they are unable to align with our [Policy on Global Human Rights](#).

## 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 modern slavery, child labor, and human trafficking. We maintain a "Speak Up" culture that encourages the [reporting of unethical behavior](#) and provides several avenues for employees, suppliers and other stakeholders 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](mailto:ethicsandcompliance@cooperstandard.com)), and
- Our confidential and anonymous whistle-blower hotline [www.CSIntegrityLine.com](http://www.CSIntegrityLine.com). IntegrityLine is available to 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 subject 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 Policy on Global Human Rights. 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.

Measures taken to remediate any forced labor or child labor identified in our activities and supply chain

While we have identified parts of our activities and supply chains that carry a risk of forced labor or child labor, we have not identified any forced labor or child labor that was or is actually being used in our activities or in our supply chain.

Measures taken to remediate the loss of income to the most vulnerable families that results from any measures taken to eliminate the use of forced labor or child labor in our activities and supply chain

While we have identified parts of our activities and supply chains that carry a risk of forced labor or child labor, we have not identified any loss of income to vulnerable families resulting from remediation measures, as we have not identified any actual forced labor or child labor that was or is being used in our activities or in our supply chain.

Training

For our own operations

At Cooper Standard, all salaried employees receive annual training on our Code, which includes prohibitions on modern slavery, including forced labor and child labor, 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. In 2022, we provided Company-wide Human Rights training which dealt specifically with the issue of modern slavery and how to recognize and address it in our own operations and in our supply chain.

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.

Effectiveness of the steps we are taking to combat forced labor and modern slavery in all forms, including child labor and human trafficking, as measured against key performance indicators

For our own operations

We regularly review our policies and procedures related to forced labor and child labor. Key performance indicators we use to measure the effectiveness of our efforts to ensure no forced labor or child labor takes place in our business include:

- Number of cases of forced labor or child labor identified in 2023 via internal audits: 0
- Number of cases of forced labor or child labor reported in 2023 via our IntegrityLine (available to all stakeholders): 0
- Rate of completion of 2023 Code of Conduct training: 99.2% of salaried workforce; 100% of new hires

In addition, we conduct biennial Company-wide ethical culture surveys (latest, 2022) and in each of our manufacturing facilities an annual fraud risk survey, providing opportunities for employees to report any workplace issues of concern, including those related to human rights. No reports of forced labor or child labor were identified via any of these surveys during 2023. In 2022, we earned recognition by Ethisphere Institute as being among the World’s Most Ethical Companies® for the third time. In 2023, for the fourth consecutive year, we were selected as one of *Newsweek’s* America’s Most Responsible Companies®. We annually communicate our progress on human rights-related KPIs externally through our [Corporate Responsibility Report](#).

For our supply chain

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 self-assessment covering the topics of Integrity, Human Rights, Safety and Corporate Responsibility. In 2023, 100% of our direct material Grow suppliers completed this self-assessment.

Approvals and Attestations

This Modern Slavery and Human Trafficking Report has been reviewed and approved by the Board of Directors of Cooper-Standard Holdings Inc. on May 16, 2024.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signed:



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


I have the authority to bind Cooper-Standard Holdings, Inc.

Date: May 16, 2024

This Modern Slavery and Human Trafficking Report has been reviewed and approved by the Board of Directors of Cooper-Standard Automotive Canada Limited on May 16, 2024.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signed:



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Jerry Preston  
Resident  
Cooper-Standard Automotive Canada Limited.

I have the authority to bind Cooper-Standard Automotive Canada Limited.

Date: May 16, 2024