

Tecumseh Products Company Corporate Policy



Tecumseh

900.00 HUMAN TRAFFICKING AND SLAVERY

1.0 INTRODUCTION

- 1.1 At Tecumseh Products Company LLC, our mission is to deliver innovative products that are built with passion, integrity, and a commitment to sustainability. We operate with respect for people and the environment, and we take seriously our obligation to respect human rights in alignment with international standards and norms.
- 1.2 Human trafficking and slavery are tragic global phenomena affecting millions of people around the world today. These practices violate human rights, destroy the lives of individuals and communities, and are contrary to good business practices. We are committed to addressing these issues and ensuring that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

2.0 PURPOSE

- 2.1 Our corporate policies play an important role in our efforts to operate with respect for human rights and to address potential modern slavery and human trafficking risks throughout our value chain. They help us set clear expectations for our employees, suppliers, and other business partners, and they also establish a framework for monitoring compliance with our standards. The purpose of this policy is to describe Tecumseh's commitments and expectations on human trafficking and slavery issues in particular.

3.0 DEFINITIONS

- 3.1 This Policy is aligned with the international framework for the prevention of human trafficking, slavery, and forced labor, including, but not limited, to the United Nations Protocol to Prevent, Suppress, and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime, 2000 (the "Palermo Protocol"); the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work; the ILO Forced Labour Convention of 1930 (No. 29); the ILO Abolition of Forced Labour Convention of 1957 (No. 105); the EU Directive on Preventing and Combating Trafficking in Human Beings (2011/36/EU); and the various anti-slavery, anti-trafficking laws of the countries in which Tecumseh conducts business, such as the U.K. Modern Slavery Act, 2015; the California Transparency in Supply Chains Act, 2012; Regulation 52.222-50 of the Federal Acquisitions Regulations System (Title 48, CFR); and other similar requirements.
- 3.2 In this policy, the term "*Modern Slavery*" is an umbrella term that covers all work or service exacted from any person under the menace of any penalty and for which

the said person has not offered himself or herself voluntarily. It encompasses such practices as forced labor, prison labor, indentured labor, bonded labor, debt servitude, state imposed forced labor, and human trafficking, where coercion, threats, or deception are used to intimidate, penalize, or deceive workers, thereby creating situations of involuntary work and exploitation. Modern Slavery may also be associated with the worst forms of child labor.

3.3 “*Human Trafficking*” means the recruitment, transportation, transfer, harboring, or receipt of people through force, fraud, or deception, with the aim of exploiting them for profit.

4 SCOPE

4.1 This policy applies to all persons working for us or on our behalf in any capacity, including our employees at all levels, contractors, external consultants, interns, volunteers, third-party representatives, business partners, and suppliers. In this Policy, the term “Supplier” refers to any third party that provides goods or services to Tecumseh for compensation. It includes their parent, subsidiary, or affiliate entities, as well as their respective employees, agents, and subcontractors.

4.2 We require our Suppliers and business partners to comply with the requirements of this Policy. We expect them to respect, uphold, and communicate these expectations throughout their supply chains by adopting efficient management systems, policies, procedures, and training on the standards and expectations set forth in this Policy within their own business operations and their own supply chains.

5 RELATED POLICIES AND PROCEDURES

5.1 This Policy interacts with the Tecumseh’s Code of Conduct which includes policies and procedures which are relevant to ensuring that there is no slavery or human trafficking in any part of our business or our supply chains, and should be read in conjunction with Tecumseh’s Code of Conduct.

6 POLICY STATEMENT

6.1 Tecumseh has a zero-tolerance approach to modern slavery in all its forms. We prohibit the use of forced, compulsory, trafficked, and other types of slave labor in our operations and our supply chain. We prohibit the use of child labor, the charging of recruitment fees to workers or potential workers, the retention of workers’ original identification or immigration documents and other factors associated with modern slavery. We comply with applicable national laws and regulations on wages and working hours as a minimum standard.

6.2 We are committed to implementing and enforcing effective systems and controls that address the risk of modern slavery within our operations and in our supply chains. In this regard, we undertake risk assessments, integrate our findings into our internal risk management processes, track the effectiveness of our actions, and communicate with our stakeholders.

- 6.3 We follow internationally recognized best practices in managing the risk of modern slavery. This includes utilizing third-party expertise and the industry-standard Slavery and Trafficking Risk Template (STRT) in risk assessment. Where the risk of modern slavery is found to be high, we require specific corrective actions to be undertaken to reduce risk significantly. Where the occurrence of modern slavery is found or alleged, we take immediate action to address it.
- 6.4 We are committed to leading by example by having clear recruitment policies and undertaking appropriate checks on all employees prior to employment, and to vetting suppliers and external recruiters prior to establishing business relationships with them.
- 6.5 We are committed to providing open and transparent reporting procedures and grievance processes for all employees, business partners and other third parties to raise concerns and have them addressed without fear of retaliation.
- 6.6 We are committed to ensuring transparency in our approach to tackling modern slavery, consistent with the disclosure obligations set out under the various anti-slavery and trafficking laws Tecumseh may be in scope of, including but not limited to the UK Modern Slavery Act and the California Transparency in Supply Chains Act. In this regard, we commit to publishing an annual modern slavery statement that sets out the actions we have taken to prevent slavery in our operations and supply chain.
- 6.7 We expect the same high standards from all of our suppliers, contractors, and other business partners. As part of our contracting processes, we include specific anti-slavery provisions which prohibit our suppliers and their employees and sub-suppliers from engaging in modern slavery, and we expect our suppliers to hold their own suppliers to the same high standards.

7 RESPONSIBILITY FOR THIS POLICY

- 7.1 Tecumseh's President and CEO has overall responsibility for this Policy.
- 7.2 Tecumseh's General Counsel has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and ensuring that there are effective internal controls and procedures to counter modern slavery.
- 7.3 Managers at all levels are responsible for ensuring that those reporting to them understand and comply with this Policy, and are provided with requisite training on modern slavery.
- 7.4 Managers have the responsibility to remain alert to indicators of modern slavery and to respond appropriately if they find or are informed of any indication of modern slavery.

- 7.5 It is the responsibility of all employees at all levels and all those working for or on behalf of Tecumseh to ensure that they read, understand, and comply with this Policy.
- 7.6 It is the responsibility of all employees at all levels and all those working for or on behalf of Tecumseh to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 7.7 The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.
- 7.8 We require our Suppliers and business partners to comply with the requirements of this Policy. We expect them to respect, uphold, and communicate these expectations throughout their supply chains by adopting efficient management systems, policies, procedures, and training on the standards and expectations set forth in this Policy within their own business operations and their own supply chains.

8 BREACHES OF THIS POLICY

- 8.1 Breaches of this policy by any employee will result in disciplinary action, up to and including dismissal. We may terminate our relationship with suppliers and other third parties if they breach this policy.
- 8.2 If anyone becomes aware of or suspects that modern slavery is taking place, or a breach of this Policy has occurred, they must notify the General Counsel immediately. This applies whether or not the suspected breach involves Tecumseh or one of our suppliers.
- 8.3 We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We will do our best to ensure the confidentiality of all information received, including the identity of the notifier, and ensure that no one suffers any detrimental or retaliatory treatment as a result of reporting their concerns or suspicions in good faith.

9 COMMUNICATION & AWARENESS

- 9.1 Training on this policy will be provided to new and existing employees, with priority placed on those with direct responsibility for supply chain management, recruitment, and other relevant departments.
- 9.2 This policy and our zero-tolerance approach to modern slavery will be communicated to suppliers at the outset of our business relationship, and the requirement to comply will be reflected in our contractual arrangements with suppliers.

10 POLICY REVIEW

10.1 This policy has been approved by the Leadership of Tecumseh and shall be overseen by the General Counsel. It is reviewed periodically by the President and CEO, as required. Information and/or training will be provided to employees and relevant third parties on any changes we make.