



Marelli – Human Rights Policy

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1 Purpose

Marelli in all its activities respects fundamental Human Rights, which are a non-negotiable fundamental value of its culture and corporate strategy, in close connection with Sustainability activity and Governance.

Marelli works to manage and reduce the potential risk of Human Rights violations, to avoid causing adverse impacts on these rights within the international and socially diverse conditions in which it operates. The global presence of the group requires the adoption of generally accepted principles in every geographic area where companies of Marelli are present.

Marelli promotes respecting of all Human Rights within its business relationships and adherence to the same Human Rights norms by its third parties paying attention to conflict-affected and high-risk contexts.

2 Scope

This Policy applies to Marelli Holdings, Co., Ltd. and all its majority-owned subsidiaries (Marelli); to all Marelli worldwide workforce and “third parties” or “partners” include all of our suppliers, consultants, contractors and other vendors/service providers, their subcontractors, our joint venture partners and their affiliates, and any other person acting on our behalf or our third parties’ behalf such as “intermediaries” (e.g., sales agents, distributors, resellers, brokers, etc).

3 General Principles

According to United Nations (“UN”) Declaration on Human Rights and the International Labor Organization (“ILO”), Marelli is committed to respecting all internationally recognized human rights as relevant to its operations. This includes, but not limited to, “the UN International Bill of Human Rights (the Universal Declaration of Human Rights, International Covenants on Human Rights)”, “the ILO Declaration on Fundamental Principles and Rights of Labor”, “the UN Guiding Principles on Business and Human Rights”, “the UN Global Compact” and “Children’s Rights and Business Principles”.

Where national law and international human rights norms differ, Marelli will follow the higher clause; where they are in conflict, we will adhere to national law, while seeking ways to respect fundamental human rights to the greatest extent possible.

4 No discrimination

Marelli is opposed to any form of direct or indirect discrimination on the basis of race, gender, gender identity, transgender status, religion, personal or political beliefs, union membership, color, marital status, sexual orientation, physical or health condition, disability, ethnicity, nationality, social background and status, protected veteran status, age, genetic information or any other basis protected by local laws, as applicable and is committed to the prevention of discrimination in all areas of working life.

Marelli is fully committed to promoting an inclusive and respectful working environment; the Company recruits employees based on their qualities and skills and is committed to providing equal opportunities to all employees, both on the job and in their career advancement.



The Head of each department shall ensure that in every aspect of the employment relationship, such as recruitment, training, compensation, promotion, transfer, and termination, employees are treated according to their abilities to meet job requirements and all decisions are free from any form of discrimination.

Each employee has a key role in creating equal opportunity for others and in treating all colleagues with dignity and respect.

5 No Harassment

Harassment can take many different forms. All types of harassment are prohibited by Marelli and will not be tolerated. By way of example, racial, sexual harassment or harassment related to other personal characteristics which has the purpose or the effect of creating a hostile work environment, violating the dignity of the person who is the victim of such harassment, or demanding any kind of sexual favor in exchange for a workplace advantage (for example a raise or to avoid being fired) is totally unacceptable to the Company whether it takes place inside or outside the workplace.

Marelli is fully committed to promoting a working environment protecting workers from any form of physical, verbal or psychological harassment.

6 Freedom of Association

Marelli recognizes the right of its employees to form or take part, freely, in trade unions or other organizations aimed at defending and promoting their interests, in accordance with local law. Marelli respects the rights of its employees to be represented by trade unions or other representatives established in accordance with the locally applicable legislation and practice and it engages in open dialogue with them. When engaging in negotiations with such representatives, Marelli actions and behaviors always have a constructive approach and relationship.

7 No child labor

Marelli does not employ child labor, namely it does not employ people younger than the permissible age for working established in the legislation of the place in which the work is carried out and, in any case, younger than fifteen, unless an exception is expressly provided by international conventions and by local legislation. The Company is also committed to not establishing or maintaining working relationships with third parties that employ child labor, as defined above.

8 Opposition to forced labor, human trafficking and any form of slavery

Marelli prohibits all forms of labor exploitation, modern slavery, forced or compulsory labor and all forms of abuse or mental or physical coercion towards their workers; Marelli does not tolerate any forms of human or sex trafficking and misuse.

Human trafficking crime is the arrangement or facilitation of the travel of another person with a view to that person being exploited. It is irrelevant whether such person consents to the travel.



9 No retaliation

Retaliating in any way against someone for reporting in good faith a violation of this or any other Policy is forbidden and will not be tolerated. Any instance of retaliation may result in discipline up to and including termination of employment.

10 Working hours, Benefits and wages

Marelli is fully committed to comply with all applicable working laws on employment and tries to exceed local minimum wage or that meets living wage, working hours and reduction of excessive working hours, respecting collective labor agreements and offering compensation and benefits to its employees in an objective and equitable manner.

Applicable laws, as well as Code of Conduct, Corporate Policies and collective labor agreements, govern the provisions of compensation and benefits to all employees.

11 Environment, Occupational Health and Safety

In line with Marelli Environment Health & Safety Corporate Policy (available on Marelli website), Marelli's vision is to minimize or eliminate all possible impacts on the Environment and on Health and Safety deriving from its operations, products and services.

Marelli aims to lead a culture of prevention, pursuing strategies of sustainable development by continually improving its performance in the areas of the Environment and Health & Safety.

Marelli requires its suppliers to implement and maintain efficient Environment and Health & Safety management systems throughout the supply chain, based on compliance with all pertinent laws and regulations and the adoption of measures and standards commensurate with Marelli Environment Health & Safety Corporate Policy.

12 Business partners and suppliers

Marelli uses the principles outlined in this Policy and in Marelli Code of Conduct as criteria of selection for its suppliers and other business partners, and all Third Parties. They are encouraged to pursue a responsible business as a basis for long-term relations. In particular, the Company assesses suppliers, business partners and all Third Parties to avoid establishing working relationships with Third Parties that employ mandatory, forced or child labor, or, that engage in, facilitates, or promotes human trafficking in persons and generally, that do not meet the requirements set forth by this Policy.

13 Local Communities

Marelli is committed to respecting the rights of local communities, protecting their cultural and natural heritage and local traditions and customs and to contributing to their realization.



In the designing and construction of infrastructure projects, Marelli is committed to taking due account, environmental and social impact assessments and the respect of Human Rights in the areas where projects will be carried out.

Moreover, Marelli seeks to contribute to the social, economic and institutional development of local communities through specific programs. Third Parties are asked to behave in a socially responsible manner by respecting the cultures and traditions of each country in which they operate and act with integrity and good faith in order to merit the trust of the community.

14 Privacy

Marelli respects the right to privacy of all its Stakeholders and is aware of the importance of ensuring adequate security level to interested parties concerned with the personal data processing operations.

Marelli Group undertakes to use the data and information provided correctly and to comply with all local laws and regulations regarding personal information.