



Top Management Commitment

Sustainability: Quality, Environment, Ethics, and Occupational Health and Safety

At SMR Automotive, Quality and Sustainability are the core elements that guide every step we take in the relentless efforts of providing our customers and final consumers with products and services that are compliant to all technical and legal requirements whilst produced in a safe, ecologically responsible and overall sustainable working environment.

Both Quality and Sustainability are the foundation of our vision of “being the automotive market leader driving innovative technology for rear view vision systems reflecting employee passion and excellence” which we aim to achieve through solid Engineering, Manufacturing and Administrative processes.

At SMR Automotive, top management is committed to always act in a coherent manner, and without compromising, towards the compliance, and the creation of an atmosphere that fosters, the following principles:

- Consistent fulfillment all our customer requirements.
- Compliance with all laws and regulations effecting our product, our personnel, our community, our environment as well as the counties in which we operate.
- Protect the Human and Labor Rights and avoid any type of Corruption within our entire business cycle.
- Effective measurement of our processes and their impacts through standardized global and local Key Process Indicators.
- To thrive based on the continual improvement of our Integrated Management System and the results emanated from it.
- To fully involve our personnel and supply chain partners to contribute, within their scope of responsibility, in the pursuit of the highest levels of Quality and Sustainability.

Char Zawadzinski
Chief Operating Officer



Sustainability Policy

Quality, Environment, Ethics, and Occupational Health and Safety

At SMR Automotive, every employee, beginning with the leader of each subsidiary and covering all other employees in the organization, is involved and committed to achieve the highest levels of Customer Satisfaction, Environmental Protection, and Ethical Responsibility within a Health and Safety work environment through the unrestrictive respect of our policies, principles, standards and systems. Therefore, all of our members are engaged in:

- Ensuring that our products are manufactured according to all applicable Standards and Customer Specific Requirements.
- The protection of the environment and the mitigation of any adverse environmental impact resulted from our manufacturing and non-manufacturing processes.
- Preventing injuries and work related illnesses.
- The full compliance of all legal and regulatory frameworks related to our products, processes and services.
- Contributing to the Continual Improvement of systems, processes, products and services to enhance the creation of value within the organization.
- To avoid any form of discrimination or any other human rights abuse as: child, forced or compulsory labor, and precluding the freedom of association.
- Avoiding corruption in all its forms, including extortion and bribery.

SMR Ethical, Social and Environmental Responsibilities Concepts and Guidelines

Ethical Responsibility

Anti-Corruption

The highest standards of integrity are expected in all business interactions. Any and all forms of corruption, bribery, extortion and embezzlement are strictly prohibited.

Non-Discrimination

Harassment or discrimination against employees in any form is unacceptable. This includes but is not limited to; gender, race, color, caste, disability, origin, religion, age, pregnancy, or sexual orientation.

Responsible Sourcing of Minerals

SMR is in compliance with the Conflict Minerals policy set forth by the Securities and Exchange Commission (SEC) in applicable regions and is available to customers upon their request.

Product Safety & Quality

All products and services will be delivered to meeting the quality and safety criteria defined in relevant specifications, and will be safe for their intended use.

Diversity in Ethics

SMR has a long-standing commitment to equal opportunity principles across all aspects of our business. Diversity in the workplace includes all differences that define each of us as individuals including; culture, ethnicity, race, gender, nationality, age, religion, disability, sexual orientation, education, opinions and beliefs. By understanding, respecting and valuing these differences we recognize the benefits of diversity.

Social Responsibility

Occupational Health and Safety

SMR will assure that Employees have a healthy and safe working environment that meets or exceeds applicable standards for occupational health and safety.

The work environment provided shall ensure that employee safety is maximized, creating an environment to allow employees to achieve pre-determined objectives with the lowest possible level of risk of injury.

Child Labor Avoidance

The company will comply with all legal requirements relating to the minimum age of workers, unless this is part of government authorized training or apprenticeship programs.

Freely Chosen Employment

Any form of forced labor will not be used. Employees have the freedom to leave employment after any contracted notice period. It will not be required for employees to surrender government-issued identification, passports, or work permits as a condition of employment.

Freedom of Association

Employees have the right to associate with societies or clubs at their discretion. Employees maintain their right to communicate with management regarding working conditions without fear of reprisal, intimidation or harassment.

Wages and Benefits, Working Hours

Wages and benefits shall comply with legislative rules and regulations governing minimum wages, working hours and legally mandated benefits.

Social Diversity

SMR is committed to create environments where social diversity is encouraged. Company employees and our business partners shall:

- promote a culture which encourages every individual to contribute to the success of business;
- value the differences in backgrounds, experience, knowledge, and skills;
- maximize benefits derived from diversity in the workforce and supply chain;
- maintain SMR as an Employer of choice by actively demonstrating commitment to equal opportunity and diversity; and
- demonstrate compliance to social responsibility in communities in which we operate.

Environmental Responsibility

Environmental Standards and Initiatives

SMR will support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility and encourage the development of environmentally friendly technologies.

SMR is committed to reducing its carbon foot-print worldwide by employing cost-effective technologies and voluntarily make efforts to reduce emissions.

Environmental Performance of Business Operations

All stages of manufacturing aim to provide maximum environmental protection. This includes proactive behavior to prevent or minimize the impact of accidents which may adversely affect the environment. Particular emphasis is given to the application and SMR is committed to eliminating waste.

continuing development of technologies which save energy, water and other resources, and which are characterized by minimal emission controls, reuse and recycling strategies.

Environmental Performance of Products

All products which are manufactured within the supply chain are required to meet the environmental standards in the respective market segment. Chemicals and other materials posing a hazard if released to the environment shall be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

SMR complies with the requirements of REACH - (EC 1907/2006).

SMR's Environmental Standards

Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations are obtained and maintained in compliance with the reporting requirements.

Pollution Prevention and Resource Reduction

SMR is committed to be an environmental leader by reducing or eliminate waste, including water and energy, through continual improvement of current practices. Activities focus on production, maintenance, materials substitution, conservation, and/or recycling and re-using materials.

Hazardous Substances

Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Wastewater and Solid Waste

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities, are characterized, monitored, controlled and treated as required prior to discharge or disposal.

Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are characterized, monitored, controlled and treated as required prior to discharge.

Product Content Restrictions

SMR adhere to all applicable laws, regulations and customer requirements regarding the prohibition or restriction of specific substances, including labeling for recycling and disposal.

In the development of our products and processes SMR will follow the principles of saving materials of any kind where possible by:

- reducing material;
- reusing material; and
- recycling (e.g. water, heat, etc.)



External References:

Title	Organization	Link
Quality Management System as per ISO/TS 16949:2009	IATF	http://iatfglobaloversight.org/
Environmental Management System as per ISO 14001:2004	ISO	http://www.iso.org/iso/iso14000
Occupational Health and Safety Management System as per BS OHSAS 18001:2007	OHSAS Project Group	https://www.bsigroup.com/en-GB/ohsas-18001-occupational-health-and-safety/
GRI	Global Reporting Initiative	https://www.globalreporting.org/Pages/default.aspx
CERES Principles	Coalition for Environmentally Responsible Economies	https://www.ceres.org/about-us/our-history/ceres-principles
UN Global Compact Principles	United Nations	https://www.unglobalcompact.org/what-is-gc/mission/principles
UN Universal Declaration of Human Rights	United Nations	http://www.un.org/en/universal-declaration-human-rights/
The UN Human Rights Council Guiding Principles on Business and Human Rights	United Nations	http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf
The UN Convention against Corruption	United Nations	https://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf
ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy	International Labor Organization	http://www.ilo.org/empent/Publications/WCMS_094386/lang--en/index.htm
The ILO Declaration on Fundamental Principles and Rights at Work	International Labor Organization	http://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm