GLOBAL GRIEVANCE MECHANISM POLICY

VISSCHER-CARAVELLE AUTOMOTIVE GROUP





Visscher-Caravelle Automotive Group

The scope of this policy are the following companies of the VC Automotive Group:

Visscher-Caravelle B.V.	Netherlands	Head office
Van Dalfsen Beheer B.V.	Netherlands	Administration office
Visscher-Caravelle Poland Sp. z o.o.	Poland	Production plant
Vicim Poland Sp. z o.o.	Poland	Production plant
Vanprotech Sp. z o.o.	Poland	Production plant
Union General de Fabricants Pour Le Sud, Lda.	Portugal	Production plant
Visscher-Caravelle S.A. de C.V.	Mexico	Production plant
Visscher-Caravelle Coatings	Mexico	Production plant
Visscher-Caravelle Yimeng Automotive (Liaoyang) Co. Ltd.	China	Production plant
Visscher-Caravelle N.A. Inc.	North America	Sales office
Visscher-Caravelle Australia Pty Ltd.	Australia	Sales office

Release date:16-08-2016Revision date:04-2022Author:G. MerkusApproved by:T. van Dijk

The company and its values

Visscher-Caravelle defined three important organizational values. The company sees these values as a guideline for every employee of the company worldwide, regardless of function or position. To make the values more recognizable they are clarified in some sentences. The company expects from all our employees to act according to these values.

<u>I am honest</u>

- I am open and transparent, without damaging the interests of the company
- I refuse to accept or initiate any form of dishonesty
- I behave in accordance with current code of conduct

<u>I perform</u>

- I understand my profession and realize sustainable results with a professional attitude
- I take the responsibility that comes with the freedom I get
- I strive for joint results and success

<u>l serve</u>

- I know, respect and appreciate my stakeholders
- I create long-lasting connecting relationships with my stakeholders
- I take my stakeholders interests into account (think win-win)

Introduction

Visscher-Caravelle is an organization who is doing business worldwide. All around the world people are working for Visscher-Caravelle in different areas. People are hired to work in the sales force, or into administration. Other people are hired to work in one of our production plants. There are people on board level, there are specialists, engineers and agents, there is a lot of diversity in the company.

For the company it is important to have one thing in common: doing your job and doing business in the right way (see Global Code of Conduct). The company truly believes in an honest way of cooperation and relationship with all our employees and stakeholders in its broadest sense. This is also the reason that the company set up this grievance mechanism policy. For the company it is important that employees (internal) or other stakeholders (external) have to possibility to report any form of grievance.

The purpose of this policy is to formalize the management of grievances from the company's employees and stakeholders. The grievance process, outlined in this policy, provides an guideline to voice the concerns of employees of stakeholders and gives transparency on how grievances will be managed by the company.

Due to the fact that the company is an international company, the company has to deal with different cultures and languages. The company strives to receive a grievance in the English language, but not every employee or stakeholder is able to speak or write in English language. Therefor it is also possible to address the grievance on papier (via email) in native language. The Company Confidant will take care of the translation by using a translation program or an independent translator.

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1. Definitions

1.1 Grievance

In this policy the following definitions shall apply: concerns, abuses, breaches of applicable rules, regulations and law, criminal act, imminent risk of - public health, safety of persons, environment, imminent of the company's Global Code of Conduct or local company policies. Or any other form of injustice or irregular behavior.

The company defined three levels of severity:

Level **C**: impact is less, no harm for people or organization. Problem has to be solved. Level **B**: impact is average, problem will have impact for people or organization or environment. Action is needed.

Level **A**: impact is high, problem will have huge impact for people, organization, environment or stakeholders. Problem must be solved immediately.

1.2 Employees

With the word employee are not only all the employees mentioned of the company, but also board members, team leaders, supervisors, account managers, agents and all others who represent the company.

1.3 Stakeholders

With the word stakeholders are mentioned individuals or groups outside the company who are not directly contracted by the company but they are affected is some way from the decisions of the company, such as customers, suppliers, community and the government.

1.4 Company Confidant

The one who officially is assigned by the board of the company to act in a way of being complete confidential and neutral.

2. Grievance reporting

This policy is located on the company's website. The policy is also known by each HR department of the company and it is connected to the Global Code of Conduct.

- Employees or stakeholders can share their grievance face to face or send an email to the company confidant.
- Employees or stakeholders can send their grievances to: <u>i.rook@visscher-caravelle.nl</u>.
- Employees or stakeholders can complete a grievance form located on the company website: <u>http://www.visscher-caravelle.nl/</u>
- Employees or stakeholders can voice their grievance to any manager of the company who will then escalate towards the company's confidant.
- In case the grievance is related to the company's confidant, employees or stakeholders can call, or write to the Board of the company: 0031 383855015 (head office) or email: <u>secretariaat@visscher-caravelle.nl</u>

Step	Description
Recieve Grievance	The Company Confidant receives the grievance face to face, via phone or email from the reporter and will send the reporter a confirmation message of the report within 3 workdays.
Record	The Company Confidant will record all formal grievances in the Grievance register.
Screen	The Company Confidant will screen the grievance depending on the level of severity in order to determine how the grievance will be approached.
Acknowledge	The Company Confidant will inform the reporter on how the process will continue. Appointments will be made about the way of communication.
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Investigate	The Company Confidant is responsible for investigating the grievance. Information gathered during the investigation will be analysed and will assist in determining how the grievance is handled and what steps need to be taken in order to resolve the grievance. The reporter will receive an assessment of the report within 3 months.
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Act	After the investigation the Company Confidant will use the findings to create an action plan outlining steps to be taken in order to resolve the grievance. Once all actions have been completed, the reporter will be informed officialy via their preffered method of contact.
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Close out	After verifying the outcome with the reporter, the Company Confidant will close the grievance and delete all the data if no longer needed to comply with the regulations.

3. Grievance mechanism process

4. Reporting

The Company Confidant is responsible to report the grievance. The grievance will be added to the HR Scorecard (head office activity) and the to the VC Sustainability Report (Corporate Sociability Report) The content of the grievance stays secret, only the numbers of grievance will be reported.

5. Storing of grievances

All records, including grievance forms, investigation notes, interviews and minutes of meetings will be deleted if no longer needed to comply with the regulations.

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Appendix I - Grievance Form

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Grievance Lodgement Form Visscher-Caravelle							
Name:				Date:			
Please do not use my name when	VC Plant:		VC Plant:				
talking about this grievance :	YES	NO	Stakeholo	ler:			
		Telephone		Supporting Documents Attached?			
Preferred Contact Method:		Email			YES		
		Face to face			ΝΟ		
Please provide contact details:				_			
What outcome are you seeking?							
Additional information							