



Policy

ALL-ETH-ESG-010

Respect & Dignity Policy

Owner

**Chief Compliance Officer,
Ethics & Compliance**

**Chief Human Resource
Officer, Human Resources**

Other Functions

Legal, IT, Sales

Original Issue Date

4 Sep 2024

Revision Effective Date

4 Apr 2025

Policy Summary

This policy:

- Emphasizes that treating people with respect matters in our everyday work and is everyone's responsibility.
- Describes our support for global human rights.
- Sets forth our collective responsibility to promote safe and fair working conditions.
- Prohibits discrimination and harassment and explains our responsibilities to maintain a workplace free from discrimination and harassment.

Respect & Dignity Policy

Purpose / Scope

We treat our stakeholders – including our team members, customers, suppliers, shareholders, and the communities in which we operate – with dignity and respect. By partnering together, we aim to promote human rights and cultivate an inclusive workplace culture where everyone can thrive.

This policy outlines our commitment to treating people respectfully across all areas of our business. We prioritize human rights, provide safe and fair working conditions, practice mutually respectful behavior, and prohibit harassment and discrimination.

This policy applies to all PHINIA **Team Members** (includes employees, directors, officers, consultants, agents, apprentices, co-ops, and contract workers) and suppliers and anyone else that may act on behalf of PHINIA.

Policy and Responsibilities

Respect People

Our values of Humility, Inclusivity, and Integrity drive how we interact with one another and the world around us. We realize that the world we serve reflects a broad range of social customs and cultural traditions. We respect and embrace those similarities and differences while promoting the rights of people to always be treated with dignity.

We appreciate and cultivate a safe and inclusive culture with a deep respect for individuals in which people feel comfortable being themselves and bringing their thoughts and ideas to PHINIA. A respectful and psychologically safe workplace requires everyone's cooperation and support. We all have a responsibility to set a positive example and behave in a manner which will not offend, embarrass, or humiliate others, whether deliberate or unintentional.

Our work environments, policies, and practices provide and prioritize equal employment opportunities, prohibit unlawful discriminatory practices – including harassment – and support safe and fair working conditions. The absence of bullying, harassment, and violence in the

We believe in making a positive impact on our people, planet, and our communities; and we take our **collective responsibility** seriously.
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workplace is a fundamental right of our team members. We respect and protect fundamental human rights in compliance with all applicable laws, rules, and regulations (**Requirements**), as well as applicable internationally recognized human rights. Human rights are the basic freedoms inherent to all people, as described in the United Nations Universal Declaration for Human Rights and other standards that are referenced in the Resources section below.

At PHINIA, we:

- Look for opportunities to improve and maintain environments that support human rights consistently across our entire business.

- Assess our potential impacts on the rights of people and actively engage with stakeholders to gauge how well we promote human rights.
- Seek to prevent and detect human rights violations applicable to our business and responsibly address any such concerns.
- Respect the human rights of all people, foster an inclusive work environment, and maintain workplaces free from harassment or discrimination, including on the basis of race, color, ethnicity, religion, sex, national origin, age, disability, or any other characteristic protected by applicable law.
- Prohibit violence, intimidation, and forced eviction.
- Support, promote, and provide safe and fair working conditions throughout our business.
- Respect the privacy of our team members and business partners who trust us with their personal information by following our PHINIA policies to safeguard, collect, use, and share personal information appropriately and in compliance with our legal obligations, including our Protecting Personal Data policy.

Safe And Fair Working Conditions

A working environment based on dignity and respect is a critical component of our emphasis on human rights. We comply with all applicable Requirements pertaining to freedom of association and collective bargaining. We pay competitive wages and benefits that are consistent with applicable Requirements, including those relating to minimum wages, overtime hours, and required benefits. We prohibit human trafficking and indentured servitude, as well as child labor and forced or slave labor, and require the same of suppliers and others we work with.

At PHINIA, we:

- Manage our facilities and conduct our operations to protect the health and safety of our employees, customers, contractors, and any visitors.
- Choose to work with business partners who share our emphasis on protecting the safety, health, and working conditions of people.
- Provide reasonable accommodations for qualified people based on disabilities, religious beliefs, and pregnancy.
- Do not tolerate physical, psychological, or verbal abuse.
- Watch for signs of modern slavery, like workers who seem younger than those who should be working, are reluctant to interact with others, or look unkept, malnourished, frightened, or withdrawn.
- Speak up if we have concerns that any of our locations or business partners are engaged in inhumane and unacceptable conditions like unreasonably low pay, no days off, unsafe conditions, or substandard housing.
- Support the right to communicate openly with management regarding working conditions without fear of retaliation, intimidation, or harassment.

Workplace Inclusion

An inclusive culture fuels innovation by bringing different perspectives, experiences, and capabilities meeting the needs of our many stakeholders and drives PHINIA's success. Any behavior that weakens or challenges our inclusivity value and efforts is unacceptable.

PHINIA complies with all applicable Requirements pertaining to equal opportunity, nondiscrimination, and harassment prevention. Discrimination occurs when a person is treated unfairly or less favorably due to a specific characteristic such as race, color, ethnicity, religion, sex, national origin, age, disability, or any other characteristic protected by applicable law. Even if discrimination is unintentional, it can be illegal. Employment discrimination includes unfavorable decisions related to hiring, job assignments, career development, compensation, promotions, or discipline. An example of a law preventing discrimination based on a characteristic is the Americans with Disabilities Act (ADA) in the United States, which prohibits an employer from treating a qualified person with a disability unfairly in processes related to job applications, hiring, firing, advancement, compensation, benefits, and job training.

Not only is discrimination illegal in many places where we do business, we prohibit discrimination because the way we treat one another matters and discriminating is not what we do or expect from each other. We strive to maintain an inclusive workplace at PHINIA where everyone feels comfortable speaking up in good faith with ideas, questions, concerns, or mistakes. We take concerns seriously, investigate them, and take appropriate corrective action.

At PHINIA, we:

- Make decisions concerning employment based strictly on an individual's qualifications and ability to perform the job under consideration, the comparative qualifications and abilities of other applicants or employees, and the individual's past performance within the organization.
- Promote equal opportunity for all employees.
- Speak up if we have concerns that someone is being mistreated.

Showing Respectful Treatment

When we show respect to others and ourselves in the workplace, it creates a healthy work environment and helps productivity. And it is simply the right thing to do.

By promoting a harassment-free work environment, we show respectful behavior and expect it in return, not only from those of us who work at PHINIA, but from everyone who works with us, for us, or on our behalf.

Harassment is unwelcome conduct that is offensive and intrusive and based on a specific characteristic such as race, color, ethnicity, religion, sex, national origin, age, disability, or any other characteristic protected by applicable law. When (1) enduring the offensive conduct becomes a condition of continued employment, or (2) the conduct is severe or widespread enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive, the harassment can be considered illegal.

Harassing behaviors may be verbal, non-verbal, physical, coercive, isolating, or intrusive.

Sexual harassment refers to unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature and is prohibited by many laws. Our policy prohibits sexual harassment against all employees and applicants, regardless of sexual

orientation, gender identity, or expression. Illegal sexual harassment: (1) explicitly or implicitly affects a term or condition of an employee's employment; (2) is used as the basis for employment decisions affecting the employee; or (3) unreasonably interferes with an employee's work performance or creates an intimidating, hostile, or abusive working environment.

Bullying in the workplace is rooted in uneven power dynamics and the misuse of power. It includes offensive, intimidating, malicious, or insulting behavior that can make a person feel vulnerable, upset, humiliated, undermined, or threatened. Bullying behavior typically repeats over time. Although bullying does not necessarily target a protected characteristic, it also can cause emotional or even physical harm to people. Bullying by someone in a position of power can cause such anxiety that people gradually lose all belief in themselves and suffer direct mental health distress.

Psychological Bullying (such as Gaslighting) is a form of psychological abuse where someone tries to gain power and control over another to make them doubt themselves. The person doing the gaslighting instills self-doubt in the other person by manipulating, undermining, lying, or intentionally setting that person up to fail. Gaslighting may also involve trying to make the other person feel as though they are the problem. When the "gaslighter" is the person's manager, that is an abuse of power. Effective "managing up" and presenting as a good leader may mask verbal attacks or gaslighting when working with others.

At PHINIA, we:

- Respect each other and hold each other accountable for acting considerately and respectfully
- Avoid language or conduct which may be derogatory, humiliating, malicious, abusive, or offensive
- Think about how our words and actions will impact others
- Stay aware for signs that someone is being bullied or gaslighted – excluded from meetings, denied opportunities to present their work, not invited to events, refused opportunities for development, given negative narrative of performance in talent planning, etc.
- Refuse to participate in activities that promote or encourage conduct that may be contrary to PHINIA's commitments to inclusivity and equal opportunity or policies and procedures, including this policy.
- Promptly report concerns about inappropriate behavior or treatment and encourage others to report potential concerns
- Believe employees when they come forward to share their experiences and concerns

Responsibilities of Managers and Other Leaders

People who manage or supervise others have additional responsibilities to maintain a working environment free from harassment and bullying, as do people in leadership positions who may not have direct reports but still influence others in the organization. Supervisors and leaders must:

- Take all harassment allegations seriously.

- Provide a signal to the offender that their behavior is not appropriate and the supervisor or leader is aware of their actions.
- Intervene to stop harassment by immediately engaging with Human Resources and the Compliance Office to properly document the incident or concern, as well as to mitigate harm (also read the **Asking Questions, Reporting Concerns and No Retaliation** section below).
- Promote an atmosphere where employees feel free to report concerns and potential violations.
- Encouraging continuing education and communication regarding these topics and this policy.
- Immediately address behavior that may be contrary to PHINIA's commitments to inclusivity and equal opportunity or policies and procedures, including this policy.
- Encourage potential witnesses to cooperate fully with investigations.
- Set the example by avoiding any conduct or language contrary to PHINIA's commitments to inclusivity and equal opportunity or policies and procedures, including this policy.

Violations of this Policy

Violation of this policy by any Team Member, supplier, or person working on behalf of PHINIA may result in disciplinary action, up to and including termination of employment or other engagement. PHINIA may also pursue civil or criminal actions.

Asking Questions, Reporting Concerns and No Retaliation

Bring questions or concerns to:

- A supervisor, site lead, functional vice president
- Human Resources
- Compliance Office (complianceoffice@phinia.com)
- Legal Department
- PHINIA Compliance Hotline (where anonymous reporting is available, subject to local law), using the web form online or by phone
- **Online:** compliancehotline.PHINIA.com
- **By Phone:** There is a number for every country where we operate. Find your country's specific phone number on <http://www.convercent.com/report>.
- Audit Committee of the Board of Directors (mail directed to their attention at PHINIA Headquarters, care of the Corporate Secretary)

All concerns and questions are taken seriously, kept confidential to the greatest extent possible, and handled promptly and professionally.

PHINIA does not tolerate retaliatory behavior. A finding of retaliation may result in disciplinary action up to and including dismissal, even if the underlying report or concern was not supported.

Resources

- Speaking Up & No Retaliation Policy, ETH-LEG-046
- Protecting Personal Information Policy, ETH-LEG-053
- [Modern Slavery Statement](#)
- [United Nations Universal Declaration for Human Rights \(www.un.org/en/documents/udhr\)](http://www.un.org/en/documents/udhr)
- [United Nations Guiding Principles on Business and Human Rights](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf)
https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf
- [OECD Guidelines for Multinational Enterprises](https://mneguidelines.oecd.org/mneguidelines/)
<https://mneguidelines.oecd.org/mneguidelines/>
- [International Labour Organization \(ILO\) Declaration of Fundamental Principles and Rights at Work](https://www.ilo.org/resource/conference-paper/ilo-1998-declaration-fundamental-principles-and-rights-work-and-its-follow)
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Policy Administration

Policy Title	Respect & Dignity Policy
Policy Owner(s), Titles, & Function	Chief Compliance Officer, Ethics & Compliance Chief Human Resource Officer, Human Resources
Initial Effective Date & Review Cadence	4 Sep 2024; Annually

Revisions

Date	Version	Description	Approver
4 Sep 2024 Review due July 2025	1	Creation of Respect and Dignity Policy	PHINIA Strategy Board; subsequently Ethics & Compliance Committee
4 Apr 2025	2	Minor updates to policy text and publication on PHINIA website	Chief Compliance Officer Chief Human Resource Officer