



---

## Report on *Fighting Against Forced Labor and Child Labor in Supply Chains Act*

### Identifying Information

This report outlines Global Steering Systems' (GSS) supply chain program for the entity doing business in Canada: Global Steering Systems, LLC located in Watertown, Connecticut, USA. This is the first submission of this report and covers activities from January 1, 2023 through December 31, 2023. At this time, GSS does not have similar reporting obligations in other jurisdictions. The referenced entity is categorized as manufacturing within the automotive industry and operates within the United States.

GSS is a leading manufacturer of steering components for automotive original equipment manufacturers like Stellantis, Ford Motor Company, Jeep, Lucid Motors, RIVIAN, and General Motors, to name a few. With a decades-long track record of excellence and production capabilities in North America, Asia Pacific, and Europe, GSS designs and manufactures “must-have” products for ensuring driver safety and satisfaction the world over—now and in the years ahead. GSS is an independent, privately held company with operations in the United States, China, and Poland.

GSS offers a safe and supportive environment that encourages growth, innovation, dedication, and the pursuit of excellence. We also understand and support the importance and strength of a blended, culturally diverse workforce, where all perspectives are welcomed and all team members are respected and included. Our team members come from different backgrounds who contribute unique perspectives and talents, resulting in comprehensive solutions to satisfy global automotive demands.

### Steps Taken Through 2023

As part of the hiring process, we verify the identity and age of potential team members are screened to ensure adherence to relevant regulations and laws. As outlined in the GSS terms and conditions, our hiring and labor practices are aligned with the United States labor law, *The Fair Labor Standards Act of 1938*, as amended, and regulations and orders issued by the United States Department of Labor and there under. This Act establishes standards and employer obligations to protect employee rights, including the right to a minimum wage and overtime pay limits to working hours and prohibits the employment of minors in oppressive labor.



### **GSS structure:**

GSS is a private, limited liability company. Executive Leadership made up of the Chief Executive Officer, Chief Financial Officer and Vice President of Sales & Marketing, Vice President of Operations serves as the governing body. The topics covered in this report are also be managed by the Vice President of Purchasing and the Human Resources Manager. Functional area leadership is included in decision-making when relevant.

### **GSS activities:**

Our location in Watertown, Connecticut manufactures intermediate steering components for the automotive industry. GSS components serve the passenger car, SUV and light truck markets, and we also offer specialty steering products for the commercial truck, delivery vehicle and agricultural markets.

### **GSS Supply Chain, Policies and Due Diligence**

As a global company, the GSS supply chain network is global. GSS and its suppliers must adhere to strict customer and industry standards. Suppliers are responsible for adhering to all requirements, as outlined in the Supplier Quality Manual and Terms and Conditions. GSS does not exclude suppliers from requirements based on location, product or material – each supplier is treated in a similar manner. Relevant requirements within the manual include:

- Compliance to GSS Customer Specific Requirements – Suppliers of material and services to GSS are required to comply with all applicable end user, OEM customer specific requirements. We've recently seen a shift in customer-specific specifications in the automotive industry to begin including sustainability-related requirements. These requirements often include clauses related to prohibiting human rights violations such as forced and child labor. GSS consistently works to improve the quality system to adhere to customer-specific requirements.
- Conflict Minerals – Suppliers are required to disclose via annual reporting whether the products they supply to GSS contain “conflict minerals necessary for the functionality or production” of these products. The Conflict Minerals Reporting Template (CMRT), published by the Responsible Minerals Initiative, collects information through the supply chain regarding mineral country of origin and smelters and refineries being used. This provides a screening mechanism for forced and child labor and other human rights abuses. To date, GSS has not identified non-conforming smelters or refineries on its CMRT.
- Government Statutory and Regulatory Compliance – GSS complies with all applicable laws, government regulations and rules in the countries in which it operates. GSS suppliers shall also comply with all applicable governmental regulations in countries in which they operate. Suppliers should recognize and comply with applicable government regulations including those in the country of manufacture as well the country receiving the products and the final country of sale.
- Health, Safety and Ethics – GSS prioritizes health, safety and ethics. It is expected that suppliers will comply with the expectations listed:
  - Provide safe working conditions for all employees, customers and contractors.
  - Adhere to all applicable National, Regional, State and Local laws and regulations governing environment, health, safety and ethics.
  - Extend and communicate these expectations to suppliers.



In addition to these requirements, GSS is ISO 9001:2015/IATF 16949:2016 certified. The certification involves demonstration of:

- Adherence to customer specific requirements.
- Corrective action procedure for GSS activities and the activities of its suppliers.
- Internal audit program.

The information in this report shows the existence of strong supplier relationships and an excellent foundation. Our activities through 2023 set the stage for GSS to begin 2024 with the development and implementation of a robust supplier sustainability program that includes risk management and due diligence activities related to forced and child labor. Our 2024 report will outline these improvements.

### **Attestation**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Full name: Chris Fenton  
Title: President, Global Steering Systems  
Date: May 31, 2024

Signature:

A handwritten signature in black ink, appearing to read 'Chris Fenton', written over a light blue horizontal line.

I have the authority to bind “Global Steering Systems, LLC.”