

## Preamble

WITTE Automotive stands for powerful know-how in development and production of vehicle access systems. Our lock-, handle- and drive systems are used in hoods, doors and seats in almost every auto brand.

The companies belonging to the WITTE Automotive Group [see <https://www.witte-automotive.com/live/Corporate-Company-Structure/corporate-structure.aspx>] - hereinafter jointly referred to as "WITTE" - strive to achieve growth based on a socially responsible conduct in all spheres in which they pursue their business activities and in all countries in which they operate.

WITTE expects its suppliers to support its efforts by observing basic ethical principles and statutory provisions and by their responsible approach to the production processes within their own companies and all upstream processes. It is in this context that WITTE has developed this Supplier Code of Conduct and requires its suppliers to comply with it.

## Contents:

### **1. General Principles, Laws and Statutes / Financial Responsibility**

The supplier commits to upholding its social responsibility in all business dealings. In all its business activities and decisions, the supplier shall respect the laws in effect and any other applicable provisions in the countries where it is active.

The supplier commits to adhering to the accounting standards for financial reporting. WITTE expects the supplier to create accurate records and not to change any record entry to conceal or misrepresent the underlying transaction. If required by law or court decision, the supplier shall provide information on its current financial situation.

The supplier complies in all areas with the laws and regulations in force in all of the countries in which it operates; in particular, the supplier complies with the applicable social, tax and customs laws and regulations.

### **2. Business Integrity / Business Ethics**

**2.1.** The supplier assures not to practice or tolerate any form of corruption, extortion, embezzlement or money laundering. Unethical behaviour may not be used to unlawfully influence others in business dealings by exchanging gifts or offering or granting other benefits. The same applies to the unlawful acceptance of benefits.

**2.2.** Conflicts of Interest:

The supplier makes decisions solely on the basis of factual, business-related considerations. Personal or familial conflicts of interest which may lead to irrelevant considerations are to be avoided.

**2.3.** Grievance mechanism - Reporting Channel for unlawful behavior:

The supplier maintains appropriate reporting channels and remediation mechanisms available to all employees and third parties so that violations of applicable laws and regulations can be reported. If required, the supplier protects the anonymity of the reporting employee and adheres to the principle of non-retaliation.

## 3. Social Responsibility

- 3.1. Human Rights: The supplier respects and supports compliance with the internationally recognized human rights and ensures not to participate in human rights violations.
- 3.2. Rights of Minorities and Indigenous Peoples: Suppliers should especially be aware of and respect the rights of indigenous peoples, and vulnerable groups, including, but not limited to migrant workers, women, children and disabled people, as well as local communities in connection with the Supplier's activities and operations. WITTE expects its Suppliers to exercise human rights due diligence in order to identify, prevent, mitigate and account for negative human rights impacts of their own operations and supply chain with a focus on where they have the highest risks of doing harm to people, and appropriate to company size and circumstances.
- 3.3. Land, Forest and Water Rights and Forced Eviction: The supplier shall observe the ban on the unlawful eviction from and deprivation of land, forests, and waters when acquiring, building on, or otherwise using land, forests, and waters that serve as a person's livelihood.
- 3.4. Child Labour: Child labour as defined by the ILO conventions (International Labour Organization) as well as national provisions is prohibited and any form of exploitation of children and adolescents will not be tolerated. The supplier assures that the production and / or processing of the supplied goods is being carried out without exploitative child labour defined in the ILO conventions.
- 3.5. Modern Slavery and Forced Labour: The supplier recognizes the principle of the freedom of choice of employment. Any form of modern slavery, i.e. all classical forms of serfdom, servitude, forced or compulsory labour and human trafficking, as well as involuntary prison labour will be refrained from by the supplier. The supplier is committed to eliminate all forms of forced and compulsory labour.
- 3.6. Working Conditions: Working hours are set according to the current laws, the industry standards or the applicable ILO conventions. Overtime shall be voluntary and employees are entitled to at least one day off after six consecutive working days. Compensation and social benefits have to be granted in accordance with the basic principles of minimum wages, overtime and the statutory social security systems / social welfare systems.
- 3.7. Occupational Health and Safety: In order to avoid hazards to employees the supplier observes all applicable health and employment-related laws and other provisions. WITTE expects the supplier to have a management system for occupational health and safety in place which preferably is certified according to an internationally approved norm.
- 3.8. Discrimination: Equal opportunity and treatment, regardless of race, skin colour, sex, religion, citizenship, sexual orientation, social origin or political persuasion (as far as it is based on democratic principles and tolerance towards persons thinking differently) is assured. Employees are chosen, hired and promoted exclusively on the basis of their qualifications and abilities. The supplier is committed to working against all forms of discrimination and harassment. The supplier shall develop, implement and maintain methods and processes that are suitable for minimising the risk that its employees will be discriminated or harassed in any way due to any reason (such as physical, sexual, psychological, verbal or any other form of harassment).

**3.9. Use of Private or Public Security Forces:** The supplier shall comply with the ban on hiring or using private or public security forces to protect a business project if, due to a lack of instruction or control on the part of the company, the prohibition of torture and cruel, inhuman or degrading treatment is disregarded during the deployment of security forces, if life and limb are injured in any other way or if the freedom of association and coalition is impaired.

## **4. Environmental Responsibility**

WITTE expects the supplier to have management systems for environmental protection and energy management in place which preferably are certified according to an internationally approved norm. In this way, the supplier manages, assesses and monitors the associated impacts of its business activities and improves its corresponding performance continuously.

### **4.1. Biodiversity**

WITTE is committed to protecting biodiversity in its own operations as well as the supply chain. WITTE encourages suppliers to share this commitment and take appropriate measures to protect and preserve biodiversity.

#### **4.1.1. Land use**

The supplier shall use best endeavors to continually review and improve its environmental performance and reduce the negative environmental impact of any land use that relates to the contract.

#### **4.1.2. Deforestation**

The supplier does not contribute to or benefit from illegal conversion of natural ecosystems through its business activities and shall prevent illegal deforestation such as the conversion of natural forests into usable areas.

### **4.2. Environmental Protection and Climate Action**

In order to protect the environment and to avoid hazards to humans and the environment the supplier observes all applicable environmental-related laws and other provisions. The supplier takes a holistic approach towards its business decisions in particular with regard to avoidable negative environmental impacts.

#### **4.2.1. Decarbonization & Circular Economy**

The supplier aims to minimize the consumption of energy and resources as well as the production of waste. In this context, the supplier analyses the complete product life cycle including opportunities to increase circularity (e.g. durability, reusability, repairability, disassembly, remanufacturing or refurbishment, recycling, recirculation) and implements the identified improvement potentials whenever possible. Supported by the above measures, the supplier strives to continuously reduce its greenhouse gas emissions.

In order to track these objectives, the supplier regularly determines and assesses its corporate and products' carbon footprint. In this respect, the supplier shall exploit any potentials to reduce greenhouse gas emissions, especially using renewable energy sources and low-emission materials.

## 4.2.2. Air, Water and Soil Quality

WITTE expects the supplier to refrain from harmful changes to the soil, water and air pollution, harmful noise emissions and excess water consumption that significantly impair the natural foundations for the preservation and production of food, deny a person access to safe drinking water, impair or destroy a person's access to sanitary facilities or harm a person's health.

## 4.2.3. Management of Hazardous Substances

The supplier minimizes the use of hazardous, flammable substances and other chemicals that can be considered dangerous and ensures a safe and prescribed handling of these (responsible chemicals management). The supplier must not use any substances or materials prohibited by the legislations or regulations applicable in the European Union and in the supplier's countries (including all countries in which supplier's supplies, products or parts are marketed and used).

## 5. Compliance in Global Trade

### 5.1. Sourcing and use of prohibited and critical (but permitted) materials:

All the supplies, products or parts bought from the supplier by WITTE, whether they are standard or specifically developed by the supplier for the Group, must not contain any product, material or substance prohibited by the legislations or regulations applicable in the supplier's country, the European Union and, more generally, in all of the countries in which these supplies, products or parts are marketed and used.

Responsible raw material sourcing:

With regard to the sourcing of minerals from conflict-affected and high-risk areas please see WITTE's Responsible Minerals Sourcing Policy (see annex).

By signing this Supplier Code of Conduct, the supplier acknowledges receipt and confirms compliance with the Responsible Minerals Sourcing Policy.

### 5.2. Counterfeit Parts:

The supplier develops, implements and maintains methods and processes appropriate to its products and services to minimize the risk of introducing counterfeit parts and materials into products.

### 5.3. Export and Import Regulations:

The supplier ensures to comply with national and international import and export control laws. These comprise but are not limited to sanctions, embargos and other laws, regulations and directives controlling the transmission or shipment of goods, technology and payments.

## 6. Adherence to Antitrust Law

The supplier will conduct its business in compliance with the principles of fair competition and in accordance with all applicable antitrust laws.

## 7. Freedom of Association

The supplier acknowledges the global right of workers to form labour unions and join the labour union of their choice and agrees to ensure that union independence and pluralism are maintained.

