

# Code of conduct for suppliers (Code of Conduct)

As a leading provider of development services in the field of mobility, Bertrandt AG, all companies connected with it as per Sections 15 ff. AktG and all subsidiaries and branches (hereinafter "BERTRANDT") acknowledge their responsibility towards customers, shareholders, business partners and the entire workforce in the Group in the present code of conduct. Our company culture is based on shared values such as setting an example, trust, fairness and appreciation in our dealings with customers, employees, business partners and the world at large.

With this code of conduct for suppliers, we ensure that our principles and values, as well as international standards and laws, are in line with entrepreneurial thinking and action within the framework of service provision throughout the entire supply chain.

For this reason, compliance with this code of conduct is an essential requirement for long-term business relationships with BERTRANDT.

## Compliance with laws and standards

What we expect from all companies in our supply chain is that they comply with both national and international laws and standards – and the principles and values outlined below.

Accordingly, requirements relating to export control and economic sanctions are relevant along our entire supply chain and must be taken into account and complied with by all our suppliers and their supply chains.

## Treatment of employees

We respect and uphold fundamental human rights and the workers' rights enshrined in the national legislation in force. We expressly state our commitment to abolishing all forms of forced labour and child labour. We also expect this from our suppliers. At the same time, we expect our suppliers to respect and uphold the constitutional fundamental rights of their employees to freedom of association and collective bargaining.

We are committed to firmly opposing any form of discrimination on the basis of gender, race, age, skin colour, religion, familial status, sexual orientation, origin, physical or mental disability or any other characteristic that is subject to special protection under applicable legislation. This particularly applies to discrimination against employees. We respect the personal dignity, personal rights and private sphere of all employees. We treat each other with openness and honesty in a manner marked by respect and responsibility. We also expect this from our suppliers.

## Remuneration and working hours

Our suppliers comply with the national laws in force regarding working hours and ensure that their employees receive appropriate remuneration in accordance with the applicable state legislation (e.g. minimum wage).

## Health and occupational safety

Taking account of economic, legal and social conditions, our suppliers constantly work to limit actual and potential risks in the workplace. They support all employees in promoting their own health and acting to prevent accidents and occupational illnesses. To this end, occupational safety and health promotion are firmly fixed in the company processes of our suppliers (occupational safety management system).

## **Environmental protection**

BERTRANDT expects that all suppliers will comply with national laws and international standards regarding environmental protection. Our suppliers constantly work to minimise environmental impacts in the form of greenhouse gas emissions, water and air pollution and waste and to improve environmental protection. This also includes responsible chemicals management. We expect our suppliers to set up and use an appropriate environmental management system and to strive at all times to act sustainably in an energy and resource-efficient, environmentally conscious way. Suppliers must endeavour to minimise the effects of any activities on the environment and to establish sustainable resource management processes. While maintaining competitiveness, they must ensure that product design is set up to consider the entire life cycle of their products and services. Suppliers must fulfil all the requirements of the EU Chemical Regulation REACH (Registration, Evaluation, Authorization and regulation of Chemicals). In addition, suppliers must respect the principles of the UN Global Compact Initiative.

## **Prohibition of corruption and bribery**

We require our suppliers to prevent all forms of corruption, bribery, and the acceptance or granting of advantages in the supply chain. By ensuring a high level of transparency in our business processes, we prevent such practices from taking root. We especially demand that, in the course of collaboration, employees of our suppliers, subcontractors or their legal representatives do not promise or guarantee our employees any advantage in exchange for financial, economic or other reward.

## **Identity protection and non-retaliation**

Programmes that ensure the confidentiality, anonymity and protection of whistleblowers among suppliers and workers must be maintained, unless prohibited by law. Suppliers should have a communicative process in place allowing their employees to express concerns without fear of reprisals.

## **Honesty and transparency**

In the course of their activities, our suppliers ensure that the results of their work guarantee an undistorted result when they are later used in the intended end products of our customers. As far as technically possible, all suppliers guarantee that they will prevent any actions that enable or promote manipulative/falsifying actions or functionalities in the use of their deliveries.

## **Avoiding conflicts of interest**

BERTRANDT expects all suppliers to avoid any conflict of interest that could negatively influence an existing or pending business relationship.

## **Fair competition and intellectual property**

Our suppliers comply with national and international competition laws and do not engage in price fixing or other actions in violation of anti-cartel law. The intellectual property of third parties is to be respected and protected.

## **Security culture and data protection**

As a development partner for the automotive industry, Bertrandt takes its responsibility for developing safety-relevant vehicle systems seriously. Keeping every individual who handles products (co-)developed by us safe is therefore a matter of particular concern to us. Our suppliers ensure that they avoid placing people and society at risk and actively promote safety consciousness at all levels of their organisation.

The processing of personal data always takes place in harmony with the national and international data protection laws in force. Personal data is only processed by suppliers and their sub-contractors/own suppliers if there is a valid legal reason for doing so. Bertrandt always processes personal data provided by suppliers and their own sub-contractors/suppliers on the basis of a valid legal foundation.

## **Supply chain and subcontractors**

Compliance with the principles and requirements outlined in this code of conduct is to be required to an appropriate extent by our suppliers from their own suppliers/subcontractors/supply chain.

## **Supplier relationships and compliance with the code of conduct**

To ensure quality is maintained throughout the supply chain, BERTRANDT carries out regular supplier evaluations. Potential measures resulting from the evaluation will be individually agreed with the supplier. Our suppliers give their assurance that they will implement the agreed measures in a timely manner.

BERTRANDT will monitor compliance with the principles and requirements in this code of conduct through spot checks. To do so, BERTRANDT or a third party BERTRANDT has commissioned will agree a date with the supplier and then carry out an on-site audit. Violation of or disregard for the requirements and principles in this code of conduct by the supplier will be considered significantly detrimental to the contractual relationship. In case of doubt, the supplier grants BERTRANDT the right to obtain information regarding the facts. Proof that the code of conduct has not been observed or no suitable corrective measures have been taken by an appropriate deadline set by BERTRANDT will be considered a compelling reason for extraordinary termination.

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## Scope of validity of the code of conduct for suppliers

This code of conduct applies to Bertrandt AG, all companies connected with it as per Sections 15 ff. AktG and all their subsidiaries and branches.

## Declaration by the supplier

By signing, the supplier declares

- that they have received, read and understood the code of conduct for suppliers
- and that they recognise and will observe all the requirements, regulations and principles contained therein.

Place, date\_\_\_\_\_

\_\_\_\_\_  
Supplier (complete company name)

Stamp:

\_\_\_\_\_  
Legally binding signature for the supplier