

ASTOTEC Automotive - Supplier Code of Conduct	Issued 20/ 02/ 2024
	Version 1.4
	Page 1 of 16
	•

1 Foreword

Dear business partners,

We are pleased to present to you the Code of Conduct (hereinafter referred to as "**CoC**") of Astotec Automotive (hereinafter referred to as "**Astotec**"), which lays the foundation for our cooperation and reflects our shared commitment to ethical behavior and sustainability. As a reliable partner for our customers, we are aware of our responsibility towards our customers, employees, society and the environment. With this in mind, we want to ensure that our business relationships are based on the principles of environmental, social and governance (ESG).

Our CoC serves as a guideline for all suppliers who work with us and share our values. For Astotec, our suppliers' commitment to our values and to fulfilling their social and environmental responsibilities are essential prerequisites for any business relationship. Our CoC is therefore a set of minimum requirements that we expect our suppliers to meet. Compliance with these minimum requirements is therefore mandatory. Accordingly, our suppliers must align their business and procurement activities with these CoC and address them appropriately along their supply chains. Our CoC also ensures that our relationships are based on integrity, respect and transparency. The CoC is not a static document, but a living framework that evolves and adapts to changing requirements and expectations. We therefore expect our suppliers not only to comply with these principles, but also to integrate them into their own corporate culture, to implement in their organizational units and to develop and improve them independently as part of their own corporate culture. The cooperation of our suppliers is crucial to our success. In terms of a dynamic process, we therefore prefer suppliers who exceed these minimum requirements, develop them independently and extend these requirements and demands to their supply chain .

Our ESG principles are an integral part of our company, as we firmly believe that sustainable business practices are a decisive factor for long-term success. We are committed to protecting the environment by using resources efficiently, minimizing emissions and promoting renewable energy. We also attach great importance to the health and safety of our employees and to promoting diversity, equality and fair working conditions. Furthermore, we strive to adhere to the highest standards of ethical behavior, integrity and anti-corruption.

Our CoC forms the basis for our cooperation and provides guidance on how to deal with the above-mentioned issues.

By developing this CoC together, we can strengthen the credibility of our products and services, gain the trust of our customers and have a positive impact on society and the environment.

Our collaboration is based on partnership, dialog and the pursuit of continuous improvement and constructive exchange. We are open to feedback and suggestions



ASTOTEC Automotive - Supplier Code of Conduct	Issued 20/ 02/ 2024
	Version 1.4
	Page 2 of 16

in order to further strengthen our business relationships and achieve our sustainability goals. Together, we can shape a more sustainable future and make a positive contribution.



ASTOTEC Automotive - Supplier Code of Conduct

Issued 20/ 02/ 2024

Version 1.4

Page 3 of 16

Table of contents:

1 Fore	eword	1
2 Req	uirements for suppliers from Astotec Automotive	4
3 Res	ponsible business practices	4
3.1	Anti-corruption	
3.2	Fair competitive behavior and business practices	5
3.3	Trade restrictions, export controls and economic sanctions	5
3.4	Plagiarism	6
4 Eco	logical responsibility	6
4.1	Decarbonization	
4.1.	1 Implementation and verification CO2e-reducing r measures	7
4.2	Protection of biodiversity	
4.3	Handling hazardous substances and waste	8
5 Soc	ial responsibility	
5.1	Ban on child labor	9
5.2	Prohibition of forced labor and slavery	10
5.3	Freedom of association and the right to collective bargaining	10
5.4	Protection against discrimination	10
5.5	Women's rights	11
5.6	Diversity, equality and inclusion	11
5.7	Right to health and safety at work	
5.8	Right to appropriate remuneration	12
5.9	Rights of local communities	12
5.10	Animal welfare	12
6 Dea	aling with critical raw materials	13
7 Imp	lementation of the Supplier Code of Conduct	
7.1	Risk management:	13
7.2	Audit rights	
7.3	Whistleblowing and protection from retaliation	14
	erences	
9 Doc	cument history	16



lesued 20/02/2024

	1330eu 20/ 02/ 2024
ASTOTEC Automotive - Supplier Code of Conduct	Version 1.4
	Page 4 of 16

2 Requirements for suppliers from Astotec Automotive

The following requirements for suppliers are based, among other things, on legal requirements and our risk-based approach. As part of this, we carry out regular risk analyses for direct suppliers and, in the case of indirect suppliers, these are carried out as required.

3 Responsible business practices

Astotec is committed to responsible business conduct and intends to demonstrate this commitment to integrity, business responsibility and trustworthiness along its value chain.

Astotec therefore expects the same level of commitment from its business partners. The basic prerequisite for a business relationship with Astotec is that the business partner's business activities comply with the law at all times. By entering into a business relationship with Astotec and during the term of this business relationship, business partners are obligated to the following:

 Conduct their business in compliance with applicable laws and regulations (which requires Business Partners to be aware of such laws and regulations) and in accordance with the principles of this CoC and ensure that their employees and subcontractors are aware of and comply with applicable laws and regulations and the principles set out in this CoC. In particular, business partners are expected to exercise reasonable care in selecting their suppliers in connection with Astotec's business, to communicate the principles of this CoC (or similar principles) to their suppliers and to ensure compliance with these principles.

This CoC covers Astotec's requirements and expectations of its business partners with regard to the protection of working conditions and human rights, environmental protection and governance issues. There may be situations where the principles of this CoC differ from local law or custom in a particular country. If this is the case and local law or custom prescribes higher standards than those set out in this document, local law and custom should always apply. On the other hand, this CoC shall prevail if it prescribes a higher standard, and business partners shall exercise good faith efforts to implement and ensure compliance with the requirements of this CoC as a minimum requirement.

This CoC contains requirements based on internationally recognized principles that are strongly supported by Astotec, such as:

• Internationally proclaimed human rights conventions, in particular the International Universal Declaration of Human Rights, the eight core conventions of the International Labor Organization and Article 32 of the UN Convention on the Rights of the Child, as well as the United Nations Guiding Principles on Business and Human Rights



	lssued 20/ 02/ 2024
ASTOTEC Automotive - Supplier Code of Conduct	Version 1.4
	Page 5 of 16

• The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and the OECD Guidelines for Multinational Enterprises.

3.1 Anti-corruption

Suppliers and their contractors must conduct their business activities and transactions in compliance with applicable anti-bribery and anti-corruption laws and regulations. In line with Astotec's firm approach to bribery and corruption, Suppliers and their contractors must not tolerate or commit any act or omission that could be construed as a form of bribery or corruption.

Therefore, business partners must ensure that they do not offer or receive inappropriate benefits (gifts, favors, etc.) to improperly influence business decisions, regardless of whether they are government agencies, government officials or private individuals.

3.2 Fair competitive behavior and business practices

Astotec always strives to act as a fair and responsible market participant and expects the same from its suppliers. Therefore, suppliers must comply with applicable competition laws and regulations.

In particular, suppliers must refrain from any arrangements or agreements that would hinder competition with their competitors or their own business partners. This applies to any arrangements that influence or are likely to influence prices, terms of sale (including discounts), strategies or customer relationships, markets, market shares, customers or territories (particular care is expected when suppliers participate in tendering procedures). This also applies to the exchange of sensitive information or any other action that unlawfully restricts or could restrict competition.

If a supplier has interactions with a competitor of Astotec, it must not share Astotec's sensitive information with the competitor and vice versa, including through third parties.

Suppliers are also expected to compete fairly and ethically for all business opportunities. They must ensure that all statements, communications and representations made to Astotec are accurate and truthful.

3.3 Trade restrictions, export controls and economic sanctions

When doing business with Astotec, suppliers must observe all applicable trade sanctions and comply with all relevant export control laws and regulations. This includes compliance with embargoes, restrictions or other trade restrictions imposed by international organizations, governments or regional authorities. Trade sanctions restrict trade and financial transactions with certain countries, companies, organizations and individuals, while export controls restrict the export and re-export of certain controlled goods, software and technology without the required licenses or other approvals from the appropriate authority. We expect our suppliers to carefully check that their products, technologies or services comply with export regulations and that there is no unauthorized distribution of sensitive information or goods. Our suppliers must ensure that their business practices comply with international security standards and that they have no direct or indirect business



ASTOTEC Automotive - Supplier Code of Conduct	lssued 20/ 02/ 2024
	Version 1.4
	Page 6 of 16

relationships with persons, organizations or countries affected by economic sanctions. By complying with these regulations, we jointly contribute to global security and stability and also prevent potential legal or reputational risks.

3.4 Plagiarism

We condemn any form of plagiarism and are committed to the strict protection of intellectual property. Our suppliers are obliged to deliver original and authentic products and to ensure that their deliveries are free of unlawfully reproduced content or ideas. We expect them to comply with applicable copyright and trademark laws and to ensure that their products or services do not contain plagiarism or otherwise infringe the copyright, patent or trademark rights of third parties. We promote a culture of innovation and respect for intellectual property.

4 Ecological responsibility

Astotec attaches great importance to protecting the environment and expects its suppliers to comply with national and international environmental standards and laws. Astotec's declared aim is to protect nature's finite resources and to create awareness for the prudent and efficient use of resources. Suppliers must therefore comply with applicable national and international environmental standards and laws on the one hand, and on the other hand suppliers should take appropriate measures to avoid soil changes, water and air pollution, noise emissions and excessive water consumption in order to protect natural resources and human health.

Astotec also requires its suppliers to continuously reduce their environmental impact and to further develop and improve environmental protection measures in their area of responsibility. The business relationship between Asotec and its business partners is based on the premise of ensuring the responsible use of resources such as water, energy, raw materials and materials.

An environmental management system in accordance with ISO14001 (or equivalent) is required and must be demonstrated by presentation of a corresponding certificate.

4.1 Decarbonization

Astotec is committed to the Paris Climate Agreement (COP 21) and has set company-wide reduction targets for its Scope 1, 2 and 3 greenhouse gas emissions in order to comply with it.

The supplier undertakes to set binding reduction targets for its own production, products, services, supply chain and logistics and to take measures to reduce its direct and indirect CO2e emissions (including its upstream value chain, cradle-to-customer). We expect the supplier to create and report to Astotec transparency regarding its own emissions and those of its upstream supply chain, in particular with regard to its CO2e footprint at product level. The path of action against climate change should follow the following priorities:

- 1. Measure energy consumption and calculate carbon footprint according to international standards (preferably GHG protocol)
- 2. Reduce energy consumption (by increasing energy efficiency and reducing waste)



	Issued 20/ 02/ 2024
ASTOTEC Automotive - Supplier Code of Conduct	Version 1.4
	Page 7 of 16

- 3. Replacing fossil energy with renewable energy
 - a. Investment in renewable energy production to cover own consumption
 - b. Increase in renewable energy supply through the use of different variants of long-term power purchase agreements (PPA-power purchasing agreements) to support additional renewable energy production
 - c. Purchase of guarantees of origin for green electricity (EACs-energy attribute certificates)
- 4. Compensation for unavoidable emissions

In order to reduce CO2e emissions, the supplier must follow the principle of avoidance, reduction and only if not otherwise possible, compensation.

4.1.1 Implementation and verification CO2e-reducing r measures

The supplier must implement the agreed CO2e-reducing measures and provide evidence of this on an annual basis.

These include:

- Green electricity agreement
- CO2e evaluation form
- promised material substitutions
- Steel/aluminum certificates and CO2e process improvements, if applicable

If there are deviations in the verification or compliance with the targets, measures must be taken to reduce the emissions (e.g. improvement of the measures, compensation of the emissions). The supplier must actively participate in the development of CO2e reduction potentials.

Suppliers must inform Astotec of any product changes with CO2e or secondary raw material impacts before the start of production (SOP) and during the production phase until the end of production (EOP). Suppliers must document the CO2e-reducing measures for components during the development phase in a similar way to the initial approval of the product. Changes, especially in terms of weight or material composition, should be analyzed for their impact on CO2e-reducing measures and approved by Astotec.

Our partners are expected to actively participate in identifying CO2e reduction potential by improving value creation structures and efficiency.

At the same time, the supplier agrees to participate in demand-driven remote or on-site audits in the event of unclear verification of the agreed measures by any third-party companies to be named. In this context, the supplier also agrees to training measures for its suppliers to provide appropriate evidence. Any audits or inspections can be carried out directly by Astotec, but also by previously appointed third-party companies.

It must adapt its decarbonization measures to new industry standards as soon as they become available.



	Issued 20/ 02/ 2024
ASTOTEC Automotive - Supplier Code of Conduct	Version 1.4
	Page 8 of 16

4.2 **Protection of biodiversity**

Astotec is strongly committed to stopping the deforestation and conversion of natural ecosystems in our supply chains. As an Astotec supplier, we expect you to protect natural ecosystems and not take any actions or enter into any business relationships that result in the alteration, deforestation or degradation of forests and other natural ecosystems.

It is important to us that you apply the guidelines of the High Conservation Value Resource Network (HCV) and the High Carbon Stock Approach (HCSA) in your area of activity, where relevant.

Business partners shall take appropriate and proportionate measures to exclude raw materials derived from deep sea mining from their supply chains

4.3 Handling hazardous substances and waste

Astotec is aware that the use of hazardous materials, chemicals and substances entails risks for those affected. We accept our responsibility to prevent, minimize or eliminate these risks. For this reason, we expect our suppliers to apply procedures that not only ensure the supply of parts and components, but also take environmental, health and safety aspects into account.

The supplier must label these substances in accordance with the applicable regulations and ensure that they are handled, transported and stored safely. He must also ensure that these substances are properly reused, recycled or disposed of.

As part of the business relationship, it is essential to comply with and observe the requirements of, in particular the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants and the Basel Convention on the Transboundary Movement and Disposal of Hazardous Waste.

In addition, all relevant laws and regulations on hazardous materials, chemicals and substances that apply to the respective operating site or market must be complied with (e.g. REACH).

Upon request, the supplier is obliged to inform Astotec about the use of legally regulated substances in production and operation and to submit written process descriptions for handling these substances.

Furthermore, we expect the supplier to inform itself about future applicable legislation and to prepare for its implementation in good time.

5 Social responsibility

Social responsibility towards employees and other potentially affected persons is a key focus at Astotec. The supplier must ensure that no human rights violations are committed and that there is no involvement in such violations. Astotec also strictly rejects the threat and defamation of persons who stand up for the protection of human rights at the supplier (human rights defenders) and address human rights violations. Astotec expects the supplier to ensure the protection of these persons if necessary.

Astotec therefore expects the supplier to align its actions with the principles and rights in accordance with the guidelines of the UN "Global Compact" initiative and the "ILO



	Issued 20/ 02/ 2024
ASTOTEC Automotive - Supplier Code of Conduct	Version 1.4
	Page 9 of 16

Declaration on Fundamental Principles and Rights at Work and its Follow-up". The supplier should implement the "Guiding Principles on Business and Human Rights" of the United Nations when aligning its due diligence processes. This also includes the prohibition of actions or omissions in breach of duty that would impair a protected legal position in a particularly serious manner and whose unlawfulness is obvious.

The following minimum requirements must be met by the supplier:

- Establishment of a competent body for social sustainability
- Establishment of a competent body to monitor risk management in the area of sustainability
- Creation of a policy on working conditions and human rights that includes at least the following topics:
 - Ban on child labor
 - Young employees
 - Wages and social benefits
 - Working hours
 - Ban on modern slavery
 - Freedom of association and collective bargaining
 - Non-discrimination and harassment
 - o Women's rights
 - Diversity, equality and inclusion
 - Land, forest and water rights and eviction
- training its employees on this policy.

5.1 Ban on child labor

Astotec condemns all forms of child labor. The supplier has the responsibility to ensure that child labor is prevented both in its own business area and at its suppliers. Astotec requires the supplier to fulfill and comply with the following requirements:

- There is a strict ban on the worst forms of child labor in accordance with the provisions of the International Labor Organization (ILO 182).
- The minimum age for taking up employment corresponds to the statutory provisions at the supplier's location and is at least 15 years in accordance with ILO 138.
- Persons under the age of 18 are considered minors and require special protection in accordance with ILO 182. They may not perform work which, by its nature or the circumstances in which it is performed, would jeopardize their safety, health or moral integrity. This includes, for example, overtime or night shifts in accordance with ILO 138.

We strongly encourage our suppliers to actively support the abolition of child labor in their own sphere of influence. This can be done through cooperation, for example within the framework of initiatives, as well as through collaboration with non-governmental organizations.



	Issued 20/ 02/ 2024
ASTOTEC Automotive - Supplier Code of Conduct	Version 1.4
	Page 10 of 16

5.2 **Prohibition of forced labor and slavery**

Astotec strictly rejects any form of forced or compulsory labor and has a "0-tolerance policy" for cooperation with suppliers and other business partners. The supplier must ensure that neither forced labor nor other forms of modern slavery (in the sense of servitude and work performed under duress) or human trafficking are tolerated in any way. Specifically, these are:

- Work or services that are required of a person under threat of punishment and for which he or she has not volunteered in accordance with ILO 29.
- All forms of slavery, slavery-like practices (e.g. demanding excessive fees or withholding documents), servitude or other forms of domination or oppression (e.g. debt bondage and the use of violence) in the workplace, including extreme economic or sexual exploitation or humiliation.

We strongly encourage our suppliers to work towards the elimination of modern slavery and forced labor within their own sphere of influence. This can be done through supplementary measures in accordance with ILO Recommendation 203, cooperation (e.g. as part of initiatives) and collaboration with non-governmental organizations.

5.3 Freedom of association and the right to collective bargaining

Astotec respects the right of employees to form trade unions and to conduct collective bargaining to regulate working conditions. It is the supplier's duty to ensure that the right of employees to form unions in their workplace is upheld and respected. The formation, joining and membership of trade unions must not be used as a reason for unjustified discrimination or retaliation. Trade unions must be able to operate freely and in accordance with applicable labor law in the place of employment, including the right to strike and collective bargaining.

The supplier shall ensure that security forces are not used to interfere with or thwart freedom of association in any way. We encourage our suppliers to promote a constructive and transparent dialog between employees, their representatives and management in order to prevent internal conflicts and to continuously improve working conditions and work processes.

5.4 **Protection against discrimination**

Astotec is committed to equal treatment and rejects all forms of discrimination. Any direct or indirect discrimination based on national or ethnic origin, social descent, health status, disability, sexual orientation, age, gender, political opinion (including trade union membership), religion or belief (in accordance with ILO 111) must be excluded. This includes, in particular, the payment of different wages for work of equal value. Protection against discrimination must be interpreted broadly.



Page 11 of 16

5.5 Women's rights

Future powered

by excellence.

We attach great importance to the protection and promotion of women's rights and define equal opportunities as the central core of our corporate philosophy. These values must therefore be adopted in our supply chain and ensured by our suppliers. Our suppliers are obliged to guarantee equal opportunities by preventing discrimination on the basis of gender in any form and ensuring equal employment opportunities for women. This also includes non-discriminatory access to employment positions, vocational training positions, nondiscriminatory career advancement and the prohibition of any discrimination based on gender in other working conditions. We support the compatibility of work and family life and actively promote women in management positions. Through these measures, we strive for a fair and inclusive working environment in which women can fully exercise their rights.

5.6 Diversity, equality and inclusion

We are actively committed to diversity, equality and inclusion in our supply chain. Our suppliers must ensure that all employees are treated fairly and not discriminated against regardless of gender, race, ethnicity, religion, sexual orientation, disability, age (or other protected characteristics). Both direct and indirect discrimination, bullying, harassment and unfair unequal treatment of any kind are strictly prohibited. We promote an inclusive work environment where diverse perspectives are valued, protected and encouraged and everyone has an equal opportunity to fulfill their potential.

5.7 Right to health and safety at work

The protection and promotion of the health of employees is a top priority for Astotec. The supplier is obliged to comply with all applicable national and international standards and laws on occupational health and safety (in particular occupational safety, health protection and working hours) at the site. At Astotec's request, the supplier must:

- Introduce and operate an effective, certified occupational health and safety management system in accordance with ISO 45001 (or a comparable standard) and provide evidence of this by submitting a corresponding certificate.
- Submit an occupational health and safety guideline.

The supplier must organize working hours (overtime and maximum working hours, rest periods, work schedules, maternity/parental leave, sick leave, leave for family reasons, paid overtime) in such a way that accidents at work due to physical and mental fatigue are avoided and the health of employees is maintained (in accordance with ILO 1, ILO 14). This principle also applies to temporary work, the secondment of employees and outsourced work.

The Supplier must comply with the prohibition of harassment, abuse and punishment with any form of violence in the workplace. In particular, the Supplier must not use private or public security forces to protect a company project if this would violate the prohibition of torture and cruel, inhuman or degrading treatment due to lack of training or control by the company or otherwise endanger physical integrity and life.



ASTOTEC Automotive - Supplier Code of Conduct	lssued 20/ 02/ 2024
	Version 1.4
	Page 12 of 16
	•

Astotec encourages suppliers to allow employees to represent their interests in the organization of working hours or at least to take the needs of employees appropriately into account in the organization of working hours.

5.8 Right to appropriate remuneration

Astotec attaches great importance to competitive, fair and appropriate remuneration. The supplier is therefore obliged to ensure appropriate remuneration and to comply with all applicable statutory labor regulations, such as with regard to working hours, remuneration and social benefits. Specifically, this means

- The wage must at least comply with the locally applicable minimum wage regulations and in any case guarantee a living wage.
- Wages must be paid transparently in accordance with ILO 95 and at a fixed time. Unjustified deductions from wages and the withholding of wages as a disciplinary measure are prohibited.
- Overtime may not exceed the statutory limits.
- Employees have the right to claim the social benefits to which they are entitled under applicable law (e.g. sick leave). If statutory social insurance exists, the corresponding contributions must be paid.

5.9 Rights of local communities

Astotec respects and upholds applicable local, national, international and traditional rights relating to land, water and resources. In particular, the rights of indigenous peoples and local communities shall be respected, promoted and protected along the entire supply chain in accordance with the "United Nations Declaration on the Rights of Indigenous Peoples".

The supplier is obliged not to participate in land grabbing. In addition, the supplier must comply with the prohibition of unlawful forced eviction from land, forests and waters when acquiring, cultivating or otherwise using such land, forests or waters that serve as a livelihood for people. Instead, the supplier must obtain Free, Prior and Informed Consent (FPIC) from existing land users and ensure adequate compensation if granted land use.

5.10 Animal welfare

At Astotec, we attach great importance to ensuring that our business activities also take animal welfare into account. We expect affected suppliers who process animal products to implement standards and best practices along the entire supply chain to ensure animal welfare. Furthermore, we prefer our suppliers to use alternative, animal-free methods, unless this is required by law. In any case, the supplier must comply with national and international regulations on animal welfare and animal testing.

In addition to these requirements, Astotec is committed to ethical principles and expects its suppliers to support and implement them along the entire supply chain. These include the 3Rs principle for animal testing (reduction, refinement, replacement), the Five Freedoms of the Farm Animal Welfare Committee (FAWC) for assessing the welfare of farm animals and



ASTOTEC Automotive - Supplier Code of Conduct	lssued 20/ 02/ 2024
	Version 1.4
	Page 13 of 16

the principles of the World Organization for Animal Health (OIE) on animal welfare in the Terrestrial Animal Health Code.

6 Dealing with critical raw materials

Astotec strives to use only raw materials whose extraction, production, transportation, trade, processing and export do not contribute directly or indirectly to human rights violations, health and safety problems, environmental pollution or compliance violations. This is one of Astotec's core strategic objectives and its business partners and suppliers are expected to have a corresponding strategic focus.

The supplier is therefore obliged to introduce special due diligence processes in accordance with the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" for raw materials such as tin, tungsten, tantalum and gold (also known as 3TG) from conflict-affected and high-risk areas such as the Democratic Republic of Congo (DRC). We also expect the supplier to exclude smelters and refineries that process these raw materials without appropriate and verified due diligence processes. In addition, we require the supplier to provide us with information on its supply chain for critical raw materials and process materials in accordance with Drive Sustainability's Material Change Report, including information on the origin of the materials, such as through the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Initiative (RMI).

In addition to the 3TG, we also focus on other raw materials and process materials for which environmental and human rights risks have been identified during extraction and processing, such as aluminum, leather, nickel, chromium, lithium, platinum group metals, graphite, manganese, rare earths, cobalt, mica, steel/iron, copper, natural rubber and zinc.

Astotec also expects suppliers who use critical raw materials or process materials for the manufacture of its products, such as components, to implement special due diligence processes and measures to identify, prevent, minimize or eliminate these risks. The supplier should procure raw materials from verified sources. We recommend the use of independent third-party certification, such as the Responsible Mining Standard of the Initiative for Responsible Mining Assurance (IRMA).

7 Implementation of the Supplier Code of Conduct

7.1 Risk management:

Suppliers are expected to implement an appropriate and effective management system for corporate due diligence for people and the environment in their organization and with their direct suppliers. This includes, for example, contractual agreements, a supplier guideline for sustainable procurement and audits.

The supplier must pass on sustainability requirements to its suppliers in accordance with this CoC, covering at least the following topics:

Prohibition of child labor; young workers; wages and benefits; working time; prohibition of modern slavery; freedom of association and collective bargaining; non-discrimination and



ASTOTEC Automotive - Supplier Code of Conduct	lssued 20/ 02/ 2024
	Version 1.4
	Page 14 of 16

harassment; women's rights; diversity, equality and inclusion; rights of minorities and indigenous peoples; land, forest and water rights and forced eviction; occupational health and safety; anti-corruption and anti-money laundering; data protection and data security; financial responsibility; information disclosure; Fair competition and antitrust; Conflicts of interest; Counterfeiting; Product compliance and safety; Intellectual property; Export controls and economic sanctions; Whistleblowing and protection from retaliation; Greenhouse gas reporting; Energy efficiency; Renewable energy; Water quality, consumption and management; Air quality; Responsible chemicals management; Sustainable resource management; Waste prevention; Biodiversity, land use and deforestation; Soil quality.

The supplier is obliged to communicate these requirements accordingly both within his company and to his business partners and direct suppliers.

If the Supplier becomes aware of any breach of the requirements of this CoC in its own business or in its supply chain, it must take appropriate remedial action immediately. The Supplier shall inform Astotec immediately in the event of confirmed violations in its own business area or in the event of such violations in its supply chain.

7.2 Audit rights

Astotec requires the Supplier and its subcontractors to cooperate to ensure traceability and maximum transparency in relevant high-risk supply chains, where applicable, back to the source of origin. Upon request, the Supplier shall provide Astotec with complete and truthful answers to questions regarding compliance with its obligations under this CoC, including measures, possible violations and complaints. The supplier must also provide relevant documentation upon request and name contact persons for queries.

We use standardized self-assessment questionnaires and audits by external third parties in accordance with the audit programs of the Responsible Business Alliance (RBA) and the Responsible Supply Chain Initiative (RSCI) to verify supplier compliance with the standards set out in this document. In addition, on-site audits can be carried out by supplier management and/or Astotec's sustainability experts. The self-disclosure questionnaires and audits cover further content that goes beyond that specified in this Supplier Code of Conduct.

The supplier must do its best to cooperate in answering the self-disclosure questionnaire and the audits. Astotec may request further suitable certificates from the supplier in order to obtain proof of compliance. In the event of substantial knowledge (event-related), we reserve the right to carry out risk analyses along the supplier's entire supply chain. This can be done, for example, through audits by independent third parties or Astotec assessors.

7.3 Whistleblowing and protection from retaliation

We encourage our suppliers to create an open and transparent environment in which whistleblowing is encouraged. Employees and external parties should be able to safely and confidentially report violations of laws, regulations or ethical standards without fear of



	lssued 20/ 02/ 2024
ASTOTEC Automotive - Supplier Code of Conduct	Version 1.4
	Page 15 of 16

retaliation. We are committed to treating such reports seriously and impartially and to ensuring appropriate safeguards for whistleblowers.

To this end, we have established an objective reporting office at Group level, which can be reached at the following address:

https://app.whistle-report.com/report/5f398988-0b90-4d3c-8883-ce28a881cb6c

Reports can be made either anonymously or by disclosing the identity of the person making the report. In both cases, the confidentiality of digital communication is guaranteed by technical security measures. We do not tolerate any form of retaliation against people who responsibly expose wrongdoing.

8 References

•

- Animal Welfare Committee (AWC)
 - https://www.gov.uk/government/groups/animal-welfare-committee-awc
 - CDP Supply Chain Program
 - https://www.cdp.net/en/supply-chain
- Eco-Management and Audit Scheme (EMAS)
 - https://ec.europa.eu/environment/emas/
- ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up adopted by the International Labor Conference at its 86th Session, Geneva, June 18, 1998 (ILO Core Labor Standards)
 - https://www.ilo.org/wcmsp5/groups/public/---europe/---ro-geneva/---iloberlin/documents/normativeinstrument/wcms 193727.pdf
- United Nations Declaration on the Rights of Indigenous Peoples
 - https://www.un.org/Depts/german/gv-61/band3/ar61295.pdf
- EU Directive 2010/63
 - https://eur-lex.europa.eu/legal-content/DE/ALL/?uri=CELEX%3A32010L0063
- High Carbon Stock Approach (HCSA)
 - http://highcarbonstock.org/
- High Conservation Value Resource Network (HCV)
 - https://hcvnetwork.org/
- Initiative for Responsible Mining Assurance (IRMA)
 - https://responsiblemining.net/
- ISO 14001
 - www.iso.org
- ISO 45001
 - www.iso.org
- Material Change Report
 - https://drivesustainability.org/wp-content/uploads/2018/07/Material-Change_VF.pdf
 - OECD Due Diligence Guidance for Responsible Business Conduct
 - https://www.oecd.org/investment/due-diligence-guidance-for-responsible-businessconduct.htm
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas



	lssued 20/ 02/ 2024
ASTOTEC Automotive - Supplier Code of Conduct	Version 1.4
	Page 16 of 16

- https://www.oecd.org/corporate/mne/mining.htm
- OECD Guidelines for Multinational Enterprises
 - https://www.oecd.org/berlin/publikationen/oecd-leitsaetze-fuer-multinationaleunternehmen.htm
- OIE Terrestrial Animal Health Code
 - https://www.woah.org/en/what-we-do/standards/codes-and-manuals/terrestrialcode-online-access/
- Paris Climate Agreement (COP 21)
 - https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement
- Responsible Minerals Assurance Process (RMAP)
 - http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/
- Responsible Minerals Initiative
 - http://www.responsiblemineralsinitiative.org/
- Self-assessment questionnaire on the topic of corporate social responsibility (CSR) / Sustainability for suppliers in the automotive industry
 - https://www.drivesustainability.org/compliance/
- UN Declaration on Human Rights
 - https://www.ohchr.org/en/human-rights/universal-declaration/translations/germandeutsch?LangID=ger
- UN Global Compact
 - https://unglobalcompact.org/
- UN Guiding Principles on Business and Human Rights
 - https://www.globalcompact.de/migrated_files/wAssets/docs/Menschenrechte/Publik ationen/leitprinzipien_fuer_wirtschaft_und_menschenrechte.pdf
- UN-REDD Program
 - https://www.un-redd.org/
- Regulation (EC) No 1907/2006 of the European Parliament and of the Council of December 18, 2006 on registration, evaluation, authorization and restriction chemical substances (REACH)
 - https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX%3A32006R1907

9 Document history

Version 1.0	02.06.2023
Version 1.1	14.06.2023
Version 1.2	20.11.2023
Version 1.3	07.12.2023
Version 1.4	20.02.2024