

Huf Group



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Code of Conduct

Code of Conduct for Suppliers

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... the **intelligent**
touch to cars.

Code of Conduct – Synopsis



I. Preamble:

The Huf Group (hereinafter “Huf”) produce mechanical and electronic locking systems for the automotive industry worldwide. We expect our suppliers and service providers (hereinafter “business partners”) to strictly comply with the principles laid down in this Code of Conduct.

- 1. Compliance with laws, recognised standards and guidelines:** The business partner shall comply with the applicable national laws and support the relevant internationally recognised standards, guidelines and principles.
- 2. Prevention of corruption:** The business partner shall respect the applicable laws which have been implemented in order to combat corruption.
- 3. Antitrust and competition laws:** Huf expect their business partners to comply with all applicable national and international antitrust laws, as well as laws against unfair competition.

4. **Product responsibility and quality:** On delivery, all products and services must comply with the quality and safety requirements as contractually agreed upon.
5. **Safety and health at work:** The business partner shall ensure a safe, healthy and hygienic working environment and take the necessary measures in order to prevent accidents and serious health problems.
6. **Working hours:** Working hours shall be in accordance with the relevant ILO conventions, or at least comply with the applicable national laws, rules and regulations.
7. **Remuneration and employee services:** The business partner shall guarantee that the remuneration paid to its employees equals at least the statutory minimum wage or that of the industry.

8. **Freedom of association and the right to collective bargaining:** The business partner shall respect the fundamental rights regarding freedom of association and the right to collective bargaining in accordance with the national laws and ensure that these rights are not impaired.
9. **Handling of child labour:** Any form of exploitation of children and adolescents will not be tolerated. Child labour is prohibited.
10. **Handling of forced labour:** Any form of forced or compulsory labour, as well as any involuntary prison labour that violates human rights, is prohibited.
11. **Handling of human trafficking:** All forms of illegal human trafficking are prohibited.
12. **Disciplinary measures:** All employees shall be treated with respect and dignity. Sanctions, fines, and any other form of punishment or disciplinary measures may only be imposed in accordance with valid national and international standards as well as internationally recognised human rights.

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- 13. Equal opportunities:** Discrimination of any kind must be avoided.
- 14. In-company information:** Huf recommend that their business partners inform their employees on a regular basis and in a transparent manner on significant events affecting them.
- 15. Environmental and climate protection:** Huf expect their business partners to protect the environment in line with valid international standards and legal provisions.
- 16. Conflict-free sourcing policy:** Our business partner shall have a conflict-free sourcing policy in place and shall have established systems in order to exercise due diligence on the source and chain of custody.
- 17. Information security and data protection:** Information as a particularly important asset of Huf shall be handled with appropriate care. Current valid laws regarding the protection of personal data of employees, customers, suppliers and other concerned persons have to be observed.

Code of Conduct – Synopsis

- i. Implementation:** Huf expect their business partners to adhere to the above-mentioned principles.
- ii. Information and communication:** Huf urge their business partners to make the rules of this Code of Conduct available to the relevant employees.
- iii. Monitoring:** Huf reserve the right to verify compliance with the above-mentioned requirements, either by themselves or by an independent third party.
- iv. Sanctions and remedial actions:** Any major failure to comply with the obligations set out in this Code of Conduct shall be regarded as a breach of contract by the business partner.
- v. Handling of questions and reports:** For any queries, in case of doubt or to report a reasonable suspicion of a violation please use the following e-mail address:
corporate-responsibility@huf-group.com.

Code of Conduct – Preamble



I. Preamble

The Huf Group (hereinafter “Huf”) produce mechanical and electronic locking systems for the automotive industry worldwide. Our mission statement illustrates our claim to strengthen our position of market leader in technology in this market segment.

We place high demands on ourselves to work in a manner that ensures social, economic and ecological sustainability in line with our corporate mission statement and our principles regarding customer satisfaction, profitability and environmental protection. Furthermore, we perceive sustainability as a responsible approach to shaping the future.

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By demonstrating fair behaviour, Huf's business partners play a crucial role in the success of the company; it is this attitude that forms the basis for joint innovation and creation of long-term values. Our top priority is close cooperation with our suppliers and service providers, based on mutual trust.

Code of Conduct

Therefore, we expect our business partners to accept responsibility and comply with the standards defined in this Code of Conduct when doing business with Huf Hülsbeck & Fürst GmbH & Co. KG in Velbert (Germany) and our associated companies ("Huf Group").

This Code shall apply to all suppliers and service companies (hereinafter "business partners") that have a direct business relationship with Huf.



Code of Conduct for Suppliers

1. Compliance with laws, recognised standards and guidelines

The business partner shall comply with the applicable national laws and support the relevant internationally recognised standards, guidelines and principles, in particular the principles of the UN Global Compact, the Universal Declaration of Human Rights, the conventions of the United Nations (UN) as well as the Core Labour Standards of the International Labour Organisation (ILO).

If applicable, the business partner shall comply with the terms of the Outline Agreement and follow the guidelines of the Huf Group, in particular with regard to the policies on quality, energy, the environment and safety. Compliance with this Code of Conduct, as well as with the above-mentioned standards, must not be circumvented by means of subsidiary agreements such as contracts or similar measures.

2. Prevention of corruption

A maximum of integrity shall be preserved in all business activities and relationships.

The business partner declares that he opposes corruption and bribery and takes responsibility for the respect

of international and national anti-corruption and anti-bribery laws.

The business partner declares that he will not offer, promise or grant any Huf employee undue advantages to influence his or her decisions.

3. Antitrust and competition laws

The business partner shall comply with all applicable national and international antitrust laws as well as laws against unfair competition. Prices and terms & conditions shall not be fixed with competitors, nor shall the business partner conclude any other agreement which restricts competition, in particular any restrictive agreement aiming at market or customer allocation.

4. Product responsibility and quality

On delivery, all products and services must comply with the quality and safety requirements as contractually agreed upon. All products and services must be safe for the intended use.

To assure health and safety for the automotive end customers, the relevant national and international regulations of product responsibility (e.g. product liability, take-back obligations, product markings,

warranty determinations) are to be considered by the supplier and to be confirmed by Huf.

5. Safety and health at work

Huf are determined to prevent occupational accidents and diseases through the use of the best available technology. This is in the best interest of the employees' well-being and satisfaction, thus contributing essentially to the success of the company.

We expect our business partners to ensure a safe, healthy and hygienic working environment and to take the necessary measures in order to prevent accidents and serious health problems that may result from work. In doing so the business partner shall ensure that occupational safety standards are heeded. The business partner shall apply appropriate measures and systems in order to identify and prevent potential health risks due to accidents, injuries and other work-related illnesses of its employees. If possible, the business partner shall use the best technologies available.

6. Working hours

Working hours must be in accordance with the relevant ILO conventions or at least comply with the applicable national laws, rules and regulations.

7. Remuneration and employee services

The business partner shall guarantee that the remuneration paid to its employees, including social benefit, corresponds to at least the statutory minimum wage or that of the industry.

8. Freedom of association and the right to collective bargaining

The business partner shall respect the fundamental rights regarding freedom of association and the right to collective bargaining in accordance with the national laws and ensure that these rights are not impaired.

In case national standards limit freedom of association and the right to collective bargaining, the business partner shall work towards enabling and allowing the free and independent association of employees for the purpose of conducting negotiations.

9. Handling of child labour

Any form of exploitation of children and adolescents will not be tolerated. Child labour as defined by the ILO conventions and national provisions is prohibited. The minimum age for employment is at least equal or

even higher than the compulsory school age and is in no case below 15 years of age (or 14 years if national law provides for this in accordance with ILO Convention 138).

Adolescents may not be put at risk by working in hazardous, unhealthy and unsafe workplaces and conditions.

10. Handling of forced labour

The business partner shall refrain from any form of forced or compulsory labour as well as involuntary prison labour that violates human rights.

11. Handling of human trafficking

All forms of illegal human trafficking are prohibited. Human trafficking is illegal, when the recruitment, transportation, transfer, detainment or receipt of persons comes off by improper means (e.g. force, deception, abduction).

12. Disciplinary measures

Huf encourage their business partners to treat all employees with respect and dignity. Sanctions, fines, and any other form of punishment or disciplinary mea-

asures may only be imposed in accordance with valid national and international standards as well as internationally recognised human rights. Arbitrary sanctions, fines, and other forms of punishment or disciplinary measures shall not be imposed.

The business partner shall ensure that employees are not exposed to verbal, psychological, sexual and/or physical violence, coercion or harassment.

13. Equal opportunities

The business partner shall not engage in any kind of discrimination due to:

- ethnic, national or social background
- race
- colour of the skin
- gender
- age
- religion and belief
- political activity
- membership in a trade union
- disability
- sexual orientation

or other personal characteristics. The corresponding legal provisions apply.

14. In-company information

Huf are committed to inform their staff in an open dialogue on current events and forward-looking planning on a regular basis. This approach enhances the participation and satisfaction of employees and contributes to the success of the company.

Huf recommend that their business partners inform their own employees in a transparent manner and on a regular basis on significant events affecting them.

15. Environmental and climate protection

Huf design their processes in an environmentally conscious manner according to the precautionary principle and commit themselves to comply with the valid laws and the minimum rules on environmental and climate protection. Our integrated energy and environment policy shows the claim of the Huf Group to work in an environmentally friendly manner and to even exceed legal provisions.

Huf expect their business partners to commit themselves to environmental and climate protection with regard to valid international standards and legal provisions and to minimise environmental pollution due to

processes and products, i.e.

- to efficiently use resources such as energy, water, raw materials and consumables
- to use environmentally friendly materials whenever possible
- to avoid, minimise or recover emissions and waste
- to make supply chain processes environmentally friendly
- and to generally work toward the development and dissemination of environmentally friendly technologies

The business partner shall adopt appropriate and traceable measures and carry on systems (based on ISO 14001, ISO 50001 or similar systems) with the aim of steadily improving environmental and climate protection.

The business partner shall motivate, inform and train its employees with regard to environmental protection according to their respective duties in the company. In addition, Huf's General Purchase Conditions as well as the Corporate Supplier Manual shall apply with regard to environmental requirements for products and services.

16. Conflict-free sourcing policy

Since years many parts of the world are affected by violent conflicts, e.g. the African Great lakes region (DRC and adjoining countries). Armed groups benefit from the so called Conflict Minerals (as defined in different international laws such as DFA section 1502 in the United States) in these conflict-affected and high-risk areas by acts of human rights abuse.

Our business partner shall have a system installed in order to identify and manage any risks that products, parts, components and/or materials that they manufacture for or supply to the Huf Group could directly or indirectly finance or benefit violent conflicts.

For this purpose our business partner shall have a conflict-free sourcing policy in place.

Based on this conflict free sourcing policy reliable systems shall be established in order to exercise due diligence on the source and chain of custody of Conflict Minerals. These due diligence measures shall be made promptly available to Huf upon request by using a standard reporting instrument such as the Conflict Minerals Reporting Template of the Conflict-Free Sourcing Initiative (CFSI).

We believe that transparency and the disclosure of information about Conflict Minerals is the best way to

support a responsible sourcing and to avoid stigmatizing whole regions which would finally deteriorate the situation of the local population.

17. Information security and data protection

Information, whether physical or digital, represent a particularly important asset of Huf. Therefore, we protect especially sensitive information of our company group to ensure integrity, availability and confidentiality. For this purpose we are certified amongst others according to ISO 27001.

Our business partner respect the know-how, the patents, the trade and business secrets of Huf as well as all other information made available by us. They shall not pass them without our prior permission or in any other illegal way to third parties.

Furthermore our business partner as well as Huf respect all valid laws regarding the protection of personal data of employees, customers, suppliers and other concerned persons.

i. Implementation

Huf expect their business partners to adhere to the above-mentioned principles.

Huf recommend that their business partners make continuous improvements possible by implementing an appropriate system (definition and documenting of responsibilities, procedures, objectives and measures).

Huf expect their business partners to steadily work towards the dissemination of these standards throughout the supply chain.

ii. Information and communication

This Code of Conduct is available on the Internet at <http://partner.huf-group.com>, including a printable version; the business partner shall give its relevant employees access to it.

iii. Monitoring

Huf reserve the right to verify compliance with the above-mentioned requirements, either by themselves or by an independent third party.

iv. Sanctions and remedial actions

Any major failure to comply with the obligations set out in this Code of Conduct shall be regarded by Huf as a breach of contract by the business partner.

If feasible, we shall provide the business partner an opportunity to carry out remedial action.

v. Handling of questions and reports

For any queries, in case of doubt or to report a reasonable suspicion of a violation please use the following e-mail address:

corporate-responsibility@huf-group.com.

For the purpose of validation and concretion of suspicions, and thereby no disadvantages could be the consequence for the whistleblower, Huf will request the disclosure of the identity in single cases.



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