



Code of Conduct

For Suppliers



I. Preamble

The Huf Group (hereafter "Huf") develops and produces mechanical and electronic locking systems as well as vehicle access and authorization systems for the global automotive industry. As a family-owned company, Huf aims to operate in a socially, economically and ecologically balanced and sustainable manner.

By demonstrating fair behavior, the business partners of Huf 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.

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.

A handwritten signature in black ink, appearing to read "Tom Graf".

Tom Graf
CEO



Supplier Code of Conduct

1. Compliance with laws, recognized standards and guidelines

The business partner shall comply with the applicable national laws and support the relevant internationally recognized 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.

Business documents, records or reports, such as annual reports, financial statements, audit reports and all other business documents must be accurate, complete and truthful.

2. Prevention of corruption, conflict of interest

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.

Huf does not tolerate any conflicts of interest, e.g., in the form of personal benefits from positions or activities, and expects the same from its business partners. Suspicious cases in connection with business activities can be reported to the central e-mail address set up for this purpose: corporate-responsibility@huf-group.com

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. Export control

Applicable trade regulations or restrictions must always be complied with. This applies in particular to anti-terrorism regulations, compliance with embargoes, and prohibitions and licensing requirements in connection with the movement of goods, the use of technologies, and the procurement of services.

5. 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.

6. Safety and health at work

Huf is 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.

7. 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.

8. 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.



9. 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.

10. Handling of child labor

Any form of exploitation of children and adolescents will not be tolerated. Child labor 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.

11. Handling of forced labour

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

12. Handling of human trafficking

Any form of human trafficking will not be tolerated.

13. Disciplinary measures

Huf encourages the business partners to treat all employees 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. 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.



14. Equal opportunities

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

- ▶ ethnic affiliation
- ▶ national or social origin
- ▶ color of skin
- ▶ gender
- ▶ age
- ▶ religion and ideology
- ▶ political activity
- ▶ membership in a trade union
- ▶ disabilities
- ▶ sexual orientation

or other personal characteristics. The corresponding legal provisions apply.

15. Environmental and climate protection

Huf designs processes in an environmentally conscious manner according to the precautionary principle and commits to comply with the valid laws and the basic 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 expects the business partners to commit themselves to environmental and climate protection with regard to valid international standards and legal provisions and to minimize 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, minimize 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.
- ▶ chemicals and other materials that pose a risk to the environment must be handled responsibly and safely during processing, storage, transport or disposal.

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, the General Purchase Conditions as well as the Corporate Supplier Manual of Huf 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. 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 (CMRT) of the Conflict-Free Sourcing Initiative (CFSI).

17. Information security and data protection, copyright

Information, whether physical or digital, represent a particularly important asset of Huf. Therefore, we protect especially sensitive information of our company to ensure integrity, availability and confidentiality. For this purpose, Huf is audited according to standards recognized in the automotive industry

Our business partners 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 and are compliant with the requirements of the General Data Protection Regulation (GDPR). Rights of third parties must be protected.



Final provisions

18. Implementation

Huf expects the business partners to adhere to the above-mentioned principles.

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

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

19. 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.

20. Monitoring

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

21. 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.

22. 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.