

# CODE OF CONDUCT FOR SUPPLIERS

VERSION 04/2023



HIRSCHMANN  
AUTOMOTIVE

# Content

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# 1

## General Principles and Scope

The Hirschmann Automotive Group (hereinafter referred to as “Hirschmann Automotive”), which is a technology group with a high degree of materials expertise, procures raw materials, goods, and services from suppliers worldwide in order to ensure the sustainable success of its customers with innovative product and service solutions. The basis for this is ensuring responsible and sustainable corporate governance. Hirschmann Automotive takes a holistic view of sustainability, which comprises three equally important dimensions: social, environmental, and economic aspects. For our stakeholders and subsequently for our long-term success, it is essential that these three areas are in harmony with each other along the entire value chain and that they are continuously improved.

In addition to process-related, economic, and technical criteria, Hirschmann Automotive also focuses on social and environmental aspects, such as human rights, working conditions, health and safety, environmental protection, and business ethics. Hirschmann Automotive adheres to the principle of ensuring that responsible action and economic success are not mutually exclusive, but rather complement each other.

When it comes to product/service, market, region and process, cost, quality, reliability, innovation, and sustainability are our fundamental factors for selecting and evaluating suppliers.



Hirschmann Automotive requires its suppliers to comply with all national and international applicable guidelines, laws, and regulations, in particular on the topics of environment, climate protection, social affairs, and governance, such as the Environmental Social Governance (ESG) guidelines, the principles of the United Nations Global Compact, and the European Sustainability Reporting Standards (ESRS), etc. In addition, suppliers shall implement suitable processes that support compliance with applicable laws in their companies and foster continuous improvement in terms of the principles and requirements of this Code of Conduct. The evaluation of suppliers with respect to environmental and social aspects is carried out based on a standardized Self-Assessment Questionnaire (SAQ), which must be completed and submitted by the Supplier at regular intervals at the request of Hirschmann Automotive.

Suppliers shall also assure that all principles and requirements described herein are also acknowledged, complied with, and implemented by their affiliated companies. In the context of this Code of Conduct, “Affiliated Companies” means companies in which the Supplier directly or indirectly holds more than 50% of the shares or voting rights, as well as all companies that are under common management or control.

In addition, the Suppliers shall communicate all the principles and requirements described herein to their Subcontractors and Subsuppliers, take them into consideration when selecting them as well as ensure and monitor compliance with them.

The following requirements are regarded as the basis for a successful business relationship between Hirschmann Automotive and its Suppliers, since a common understanding of ethical and sustainable behavior is vital for working together in an honest and responsible manner.

# 2

## Human Rights and Labor Practices

### 2.1 Respect for Human and Labor Rights

Consistent respect for internationally recognized human and labor rights and their proactive advancement is an integral part of corporate responsibility and a fundamental expectation that Hirschmann Automotive places on its Suppliers. Suppliers are therefore required to commit to the international human rights code of the United Nations (UN), the UN Guiding Principles on Business and Human Rights, The Ten Principles of the UN Global Compact, and the internationally recognized standards (core labor standards) of the International Labor Organization (ILO).

### 2.2 Forced and Child Labor

Hirschmann Automotive stipulates that its Suppliers and their Subcontractors strictly reject and do not in any way practice any form of forced or compulsory labor, modern slavery, involuntary or exploitative prison labor, human trafficking, or other forms of exploitation in their companies along the entire supply chain. Employment relationships are based on a voluntary agreement and can be terminated by employees at their own discretion and subject to a reasonable period of notice.

In addition, Suppliers undertake to Hirschmann Automotive to exclusively hire employees who have reached the minimum age required to perform work under the applicable national legislation. The ILO Conventions on the Minimum Age of Employees (No. 138) and on the Elimination of the Worst Forms of Child Labor (No. 182) must be observed.



### 2.3 Discrimination

Hirschmann Automotive expects its Suppliers to foster equal opportunities and equal treatment and prohibit discrimination in the hiring of employees and in the promotion or granting of training and development programs. No employee may be discriminated against based on age, gender, sexual identity, skin color, culture, ethnic origin, nationality, disability, religious affiliation, or worldview.

In addition, unreasonable treatment of employees, such as psychological hardship, sexual harassment or discrimination, including gestures, language, and physical contact that is sexual, coercive, threatening, abusive, or exploitative, is strictly prohibited on the part of Suppliers.

## 2.4 Freedom of Association

The Suppliers shall, in compliance with national legislation, safeguard the rights of employees, form an employee representative body, and engage in collective bargaining. The membership in employee representative bodies does not constitute a reason for unequal treatment.

Hirschmann Automotive's Suppliers must rule out the use of security forces to infringe on freedom of association.

## 2.5 Fair Working Conditions

Suppliers of Hirschmann Automotive undertake to comply with the labor regulations applicable in the respective labor markets, in particular, but not exclusively, with legally stipulated minimum wages and working hours.



## 2.6 Land, Forest, and Water Rights, and Eviction

Hirschmann Automotive Suppliers shall comply with the prohibition against unlawful eviction and unlawful seizure of land, forests, and waters. In particular, the rights of indigenous groups and local communities must be respected, encouraged, and protected throughout the entire supply chain in accordance with the UN Declaration on the Rights of Indigenous Peoples. The local population must be granted access to available resources, good soil quality for agriculture, and good air quality at all times.

## 2.7 Health Protection and Occupational Safety

Hirschmann Automotive requires its Suppliers to comply with the respective applicable national standards for health protection and occupational safety. In addition, Suppliers are expected to establish, apply, and further develop an adequate occupational safety management system. On the one hand, this includes the mitigation of actual and potential occupational safety risks through suitable preventive measures (protective equipment and safe workplace, etc.). On the other hand, it also includes safety training for employees in order to prevent accidents and occupational illnesses in the best possible way. Hirschmann Automotive requires the implementation of a management system in accordance with international standards, such as ISO 45001.

# 3

## Environmental & Climate Protection

Hirschmann Automotive requires its Suppliers to adopt sustainable and responsible environmental practices in order to minimize the impact of their activities and products on the environment throughout the entire life cycle and value chain. Responsible environmental practices include deliberate waste reduction through reuse and recycling, provision of sustainable materials, air quality control, control of noise emissions, and measures to reduce water consumption. All illegal treatment/disposal of waste is prohibited.

These measures must continue to minimize the impact on biodiversity and ensure the preservation of biodiversity. It is also essential to ensure responsible land use.

Suppliers of Hirschmann Automotive are expected to protect natural ecosystems and not to contribute to changing, deforesting, or damaging natural forests and other natural ecosystems.

The environmental practices described must comply with applicable relevant environmental laws and regulations, including but not limited to REACH and RoHS, which apply to the Suppliers' business. Hirschmann Automotive also prefers to implement a management system based on international standards, such as ISO 14001, ISO 50001, or EMAS.

### 3.1 Emissions Capture and Decarbonization

Hirschmann Automotive expects its Suppliers to proactively assume responsibility for mitigating CO<sub>2</sub> emissions generated by their own operations as well as their other value chains. The collection, calculation, evaluation, and transmission of the corresponding CO<sub>2</sub> data must be carried out according to the applicable standards of the Greenhouse Gas Protocol (GHG). Hirschmann Automotive also reserves the right to request the CO<sub>2</sub> footprint (Scope 1 to 3) for the products, processes, and services on specific request.

### 3.2 Energy Efficiency and Renewable Energies

The Suppliers are required to monitor and document energy consumption. The focus lies on the use of renewable energies. In the interest of sustainable corporate management, Hirschmann Automotive requires the implementation of adequate measures, which are designed to increase energy efficiency and minimize energy consumption. Hirschmann Automotive reserves the right to request certificates for green power from Suppliers.



# 4

## Ethical Principles in the Business Environment

### 4.1 Prohibition of Corruption, Bribery, and Extortion

Hirschmann Automotive requires its Suppliers not to engage in or tolerate any form of corruption, extortion, embezzlement, or bribery and to comply with all anti-corruption and anti-bribery regulations, including, but not limited to, those of the UN and the Organization for Economic Co-operation and Development (OECD) conventions on combating corruption and relevant anti-bribery laws. In particular, they must ensure that their employees, subcontractors, or representatives do not offer, promise, or grant any benefits to Hirschmann Automotive employees or associated third parties with the objective of obtaining a contract or any other preferential treatment in business transactions.

### 4.2 Invitations and Gifts

Suppliers must not misuse invitations, gifts, or other benefits for the purpose of exerting influence. Such donations to Hirschmann Automotive employees or persons close to them are generally not tolerated.

### 4.3 Donations and Sponsoring

Hirschmann Automotive recommends that its Suppliers do not make donations to political parties, their representatives, politicians, or elected officials and candidates for political office or private individuals. Sponsoring activities with or in reference to the business relationship with Hirschmann Automotive must be approved by Hirschmann Automotive.

### 4.4 Avoidance of Conflicts of Interest

Suppliers are required to make decisions relating to their business with Hirschmann Automotive exclusively based on objective criteria. Conflicts of interest with private interests or other economic or non-economic activities, including those of relatives or otherwise related persons or organizations, are avoided from the outset.

### 4.5 Fair Competition

Hirschmann Automotive expects its Suppliers to behave fairly in competition. In particular, Hirschmann Automotive expects its Suppliers to comply with applicable antitrust laws and laws against unfair competition. Suppliers must not participate in agreements with competitors that violate antitrust law, or abuse any dominant position that may exist in the market.

### 4.6 Money Laundering and Terrorist Financing

Suppliers of Hirschmann Automotive shall comply with the pertinent legal obligations to combat money laundering and terrorist financing and must not engage in or facilitate any activities related to money laundering and terrorist financing.

### 4.7 Appropriate Conduct in Public

Hirschmann Automotive requires its Suppliers not to make any statements or declarations related to Hirschmann Automotive in public or via social media and not to use any logos of Hirschmann Automotive for their own purposes without obtaining the prior consent of Hirschmann Automotive.

#### **4.8 Responsible Procurement of Minerals**

Suppliers must pay careful attention to transparency and sustainability, especially when dealing with conflict minerals and other critical minerals and materials. The Suppliers undertake to comply with all applicable legal regulations concerning conflict minerals, prohibited and declarable substances and to demonstrate compliance. Suppliers are required to provide adequate transparency on an annual basis by providing Hirschmann Automotive with information regarding conflict minerals based on the Conflict Minerals Reporting Template (CMRT) of the Responsible Minerals Initiative (RMI) in its current version. Suppliers are also required to ensure the responsible sourcing of materials within their value chain.



#### **4.9 Export Controls**

Suppliers shall comply with all applicable regulations regarding the import and export of goods, services, and information, including applicable export control regulations, trade restrictions, embargoes, sanctions lists, and other restrictions, as well as anti-terrorism regulations. In particular, Suppliers shall procure all permits, licenses, and similar items required for exporting their goods themselves. In addition, Suppliers are obliged to notify Hirschmann Automotive separately in writing if their goods or services are subject to trade restrictions or export controls. If required, the Suppliers shall provide Hirschmann Automotive with the required information, documents, and records to ensure compliance with the respective applicable regulations.

#### **4.10 Counterfeit Parts**

Hirschmann Automotive requires its Suppliers to develop, implement, and maintain effective methods and processes to identify and minimize the risk of introducing counterfeit parts and materials into the supply chain.



# 5

## Information Protection

### 5.1 Data Privacy and Information Security

The protection of privacy and personal data is an integral part of all Hirschmann Automotive business relationships. Hirschmann Automotive respects the confidentiality of personal data and operates in accordance with the applicable legal provisions on data privacy.

Suppliers who collect and process personal data shall ensure compliance with the applicable legal provisions. In addition, the Suppliers shall ensure an adequate level of information security by implementing technical and organizational measures.

### 5.2 Handling Company-Relevant Information

Suppliers of Hirschmann Automotive undertake to respect intellectual property (patents, trade, and business secrets, expertise or other confidential information of Hirschmann Automotive and/or other third parties) at all times and not to make them public or to disclose them to third parties or to utilize them for their own purposes without obtaining the express prior written consent of Hirschmann Automotive. Disclosure or unauthorized use of such information may lead to substantial damage to Hirschmann Automotive. In general, all information obtained in the course of the business relationship between Suppliers and Hirschmann Automotive is subject to the obligation of secrecy and confidentiality, in particular – but not exclusively – financial data, contracts, technical data, correspondence, and drawings, etc., regardless of the form or medium by which they are transmitted.

Hirschmann Automotive properly documents the essential business processes and records relevant financial information in order to accurately reflect the business operations with complete reports.



# 6

## Compliance with the Code of Conduct



Any violation of the principles and requirements set forth in the Hirschmann Automotive Supplier Code of Conduct is considered a material breach of the contractual relationship on the part of the Supplier. In this context, Hirschmann Automotive reserves the right to visit the Supplier at regular intervals (hereinafter referred to as “Audit Right”) in order to monitor compliance with this Code of Conduct.

If there is a suspicion of non-compliance with the described principles and requirements of the Hirschmann Automotive Code of Conduct for Suppliers (e.g. due to negative media reports), Hirschmann Automotive may demand that the Supplier discloses the appropriate facts or provides all relevant information. In addition, Hirschmann Automotive has the right to terminate individual or all contracts with the Supplier, without notice, who demonstrably fails to comply with the Hirschmann Automotive Code of Conduct for Suppliers despite having been given a reasonable period of time to do so, or who fails to endeavor to implement improvement measures. Such extraordinary termination entitles Hirschmann Automotive to claim compensation from Supplier for all damages resulting from such termination.

# 7

## Whistleblower System

Legal compliance and integrity are paramount at Hirschmann Automotive. In order to safeguard these values and avoid potential violations of relevant regulations, it is essential that misconduct or grievances are identified, reported, investigated, and remedied at an early stage. Information on violations of the Hirschmann Automotive Supplier Code of Conduct may be reported at any time via the Hirschmann Automotive whistleblower system. The system allows completely anonymous, confidential, and secure communication with the appropriate department of Hirschmann Automotive.



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Confidential and anonymous reports may be submitted using the following independent reporting channels:

**Online:** Hirschmann Automotive's online whistleblowing channel is operated by an external service provider, can be accessed via the link [hirschmannautomotive.whistlelink.com](https://hirschmannautomotive.whistlelink.com) and used for reports around the clock.

**Post:** Alternatively, reports may be submitted via mail to the following address:  
Hirschmann Automotive GmbH, FAO LC, Oberer Paspelsweg 6–8, 6830 Rankweil, Austria.

**Tel.:** In addition, telephone messages are also accepted at the following number: +43 5522 3070. In this case, the whistleblower must indicate at the onset of the interview that they would like to report misconduct or a violation of the law in order to be able to speak with a reliable and competent employee who will take up the case.

**E-Mail:** Messages can also be sent to the following e-mail address:  
[whistleblowing@hirschmann-automotive.com](mailto:whistleblowing@hirschmann-automotive.com).

**Personally:** If desired, reports can also be submitted in person. Hirschmann Automotive Hirschmann Automotive rigorously follows up on any indication of misconduct and takes appropriate measures to put an end to the violation as well as to prevent similar incidents in the future.

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# 8

## Contact

For any questions related to this Supplier Code of Conduct, please contact your direct Hirschmann Automotive representative or the following contact:



**E-Mail**

[compliance@hirschmann-automotive.com](mailto:compliance@hirschmann-automotive.com)



**Tel.**

+43 5522 307-0

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