



CODE OF CONDUCT FOR EMPLOYEES

VERSION 06/2023



HIRSCHMANN
AUTOMOTIVE



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Foreword

Dear Employees,

Responsible conduct, fair interactions, legally compliant behavior, sustainability, and integrity are given the highest priority within the Hirschmann Automotive Group (hereinafter “**Hirschmann Automotive**”) and are integral parts of our **corporate culture**. At the same time, we take our social responsibility very seriously.

This Code of Conduct is based on our values (**passion, cooperation, and commitment**) and key international standards, supports us in achieving our strategic business objectives, and is essential for ensuring compliance with the applicable legal framework.

To ensure responsible and lawful conduct in the company, we therefore attach importance to social, economic, societal, and environmental aspects, such as fair working conditions, health and safety in the workplace, sustainability, environmental protection, and conserving resources. Through this Code of Conduct, we wish to promote a culture of integrity and respect in which all employees are treated equally. We adhere to the principle that responsible conduct and economic success are not mutually exclusive, but rather complement each other.

This Code of Conduct establishes a **uniform global standard regarding the behavior of all Hirschmann Automotive employees**, is based on the principles of the United Nations Global Compact, and is characterized by openness, honesty, transparency, and fairness. These principles are therefore an essential tool for ensuring that we conduct ourselves ethically, morally, and responsibly.

To achieve these goals, **we must all play our part**, which also contributes to our long-term corporate success. Each and every one of us plays a critical role in implementing this Code of Conduct. By acting according to these principles and working together to promote social responsibility, we can bring about positive change and build a better future for us all.

We thank you for your support and commitment in implementing and complying with this Code of Conduct. Together, we can achieve great results.

[#ConnectedByPassion](#)



Angelo Holzknacht, CEO

Stefan Tschol, CFO

Sebastian Herler, COO

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Application Area

This Code of Conduct applies to all employees of Hirschmann Automotive worldwide and therefore to all managers, salaried employees, workers, apprentices, employees on a contract-for-work basis, security personnel, leased employees, and other personnel of other companies working at the Hirschmann Automotive sites (hereinafter referred to as “**Employees**”). All employees must therefore comply with the regulations of this Code of Conduct.

This Code of Conduct shall enter into **force** once it is published in WIKI. It can be **accessed by all employees at any time and is binding**.



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Legal Compliance and Integrity

When carrying out their activities for Hirschmann Automotive, employees undertake to conduct themselves at all times **in accordance with the applicable laws**, regulations, official requirements, and internal guidelines. All employees are expected to question their actions and make deliberate decisions.

Hirschmann Automotive is strongly committed to integrity, which means doing the right thing. All employees must therefore comply with the applicable internal and external rules and conduct themselves in line with our core values.

Hirschmann Automotive adopts all measures necessary to ensure legally compliant actions and integrity on a global scale.



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Code of Conduct

4.1 No Discrimination

Hirschmann Automotive **fosters diversity, individuality, equal opportunities, and equal treatment.** We therefore always treat colleagues and business partners **fairly, with appreciation and respect.** In this context, any behavior that constitutes discrimination or harassment (e.g., based on gender, sexual identity, skin color, culture, ethnic origin, nationality, membership of a minority, age, disability, religious affiliation, or ideology) is prohibited.

Any and all forms of discrimination, harassment, unfair behavior, or bullying violate our philosophy, will not be tolerated, and therefore have no place at Hirschmann Automotive. As a matter of principle, Hirschmann Automotive does not tolerate any unlawful behavior on the part of security personnel towards employees or third parties. Our common objective is to ensure a fair, appreciative, and cooperative working environment.

4.2 Prohibition of Corruption and Bribery

Corruption is the abuse of a position of power or trust for financial or personal gain. Corruption essentially involves people taking advantage of their position or authority to obtain (personal) benefits to which they are not entitled (such as paying bribes in order to receive something in return).

Hirschmann Automotive employees must refrain from any and all forms of active and passive corruption or bribery and **avoid even the mere appearance of inappropriate influence** on our business partners or other third parties (including, in particular, authorities, public officials, or politicians). Fraudulent conduct, extortion, and other activities to dishonestly or illegally obtain an advantage are of course also strictly prohibited.

The establishment and conclusion of business relationships is therefore **based exclusively on factual criteria** (such as quality, price, technological standard, or reliability). In addition, Hirschmann Automotive employees **may not accept or demand, offer, or grant any unacceptable personal benefits.**

4.3 Invitations and Gifts

Invitations, gifts, and other benefits **within reasonable limits are customary and permissible** in relations with our business partners. Invitations, gifts, and other benefits may therefore be granted or accepted only if both the occasion and the amounts involved are appropriate, i.e., they are low in value and can be regarded as an expression of the generally accepted local business practice (such as promotional gifts). Invitations to business meals or events may be accepted only if they are unsolicited, serve a business function, are not repeated too frequently, and are proportionate to the occasion.

Invitations, gifts, or other benefits must not under any circumstances be improperly used for the purpose of exerting influence and may not be suggested, solicited, or demanded by employees. If there is even the mere appearance of inappropriate influence, such benefits must be immediately rejected by the employees.

In case of questions or ambiguities in connection with invitations, gifts, or other benefits (in particular with regard to their appropriateness), the respective manager or the Compliance Helpdesk must be consulted in advance.



4.4 Avoidance of Conflicts of Interest

Hirschmann Automotive respects the personal interests and private lives of its employees. Employees are, however, obligated not to pursue **personal interests that are in conflict with the interests of Hirschmann Automotive**. The personal interests of employees must therefore not influence their business decisions. Conflicts of interest may exist, for example, in the granting of contracts to family members or friends, in the hiring or promotion of family members or friends that is not objectively justified as well as in the assumption of secondary employment at other companies.

Such conflicts of interest may result in economic and financial damage and will not be tolerated. Employees are therefore obligated to avoid situations that may result in personal conflicts of interest. If there are potential conflicts of interest, employees are requested to disclose them immediately and, in cooperation with the respective manager, the responsible contact in the HR department, or the Compliance Helpdesk, to find a solution in which the interests of Hirschmann Automotive are not affected.

4.5 Conduct in Public

To ensure a uniform public appearance of Hirschmann Automotive, **statements made by Hirschmann Automotive** to the media (online, print, TV, radio, and social media) are coordinated by the internal Global Marketing & Communication (MC) department and must be agreed in advance with Global Marketing & Communication (MC).

All employees may naturally publish their **personal views in their own name** (for example, on social networks or as part of interviews during events) while maintaining the **confidentiality** of our corporate information, **fairness, respect**, and complying with the **legal framework** as well as our **internal guidelines**. In such cases, care must be taken to ensure that these statements are clearly recognizable as the employees' personal views.



4.6 Fair Competition

Competition and antitrust law serves as the basis for ensuring smooth cooperation between competitors on the market and for ensuring functioning, fair, and unfettered competition. Violations of competition or antitrust law (such as unfair competition, deception, restrictive agreements with business partners, leveraging a dominant market position, or unjustified influence on prices) may result in serious consequences both for Hirschmann Automotive and for the employees involved. Such misconduct may lead to large fines, civil lawsuits, and even claims for damages by third parties and must thus be avoided. Hirschmann Automotive therefore pursues its corporate objectives solely based on the principle of performance and in compliance with the applicable rules of competition.

4.7 Money Laundering and Terrorist Financing

Hirschmann Automotive complies with the relevant legal obligations to combat money laundering and terrorist financing and ensures that it does not engage in or facilitate any activities related to money laundering and terrorist financing. Hirschmann Automotive employees in the departments concerned are required to keep themselves informed of the applicable legal situation and to design business processes in a way that prevents any form of legal violations or white-collar crime.

4.8 Economic Sanctions and Export Controls

All applicable regulations for importing and exporting goods, services, and information must be observed at Hirschmann Automotive. In particular, the applicable customs and tax regulations, export control regulations, trade restrictions, embargoes, sanctions lists, and other restrictions, or economic sanctions must be observed.



4.9 Innovation Protection

Hirschmann Automotive highly values the safety and quality of our products. To secure our long-term success, our products and innovations must be protected accordingly. Product piracy (i.e., the manufacture of counterfeit or pirated products by third parties) cannot, however, be prevented altogether. Hirschmann Automotive employees must immediately report any product piracy as well as any infringements of our intellectual property rights (in particular, patents and trademarks) to their respective superiors so that appropriate measures can be implemented.

4.10 Financial Responsibility

All employees bear significant responsibility for managing financial resources. Hirschmann Automotive is committed to maintaining the highest standards in recording financial transactions and preparing financial reports. Employees must therefore always record and document information about financial transactions accurately and correctly. The applicable legal provisions must be observed.

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Environmental Protection

Hirschmann Automotive commits itself and all its employees to **using resources and energy responsibly and sustainably, to environmental, climate and animal protection, and to sustainable waste management.** Hirschmann Automotive complies with the relevant international standards and applicable legal provisions in this regard. Employees are therefore required to minimize the impact of their activities on the environment, climate, and animal protection throughout the life cycle of Hirschmann Automotive's products and the entire value chain. Employees must proactively assume shared responsibility for contributing, for example, to reducing air pollution, energy and water consumption, reducing waste generated including wastewater, closing value-adding cycles, and reducing greenhouse gases.



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Social Responsibility

6.1 Respect for Human and Labor Rights

Consistent respect for national and internationally recognized human and labor rights and their proactive advancement is an integral part of our corporate responsibility. Hirschmann Automotive is committed to ensuring compliance with all applicable legal provisions in respect of human and labor rights as well as with the international human rights code of the United Nations, 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).

Any and all forms of forced and compulsory labor, modern slavery, involuntary or exploitative prison labor, human trafficking, or other forms of exploitation are strictly prohibited at all Hirschmann Automotive locations (**prohibition of forced labor**). Employment relationships are always 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, Hirschmann Automotive only hires employees who have reached the minimum age required to perform work under the applicable national legislation (**prohibition of child labor**). The ILO Conventions on the Minimum Age of Employees (No. 138) and on the Elimination of the Worst Forms of Child Labor (No. 182) are observed.

Hirschmann Automotive respects the right to organize and the **freedom of association** of its employees by observing relevant legal standards and endeavors to treat employee representatives and trade unions with respect and openness. Hirschmann Automotive ensures a fair balance between the economic interests of the company and the interests of its employees.

Hirschmann Automotive also respects the **rights of local communities** (e.g., indigenous peoples) who are affected by Hirschmann Automotive’s business activities (such as land, forest, water rights and the prohibition of eviction). In addition, efforts shall be taken to minimize any adverse effects on the local population during construction and ongoing operations.



6.2 Health and Occupational Safety

Hirschmann Automotive assigns high priority to protecting the **physical and mental health** of its employees. Hirschmann Automotive therefore consistently ensures compliance with the applicable occupational health and safety laws across the world and sets standards above and beyond this to improve occupational safety and maintain the health of its employees.

The objective is to prevent occupational accidents and work-related illnesses by establishing and maintaining an appropriate work environment, setting and maintaining high safety standards, and providing personal protective equipment. To prevent health hazards, all employees must comply with the applicable occupational health and safety regulations and report occupational and commuting accidents, near-accidents, potential health hazards, and areas for improvement directly themselves or through their manager to the Integrated Management Systems (IMS) department. Hirschmann Automotive also offers various programs at all its locations to prevent ill health and promote wellbeing.

6.3 Fair Working Conditions

Hirschmann Automotive ensures **fairness in terms of working hours and compensation**, which are in accordance with the labor laws applicable in the respective labor markets. Hirschmann Automotive compensates employees with competitive and performance-based salaries, which may be supplemented by additional benefits and services. In addition, Hirschmann Automotive complies with the respective national working time regulations and promotes a healthy work-life balance.



6.4 Hiring, Training, and Further Education

Hirschmann Automotive hires new employees based on their individual skills and promotes or develops them accordingly. Hirschmann Automotive systematically strengthens the competencies and talents of its employees through forward-looking training and further education programs in order to ensure a high level of performance and long-term employability. Through regular training, Hirschmann Automotive also ensures that all employees are familiar with this Code of Conduct, know their obligations, and comply with them accordingly.

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Information and Property Protection

7.1 Data Privacy

The protection of privacy and personal data is an integral part of all Hirschmann Automotive business relationships. Hirschmann Automotive therefore expects all employees to respect the confidentiality of personal data and always process personal data in compliance with the applicable legal provisions.

7.2 Handling of Confidential Information

The disclosure or unauthorized use of confidential information or any other abuse of trust may cause considerable damage to Hirschmann Automotive. Hirschmann Automotive employees must therefore treat any information that they become aware of during their work at Hirschmann Automotive – regardless of whether the information concerns Hirschmann Automotive or third parties – with special care, while ensuring **confidentiality** and in accordance with the guidelines provided for this purpose. Confidential information **must be used only in connection with work for Hirschmann Automotive and must not be disclosed to third parties**, unless such disclosure has been expressly approved. In general, all information obtained in the course of the employment relationship is subject to the obligation of secrecy and confidentiality, in particular – but not exclusively – financial data, contracts, technical data, correspondence, drawings, etc., regardless of the form or medium with which they are processed, transmitted, or stored.

Employees who have access to non-public information with the potential to significantly impact the share price of business partners of Hirschmann Automotive are advised that – in addition to maintaining the strict confidentiality of this information – they are prohibited from buying or selling securities of these business partners of Hirschmann Automotive according to applicable securities laws and regulations (**misuse of insider information**).



7.3 Handling of Corporate Property

Hirschmann Automotive requests all employees to avoid any misuse or improper use of the corporate property of Hirschmann Automotive and to use it with the utmost care. Hirschmann Automotive work equipment and other items must generally be used only for business purposes. They must also be protected from loss, theft, damage, or misuse.

7.4 Protection of Intellectual Property

Intellectual property (such as inventions, research results, product developments, and technical data, etc.) provides the basis for the success of Hirschmann Automotive, among other things. It must therefore be protected accordingly. The disclosure of information regarding new products before a patent application has been filed, communication with business partners about confidential information that is not protected by a non-disclosure agreement, and similar conduct are therefore strictly prohibited. It is also essential to avoid the unauthorized use of third-party intellectual property (such as third-party patents, trademarks, design rights, or copyrights).



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Compliance with the Code of Conduct

All employees acknowledge that this Code of Conduct includes fundamental values and principles of Hirschmann Automotive and must therefore familiarize themselves **with its contents as they may be amended from time to time, be aware of it, and behave in accordance with it**. Each individual employee is therefore **personally responsible for complying with applicable law and this Code of Conduct**.

To ensure compliance with this Code of Conduct, all employees must attend the **compliance training courses** offered to them and are requested to contact the **Compliance Helpdesk** in case of any uncertainties.

In addition, **all managers must act as role models** and ensure compliance with this Code of Conduct in their area of responsibility, inform their employees about the content and significance of this Code of Conduct, raise their awareness, and provide support in complying with it.

Violations of laws, internal guidelines, and this Code of Conduct may lead to massive economic damage for Hirschmann Automotive. Any misconduct must therefore be identified at an early stage to prevent potential damage to Hirschmann Automotive and its business partners and to ensure fair cooperation. If there are specific indications that this Code of Conduct has been violated, Hirschmann Automotive shall systematically investigate them in line with a **“zero tolerance”** approach.

Violations of this Code of Conduct by employees shall not be tolerated and may result in sanctions under labor law, up to and including termination of employment. If legal violations by employees result in damage to Hirschmann Automotive or third parties, this may also lead to personal liability on the part of the employee. Grave violations of the rules may even involve criminal consequences for the employee. In addition, the relevant courts and authorities may impose penalties or fines.

The compliance with and implementation of this Code of Conduct shall be **reviewed on a regular basis** and ensured through appropriate control measures.



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Whistleblower System

To ensure compliance with this Code of Conduct and avoid possible violations of relevant regulations, it is crucial that misconduct or grievances are identified, reported, investigated, and remedied at an early stage. Employees are therefore requested to report any verifiable or suspected violations of this Code of Conduct or applicable legal standards of which they become aware to a trustworthy authority. Hirschmann Automotive shall consistently investigate any indication of misconduct and undertake appropriate measures to eliminate the violation as well as to prevent similar incidents in the future.



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. It can be accessed via the link hirschmannautomotive.whistlelink.com and used to submit reports around the clock.

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

Telephone: Telephone messages are also accepted at the following number: +43 5522 3070. In this case, the whistleblower must indicate at the start of the conversation that they would like to report misconduct or a violation of the law. They will then be connected to 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.

In personal: If desired, reports can also be submitted in person.

All reports of misconduct will be treated confidentially in all cases and will not result in any negative consequences for the employee submitting a report. Knowingly false accusations may, however, be punished by means of disciplinary measures.

10 Contact

This Code of Conduct cannot provide definite answers to all questions and situations and is supplemented and elaborated upon by further guidelines and instructions for action.

All employees can contact their manager, the **Compliance Helpdesk** or the **Legal & Contract Management (LC)** team at any time if they have questions or doubts.

Compliance Helpdesk:

 compliance@hirschmann-automotive.com

Legal & Contract Management (LC):

Gertraud Mathis-Dietrich


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