

CODE OF CONDUCT FOR BUSINESS PARTNERS

VERSION 03/2025

This Code of Conduct for Business Partners replaces the Hirschmann Automotive Code of Conduct for Suppliers (Version 04/2023).



HIRSCHMANN
AUTOMOTIVE

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Foreword

Dear Business Partners,

As an internationally active technology group with a high level of materials expertise, the Hirschmann Automotive Group (hereinafter referred to as “Hirschmann Automotive”) procures raw materials, goods and services worldwide in order to ensure the sustainable success of its customers with innovative product and service solutions. The basis for this is responsible and sustainable corporate management. However, our responsibility does not end at the boundaries of our company – it extends across the entire value chain. Together with you, our Business Partners, we want to create an environment based on integrity, fairness and sustainable behavior. Because we are convinced that economic success and responsible behavior go hand in hand.

Hirschmann Automotive views sustainability as a holistic concept that takes equal account of social, environmental and economic aspects. The long-term success of our company and the trust of our stakeholders depend to a large extent on these three dimensions being in balance along the entire value chain and being continuously improved. We therefore expect our Business Partners to adhere to the same high standards that we set for ourselves. This includes compliance with legal requirements, the protection of human rights, fair working conditions, environmental and climate protection as well as ethical business behavior.



The following requirements serve as a binding basis for a successful and trusting cooperation between Hirschmann Automotive and its Business Partners. A common understanding of ethical and sustainable behavior is essential for a transparent and responsible partnership.

Your commitment to these values not only makes an important contribution to a sustainable economy but also forms the basis for our mutual success. Let us take responsibility and shape the future actively and sustainably.

Sincerely,

Handwritten signature of Angelo Holzknrecht in blue ink.

Angelo Holzknrecht, CEO

Handwritten signature of Stefan Tschol in blue ink.

Stefan Tschol, CFO

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General Principles and Scope

This Code of Conduct sets out binding principles and expectations in the areas of ethics, human rights, environmental and climate protection, working conditions and responsible business practices. All existing and future Business Partners of Hirschmann Automotive, including but not limited to suppliers, customers, consultants, vendors, brokers, dealers, contractors, agents and cooperation partners (hereinafter referred to as “Business Partners”), are required to comply with these requirements, take appropriate measures to implement them and pass on the principles of this Code of Conduct along the entire supply chain.

Business Partners must also ensure that all principles and requirements described here are recognized, adhered to and implemented by their affiliated companies. For the purposes of this Code of Conduct, “affiliated companies” are companies in which the Business Partner 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.

Hirschmann Automotive expects its Business Partners to comply with all nationally and internationally applicable guidelines, laws and regulations, in particular on environmental, climate protection, social and governance issues, such as the Environmental Social Governance (ESG) guidelines, the Principles of the United Nations Global Compact, the European Sustainability Reporting Standards (ESRS), the EU Corporate Sustainability Due Diligence Directive (after respective implementation in the member states). In order to ensure compliance with these requirements, Business Partners are required to implement appropriate processes that support compliance with applicable laws in their companies and promote continuous improvement with regard to the requirements of this Code of Conduct.

Business Partners are selected and evaluated taking into account key factors such as cost, quality, reliability, innovation and sustainability. In a constantly changing market environment, these criteria are essential to ensure long-term and successful partnerships. Special attention is also paid to the environmental and social aspects, which are assessed using a standardized self-assessment questionnaire (SAQ). This is provided via the NQC platform and must be completed and submitted by Business Partners at regular intervals at the request of Hirschmann Automotive.



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Human Rights and Working Conditions

3.1 Respect for Human and Labor Rights

Consistent respect for internationally recognized human and employee rights as well as their active promotion is an integral part of corporate responsibility and a fundamental expectation that Hirschmann Automotive places on its Business Partners. It is therefore required that Business Partners commit themselves to the United Nations International Bill of Human Rights, 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).

3.2 Forced and Child Labor

Hirschmann Automotive requires that its Business Partners throughout the entire supply chain strictly reject and in no way practice any kind of forced and compulsory labor, modern slavery, involuntary or exploitative prison labor, human trafficking or other forms of exploitation in their companies. Employment relationships are voluntary and can be terminated by employees at their own discretion and with a reasonable period of notice.

In addition, the Business Partners undertake to Hirschmann Automotive to only employ employees who have reached the minimum age required by 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 complied with. The term “child” includes anyone under the age of 15 or under the age at which compulsory education ends or the legal minimum age for employment in the respective country is reached, whichever is higher. Employees under the age of 18 (young employees) are not allowed to perform any work that could jeopardize their health or safety, including night shifts and overtime.

3.3 Discrimination

Hirschmann Automotive expects its Business Partners to promote equal opportunities and equal treatment and to prevent discrimination in the hiring of employees as well as in the promotion or granting of training and further education measures. No employees may be disadvantaged on the basis of their age, gender, sexual identity, skin color, culture, ethnic origin, nationality, disability, religious affiliation or ideology.

In addition, inappropriate 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, must be strictly avoided by Business Partners.



3.4 Freedom of Association

In accordance with national legislation, Business Partners must protect the rights of employees to form an employee representative body and conduct collective bargaining. Membership in employee representative bodies must not constitute a reason for unequal treatment. Where the right to freedom of association and collective bargaining is restricted by applicable laws and regulations, employees must have a comparable opportunity to choose and join alternative, lawful forms of employee representation.

Hirschmann Automotive's Business Partners must prevent that security forces interfere with the right to freedom of association.



3.5 Fair Working Conditions

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

Compensation paid to employees must comply with all applicable legal provisions, including those related to minimum wages, overtime, and statutory benefits. All employees receive equal pay for equal work and qualifications. Overtime is paid at a higher wage than the regular hourly rate. Wage deductions as a disciplinary measure are not permitted. For each wage payment period, employees must be provided with a comprehensible pay slip in a timely manner, which contains sufficient information to verify the exact remuneration for the work performed. The use of temporary, agency and outsourced workers may only take place within the framework of local legislation.

Working hours may not exceed the legally stipulated maximum. Furthermore, a workweek cannot exceed 60 hours per week, including overtime, except in emergencies or unusual situations. All overtime must be voluntary. Employees must be granted at least one day off every seven days.

3.6 Land, Forest and Water Rights and Evictions

Business Partners of Hirschmann Automotive comply with the prohibition of unlawful eviction and unlawful seizure of land, forests and water. In particular, the rights of indigenous groups and local communities are to be respected, encouraged and protected along the entire supply chain in accordance with the “United Nations Declaration on the Rights of Indigenous Peoples”. The local population should be granted access to available resources, good soil quality for agriculture and good air quality at all times.

3.7 Health and Safety at Work

Hirschmann Automotive requires its Business Partners to comply with the applicable national standards for health and safety at work. In addition, Business Partners are expected to establish, implement and further develop an appropriate occupational safety management system. Hirschmann Automotive requires the implementation of a management system in accordance with international standards, such as ISO 45001.

A key goal is to minimize actual and potential hazards in the workplace through preventive measures such as providing safe workplaces, appropriate protective equipment, and regular safety training for employees. Business Partners are also expected to arrange working hours and overtime in such a way that the health of employees is protected and accidents caused by fatigue are avoided. Special care is required towards vulnerable employees such as minors, pregnant women and people with physical disabilities.

To ensure compliance with these standards, Business Partners must provide evidence of their occupational health and safety management on request, for example in the form of certificates. In addition, it is expected that the causes of incidents will be systematically investigated and measures taken to avoid recurrence. Emergency plans should be in place in order to be able to react quickly and effectively in an emergency. Hirschmann Automotive encourages its Business Partners to continuously work to improve working conditions and to offer regular training to all employees in order to ensure long-term and sustainable safety and health in the workplace.



3.8 Ethical Recruitment

Hirschmann Automotive is committed to fair and ethical recruitment practices and expects the same from its Business Partners. All applicants must be treated equally, regardless of gender, age, origin, religion or other protected characteristics. Recruitment processes must be transparent, comprehensible and free of misleading promises. Personal data of applicants must be treated confidentially and used exclusively within the framework of the legal requirements. Business Partners of Hirschmann Automotive are encouraged to implement these principles in their own processes and to actively promote ethical recruitment.

4 Environmental and Climate Protection

Hirschmann Automotive expects its Business Partners to establish 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.



4.1 Environmental Management System and Certifications

Hirschmann Automotive requires its Business Partners to comply with applicable national standards for environmental protection, i.e. compliance with the relevant environmental laws and regulations, including REACH and RoHS. In addition, Business Partners are expected to establish, implement and further develop an appropriate environmental management system. Hirschmann Automotive requires the implementation of a management system in accordance with international standards, such as ISO 14001.

4.2 Energy Efficiency and Renewable Energies

Business Partners are requested to monitor and document energy consumption. The focus is on the use of renewable energies. In the spirit of sustainable corporate management, Hirschmann Automotive expects the implementation of appropriate measures that contribute to increasing energy efficiency and reducing energy consumption. Hirschmann Automotive reserves the right to request certificates or proof of green electricity from its Business Partners.

4.3 Waste Management and Recycling

Responsible environmental practices include targeted waste reduction through reuse and recycling, the provision of sustainable materials, and return to circular economies.

4.4 Responsible Use of Resources and Procurement

Hirschmann Automotive and its Business Partners are committed to the efficient and sustainable use of resources in order to minimize environmental pollution and conserve natural raw materials. This also includes the responsible sourcing of materials and minerals.

Business Partners must pay attention to transparency and sustainability, especially when dealing with conflict minerals and other critical minerals and materials. The Business Partners undertake to comply with all applicable legal regulations regarding conflict minerals, prohibited and declarable substances and to prove compliance. Every year, Business Partners are asked to create appropriate transparency 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. Business Partners are also required to ensure the responsible sourcing of materials within their value chain.

4.5 Responsible Use of Chemicals

Hirschmann Automotive is committed to the responsible use of chemicals and relies on safe, sustainable alternatives. This includes strict compliance with all relevant regulations, especially PFAS and other regulated substances. Further details on Hirschmann Automotive's handling of chemicals are set out in a separate chemicals statement, which will be made available on request.

4.6 Decarbonization and Air Quality

Hirschmann Automotive expects its Business Partners to actively reduce CO₂ emissions along the entire value chain. The collection and transmission of CO₂ data must be carried out in accordance with the standards of the Greenhouse Gas Protocol (GHG). In addition, Hirschmann Automotive reserves the right to request the CO₂ footprint (Scope 1-3) for products, processes and services. In addition, technologies and strict environmental standards are used to minimize emissions, improve air quality and sustainably reduce air pollution.

4.7 Sustainable Use of Water Resources

Hirschmann Automotive is continuously improving its production processes in order to reduce water consumption and use resources efficiently. Through circular systems, water recovery and sustainable management strategies, these measures actively contribute to the protection of water resources. Business Partners of Hirschmann Automotive are also committed to the responsible use of water.



4.8 Land Use and Biodiversity

Hirschmann Automotive is committed to sustainable land use and promotes measures to protect biodiversity in order to preserve natural ecosystems and minimize negative environmental impacts. Hirschmann Automotive's Business Partners are also expected to protect natural ecosystems and not contribute to the alteration, deforestation or degradation of forests and other natural ecosystems.

4.9 Animal Welfare

Hirschmann Automotive is committed to the protection of animals and compliance with high animal welfare standards along the entire value chain. Therefore, Hirschmann Automotive expects its Business Partners to ensure responsible and ethical practices in accordance with applicable animal welfare guidelines.

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Ethical Principles in the Business Environment

5.1 Prohibition of Corruption, Bribery and Extortion

Hirschmann Automotive expects its Business Partners 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 those of the United Nations and the Organization for Economic Co-operation and Development (OECD) conventions on combating corruption and relevant anti-bribery laws. In particular, Business Partners must ensure that their employees, sub-contractors or representatives do not offer, promise or grant any advantages to Hirschmann Automotive employees or third parties related to them with the aim of obtaining an order or other preferential treatment in business transactions.

5.2 Invitations and Gifts

Invitations, gifts or other benefits are not to be misused by Business Partners for the purpose of inappropriately influencing business decision. Such invitations or gifts to Hirschmann Automotive employees or persons close to them are generally not accepted.

5.3 Avoidance of Conflicts of Interest

Business Partners are required to make decisions relating to their business activities 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, must be avoided in any case.

5.4 Fair Competition

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

5.5 Appropriate Conduct in Public

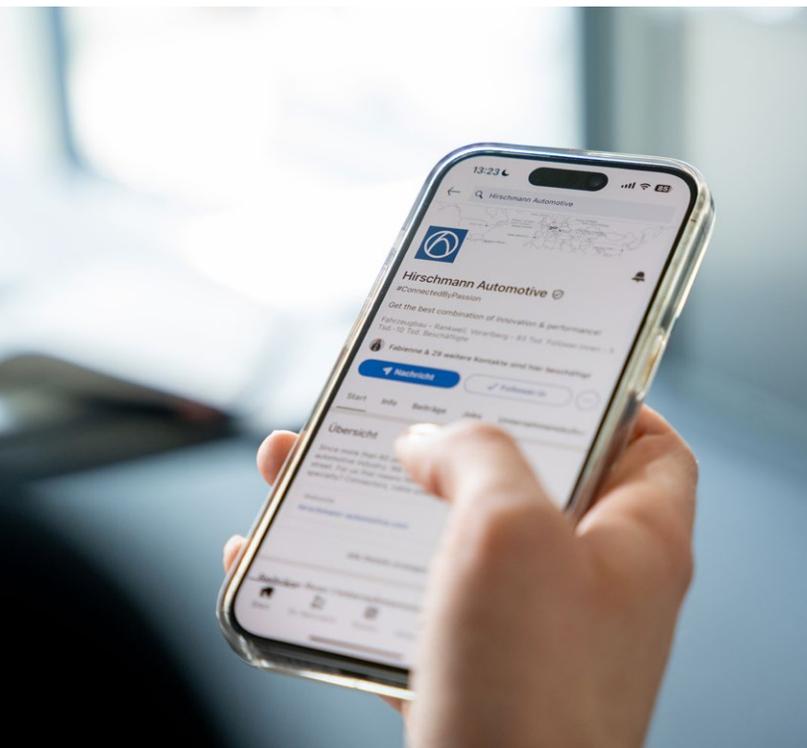
Hirschmann Automotive requires its Business Partners not to make any statements or declarations related to Hirschmann Automotive in public or via social media and not to use any logos of Hirschmann Automotive for their own purposes without obtaining the prior consent of Hirschmann Automotive.

5.6 Financial Responsibility

All business transactions must be carried out transparently and comply with the principles of proper accounting. Business Partners must disclose information (financial and non-financial) to the competent authorities in accordance with the applicable legal provisions.

5.7 Money Laundering and Terrorist Financing

Business Partners of Hirschmann Automotive must comply with the relevant legal obligations to combat money laundering and terrorist financing and must neither participate in nor facilitate activities related to money laundering and terrorist financing.



5. 8 Donations and Sponsorship

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



5. 9 Export Control

Hirschmann Automotive and its Business Partners are obliged to comply with all applicable national and international regulations for the import and export of goods, services, software, technologies and information. These include, in particular, the applicable export control regulations, trade restrictions, embargoes, sanctions lists and other relevant regulations. Business Partners warrant that (a) they are not listed on a national or international sanctions list and (b) their goods, services, software, technology and information will not be used for purposes related to the development, production or use of nuclear, biological or chemical weapons or ballistic missile systems.

In addition, the Business Partners will use their best efforts to ensure that the purpose of these export control regulations is not frustrated by third parties in the further commercial chain, including potential resellers. Business Partners shall establish and maintain an appropriate monitoring mechanism to detect infringements by third parties in the wider commercial chain, including potential resellers.

Business Partners are responsible for obtaining all permits and licenses required for the export of their goods. They must notify Hirschmann Automotive in writing if their goods or services are subject to trade restrictions or export controls and, if necessary, provide the necessary documentation to ensure compliance. If a Business Partner becomes aware of violations of trade restrictions and/or export control regulations, the Business Partner must notify Hirschmann Automotive and the competent authorities immediately in writing. In addition, the Business Partner must inform Hirschmann Automotive of any problems in the application of these export control provisions, in particular of relevant activities of third parties that could affect their purpose.

5. 10 Data Protection and Information Security

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

Business Partners who collect and process personal data ensure compliance with applicable legal requirements. In addition, Business Partners must ensure an appropriate level of information security by implementing technical and organizational measures.

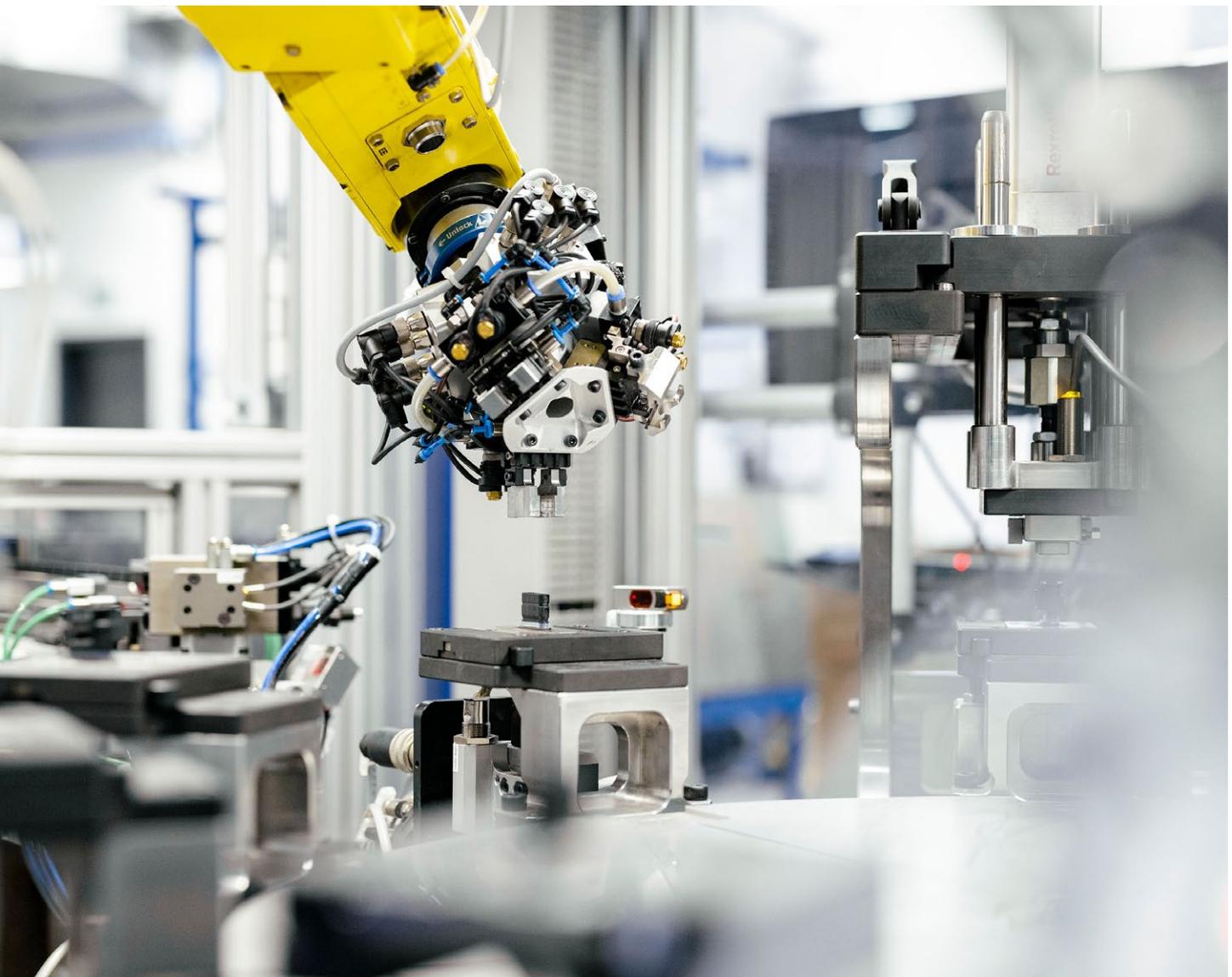
5. 11 Intellectual Property and Trade Secrets

The Business Partners respect the intellectual property rights of Hirschmann Automotive and third parties and ensure that their products or services do not interfere with the rights of third parties. Business Partners must also ensure that they use the intellectual property rights, including but not limited to copyrights, patents, designs and trademarks, of Hirschmann Automotive and other third parties only for the expressly authorized purposes and comply with applicable laws and regulations. The transfer of technology and know-how must be carried out in a way that safeguards intellectual property rights.

Business Partners of Hirschmann Automotive also undertake to respect all business and trade secrets, know-how or other confidential information of Hirschmann Automotive and/or other third parties at all times and not to publish them, pass them on to third parties or use them for their own purposes without the express prior written consent of Hirschmann Automotive. The disclosure or unauthorized use of such information may result in significant damage to Hirschmann Automotive. In principle, all information obtained in the course of the business relationship between the Business Partner and Hirschmann Automotive is subject to secrecy and confidentiality obligations, in particular – but not exclusively – financial data, contracts, technical data, correspondence, drawings, etc., regardless of the form or medium by which it is transmitted.

5. 12 Counterfeit Parts

Hirschmann Automotive requires its Business Partners 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.



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Duty to Provide Information and Cooperation

Business Partners are obliged to provide Hirschmann Automotive with all necessary information, records, evidence, documents and certificates that are deemed necessary to a reasonable extent. This obligation serves to ensure that Business Partners act in accordance with this Code of Conduct and all applicable legal requirements. Providing this information enables the verification of compliance with relevant standards and legal requirements in a transparent and comprehensible manner.

Should confirmation of compliance with certain regulations and requirements be required, Business Partners are obliged to provide it promptly and in an appropriate form upon request.



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Compliance with the Code of Conduct for Business Partners

This Code of Conduct for Business Partners replaces the Hirschmann Automotive Code of Conduct for Suppliers (Version 04/2023). All Business Partners who have accepted the Code of Conduct for Suppliers are also obliged to comply with the current version of this Code of Conduct for Business Partners.

Any violation of the principles and requirements set forth in the Hirschmann Automotive Code of Conduct for Business Partners will be considered a material breach of the contractual relationship on the part of the Business Partner.

Hirschmann Automotive reserves the right to visit the Business Partner at regular intervals ("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 Business Partners (e.g. due to negative media reports), Hirschmann Automotive may demand that the Business Partner discloses the appropriate facts or provides all relevant information.

In addition, Hirschmann Automotive has the right to terminate individual or all contracts with the Business Partner, without notice, who demonstrably fails to comply with the Hirschmann Automotive Code of Conduct for Business Partners 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 demand compensation from the Business Partner for all resulting damages. Furthermore, the Business Partner shall indemnify and hold Hirschmann Automotive harmless in such a case.



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Whistleblower System

Legal compliance and integrity are top priorities 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 Code of Conduct for Business Partners 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.



Confidential and anonymous reports can be submitted through 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 and used for reports around the clock.

Post:

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

Telephone:

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.

Personal:

If desired, reports can also be submitted in person.

Hirschmann Automotive rigorously follows up 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.

Business Partners must also create a whistleblower system that allows employees and third parties to express concerns anonymously and securely without fear of retaliation.

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Contact

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

 compliance@hirschmann-automotive.com

 +43 5522 307 0

We invite all Business Partners, their employees and other relevant stakeholders to provide us with feedback on our practices and principles. An open, continuous dialogue is a central part of our commitment to continuous improvement and the further development of our standards. Your feedback and suggestions are of great value to us in identifying potential for optimization and implementing targeted measures.



Hirschmann Automotive Group

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