

SUPPLIER CODE OF CONDUCT

MAHLE's principles stand for innovation, responsibility, fairness and customer orientation. Our behavior is based on these values. Not only do these values govern how we deal with each other and work together, they also apply to our relationships with customers, suppliers, and other business partners.

Being a global company, MAHLE¹ is aware of its legal, social and environmental responsibility and is committed to these principles. In particular, MAHLE is committed to climate protection in line with the Paris Agreement and has set the target to reduce carbon emissions by 49% until 2030 and to become carbon neutral until 2040 (Scope 1+2). Responsible business and respect for human rights in line with the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the Fundamental Conventions of the International Labor Organization (ILO), and the OECD Due Diligence Guidance for Responsible Business Conduct constitute fundamental elements of our corporate social responsibility.

To ensure compliance with legal and other requirements within MAHLE, we have developed a global compliance structure. MAHLE's approach to doing business reflects its continuous pursuit of excellence. Employees as well as interacting external parties are held to the same high standard compliant with all applicable anti-corruption, competition and antitrust laws, as well as with all applicable social and environmental provisions and other applicable laws. It is imperative to prevent false behavior and every employee is expected to uphold the company's public reputation.

In order to ensure compliance with statutory provisions and ethical, social and environmental principles within its own supplier base, MAHLE has developed this Supplier Code of Conduct for all suppliers of MAHLE and all suppliers must ensure compliance with these provisions.

RESPONSIBLE BUSINESS CONDUCT & ETHICS

MAHLE is committed to competing globally with honesty, integrity and in full compliance with all applicable laws and regulations. MAHLE prohibits all forms of corruption, extortion and embezzlement, and will not conduct business with any supplier engaged in such practices. MAHLE requires the supplier to comply with all applicable laws and regulations relating to its behavior with business partners. The supplier commits to upholding its social and environmental responsibility in all business dealings in the countries where it conducts business. At a minimum, the supplier is obliged to comply with the following:

- 1. Prevention of Corruption.** The supplier will not seek, accept, offer or grant unfair advantages.
Advantages are any kind of gratuity that the beneficiary has no claim to and which objectively improves the beneficiary's economic, legal or personal situation.
An advantage is unfair when it is not customary and inappropriate in light of all the circumstances of the particular case.

¹ "MAHLE" includes all fully-consolidated MAHLE companies

2. **Competition Law and Antitrust Law.** The supplier conducts its business in line with free and fair competition and in accordance with all applicable competition and antitrust laws.
3. **Foreign Trade.** The supplier complies with all applicable export control, customs, tax and foreign trade regulations, including without limitation, applicable EU- and US-sanctions, embargoes and other laws, regulations, government orders and policies controlling the transmission or shipment of goods, technology and payments.
4. **Fraud and Anti Money Laundering.** The supplier takes appropriate measures to prevent any form of fraud and to ensure that the business relationship to MAHLE is not abused for money laundering or for any other unlawful activity (for example terrorist financing).
5. **Conflicts of Interest.** The supplier makes business decisions independently and makes sure to keep business interests strictly separate from private interests.
6. **Confidentiality.** The supplier must keep trade and business secrets as well as all other confidential information strictly confidential. Such information is to be appropriately protected from disclosure to and against access by third parties.
7. **Data Protection.** The supplier has to process (like collection, recording, organization, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission) personal data in strict compliance with all freedom of information acts, in particular with the European Union Freedom of Information Act, data protection laws like the EU General Data Protection Regulation and the German Federal Data Protection Act and all applicable regulations.
8. **Intellectual Property.** The supplier respects intellectual property rights. The supplier performs the transfer of technology and know-how transfer in such manner that all intellectual property rights of MAHLE are protected.
9. **Counterfeit Parts.** The supplier develops, implements, and maintains methods and processes appropriate to its products and services to minimize the risk of introducing counterfeit parts and materials into products.

RESPONSIBLE WORKING CONDITIONS AND PROTECTION OF HUMAN RIGHTS

The supplier respects and supports compliance of internationally recognized human rights, in particular the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, and the Fundamental Conventions of the International Labor Organization (ILO), attesting to the following:

1. **No Forced or Underage Labor, Slavery or Human Trafficking.** The supplier rejects all forms of forced labor and does not employ any person who is under the statutory minimum age as stated in the applicable laws. The supplier does not participate in and rejects all forms of slavery and human trafficking. In particular, the supplier ensures

that no exploitative child labor within the meaning of ILO Convention no. 182 is or was involved in producing or processing the products to be delivered, as well as that these products do not violate any obligations resulting from the implementation of this Convention.

2. **Diversity, Non-discrimination and Equal Opportunity.** The supplier values diversity in its workforce and commits to building an inclusive work environment. The supplier commits to the principle of equal opportunity when selecting and promoting its employees and other employment decisions. In doing so, the supplier refrains from any discriminatory treatment on the grounds of gender, ethnic and cultural origin, religion, political views, nationality, membership of an employee organization, disability, age, or sexual orientation
3. **Anti-harassment.** The supplier does not tolerate coercion, harassment or bullying in the workspace. The supplier does not threaten or subject employees to any form of psychological, physical, sexual or verbal abuse, intimidation or harassment, and prohibits the same.
4. **Freedom of Association and Right to Collective Bargaining.** The supplier respects the right of its employees to associate freely in accordance with local laws. The supplier treats employees fairly who act as employee representatives or who are members of labor unions. The supplier respects collective bargaining, as a process of negotiations between employers and a group of employees aimed at reaching an agreement that regulates working conditions. The supplier will strive for a trustful cooperation with the responsible employee representatives and labor unions.
5. **Working Hours and Wages.** The supplier complies with all applicable laws regarding working hours, minimum wages and benefits. In addition, working conditions must allow an appropriate standard of living, securing workers' livelihood and social and cultural participation.
6. **Health and Safety.** The supplier complies with all applicable health and safety-related laws and regulations. The supplier takes proactive measures to ensure and continuously improve safe and healthy working conditions for its employees, contractors and visitors.
7. **Protection of Local Communities and Indigenous Peoples.** The supplier respects the rights of local communities and indigenous peoples who may be affected by doing business at the supplier's locations and to take into account the local impact of its business activities.
8. **Conflict Raw Materials.** The supplier is committed to identify and replace materials and products containing minerals from conflict-affected and high-risk areas and avoid the use of such minerals. The supplier shall investigate the source of these minerals and undertake due diligence measures in their supply chains to ensure that conflict minerals are only sourced from mines and smelters outside of conflict-affected and high-risk areas or use smelters and refiners validated as conformant to an independent

3rd party responsible mineral sourcing validation program. The supplier is also required to extend the responsible sourcing and due diligence requirements to sub-tier suppliers and report any identified risk in the supply chain.

If requested by MAHLE, the supplier provides a Conflict Minerals Reporting Template (CMRT) and/or CRT (Cobalt Reporting Template) on an annual basis. Suppliers of 3TG (tin, tantalum, tungsten, and gold) and suppliers that use these raw materials in their products must identify and disclose all the smelters and refiners in their supply chains.

ENVIRONMENTAL SUSTAINABILITY AND CLIMATE PROTECTION

MAHLE believes it is crucial to harmonize the future of humanity with technical progress. MAHLE is continuously evaluating and improving its products and processes to ensure sustainable use of resources and efficient use of energy limiting the impact of our operations and products on climate change and natural resources. MAHLE expects the same of its suppliers.

The supplier ensures that it complies with all applicable environmental laws and environmental regulations. In addition, the supplier respects the requirements of the international conventions of Minamata (mercury), Stockholm (persistent organic pollutants), and Basel (hazardous waste). The supplier maintains all required environmental permits up-to-date and complies with reporting requirements and regulations. In addition, the supplier has or will implement environmentally friendly and sustainable business practices, including:

- 1. Climate Protection / Reduction of Greenhouse Gas Emissions.** The supplier implements a strategy to reduce CO₂ emissions in order to contribute to MAHLE's commitments in line with the Paris agreement (e.g., corporate goals for its scope 1, 2 and 3 emissions). If prompted by MAHLE, the supplier regularly reports on its progress, especially with regards to its CO₂ footprint at product level. In case MAHLE sets binding material- and component-specific CO₂ targets as part of the awarding process they are binding during project execution.
- 2. Protection of Water Resources.** The supplier takes action to reduce water consumption and the generation of wastewater. In addition, measures are taken to prevent the contamination of surface water or groundwater.
- 3. Circular Economy, and Waste Management.** The supplier takes actions to reduce the environmental impacts of its products and services during their life cycle (i.e., conception, development, production, transport, use and recycling), and implements measures to minimize consumption of energy and natural resources. The supplier ensures that no waste is disposed of illegally and takes actions to eliminate and minimize waste generation by means of improvement, replacement, reuse and recycling of materials.
- 4. Biodiversity.** The supplier does not contribute to or benefit from illegal conversion of natural ecosystems through its business activities, i.e., preventing illegal deforestation such as the conversion of natural forests into usable areas

5. **Hazardous Materials.** The supplier implements processes and procedures to properly identify, manage, handle, dispose and replace hazardous materials.
6. **Recycled Material.** The supplier provides MAHLE with information about its use of secondary materials at product level via IMDS or CDX. The supplier shall increase the use of recycled material as much as possible.
7. **Material Compliance.** The supplier respects legislation or regulations applicable in the production countries and also in the countries/regions where the product or part is sold or used (e.g. European Union) in terms of prohibition, restriction, registration, authorization and/or traceability of substances of concern for human health or the environment (e.g. REACH, RoHS, ELV, TSCA (Toxic Substances Control Act)). Substance of very high concern (SVHC) based on the European REACH regulation must be avoided in products and parts. In order to track and follow-up on substances of concern and critical materials, Material Data Sheet (MDS) registration is mandatory via IMDS or CDX in due time for all parts and materials delivered to MAHLE. Please find more information on prohibition and declaration of substances on our website: <https://www.mahle.com/en/purchasing/prohibition-and-declaration-of-substances/>.

DUE DILIGENCE & COMPLIANCE MANAGEMENT SYSTEM

The supplier implements and maintains a risk management process to identify, prevent, mitigate, and account for risks and impacts on the environment and people. The supplier performs due diligence in the areas covered by this Supplier Code of Conduct in accordance with international standards such as the OECD Due Diligence Guidance for Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights.

Every supplier is responsible for ensuring that its employees, representatives and agents comply with this Supplier Code of Conduct in their business dealings with MAHLE. In order to effectively evaluate and ensure that the supplier maintains compliance at all levels of its operations, MAHLE expects the supplier to implement a compliance management system that at a minimum includes the following:

1. **Supply Chain.** Processes to effectively communicate the principles of this Supplier Code of Conduct to its suppliers and sub-suppliers and require its supply chain to comply with the principles of this Supplier Code of Conduct to the best of its ability.
2. **Risk Management.** Measures to effectively monitor and verify compliance with the Supplier Code of Conduct, including maintaining documentation to demonstrate its commitment to the Supplier Code of Conduct.
3. **Training Programs.** Training programs to educate its employees about the principles of this Supplier Code of Conduct and any applicable laws and regulations referenced herein.
4. **Reporting Channel.** If not already existing, the supplier has to implement an internal reporting channel for its employees to ensure that violations of applicable laws and

regulations can be reported. The supplier has to ensure the protection of the reporter and has to ensure that employees who report a violation do not need to fear any negative consequences for themselves.

By accepting a purchase order from MAHLE and/or signing the Supplier Code of Conduct, the supplier acknowledges its acceptance of the Supplier Code of Conduct and agrees to comply with this Supplier Code of Conduct. MAHLE reserves the right to verify supplier's compliance with the provisions of this Supplier Code of Conduct by self-assessment questionnaires. In case the supplier has received a self-assessment questionnaire from MAHLE or by an organization commissioned by MAHLE, the supplier is obliged to fill-out and reply such self-assessment questionnaires within the given deadline. If there is a suspicion of non-compliance of the supplier, MAHLE reserves the right to conduct audits at the premises of the supplier during normal business hours. In the event MAHLE determines the supplier is non-compliant, the supplier shall take immediate corrective actions or MAHLE may terminate the business relationship.

MAHLE has established a whistleblowing platform where any violations of these requirements can be reported to MAHLE by any partner in the supply chain. If a violation falls within the sphere of influence of the supplier, the associated risks must be remediated by the supplier immediately.

The supplier makes its supply chains aware of the available channels for reporting complaints and ensures that this information is passed on to the deeper levels of the supply chain.