

# CODE OF CONDUCT FOR BUSINESS PARTNERS

## Introduction

Hirschmann Car Communication ("HCC") is a leading global supplier of mobile transmission and reception solutions. HCC develops antennas, tuners and infotainment systems. Since our foundation in 1924, we have mastered various markets, including automotive, commercial vehicles, transportation, M2M and telematics. As a global company, HCC bears social responsibility towards its customers, employees, shareholders and the public. As part of this social responsibility, HCC must abide by applicable laws, respect fundamental ethical values and act in a sustainable manner, at all times and in any place.

With its Code of Conduct, HCC has committed itself to mandatory guidelines for responsible behavior. The Code of Conduct applies to all business units, sites and regions in which we operate and covers our relationships with employees, customers, suppliers, business partners and public bodies.

The Code of Conduct for Business Partners reflects the guiding principles from our HCC Code of Conduct.

The guidelines set out therein are based on statutory regulations such as the German Supply Chain Due Diligence Act (LkSG) and internationally recognized standards such as the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Declaration on Fundamental Principles and Rights at Work and the principles of the UN Global Compact.

We require all employees and business partners to live these principles in their daily actions and to support us in further developing and strengthening our commitment to ethics, integrity and social responsibility.

The requirements and principles of the Code of Conduct for Business Partners are an integral part of the contractual obligations and the cooperation between our Business Partners and HCC.

Our Business Partners therefore undertake to comply with and promote the following principles of this Code of Conduct, and to provide regular and appropriate training to their workforce to this end. The contents of this Code of Conduct shall also apply in its entirety to suppliers and other third parties used by our Business Partners to fulfill any contracts with HCC. Therefore, our Business Partners shall integrate requirements corresponding to the content of this Code of Conduct into their respective own contracts. We expect them to use their best efforts to obligate their suppliers and other third parties accordingly.

## Compliance with applicable laws and regulations

Our Business Partners undertake to strictly comply with all local, national and international laws and regulations that are relevant to their business activities. This commitment to legal compliance is an integral part of our business relationships and essential to maintaining a partnership of integrity and legal compliance.

## Social responsibility and human rights

### *Human rights standards*

Our Business Partners are committed to respecting and promoting human rights. This includes the protection of fundamental freedoms and the dignity of all human beings, regardless of origin, gender, age, religion, sexual orientation, disability or other personal characteristics. Our Business Partners must ensure that they do not commit or participate in human rights violations.

### *Equal treatment and equal rights*

Strict compliance with and promotion of non-discrimination, equality and inclusion in the working environment of our Business Partners is essential for us. It is essential that our Business Partners ensure equal treatment and promotion of all employees, regardless of their personal characteristics. It is also mandatory for our Business Partners to avoid harassment of any kind in the workplace to create a respectful, safe and positive working environment for everyone.

### *Prohibition of child labor and forced labor*

Our Business Partners undertake to employ only employees who have reached the minimum age required to perform work in accordance with the applicable national legislation and not to tolerate child labor. ILO Conventions No. 138 on the minimum age for employment and No. 182 on the elimination of the worst forms of child labor must be complied with. Our Business Partners also undertake to observe and respect the dignity and rights of children.

The use of forced labor, bonded labor, indentured servitude, involuntary or exploitative prison labor, which can be identified by indications such as labor under threat of punishment, withholding of identity documents, posting of a bond or other coercion, whether direct or indirect, is strictly prohibited. Our Business Partners will not support these practices in any way and will establish effective processes to prevent them. This explicitly includes the avoidance of any human rights violations against ethnic and religious minorities. Furthermore, no materials may be sourced from regions that are subject to sanctions under applicable law. Business Partners must ensure that no forced or child labor is used in the production of their raw materials or end products in their supply chain.

### *Social and humane working conditions*

Our Business Partners are obliged to actively contribute to the promotion of social justice. This includes striving for fair working conditions and supporting initiatives aimed at improving social standards. The protection of social rights, including the right to decent working conditions, health protection and education, must be respected and promoted by all our Business Partners.

All Business Partners must introduce effective processes to achieve and ensure these goals. This includes compliance with all applicable national and international standards and laws on occupational health and safety (in particular occupational safety, health protection and working hours) as well as remuneration and social benefits. Fair remuneration of all employees that at least meets national legal or industry-specific standards must be ensured.

When using or cooperating with private or state security forces, it must be ensured that the human rights of the Business Partner's employees and other rights holders are respected. In particular, no unlawful physical or psychological violence may be used.

### *Freedom of association*

The recognition and respect of freedom of association is mandatory for our Business Partners. This includes the unrestricted right of employees to form and participate in trade unions or other associations of their choice.

Furthermore, respecting and supporting collective bargaining and representation is an essential part of our expectations of Business Partners to appropriately respect and promote the interests of employees.

### *Environmental impact on local people*

Our Business Partners must ensure that local people are not adversely affected by their operations, e.g. through harmful soil contamination, water pollution, air pollution, harmful noise emissions or excessive water consumption that affect the natural resource base for food preservation and production, access to safe drinking water and sanitation.

### *Rights of local communities*

We expect our Business Partners to protect local communities, indigenous peoples and human rights defenders. It is essential that our Business Partners respect cultural differences and take into account the specific needs of these groups in their business activities.

Furthermore, special attention and care are required in business relationships in conflict-affected and high-risk areas (CAHRAs) to ensure that local communities are protected and that local challenges and circumstances are dealt with responsibly.

Our Business Partners must also comply with the prohibition of unlawful eviction from land, forests and waters when acquiring, cultivating or otherwise using land, forests and waters that serve as a person's livelihood.

## Environmental protection and sustainability

### *Environmental standards*

Our Business Partners must comply with all national and international environmental standards and laws applicable to the operating site. They must actively take measures to reduce pollution and promote environmental sustainability. This includes the implementation of processes and technologies that both minimize the environmental impact of their activities and contribute to the conservation of natural resources. In addition, our Business Partners must conduct regular environmental impact assessments to evaluate the potential environmental impact of their business practices and make appropriate adjustments to their operations to protect and promote the environment. To this end, our Business Partners who are also manufacturers must establish, apply and continuously improve an appropriate and effective environmental management system in accordance with ISO 14001 or a comparable, suitable environmental management system.

### *Climate protection*

We expect sustainable and active climate protection from our Business Partners. In this context, our Business Partners are committed to reducing greenhouse gas emissions, improving energy efficiency in all business processes and increasing the use of renewable energies.

The use of renewable energy sources is to be promoted in order to achieve a more sustainable energy supply.

A key aspect of our environmental strategy is to minimize the CO<sub>2</sub> footprint of all products and materials. Our Business Partners are obliged to take concrete measures to reduce their direct and indirect CO<sub>2</sub> emissions (including their upstream value chain) in all phases of production, transportation and use of their products. We expect our Business Partners to create transparency with regard to their own emissions and those of their upstream supply chains. To this end, we reserve the right to request evidence of the implementation of these measures and the progress made in terms of energy efficiency and CO<sub>2</sub> minimization at the product level, in particular in the form of an annual CO<sub>2</sub> report.



### *Conservation of resources*

Our Business Partners are obliged to avoid waste and to ensure responsible use of resources such as water, energy, raw materials and other materials.

They must actively promote the recycling and reuse of materials to reduce the environmental footprint of their production. Whenever technically feasible and economically justifiable, Business Partners should use secondary materials in their processes. Business Partners should know the percentage of recycled content in their products and provide this to us on request.

Our Business Partners are encouraged to actively reduce their energy and water consumption where possible and to take effective measures to ensure the protection of water resources and avoid water pollution.

We also expect our Business Partners to implement sustainable procurement practices that take both environmental and social aspects into account and thus contribute to the long-term conservation of resources.

### *Protection of biodiversity*

Our Business Partners are required to actively contribute to the conservation of biodiversity. We expect our Business Partners to protect natural ecosystems and not to contribute to the alteration, deforestation or degradation of natural forests and other natural ecosystems.

### *Handling waste and hazardous substances; Material Compliance*

Business Partners shall take appropriate and reasonable measures to realize the avoidance of waste, the reuse of resources, recycling, and the safe and environmentally friendly disposal of residual waste, chemicals and wastewater in their operations and along the supply chain.

Our Business Partners are obliged to observe material compliance, i.e. the statutory requirements and applicable standards and conventions on the prohibition, restriction and declaration of ingredients. Our Business Partners must therefore label these substances in accordance with the applicable regulations and ensure that they are handled, transported and stored safely. They must also ensure that they are properly reused, recycled or disposed of. Our Business Partners are obliged to inform us on request about the use of substances in production and operation that are subject to legal regulations/restrictions.

### *Animal welfare*

All Business Partners undertake to consistently comply with applicable national and international animal welfare laws and guidelines. This also includes the prohibition of animal testing if ethical and scientifically recognized alternatives exist.

Furthermore, it is desirable that our Business Partners are committed to promoting animal-friendly husbandry conditions. This includes supporting practices that respect the welfare and natural needs of animals. We also encourage our Business Partners to take measures to protect wild animal species and their habitats.

### *Product Safety*

The safety and quality of our products have a high priority for us and our customers. We therefore ensure the legal and regulatory conformity of our products and processes throughout the entire product life cycle. We also expect this from our Business Partners: all products and services must meet the contractually agreed and legally defined criteria for quality and safety at the time of delivery and be safe to use for their intended purpose. This requires that all relevant laws and regulations are observed throughout the entire product life cycle. We expect our Business Partners to report any suspected violations of legal requirements or regulations relating to regulatory conformity and product safety to us without delay.

## Responsible business practices

### *Prohibition of bribery, corruption and extortion*

To avoid bribery, corruption and extortion, our Business Partners must commit to transparent business practices. It is imperative that our Business Partners comply with all applicable national and international anti-corruption laws. Offering, promising, giving or accepting bribes in any form is strictly prohibited. This also includes refraining from granting or accepting improper facilitation payments.

### *Avoidance of conflicts of interest*

We expect our Business Partners to make decisions on the basis of objective considerations and not to be improperly guided by personal interests. As soon as a Business Partner becomes aware of a potential conflict of interest, the Business Partner is required to take internal measures to eliminate these conflicts and to inform us immediately.

### *Free competition and antitrust law*

Our Business Partners are obliged to comply with all applicable national and international competition laws and not to participate in price fixing, market or customer allocation, market and bid rigging.

### *Intellectual property*

Our Business Partners undertake to respect and protect copyright and other forms of intellectual property. This includes the obligation to avoid patent infringements in all business processes. Compliance with license agreements and the correct licensing of intellectual property are essential.

We also expect our Business Partners to support anti-piracy measures to prevent the misuse and unlawful distribution of intellectual property. We encourage our Business Partners to actively promote innovation and research while always respecting intellectual property rights.

### *Economic sanctions and money laundering*

Our Business Partners observe applicable sanction regulations and act in accordance with the legal requirements for the prevention of money laundering and combating the financing of terrorism.

Sanctions violations and violations of money laundering laws can lead to fines or imprisonment, reputational risks, the freezing of assets or being placed on sanctions lists.

We expect our business partners to ensure compliance with the relevant laws and regulations through adequate risk management processes.

### *Customs and export control regulations*

The applicable customs and export control regulations must be complied with. Our Business Partners are obliged to implement appropriate control mechanisms and to provide evidence of compliance with the applicable export or import requirements on request.

### *Safeguarding data protection and data security*

It is mandatory for our Business Partners to ensure the protection of personal data in accordance with applicable data protection laws. Data must be accessed and processed in strict compliance with applicable data protection laws and regulations. In the event of a data breach, it is mandatory to report it immediately in accordance with the statutory provisions and to take appropriate measures to remedy and prevent it.

Our Business Partners must implement effective data security measures to ensure the integrity and confidentiality of all data handled.

The confidentiality of customer information must be maintained at all times. This is a central aspect of our data protection policy and is essential for building and maintaining the trust of our customers.

### *Digital ethics and dealing with AI technology*

Artificial intelligence (AI) technology must be used responsibly and ethically. Our Business Partners should ensure transparency in the decision-making processes of AI systems. This includes the protection of personal data within AI systems. Special attention must be paid to avoiding bias and discrimination in AI systems to ensure fair and equitable results. We also expect our Business Partners to carry out ethical assessments when developing and implementing AI technologies to ensure that these technologies are in line with our ethical principles and values.

### *Transparency, political activities and lobbying*

Our Business Partners are required to ensure full transparency regarding political donations and activities. It is imperative that all lobbying activities comply with applicable lobbying laws. Our Business Partners must implement processes to avoid partisanship in business decisions and to ensure neutrality and objectivity. Transparency in communication with all stakeholders is essential to ensure trust and credibility. In addition, any undue influence is strictly prohibited to ensure the integrity and ethics of business practices.

### *Conflict minerals*

When sourcing minerals from high-risk areas, our Business Partners are obliged to carry out a thorough check and will disclose to us all conflict minerals used in the manufacture of the products supplied to us. At our request, they are obliged to provide information on the origin of the conflict minerals contained in their products throughout the entire supply chain. To ensure transparency in their supply chains and compliance with ethical and legal standards, our Business Partners will conduct regular audits of their Business Partners.

This includes the careful selection and monitoring of smelters and refineries to ensure that they operate responsibly and comply with international human rights and environmental standards. It is imperative that our Business Partners identify any links to conflict minerals and take active measures to avoid contributing to the financing of conflicts or human rights abuses. Where possible, our Business Partners will only source minerals from conflict and high-risk areas from certified smelters and refiners.

Our Business Partners are obliged to submit an annual Conflict Minerals Report to us or to a third party commissioned by us.

Our Business Partners will assist us in conducting appropriate due diligence on the origin of conflict minerals and provide us with information on the measures taken to ensure proper sourcing and monitoring in the supply chain for such materials.

### *Integrity of the supply chain*

We expect our Business Partners to implement, review, evaluate and maintain all the standards set out in this Code of Conduct as well as the statutory standards at every stage of their procurement processes. To this end, it is mandatory to pass on the obligations from this Code of Conduct in the supply chain and to regularly check Business Partners for compliance with these standards.

In this context, Business Partners shall disclose information about their supply chains to HCC on request in order to identify and minimize sustainability risks in the supply chain. Our Business Partners are also obliged to impose a corresponding disclosure obligation on their suppliers, which they must pass on in their supply chain. In particular, this may require business partners to disclose their supply chain to HCC up to the origin of the material (including interfaces such as smelters and refineries) and to provide evidence of the implementation of measures that exclude or minimize sustainability risks in the supply chain.

### *Setting up reporting channels*

In order to protect the requirements set out in this Code of Conduct and the statutory standards, it is essential that whistleblowers can express their concerns anonymously and thus be protected from possible negative



consequences. For this reason, our Business Partners are committed to establishing secure communication channels that cannot be traced and ensure that the identity of whistleblowers remains protected.

The reporting procedures must be clear, understandable and easily accessible. This can be achieved through written policies, online portals or dedicated hotlines. It is important that employees and other whistleblowers understand exactly how and where they can report concerns.

Our Business Partners must implement policies and procedures that protect whistleblowers from retaliation. This includes legal protections, non-retaliation policies and supportive measures for whistleblowers who are subject to retaliation.

Reports must be reviewed by an independent and objective body within or outside the Business Partner's operational organization. This ensures that the reports are treated fairly and without influence from internal interest groups.

Ultimately, creating a culture that encourages openness, honesty and ethical behavior is crucial to the success of a whistleblowing system. This can be achieved through regular training, awareness campaigns and the clear support of top management for employees.

At HCC, reports can be submitted via the [HCC whistleblower system](#).

## Compliance with the Code of Conduct

### *Audit and information rights*

HCC is entitled to check Business Partners' compliance with the Code of Conduct in an appropriate manner. Business Partners are obliged to actively support any necessary checks. To this end, HCC shall coordinate with the Business Partners as far as possible on the scope, time and place. The Business Partners must answer inquiries and requests for information completely and truthfully within a reasonable period of time and in compliance with the specified formalities within the framework of the applicable data protection laws. The Business Partners must also provide the relevant documents upon request. Business Partners shall support HCC to the best of their ability in verifying compliance with the requirements of this Code of Conduct in their supply chain.

### *Remedial measures*

Business Partners must immediately remedy any violations of which they become aware. If this is not achieved in the foreseeable future, Business Partners must draw up a remediation plan. They must draw up a timetable, document the measures, and also check their effectiveness. Business Partners are obliged to immediately investigate any suspicion of violations and to inform HCC of their measures to clarify the matter.

### *Consequences of violations*

A breach of the obligations described in this Code of Conduct constitutes a breach of contract towards HCC and a material impairment of the business relationship between HCC and the Business Partners. Business Partners must inform HCC within a reasonable period of time of the internal measures they have taken to prevent future violations. If the Business Partners do not comply with these obligations within a reasonable period of time, if the Business Partners do not initiate suitable improvement measures within a reasonable period of time or if a violation is so serious that a continuation of the business relationship becomes unreasonable for HCC, HCC reserves the right, without prejudice to further rights, to terminate the affected contractual relationship without notice or to withdraw from the affected contract.