

Fairness and Integrity.

# BUSINESS PARTNER CODE OF CONDUCT



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Stabilus S.A. has issued a Code of Conduct that is based on the belief that business activities should only be conducted in full compliance with legal requirements and consistent with ethical values, which are based on globally valid principles; in particular, the United Nations Universal Declaration of Human Rights and the Global Compact's Principles, the OECD Guidelines for Multinational Enterprises, and the International Labour Organisation Conventions.

This code of conduct is binding for all companies of the Stabilus group (together "Stabilus").

Stabilus expects all of its business partners to share this basic belief and, as a result, not only comply with the following principles on a company-wide level, but also to apply them at their associated companies world-wide, as well as take all necessary regulatory, organizational and technical precautions to ensure compliance with applicable laws.

## Compliance with Applicable Laws

Legal compliance is the basis for all actions and applies to all activities of our company and employees without exception.

## Protection of Human Rights

The protection of human rights in accordance with the United Nations Universal Declaration of Human Rights will be respected both within the company and with business partners, and in the company's presence in the public sphere.

## Fair Working Conditions

The principles of the International Labour Organisation ("ILO") regarding the basic principles and rights at work will be respected company-wide / group-wide; in particular,

- ▶ Any type of forced labor or child labor will not be condoned. The gainful employment of minors under the age of 15 or of school-age according to the respective country law is prohibited.
- ▶ The right to form an employee union and to join it, as well as employees' right to collective bargaining agreements as provided by applicable law will be respected.
- ▶ The same compensation will be paid to female and male employees for equivalent work. Wages and salaries as well as fringe benefits correspond to the respective national minimum norms.
- ▶ The country-specific legal provisions and stipulations of the International Labour Organisation shall apply to work hours.

## Non-Discrimination

Discrimination due to gender, ethnic origin, religion, age, disability, citizenship, sexual orientation, socio-economic class or other reasons that are prohibited by law will not be tolerated.

## Fair Competition

### Competition and Anti-Trust Laws

The applicable laws and regulations will be complied with. No anticompetitive agreements are entered into or information shared with competitors or business partners regarding topics that might determine or influence competitive behavior. In markets where a leading market position is held, rules regarding abuse of a dominant market position will be strictly complied with.

### Anti-Corruption

Stabilus does not condone any form of bribery or actions, neither by its employees or business partners, that could be construed as undue persuasion or exertion of influence. Stabilus expects of its business partners to agree to

- ▶ Make decisions exclusively on the basis of objective considerations;
- ▶ Not to offer or grant a domestic or foreign official or public servant any favor to said official or a third party for an official act;
- ▶ Not to request any favors;
- ▶ Not to accept, offer or grant any favors that violate legal regulations;
- ▶ Not to accept, offer or grant any financial favors that are immoral in nature;
- ▶ Mo Not to offer or grant employees of the Stabilus Group any favors that go beyond gifts of minor value, promotional gifts or business meals and entertainment as an expression of normal business courtesy.

## Avoiding Conflicts of Interest

All proposals from business partners will be examined fairly and without prejudice. The entire order awarding and processing procedure shall follow only objective criteria and must be transparent and reproducible. Biased preferential treatment or discrimination of business partners is not permissible.

## Transparent Business Relationships

We will only conduct business with business partners who, upon reasonable review, are deemed to be of integrity and whose legal compliance of their actions is beyond a doubt. It is vital that laws regarding money laundering are complied with at all times.

Consultants and brokers will only be used in compliance with applicable laws. Compensation will only be paid for services rendered. The compensation amount must be reasonable relative to the services provided.

## Environmental Protection

All legal regulations for protecting the environment and for using resources efficiently, both company-wide and group-wide, will be complied with. In addition, suitable and appropriate measures shall be taken to continuously improve the protection of the environment and resources throughout the entire value-added chain, in particular through the introduction of appropriate environmental management systems based on international standards.

## Occupational Health and Safety

Compliance with applicable laws shall be ensured throughout the company as well as group-wide. In addition, suitable measures will be taken to provide employees and third parties working for or with our company or group companies a safe and healthy work environment world-wide.

## Data Privacy

Personal data shall be treated with strict confidentiality and diligence, in compliance with applicable laws, as not to infringe on the right to privacy of employees, customers and business partners.

## Confidentiality Obligation / Protection of Confidential Data

Confidential information and know-how of Stabilus shall be treated strictly confidential, protected from unauthorized access and may only be disclosed to a third party with the written approval from Stabilus.

## Export Controls, Customs Regulations and International Sanctions

All laws regarding export, import and customs duties are complied with in global business activities, as are applicable embargo regulations and lists of sanctions, especially in the EU and the USA.

Stabilus expects to be notified by its suppliers regarding export restrictions and classifications.

## Prohibited Substances and Materials

Deliveries to Stabilus may not contain any products, substances or materials that are prohibited pursuant to applicable laws and regulations in the supplier's country of origin, the European Union, or one of the countries in which the products or parts are sold and used.

Any applicable legal regulations regarding "conflict minerals" shall be complied with. In the event that a product contains so-called conflict minerals (tin, tantalum, tungsten, gold), Stabilus expects its suppliers to provide transparency regarding their supply chain, in order to prove that no armed groups that are in violation of human rights are financed, neither directly nor indirectly.

## Validity along the Supply Chain

Compliance with the contents of this Code of Conduct will become a binding component of the business relationships with our own business partners. We will also promote the idea of our business partners adopting this Code of Conduct as part of their own business relationships.

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## Right to Information and Audit

If there is reason to suspect that this Code of Conduct has been violated in a significant way, Stabilus reserves the right to request written information.

In addition, Stabilus reserves the right to check compliance with these principles as part of customary or contractually agreed-upon supplier audits. If there is reason to suspect a violation, Stabilus shall have the right to conduct an unscheduled audit.

Requests for information and on-site audits shall protect the interests of the contract partner and employees, in particular with regard to trade and business secrets as well as compliance with data privacy rules.

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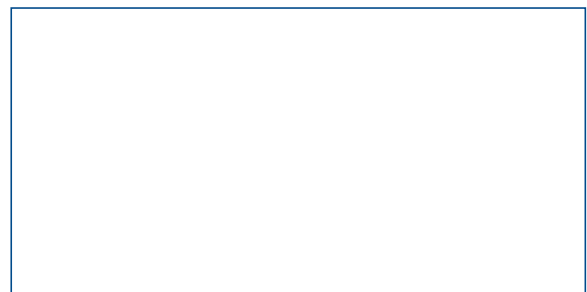
Date / Signature

## Early Termination Clause

In the event of a violation of the Code of Conduct for Business Partners, Stabilus shall have the right to request the other party refrain from the violating action(s), to the extent that the violation is substantial. In the event that no evidence can be provided that correction measures have been taken, despite a specific request to do so, or if repeated violations occur, Stabilus reserves the right to terminate agreements affected by the violation through early termination.

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Printed Name



Company Stamp

Stabilus S.A.  
2, rue Albert Borschette,  
L-1246 Luxemburg  
Grand Duchy of Luxembourg

Tel.: +352 286 770 1  
Fax: +352 286 770 99

[info.lu@stabilus.com](mailto:info.lu@stabilus.com)  
[www.stabilus.com](http://www.stabilus.com)