

ACPS AUTOMOTIVE

ACPS Automotive GmbH

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To
The Supplier

Name	Department	E-Mail	Date
Ferryd Abbas	Sourcing Director	Ferryd.Abbas@acps-automotive.com	August 2020

Compliance

Dear Supplier,

at ACPS Automotive, compliance is an integrated component of the corporate culture. ACPS Automotive expects its Suppliers to conduct business with the highest ethical standards, adhering to all applicable laws, rules and regulations.

Integrity is one of our main company values. It is fundamental for our behavior and a sustainable business success of ACPS Automotive, which has the utmost priority within our organization. Integrity is also a pre-condition for a trustful partnership and cooperation. Compliance applies to everyone, every ACPS Automotive employee and Supplier is responsible for ethically impeccable behavior.

This letter focuses on Suppliers with direct and, where appropriate, indirect relationships with ACPS Automotive, for both Suppliers who have a direct contractual relationship, as for Suppliers who have an indirect contractual relationship with an ACPS Automotive Supplier. It applies to existing and prospective suppliers.

ACPS Automotive is entitled to assess existing and prospective direct Suppliers at any time to ensure that they share our business values.

It is expected that Suppliers adhere to all laws, rules and regulations and must comply with all ACPS Automotive policies and guidelines related to the Code of Business Conduct.

In dealing with Suppliers and state institutions, the interests of the company and the private interests of employees on both sides are to be kept strictly separate. Actions and (Sourcing) decisions are to be proceeded independently of considerations that do not concern the business at hand and which involve personal interests.

Anti-corruption criminal laws are to be upheld. Among other things, the following is to be observed:

Environmental Management System of the Supplier

The Supplier shall be able to verify that it identified all relevant environmental regulations, and that their impact on the organization is known. Furthermore, the Supplier shall be obliged to comply with the environmental regulations in a verifiable, continuous and sustainable manner. The Supplier shall aim at further development of its environmental management system as per the requirements of ISO 14001 in the respectively applicable version. ACPS Automotive expects its Suppliers to send in proof of compliance.

Conflict Minerals

ACPS Automotive is committed to ensuring the responsible procurement of Conflict Minerals in accordance with human rights, legal obligations and international standards. We require all our Suppliers to provide up-to-date and accurate information to identify smelters and refineries in their supply chain. Additional costs to meet the requirements of a comprehensive Conflict Minerals Reporting shall be covered by the Supplier. The Supplier provides ACPS Automotive with the requested information and obtains this standard and related information from the next supplier level, which continues along the supply chain, with the aim of obtaining the DRC without conflict.

Corruption

Corruption is a criminal offence that can have far-reaching consequences for everyone involved. At ACPS Automotive we want to conduct business in a responsible, legal manner. We expect the same from all our Suppliers we conduct business with. Granting personal advantages such as payments and loans, including giving smaller gifts over a longer period of time and/or the payment of bribes by signing / acceding companies and their employees to public officials (such as civil servants or public employees) with the objective of gaining advantages or for the purpose of facilitating, obtaining or retaining business opportunities for the signing / acceding company or oneself or for third parties, are not permitted.

Criminal Acts in Business Dealings

Personal benefits in exchange for a favored position in business dealings may not to be offered, promised, granted or approved. Nor may personal benefits be demanded or accepted while dealing with Suppliers. The signing / acceding company must require from its employees that they will not allow such benefits to be promised to them. The management and employees of a Supplier are not allowed, during business dealings, to offer, promise, demand, give or accept gifts, payments, invitations or services that are provided with the aim of influencing a business relationship in a prohibited way or with whom there exists the risk of jeopardizing the professional independence of the Supplier. This generally does not apply to gifts and invitations that fall within the bounds of normal business practice, regarding hospitality, convention and courtesy.

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Conduct vis-à-vis Competitors (Anti-trust Law)

The Supplier respects fair competition. Therefore, the Supplier adheres to existing laws and regulations that uphold and promote competition, in particular prevailing anti-trust laws as well as laws that regulate competition.

In dealing with competitors, these provisions strictly prohibit collusion and other activities aimed at influencing prices or conditions, dividing up sales territories/ customers or using prohibitive means to inhibit free and open competition. Furthermore, these provisions prohibit the agreements between customers and suppliers by which customers are to be enjoined in their freedom to autonomously determine their pricing and miscellaneous conditions when reselling (determination of pricing and conditions).

Forced Labor

The Supplier rejects every form of forced labor.

Child Labor

The Supplier respects the regulations of the United Nations on human rights and children's rights. The signing / acceding company commits to complying with the Convention concerning the minimum age for admission to employment (Convention No 138 of the International Labor Organization) as well as the Convention concerning the prohibition and immediate action for the elimination of the worst forms of child labor (Convention No 182 of the International Labor Organization). If a national regulation concerning child labor requires stricter measures, these shall have precedence.

Principles promoting Social Responsibility

The Supplier respects and supports compliance of internationally recognized human rights and will oppose all forms of discrimination. The Supplier is committed to sustainably uphold the goal of environmental protection for current and future generations. Laws passed for the protection of the environment are to be obeyed.

Company Secrets and intellectual property

The Supplier commits its employees to safeguard trade and company secrets. It is forbidden to divulge confidential information, as well as confidential documents, to third parties without proper authorization or to provide other forms of access to them, unless proper authorization has been granted or it has to do with publicly available information. Any document or information involving ACPS Automotive's intellectual property, such as drawings or specifications, are strictly forbidden to be transferred to a third party or used for any purpose, unless for the completion of the contract with ACPS Automotive.



Ppa. _____

Ferryd Abbas

Sourcing Director

ACPS International Management

Confirmation of Compliance

The supplier, herewith, confirms to its best knowledge to have,

- Identified all material compliance risks and implemented effective risk mitigating processes.
- To implement proper preventive measures to reduce compliance risks and to monitor the effectiveness of such measures.
- No compliance violations were identified.

Date, company sign, signature of Supplier

Please sign and send it back.