### **ACPS Automotive GmbH**

Bertha-Benz-Straße 2 74379 Ingersheim – Germany Telephone +49 (0) 7142 9930-0 csr@acps-automotive.com

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 integral part of our corporate culture. ACPS Automotive expects its suppliers to conduct business with the highest ethical standards and to comply with all applicable laws, rules and regulations.

Integrity is one of our most important corporate values. It is fundamental to our conduct and to sustainable business success for ACPS Automotive, which is a top priority within our organization. Integrity is also a prerequisite for a trusting partnership and cooperation. Compliance applies to everyone, every ACPS Automotive employee and supplier is responsible for ethically impeccable behavior.

This letter is addressed to suppliers who have a direct and, if applicable, indirect relationship with ACPS Automotive as well as to suppliers who have an indirect contractual relationship with an ACPS Automotive supplier. It applies to existing and potential suppliers.

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ACPS Automotive is entitled to evaluate existing and potential direct suppliers at any time to ensure that they share our business values.

Suppliers are expected to comply with all laws, rules and regulations and to follow all related ACPS Automotive policies and guidelines.

When dealing with suppliers and government institutions, the interests of the company and the private interests of employees on both sides must be strictly separated. Actions and (procurement) decisions must be made independently of extraneous considerations and personal interests.

The criminal laws against corruption must be observed. Among other things, the following must be observed:

## 1. Social affairs and human rights

### Prohibition of child labour, forced labour and other forms of modern slavery

The supplier rejects any form of forced labour and respects the provisions of the United Nations on human rights and the rights of the child. The Supplier undertakes to comply with the Convention concerning the Minimum Age for Admission to Employment (Convention No. 138 of the International Labour Organisation) and the Convention concerning the Prohibition and Immediate Action for the Elimination of the worst forms of Child Labour (Convention No. 182 of the International Labour Organisation). If a national child labour regulation prescribes more stringent measures, these shall take precedence.

#### No discrimination and harassment

When selecting its employees, the supplier shall be guided only by their qualifications and skills and shall maintain equal opportunities in recruitment and employment. Furthermore, it does not tolerate any form of harassment or abuse. This is flanked by an anti-harassment policy in the company.

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### Remuneration and working hours

Remuneration and benefits correspond at least to the statutory minimum wage. The legal working hours and working time regulations of the respective country are observed. The payment of living wages within the framework of the "living wage concept" is supported.

### Freedom of association incl. collective bargaining

The supplier supports the right to organize and the right to collective bargaining in accordance with applicable laws.

#### Compliance with occupational health and safety regulations

The supplier shall avoid health hazards by complying with all statutory occupational health and safety regulations.

### 2. Environmental protection

### **Environmental management system of the supplier**

The supplier must be able to prove that he has identified all relevant environmental regulations and that their effects on the organization are known. Furthermore, the supplier undertakes to comply with the environmental regulations in a verifiable, continuous and sustainable manner. The supplier strives for the further development of his environmental management system in accordance with the requirements of ISO 14001 in the currently valid version. ACPS Automotive expects proof of compliance from its suppliers.

#### **Conflict Minerals**

ACPS Automotive is committed to ensuring the responsible sourcing 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 refiners in their supply chain. Additional costs to meet the requirements of comprehensive Conflict Minerals Reporting are the responsibility of the supplier. The supplier shall provide ACPS Automotive with the required information and obtain this standard and related information from the next level of supplier, continuing along the supply chain, with the goal of maintaining DRC conflict free.

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### Sustainable resource management

The supplier shall use resources efficiently, use energy-efficient and environmentally friendly technologies and reduce waste as well as emissions to air, water and soil. In addition, the continuous reduction of impacts on biodiversity, climate change and water scarcity shall be pursued.

### Responsible chemical management

The supplier is committed to avoiding negative effects on the environment and health. This is ensured through responsible chemicals management. In addition, the supplier complies with the European chemicals regulation "REACH".

### 3. Governance

### Corruption

Corruption is a criminal offence that can have far-reaching consequences for all parties involved. At ACPS Automotive, we want to conduct our business in a responsible and legal manner. We expect the same from all our suppliers with whom we do business. The granting of personal benefits such as payments and loans, including the giving of minor gifts over an extended 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) for the purpose of obtaining benefits or for the purpose of facilitating, obtaining or retaining business opportunities for the signing/acceding company or themselves or for third parties is not permitted.

#### Criminal acts in business transactions

Personal advantages in return for a preferential position in business dealings may not be offered, promised, granted or approved. Personal advantages may also not be demanded or accepted in dealings with suppliers. The signing / acceding company must require its employees not to allow themselves to be promised such advantages. The management and employees of a supplier may not offer, promise, demand, give or accept gifts, payments, invitations or services in business dealings which are provided with the aim of influencing a business relationship in an inadmissible manner or where there is a risk that they could jeopardize the professional independence of the supplier. This does not apply

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in principle to gifts and invitations that are within the scope of customary business practices about hospitality, convention and courtesy.

### **Conduct towards competitors (antitrust law)**

The supplier respects fair competition. The supplier therefore observes the existing laws and regulations for the preservation and promotion of competition, the applicable antitrust laws and the laws regulating competition.

These provisions strictly prohibit collusion and other activities aimed at influencing prices or conditions, dividing sales territories/customers or using prohibitive means to prevent free and open competition in dealings with competitors. In addition, these provisions prohibit agreements between customers and suppliers that are intended to hinder customers' freedom to determine their own prices and other conditions for resale (price and condition fixing).

### Trade secrets and intellectual property

The supplier shall oblige its employees to protect business and trade secrets. It is prohibited to disclose confidential information and confidential documents to third parties without authorization or to make them accessible in any other way, unless a corresponding authorization has been granted or the information is publicly accessible. Any documents or information concerning the intellectual property of ACPS Automotive, such as drawings or specifications, are strictly prohibited to be disclosed to third parties or to be used for any purpose, unless this serves the fulfilment of the contract with ACPS Automotive.

Last changes: 05.02.2021

Ppa.

### **Ferryd Abbas**

Sourcing Director

ACPS International Management

## **Confirmation of Compliance**

The Supplier hereby confirms to the best of its knowledge and belief that it has,

- has identified all material compliance risks and implemented effective risk mitigating processes.
- has implemented appropriate preventive measures to reduce compliance risks and monitors the effectiveness of these measures.
- has not identified any compliance violations

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### Date, company logo, signature of the supplier

Please return the signed compliance letter to us.

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