



# Code of Conduct for Suppliers and Service Providers

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# PREFACE

In today's world, with the many environmental and societal challenges posed by urbanization, growing populations, technology disruption and global warming, FORVIA has a responsibility as a company to make a positive contribution to society and to all its stakeholders.

Therefore, we have summarized our expectations to our suppliers and service providers (FORVIA partners) with respect to working conditions, health and safety, environment and business ethics in the following "Code of Conduct for Suppliers and Service Providers". This code of conduct is based upon the principles of the UN Global Compact, the standards set out in the Core Conventions of the ILO (International Labor Organization) and the Code of Conduct of the Electronics Industry (EICC).

The FORVIA Code of Conduct for Suppliers and Service Providers defines FORVIA's principles and our expectations to our FORVIA partners and their employees. This includes acting responsibly and abiding by the principles set out herein.

We expect our FORVIA partners to ensure that their own suppliers and service providers will also adhere to and abide by the principles of this code of conduct and the standards upon which it is based. If other regulations or laws

impose more extensive provisions, these have priority over this code of conduct.

FORVIA will use this code of conduct as part of its supplier selection and evaluation procedures. FORVIA reserves the right to carry out, at any time, audits at partners' various sites, facilitated by FORVIA or by a third party appointed by FORVIA, to verify conformance of the FORVIA partner's practices with FORVIA requirements. FORVIA reserves the right to potentially end its business relationship with FORVIA partners if they do not adhere to the principles defined below.

FORVIA requests its partners to work on reducing the environmental impacts of their products and processes by developing new solutions supporting the Circular Economy. Furthermore, FORVIA partners are requested to be regularly assessed by the sustainability rating company EcoVadis.

Adherence to these principles throughout the entire supply chain is of great significance to FORVIA. We are counting on your support as part of this supply chain.

If you have any questions about this code of conduct, please refer them to your FORVIA Procurement contact.



**PATRICK KOLLER**  
FORVIA CEO



**BERNARD SCHÄFER BARTHOLD**  
HELLA CEO

April, 2024

# 1. Labor and Social

## 1.1 Human Rights Policy

To prevent human rights violations in our activities, we have developed a human rights and environment due diligence approach which is detailed in our Group Policy:

[FAURECIA](#)  
[HELLA](#).

## 1.2 No Child Labor

FORVIA partners are prohibited from employing children in violation of the stipulations of the International Labor Organization's conventions (ILO Convention n° 138, 182).

The minimum age of employment for young workers shall comply with the provisions of the Core ILO Conventions. The health, safety and moral of young workers shall be protected accordingly.

As an example, employees under 18 years of age shall not perform hazardous work, night work or overtime.

## 1.3 No Forced Labor

The FORVIA partner must not, under any circumstances, resort to forced or compulsory labor, modern slavery or human trafficking.

Forced or compulsory labor is any work or service which is forced upon any person under the menace of a penalty and which the person has not entered of his or her own free will. Forced labor can include practices such as restricting people's movement; withholding wages or identity documents to force them to stay on the job; or entan-

gling them in fraudulent debt or wage deductions from which they cannot escape; or developing their dependency of in-kind payments; or deprivation of food, shelter or other necessities; applying compulsory overtime; or loss of social status; etc. (see ILO Conventions n° 29, 105 and Protocol 2014 to ILO C29).

All labor must be voluntary, and employees must be free to end their employment relationship at any time in line with respect of a reasonable notice period according to local law.

FORVIA partners will ensure that employees understand their rights regarding payment of wages, overtime, retention of identity documents, etc.

Migrant employees, employees who are part of a group that has suffered from long-standing discrimination, young people and unskilled or illiterate employees, and women among these groups, constitute populations which may not be aware of their legal rights. Therefore, FORVIA partners will ensure that they are treated fairly, and their rights are respected.

FORVIA expects from its partners to comply with the following Ethical Recruitment Principles:

- » No retaining, destroying or denying access to the employee identity documents
- » No Recruitment Fees paid by employees
- » Labor Contracts provided in a language well understood by the employee

If employees are recruited by third parties, it is expected that the suppliers of our partners adhere to the above principles.



## 1.4 Health and Safety

FORVIA partners shall ensure that the health and safety (H&S) risks to their policyholders, employees, contractors and members of the public which arise from their operations are reduced as far as is reasonably practicable.

FORVIA partners will carry out their operations in a safe manner in line with relevant regulation, approved codes of practice and industry best practice and in a way that does not expose any person to the risk of injury or ill health.

Accordingly, their chosen contractors or suppliers are expected to demonstrate a clear commitment to Health and Safety Management and that they maintain effective policies and procedures. FORVIA partners shall be certified according to ISO 45001 standard by an accredited third party, or at least show a schedule of implementation.

FORVIA partners will provide their H&S indicators, risk assessment and associated H&S improvement plan, upon request. FORVIA partners will adopt a continuous improvement approach, based on the collection and analysis of occupational incident and accident data and feedback. Partners will also respect employee's rights to participate in such activities and H&S decisions.

FORVIA partners will provide training to their employees and anyone else impacted by their activities, where the details may include training on how

to use work equipment; manual handling; risk assessments; fire safety, emergency response and preparedness; first aid; personal protective equipment and training relevant to the particular health and safety risks relevant to or created by that organization's operations.

FORVIA partners will ensure the provision and maintenance of protection equipment, at no cost to the employees. FORVIA partners will promptly communicate any safety concern related to products and make suggestions to improve product safety.

FORVIA partners will identify, evaluate, and control worker exposure to hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and high repetitive or forceful assembly tasks.

## 1.5 Working Hours

Working hours (including overtime), as well as break times and periodic days off, shall be compliant with applicable local laws.

Overtime work should be voluntary and paid as such.

Work or service outside normal daily working hours will not be imposed by exploiting an employees' vulnerability under the menace of a penalty. For example, employers shall not set performance targets that result in an obligation to work beyond normal working hours because of the employees' need to be able to earn the minimum wage.

### **1.6 Fair Wages**

Employees must be paid in a fair and timely manner, and the basis on which employees are being paid must be clearly conveyed.

FORVIA partners are expected to remunerate their employees with an adequate wage which is amounting to at least the minimum wage as established by the local law or determined in accordance with the regulations of the place of employment, so that a decent living for the employee can be ensured. Local living costs and the local social security benefits shall be considered.

### **1.7 Equality of Treatment and Non-discrimination**

FORVIA partners must not discriminate against any person based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, social origin, marital status, or any other characteristics protected by law in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, termination and retirement (see ILO Convention n° 100, 111).

Employees shall not be subjected to disproportionate stringency or treated in an inhumane manner. This includes sexual harassment, sexual abuse, physical reprimand and physical and mental abuse. It also applies to the threat of such treatment.

FORVIA partners should provide equal opportunity for women in employment and commit to equal pay for equal work of men and women.

### **1.8 Rights of Minorities and Indigenous People**

FORVIA partners should respect the rights of local communities to decent living conditions; education, employment and social activities.

### **1.9 Land Rights and Forced Eviction**

FORVIA partners should avoid forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.

### **1.10 Freedom of Association and the Right to Collective Bargaining**

FORVIA partners must respect the right of employees to associate freely, form and join union or employee representative bodies of their own choice, seek representation, and to bargain collectively, in accordance with the applicable local laws and regulations.

FORVIA partners shall ensure that representatives of such personnel are not the subject to discrimination and that such representatives have access to their members in the workplace as well as adequate working space in order to work effectively and without interference (see ILO Convention n° 98, 87).

Where the right to freedom of association and collective bargaining is restricted under law, FORVIA partners should provide employees a parallel mechanism to make their views known to the management and take those into consideration.

### **1.11 Private or Public Security Forces**

FORVIA partner should not commission or use private or public security forces to protect the business project if, due to a lack of training or control on the part of the company, the deployment of the security forces may lead to violations of human rights.

# 2. Environment

## 2.1 Environmental Policy

The FORVIA partner acknowledges that environmental responsibility is an integral part of product manufacture. Production processes shall be designed to prevent negative impacts on the environment and natural resources shall be conserved.

The FORVIA partner will follow applicable local, national, and international environmental laws. The FORVIA partner will obtain and keep current all required environmental permits, approvals, and registrations, follow their operational and reporting requirements, and will provide said documentation to FORVIA upon request. FORVIA encourages all partners to be bold and go beyond compliance obligations to integrate environmental practices.

The FORVIA partner must systematically identify environmental risks for its own production and upstream supply chain and take suitable measures to prevent or minimize any negative environmental impact. The employees shall be instructed on how to mitigate environmental risks.

FORVIA Partners shall be certified according to ISO 14001 standard by an accredited third party, or at least show a schedule of implementation.

## 2.2 CO<sub>2</sub> Emission Reduction

FORVIA has set the target to have a carbon neutral supply chain by 2045. FORVIA partners are requested to develop suitable corporate targets in line with the Paris Agreement for their Scope 1, 2 and 3 emissions and take measures in line with these targets.

The target assessment shall be done in accordance with suitable methods. Measures shall be tracked and documented against the reduction target.

The FORVIA partner must deploy actions on their operational perimeter to improve the energy efficiency and usage of renewable energy of their sites to reduce greenhouse gas emissions. The FORVIA partner must on demand commit to the material- and component-specific CO<sub>2</sub> targets of FORVIA that are agreed as part of the sourcing process and switch to CO<sub>2</sub>-neutral products in the medium term.

## 2.3 Circularity, Sustainable Resources, Waste Reduction, Reuse and Recycling

FORVIA partners should promote closed loop systems by supporting the use of sustainable, renewable natural resources.

The FORVIA partner shall monitor and upon request inform FORVIA about the Life Cycle Assessment of the supplied product. The Product Carbon Footprint calculation shall be in accordance with ISO 14067 and the Life Cycle Assessment standards ISO 14040 and ISO 14044.

The FORVIA partner shall provide FORVIA with information about its use of secondary materials at product level. Additionally, the FORVIA partner should opt to use secondary, bio-based, and renewable materials where these are available and where it is technically feasible to use them.

FORVIA partners shall implement a systematic approach to identify, manage, reduce, reuse, recycle and, as last option, to responsibly dispose waste.



## 2.4 Water Quality, Consumption and Management

FORVIA partners should preserve water resources through an impact assessment of water stress in operations and throughout the life-cycle and integrate water management into the business plan.

FORVIA partners should measure and monitor their water consumption and quality.

FORVIA partners should develop a water assessment and water balance for each site, establish a baseline and set objectives for reduction (e.g., cubic meters per unit).

FORVIA partners should also set objectives and methods for efficient conservation projects with measurements to compare progress against goals to close gaps and provide transparency via reports, upon request.

Additionally, a risk assessment of potential impact on flooding (as a consequence of rainwater run-off) should be performed.

## 2.5 Air Quality

FORVIA partners should routinely monitor air emissions, integrate air emissions controls into the business plan, establish an air emissions management plan that meets or exceeds regulatory requirements for each facility and apply needed corrective actions if air emissions are in violation of regulatory requirements.

Air emissions include, but are not limited to, volatile organic compounds (VOCs), corrosives, particulate matter (PM), ozone-depleting substances, air toxics and combustion by-products generated from business and manufacturing operations.

## 2.6 Soil Quality

Where appropriate, partners should monitor and control their impact on soil quality to prevent soil erosion, nutrient degradation, subsidence and contamination.

## 2.7 Noise Emissions

Where appropriate, partners should monitor and control the levels of industrial noise to avoid noise pollution.

## 2.8 Prohibited Substances and Materials

Chemicals and other materials, that pose a hazard to the environment if released, shall be identified and managed in a way that ensures their safe handling, transport, storage, use and recycling or disposal.

The FORVIA partner shall abide by all applicable national laws and regulations and customer specifications regarding the prohibition or restriction of specific substances. This includes mandatory labeling for recycling and disposal.





FORVIA partners must adhere to the European REACH procedures or their national / international equivalent, such as the American Toxic Substance Control Act (TSCA) or the Inventory of Existing Chemical Substances in China (IECSC).

FORVIA partners must disclose on the use and origin of certain substances and materials in order to comply with laws and regulations and actively investigate suitable substitutes for these certain substances to maintain product and environmental stewardship.

## 2.9 Responsible Sourcing of Minerals

FORVIA partners shall ensure compliance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Upon request, FORVIA partners shall provide information about their minerals supply chain, including information about their origins.

FORVIA partners shall exercise due diligence on the origin and supply chain of conflict minerals (3TGs, tantalum, tin, tungsten, and gold) as well as cobalt and mica and, upon request, of further critical raw materials in their products supplied to FORVIA.

Smelters and refineries without an adequate and audited due diligence process such as the RMI's Responsible Minerals Assurance Process (RMAP) shall be excluded.

FORVIA partners shall ensure that smelters and/or manufacturers in FORVIA's supply chain are not affected by applicable embargo regulations at time of delivery. Affected parties shall be excluded from FORVIA's supply chain with immediate effect.

## 2.10 Biodiversity and Deforestation

The activities of FORVIA partners - including the production and processing of raw materials - shall protect natural ecosystems and avoid modification, deforestation and degradation of forests based on the identification and management of natural forests and other natural ecosystems.

The FORVIA partner must also perform corresponding due diligence with regards to its supply chain.

## 2.11 Animal Welfare

FORVIA partners should adhere to the 3Rs principles for animal testing within their operations.

The 3Rs are:

Replacement: Replace animals with non-animal methods where possible.

Reduction: Reduce the number of animals used, using only enough to obtain scientifically valid results.

Refinement: Refine animal use and care practices to minimize pain, suffering, distress or lasting harm to the animals.

FORVIA partners should not cruelly or unnecessarily cause injury to an animal and should take all reasonable steps to avoid animal suffering in their operations.

FORVIA partners should respect the five freedoms formalized by the World Organization for Animal Health (WOAH) concerning animal welfare, which include: freedom from hunger and thirst; freedom from discomfort; freedom from pain, injury, and disease; freedom to express normal and natural behavior; and freedom from fear and distress.



# 3. Business Practices

## 3.1 Compliance with Laws

The FORVIA partner agrees to comply with all applicable national laws and other regulations in the context of its business operations at any time.

## 3.2 No Corruption and Bribery

FORVIA partners shall prevent and fight all forms of corruption, bribery, extortion, and improper advantage, and comply with all applicable laws pertaining to these issues.

FORVIA partners should not, directly or indirectly, offer, promise, give, demand or accept any bribe or other undue advantage to FORVIA employees, public officials or other private or public actors, with the intention to obtain or retain business or any other improper advantage.

FORVIA partners should develop and adopt adequate internal controls, ethics and compliance programs or measures for preventing and detecting bribery.

These may include promoting employee awareness of the company policies against bribery and a system of financial and accounting procedures, reasonably designed to ensure the maintenance of fair, transparent and accurate books, records, and accounts.

FORVIA has a strict policy regarding the acceptance of gifts and gratuity from business partners, including suppliers.

## 3.3 Disclosure of Information

Information on the FORVIA partners' business activities, financial situation and performance shall be disclosed in accordance with applicable laws and regulations as well the prevailing industry expectations.

All business transactions must be transparently and properly reflected on the FORVIA partners' business records (no falsification).

## 3.4 Fair Competition (Antitrust Law)

The FORVIA partner shall strive for fair business practices, and in any case, FORVIA partners must comply with the applicable laws and regulations, notably antitrust / competition laws.

## 3.5 Conflict of Interests

A conflict of interest exists when an employee or a close relative is liable to benefit personally from a transaction involving a company in the FORVIA Group.

Conflicts of interest shall be addressed by avoiding, identifying and revealing situations where there is an actual risk of conflict of interest in association with FORVIA employees or their relatives.



### **3.6 Protection of Confidential Information and Data Privacy**

The FORVIA partner shall comply with all applicable laws and regulations concerning data protection and data security. The FORVIA partner shall take all necessary measures to adequately protect personal data and confidential information.

### **3.7 Protection of Intellectual Property**

Intellectual property rights must be respected. Transfer of technology and know-how must be done in a manner that protects intellectual property rights.

### **3.8 Sanctions and Export Control**

The FORVIA partner shall comply with all applicable laws and regulations relating to sanctions and trade embargoes, export and import control as well as customs. The Partner must therefore take all necessary measures to avoid the risk of any violation.





# REPORTING INFRINGEMENTS

The FORVIA partner is offered to use the HELLA Whistleblowing System tellUS! ([www.hella.whistleblownetwork.net](http://www.hella.whistleblownetwork.net)) or the Faurecia Speak Up Line ([www.faurecia.ethicspoint.com](http://www.faurecia.ethicspoint.com)) to report violations of the rules set out in this Code of Conduct for Suppliers and Service Providers, notably related to (but not limited to):

- » Corruption; or
- » Anti-competitive practices; or
- » Human rights and/or environmental violations; or
- » Harassment in the workplace; or
- » Accounting irregularities; or
- » Breach of confidentiality; or
- » Other serious crimes constituting a threat or serious harm to public interest.

The identity of the whistleblower will be kept confidential.

Whistleblowers are protected against retaliation (caused by the report being submitted in good faith).

Whistleblowers can choose to report anonymously (if permitted by local law).

The FORVIA partner is required to provide an equivalent operational-level grievance mechanism which is accessible to all employees, suppliers, and the public. The FORVIA partner will not retaliate against anyone who makes a good faith report of a violation of policy or law. The FORVIA partner will review and close all reported grievances, and provide appropriate remedies when a non-compliance occurs.

# REFERENCES

The standards listed below form the basis for our code of conduct and can be regarded as sources of further information:

- > United Nations Global Compact
- > Faurecia and HELLA Human Rights Policy
- > ILO International Labor Standards
- > European Automotive Working Group on Supply Chain Sustainability (Guiding Principles)
- > AIAG Automotive Industry Guiding Principle
- > Responsible Business Alliance (RBA)
- > OECD Guidelines for Multinational Enterprises – 2023
- > OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- > United Nations guiding principles on Business and Human Rights – 2011
- > ISO 14001: Environmental Management Systems
- > ISO 45001: Occupational Health and Safety Management Systems





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