



Elektrobit

# Business Partner Code of Conduct (V. 2017) Elektrobit Automotive GmbH



Document version: 2.0, Status: approved



## Dokumentenhistorie

Date	Version	Editor	Description
2016-07-13	0.9	Sj	Creation with EB brand, obvious adaptations
2016-11-09	1.0	Bhp	Finalized
2018-02-21	1.1	voar	Update to version 2017 based on Conti Doc
2018-03-20	2.0	voar	Updates based on review feedback

## Legal disclaimer

Company-confidential and proprietary information

ALL RIGHTS RESERVED. No part of this publication may be copied in any form, by photocopy, microfilm, retrieval system, or by any other means now known or hereafter invented without the prior written permission of Elektrobit Automotive GmbH.

Copyright 2018, Elektrobit Automotive GmbH

Elektrobit Automotive GmbH

Am Wolfsmantel 46

91058 Erlangen, Germany

Phone: +49 9131 7701 0

Fax: +49 9131 7701 6333

<http://automotive.elektrobit.com>

## 1. Preface

Elektrobot Automotive GmbH and all of its subsidiaries including minority holdings under the management control of an Elektrobot company (hereinafter collectively referred to as “Elektrobot”) are committed to honesty and integrity with respect to their entire business conduct towards employees, customers, suppliers, competitors and other stakeholders. Elektrobot recognizes that legal and cultural requirements vary in a global market. Elektrobot expects all of its suppliers to act with the same fairness, honesty and responsibility in all aspects of their business. This Business Partner Code of Conduct highlights important standards that are consistent with Elektrobot’s company values and to which each supplier of Elektrobot must strictly adhere

## 2. Our Corporate Social Responsibility

The respect for freedom and human rights is an essential principle of Elektrobot’s business activities. It creates the framework of our operations and is pre-requisite for our success. Elektrobot is committed to the principle of sustainability. This includes the responsible – meaning efficient and effective – and sustainable use of available resources, at present and in the future. As a participant of the United Nations Global Compact, Elektrobot has committed itself to its ten principles in the areas of human rights, labor, the environment and anti-corruption.

Elektrobot is committed to honesty and integrity with respect to our entire business conduct towards employees, customers, suppliers, competitors and other stakeholders. Elektrobot recognizes that legal and cultural requirements vary in a global market. Elektrobot expects all of its Business Partners to act with the same fairness, honesty and responsibility and dedication to corporate social responsibility in all aspects of their business.

This Business Partner Code of Conduct highlights important standards that are consistent with Elektrobot’s values and which we expect each Business Partner including, but not limited to suppliers, consultants, vendors, brokers, merchants, dealers, contractors, agents and others, to observe and strictly adhere to.

## 3. Compliance with Laws, Rules and Legal Regulations

The Business Partner will comply with all applicable laws, rules and regulations in the countries in which it operates and will maintain suitable measures to ensure Compliance with such laws, rules and legal regulations.

### **Combating Slavery and Human Trafficking**

The Business Partner will comply with all applicable laws, rules and legal regulations prohibiting slavery and human trafficking in its own business as well as in its supply chain.

---

## **Compliance with Antitrust Laws**

The Business Partner will strictly comply with all applicable antitrust laws, trade practice laws and any other competition laws, rules and regulations dealing for example with monopolies, unfair competition and restraints of trade, and relationships with competitors and customers. The Business Partner will not enter into agreements with competitors or engage in other acts that may unfairly impact competition, including, but not limited to, price fixing or market allocations.

## **Combating Corruption**

Elektrobit does not tolerate any form of corruption. Thus, the Business Partner will comply with applicable laws and regulations concerning bribery and anti-corruption, including those concerning foreign corrupt practices.

The Business Partner will neither engage in nor tolerate any form of corruption, bribery, theft, embezzlement, or extortion or the use of illegal payments, including without limitation, any payment or other benefit conferred on any individual, company or government official, for the purpose of influencing the decision-making process in violation of applicable laws. Specifically, the Business Partner must not offer illegal benefits or illegal favors such as bribe payments, kick-backs, or other illegal benefits including inappropriate gifts and undue hospitality towards Elektrobit employees for the exchange of business opportunities.

## **Conflict Minerals**

The Business Partner is aware of applicable legal requirements in relation to “conflict minerals” including tin, tantalum, tungsten, their ores and gold originating from conflict areas and shall ensure compliance with such laws. Additionally, the Business Partner will take best efforts to avoid the use of raw materials in its products that directly or indirectly finance armed groups violating human rights.

## **Export and Import Regulations**

The Business Partner will comply with all applicable import and export control laws, including without limitation, sanctions, embargoes and other laws, regulations, government orders and policies controlling the transmission or shipment of goods, technology and payments.

## **Money Laundering**

At Elektrobit we expect our Business Partners to comply with all applicable statutes governing the prevention of money laundering and not to participate in any money laundering activity.

## 4. Conflict of Interest

Employees are expected to act in the best interest of their company. Private interests and personal consideration shall not affect any business decision. Elektrobit as well as the Business Partner will avoid any activity or situation which may lead to a conflict of private interest of a Elektrobit employee or Business Partner and the business interest of Elektrobit. A Business Partner becoming aware of a conflict of interest situation will immediately notify Elektrobit about this.

## 5. Respect for Human Rights, Anti-Discrimination and Women's Empowerment

Elektrobit respects human rights and actively promotes their observance. We follow the Universal Declaration of Human Rights of the United Nations, which requires each individual, every organ of society and, by extension, economic agents and businesses, to contribute towards the observation of these rights. In addition, Elektrobit respects the tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the UN International Labour Organization as well as the OECD Guidelines for Multinational Enterprises. Elektrobit strives at providing people with goods while maintaining our competitive capacity. The Business Partner will treat all individuals with respect and fairness and will observe basic human rights set forth, for example, in the Universal Declaration of Human Rights of the United Nations and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the UN International Labour Organization (ILO), including, but not limited to, the prohibition of forced or child labor, and the provision of reasonable wages, social benefits, working hours, freedom of association and other fair working conditions in compliance with applicable laws.

The Business Partner will maintain an environment with no retaliation, free of discrimination and harassment on the basis of gender, age, race, skin color, ethnicity, culture or national origin, citizenship, religion or religious beliefs, physical or mental disability, veteran status, sexual orientation or any other characteristics protected by applicable law.

Elektrobit supports the UN Female Empowerment Principles and believes that empowering women to participate fully in economic life across all sectors is essential to build stronger economies, achieve internationally agreed goals for development and sustainability, and improve the quality of life for women, men, families and communities.

### **Elektrobit strongly encourages its suppliers to:**

- Join Elektrobit in formally supporting the UN Female Empowerment principles
- Ask business partners and peers to respect the company's commitment to advancing equality and inclusion
- Respect the dignity of women in all marketing and other company materials

---

## **6. Product Safety, Health, and Environment**

With our processes and products, Elektrobit desires to make a substantial contribution to the sustainable use of resources, environmental protection, including climate protection in particular. Elektrobit strives to save resources by continually aligning our production, quality and performance of our products with environmental soundness, and by reducing consumption of energy, water, raw materials and supplies.

The Business Partner will support Elektrobit in these efforts. Thus, the Business Partner will be committed to manufacture and deliver safe products to Elektrobit and provide a safe working environment that supports accident prevention and minimizes exposure to health risks to the Business Partner's employees.

The Business Partner will comply with applicable laws and regulations on environmental protection and will preserve resources and protect the environment as much as possible.

## **7. Data Protection, Confidential Information and Intellectual Property**

The Business Partner will comply with all applicable laws concerning data protection.

It is the Business Partner's responsibility to ensure that any confidential business information or trade secrets gained by virtue of the business activities with Elektrobit (hereinafter referred to as "Confidential Information") is held in strict confidence and not improperly used or disclosed to third parties. Furthermore, the Business Partner will protect and secure Elektrobit's intellectual property as Confidential Information.

## **8. Compliance with this Business Partner Code**

Elektrobit regards the provisions of this Business Partner Code, which we shall amend from time to time, to be essential for the business relationship between Elektrobit and the Business Partner. Therefore, compliance with the provisions herein is essential for the business relationship between Elektrobit and the Business Partner which is acknowledged and agreed by the Business Partner.

In case of significant breaches by the Business Partner of this Business Partner Code, Elektrobit reserves the right to terminate the business relationship with the Business Partner subject to applicable laws.



Elektrobit reserves the right to audit the Business Partner's compliance with this Business Partner Code in an appropriate manner. Any audit will be scheduled at business hours mutually agreed with the Business Partner and by the Business partner providing an appropriate level of documentation which substantiates in a clear and transparent manner the adherence to this Business Partner Code.

The Business Partner will use its best efforts to be familiar with the business practices of its suppliers, sub-contractors and other business partners and to require all such suppliers, sub-contractors and business partners to comply with this Business Partner Code or the values laid down herein.

The Business Partner and Elektrobit will discuss any questions in relation to this Business Partner Code in a trustful and respectful manner.

Elektrobit Automotive GmbH is a German company, located in Erlangen and a 100% subsidiary of the Continental Group.

The Business Partner is encouraged to report violations of this Business Partner Code to the Continental Compliance and Anti-Corruption Hotline. Contact details are available on the Continental website ([www.continental-corporation.com](http://www.continental-corporation.com)).