

# Supplier Code of Conduct

## TTTech Auto

[tttech-auto.com](http://tttech-auto.com)

## TTTech Auto Supplier Code of Conduct

### Table of contents

1.0	Objectives / Purpose .....	3
2.0	Standards for Labor and Human Rights .....	5
2.1	Prohibition of Forced Labor .....	5
2.2	Child Labor Avoidance and Young Workers .....	6
2.3	Working Hours .....	7
2.4	Wages and Benefits .....	7
2.5	Non-Discrimination/ Non-Harassment/ Humane Treatment .....	7
2.6	Freedom of Association and Collective Bargaining .....	8
2.7	Diversity .....	8
3.0	Standards for Health and Safety .....	10
3.1	Occupational Health and Safety .....	10
3.2	Emergency Preparedness .....	10
3.3	Occupational Injury and Illness .....	11
3.4	Industrial Hygiene .....	11
3.5	Physically Demanding Work .....	11
3.6	Machine Safeguarding .....	11
3.7	Sanitation, Food, and Housing .....	12
3.8	Health and Safety Communication .....	12
3.9	Worker Health and Safety Committees .....	12
4.0	Standards for Environment .....	13
4.1	Environmental Permits and Reporting .....	13
4.2	Pollution Prevention and Resource Conservation .....	13
4.3	Hazardous Substances .....	13
4.4	Solid Waste .....	14
4.5	Air Emissions .....	14
4.6	Materials Restrictions .....	14

## TTTech Auto Supplier Code of Conduct

4.7	Water Management .....	15
4.8	Energy Consumption and Greenhouse Gas Emissions .....	15
4.9	Certification .....	16
5.0	Standards for Business Ethics .....	17
5.1	Business Integrity .....	17
5.2	No Improper Advantage and Conflict of Interest .....	17
5.3	Disclosure of Information.....	17
5.4	Intellectual Property .....	18
5.5	Fair Business, Advertising and Competition .....	18
5.6	Protection of Identity and Non-Retaliation .....	18
5.7	Responsible Sourcing of Minerals .....	18
5.8	Privacy .....	19
6.0	Standards for Management System .....	20
6.1	Company Commitment .....	20
6.2	Management Accountability and Responsibility .....	20
6.3	Legal and TTTECH AUTO Requirements .....	20
6.4	Risk Assessment and Risk Management.....	20
6.5	Improvement Objectives .....	21
6.6	Training and Competencies .....	21
6.7	Communication .....	21
6.8	Worker/Stakeholder Engagement and Access to Remedy .....	21
6.9	Audits and Assessments .....	21
6.10	Corrective Action Process .....	22
6.11	Documentation and Records.....	22
6.12	Supplier Responsibility .....	22
7.0	Document Information.....	22
7.1	References .....	23
7.2	Revision History .....	24

## TTTech Auto Supplier Code of Conduct

### 1.0 Objectives / Purpose

TTTECH AUTO is a company with a strong commitment to sustainability. TTTECH AUTO encourages its suppliers to join TTTECH AUTO in this commitment, based on a shared set of values and principles.

TTTECH AUTO pursues mutually beneficial relationships with its suppliers and contractors ("Suppliers") and seeks to award business to those Suppliers that are committed to acting fairly and with integrity towards their stakeholders, to observing the applicable rules of law, and to supporting and respecting internationally proclaimed human rights.

TTTECH AUTO is committed to ensuring that working conditions in TTTECH AUTO's supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally responsible.

TTTECH AUTO's Suppliers will commit, in all their activities, to operate in full compliance with the laws, rules, and regulations of the countries in which they operate. Beyond this, Suppliers will comply with the TTTECH AUTO Supplier Code of Conduct ("Code") using the management systems described in this document.

The Code embodies the principles outlined in the Responsible Business Alliance (formerly the Electronic Industry Citizenship Coalition) ("RBA") Code of Conduct, Version 8.0. RBA member companies, including TTTECH AUTO, are committed to supporting the rights and well-being of workers and communities worldwide affected by the global electronics supply chain. The Code is also based upon the TTTECH AUTO Code of Conduct (COBC). In some places, this Code is more detailed than the RBA Code of Conduct or the TTTECH AUTO Code of Conduct to provide clarity and to incorporate the possibility of assessing Supplier's compliance with the Code.

TTTECH AUTO suppliers shall comply with the requirements in this Code and require their own suppliers to do the same. TTTECH AUTO may visit (and/or have external monitors visit) Supplier facilities to assess compliance with this Code. Violation of this Code may result in an immediate termination of the relationship with TTTECH AUTO. Additionally, any such violation may result in legal action.

## TTTech Auto Supplier Code of Conduct

Recognized standards, such as the Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles on Business and Human Rights (UNGPs), standards, conventions and guidelines issued by organizations such as the International Labor Organization (ILO) Fundamental Conventions, The Organization for Economic Co-operation and Development's (OECD), Social Accountability International (SAI), and the Ethical Trading Initiative (ETI), have been used as references in preparing this Code and may be useful sources of additional information (see Section 7). TTTECH AUTO extends the Code by maintaining a series of detailed Standards that clarify its expectations for compliance.

This Code is not intended to create new and additional third-party rights, including for employees.

## TTTech Auto Supplier Code of Conduct

### 2.0 Standards for Labor and Human Rights

TTTECH AUTO is committed to upholding the human rights of workers and treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

The labor standards are as follows:

#### 2.1 Prohibition of Forced Labor

Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities, including, if applicable, workers' dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in a language understood by the worker that contains a description of terms and conditions of employment. Foreign migrant worker must receive their employment contract prior to the worker departing from his or her country of origin and there shall be no substitution or change[s] allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.

All work shall be voluntary, and workers shall be free to leave work at any time or terminate their employment without any penalty if reasonable notice is given, which shall be clearly stated in worker's employment contracts. Suppliers shall maintain documentation on all leaving workers. Suppliers, agents, and sub-agents may not hold or otherwise destroy, conceal, or confiscate employees' identity or immigration documents, such as government-issued identification, passports or work permits. Notwithstanding the foregoing, suppliers can only hold documentation if necessary to comply with the local law. Workers shall not be required to pay employers' agents or sub-agents recruitment fees or other related

## TTTech Auto Supplier Code of Conduct

fees for their employment. Such fees and expenses include, but are not limited to expenses associated with recruitment, processing, or placement of workers. If any such fees are found to have been paid by workers, Suppliers shall be responsible that such fees shall be repaid to the worker.

Suppliers shall monitor and screen their suppliers and sub-tier suppliers for risk of forced labor used in goods mined, produced, or manufactured wholly or in part with forced labor. Suppliers shall undertake adequate due diligence measures in their supply chain to investigate any indications of forced labor and mitigate such risk. Suppliers shall share with TTTECH AUTO any unmitigated forced labor risks pertaining to the items supplied to TTTECH AUTO without delay and shall make available to TTTECH AUTO any due diligence findings pertaining to forced labor, upon request. If forced labor in the TTTECH AUTO supply chain is found, TTTECH AUTO will investigate and take appropriate remediation measures, in collaboration with suppliers.

### 2.2 Child Labor Avoidance and Young Workers

Child labor shall not be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shift and overtime. Supplier shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Supplier shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation shall be provided

## TTTech Auto Supplier Code of Conduct

### 2.3 Working Hours

Working hours shall not exceed the maximum set by local law. Further, a work week shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall have at least one scheduled day off every seven days and not work more than six consecutive days. All overtime must be voluntary.

### 2.4 Wages and Benefits

TTTECH AUTO recognizes the importance of all workers to earn a living wage. Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. All workers shall receive equal pay for equal work and qualification. Workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. Suppliers shall offer vacation time, leave periods, and holidays consistent with applicable laws and regulations. Suppliers shall pay workers in a timely manner. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law.

### 2.5 Non-Discrimination/ Non-Harassment/ Humane Treatment

Suppliers shall commit to a workplace free of harassment and unlawful discrimination. There shall be no harsh or inhumane treatment of workers, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Companies shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.

## TTTech Auto Supplier Code of Conduct

Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers. Workers shall be provided with reasonable accommodation for religious practices and disability. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way. This was drafted in consideration of the ILO Discrimination (Employment and Occupation) Convention (No. 111)

### 2.6 Freedom of Association and Collective Bargaining

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. In alignment with these principles, suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.

Supplier shall respect – within the framework of laws, regulations, and prevailing labor relations and employment practices – the right of its employees to be represented by labor unions and other employee organizations. Supplier will engage in negotiations, either on its own behalf or through employers' associations, with a view to reaching agreement on employment conditions.

### 2.7 Diversity

TTTECH AUTO furthers innovation and accelerates growth by fostering inclusive teams of diverse employees and recognizes that teams' varied backgrounds, experiences, and ideas are critical to TTTECH AUTO's success. Suppliers (agents or recruitment companies) engaged by TTTECH AUTO in

## TTTech Auto Supplier Code of Conduct

recruiting employees for TTTECH AUTO shall therefore make every effort to present a diverse list of candidates for each position, without regard to race, gender, age, or other factors unrelated to their ability to perform in the position. Suppliers will document their efforts and provide evidence to TTTECH AUTO upon TTTECH AUTO's request.

## TTTech Auto Supplier Code of Conduct

### 3.0 Standards for Health and Safety

TTTECH AUTO recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy working environment enhances the quality of products and services, the consistency of production, and worker retention and morale. TTTECH AUTO also recognizes that ongoing worker participation and education are essential to identifying and solving health and safety issues in the workplace.

The health and safety standards are as follows:

#### 3.1 Occupational Health and Safety

Worker potential for exposure to potential health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards) shall be identified, assessed, and mitigated using the Hierarchy of Controls. Where hazards cannot be adequately controlled by these means, workers shall be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Gender-responsive measures shall be taken, such as not having pregnant women and nursing mothers in working conditions that could be hazardous to them or their child and providing reasonable accommodations for nursing mothers. Workers shall not be disciplined for raising safety concerns and shall have the right to refuse unsafe working conditions without fear of reprisal until management adequately addresses their concerns.

#### 3.2 Emergency Preparedness

Potential emergency situations and events shall be identified and assessed, and their impact minimized, by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training and drills.

Emergency drills shall be executed at least annually or as required by local law, whichever is more stringent. Emergency plans shall include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures

## TTTech Auto Supplier Code of Conduct

shall focus on minimizing harm to life, the environment and property.

### 3.3 Occupational Injury and Illness

Procedures and systems shall be in place to prevent, manage, track, and report occupational injury and illness including provisions to encourage workers to report, classify and record injuries and illnesses, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work. Suppliers shall allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.

### 3.4 Industrial Hygiene

Worker exposure to chemical, biological, and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls. When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained, personal protective equipment, free of charge. Suppliers shall provide workers with safe and healthy working environments, which shall be maintained through the ongoing, systematic monitoring of workers' health and working environments. Suppliers shall provide occupational health monitoring to routinely evaluate if workers' health is being harmed by occupational exposures. Protective occupational health programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards.

### 3.5 Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks -- including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks shall be identified, evaluated, and controlled.

### 3.6 Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards.

## TTTech Auto Supplier Code of Conduct

Physical guards, interlocks, and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers.

### 3.7 Sanitation, Food, and Housing

Workers shall be provided with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities. Worker dormitories, provided by the Supplier or a labor agent, shall be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, adequate conditioned ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space as well as reasonable entry and exit privileges.

### 3.8 Health and Safety Communication

Supplier shall provide workers with appropriate workplace health and safety information and training, in the language of the worker or in a language the worker can understand, for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information, including Safety Data Sheets, and warnings shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training shall be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without fear of retaliation.

### 3.9 Worker Health and Safety Committees

Suppliers are encouraged to initiate and support worker health and safety committees to enhance ongoing health and safety education and to encourage worker input regarding health and safety issues in the workplace.

## TTTech Auto Supplier Code of Conduct

### 4.0 Standards for Environment

TTTECH AUTO recognizes that environmental responsibility is integral to producing world-class products. In manufacturing operations, adverse effects on the community, the environment, and natural resources are to be minimized while safeguarding the health and safety of the community and the public.

The environmental standards are as follows:

#### 4.1 Environmental Permits and Reporting

All required environmental permits (e.g., discharge monitoring), approvals, and registrations shall be obtained, maintained, and kept current, and their operational and reporting requirements shall be followed.

#### 4.2 Pollution Prevention and Resource Conservation

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, shall be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means. Suppliers should establish a biodiversity policy and consider local impact and risk assessments to avoid business operations that could negatively impact fragile habitats, ecosystems, endangered species and forests.

#### 4.3 Hazardous Substances

Chemicals, wastes, and other materials posing a hazard to humans or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented.

## TTTech Auto Supplier Code of Conduct

### 4.4 Solid Waste

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Waste data shall be tracked and documented.

### 4.5 Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting substances, and combustion by-products generated from operations shall be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone-depleting substances shall be effectively managed in accordance with the Montreal Protocol and applicable regulations. Suppliers shall conduct routine monitoring of the performance of their air emission control systems.

### 4.6 Materials Restrictions

Suppliers shall comply with all applicable laws and regulations prohibiting or restricting the use and handling of specific substances in manufacturing and product materials, including labeling for recycling and disposal.

Suppliers engaged in the manufacturing of materials that will be part of TTTECH AUTO's end products and Suppliers engaged in the manufacturing of TTTECH AUTO branded products shall comply with the most recent version of TTTECH AUTO's List of Hazardous Substances in Products and Packaging. Upon TTTECH AUTO's request, the Supplier shall provide TTTECH AUTO with full material content information using the TTTECH AUTO Material Declaration Form and/or Material Safety Data Sheets.

Suppliers shall identify and manage product substances that pose an environmental hazard and shall conform to applicable labelling laws and regulations for recycling.

Legislative compliance includes:

Restriction of Hazardous Substances (RoHS) in the European Union and China

Regulation on Registration, Evaluation, Authorization and Restriction of

## TTTech Auto Supplier Code of Conduct

Chemicals (REACH)

Waste Electrical and Electronic Equipment (WEEE)

End of Life Vehicle Directive in the European Union (ELV)

Other regulations in the countries and regions in which TTTECH AUTO operates

Upon TTTECH AUTO's request, the Auditee shall provide TTTECH AUTO with full a material content declaration using the industry standard IPC-1752A XML Class D format. Additional evidence is required in the form of annual test reports for RoHS substances, Halogens, and Antimony, executed according to the IEC62321 standard and performed by a third-party laboratory certified to ISO/IEC 17025.

### 4.7 Water Management

Supplier shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater shall be characterized, monitored, controlled, and treated as required by applicable laws and regulations prior to discharge or disposal. Participant shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance. Upon TTTECH AUTO's request, Supplier shall participate in the CDP Water Disclosure and/or the RBA Environmental Reporting.

### 4.8 Energy Consumption and Greenhouse Gas Emissions

Suppliers shall establish and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scope 1 and 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented, and publicly reported. Suppliers shall look for methods to improve energy efficiency and minimize their energy consumption and greenhouse gas emissions. Upon TTTECH AUTO's request, Supplier shall participate in the CDP Supply Chain Disclosure and/or the RBA Environmental Reporting.

## TTTech Auto Supplier Code of Conduct

### 4.9 Certification

Suppliers engaged in the manufacture of, or engaged in providing materials that will be part of TTTECH AUTO branded products shall have ISO14001 certification (or comparable), or a plan to become certified. Alternatively, the material suppliers must provide documented objective evidence of an operational environmental management system and demonstrate equivalency.

## TTTech Auto Supplier Code of Conduct

### 5.0 Standards for Business Ethics

Suppliers shall be committed to the highest standards of ethical conduct when dealing with workers, suppliers, and customers.

#### 5.1 Business Integrity

The highest standards of integrity shall be upheld in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion, or embezzlement.

#### 5.2 No Improper Advantage and Conflict of Interest

Bribes or other means of obtaining undue or improper advantage shall not be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record-keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

Suppliers shall take appropriate steps to ensure that the conduct of itself and its employees do not place TTTECH AUTO nor its employees in a position where there is or may be a conflict, or a potential conflict of interest. Such a conflict of interest would arise when the Supplier and/or its employees were to offer or provide any tangible personal benefit, gain improper advantage or improperly impact TTTECH AUTO and/or its employee's ability to make a sound, impartial or objective decision on behalf of TTTECH AUTO or where an TTTECH AUTO employee has an interest in the Supplier's business. Supplier further agrees to disclose to TTTECH AUTO once it becomes aware of an actual or potential conflict.

#### 5.3 Disclosure of Information

All business dealings shall be transparently performed and accurately reflected on Supplier's business books and records. Information regarding Supplier's labor, health and safety, environmental practices, business

## **TTTech Auto Supplier Code of Conduct**

activities, structure, financial situation, or performance shall be disclosed in accordance with applicable regulations and prevailing industry practices.

Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

### **5.4 Intellectual Property**

Intellectual property rights shall be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights; customer and supplier information shall be safeguarded.

### **5.5 Fair Business, Advertising and Competition**

Standards of fair business, advertising, and competition shall be upheld.

### **5.6 Protection of Identity and Non-Retaliation**

Suppliers shall maintain programs to ensure the confidentiality, anonymity and protection of supplier and worker whistleblowers, unless prohibited by law. Supplier shall prohibit retaliation against workers who participate in whistleblowing in good faith or who refuse an order that is in violation of the TTTECH AUTO Supplier Code of Conduct. Suppliers shall provide an anonymous complaint mechanism for workers to report workplace grievances in accordance with local laws and regulations. Supplier shall have a formal communication program to ensure that every employee is fully informed of and understands the policy of non-retaliation.

### **5.7 Responsible Sourcing of Minerals**

Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody for the tantalum, tin, tungsten, gold, and cobalt in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA) or an equivalent and recognized due diligence framework. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and shall make their

## TTTech Auto Supplier Code of Conduct

due diligence measures available to TTTECH AUTO upon TTTECH AUTO's request.

### 5.8 Privacy

Suppliers shall commit to protecting the reasonable privacy expectations for personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

## TTTech Auto Supplier Code of Conduct

### 6.0 Standards for Management System

Suppliers shall adopt or establish a management system that is related to the content of this Code. The management system shall be designed to ensure: (a) a commitment to respect human rights and environment; (b) a due diligence process; and (c) access to remedy for internal and external stakeholders where the supplier caused, or contributed to adverse human rights and environmental impacts, with a scope that is related to this Code. It shall also facilitate continual improvement. The management system shall contain the following elements:

#### 6.1 Company Commitment

Suppliers shall establish human rights, health and safety, environmental and ethics policy statements, affirming Supplier's commitment to due diligence and continual improvement, and endorsed by executive management. Policy statements shall be made public and communicated to workers in a language they understand via accessible channels.

#### 6.2 Management Accountability and Responsibility

Supplier shall clearly identify senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

#### 6.3 Legal and TTTECH AUTO Requirements

Suppliers shall have a process to identify, monitor, and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

#### 6.4 Risk Assessment and Risk Management

Suppliers shall adopt or establish a process to identify the legal compliance, environmental, health and safety, and labor practice and ethics risks, including the risk of severe human rights and environmental impacts, associated with Supplier's operations. Suppliers shall determine

## **TTTech Auto Supplier Code of Conduct**

the relative significance of each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

### **6.5 Improvement Objectives**

Suppliers shall establish written performance objectives, targets, and implementation plans to improve the Supplier's social, environmental, and health and safety performance, including a periodic assessment of Supplier's performance in achieving those objectives.

### **6.6 Training and Competencies**

Suppliers shall establish programs for training managers and workers to implement Supplier's policies, procedures, and improvement objectives, and to meet applicable legal and regulatory requirements.

### **6.7 Communication**

Suppliers shall establish a process for communicating clear and accurate information about Supplier's policies, practices, expectations, and performance to workers, suppliers, and customers.

### **6.8 Worker/Stakeholder Engagement and Access to Remedy**

Supplier shall establish processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall aim to obtain feedback on operational practices and conditions covered by this Supplier Code of Conduct, and foster continuous improvement. Workers shall be given a safe environment to provide grievances and feedback without fear of reprisal or retaliation.

### **6.9 Audits and Assessments**

Suppliers shall conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements relating to social and environmental responsibility.

## TTTech Auto Supplier Code of Conduct

### 6.10 Corrective Action Process

Suppliers shall establish a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

### 6.11 Documentation and Records

Suppliers shall create and maintain documents and records to ensure regulatory compliance and conformity to Suppliers' requirements along with appropriate confidentiality to protect privacy.

### 6.12 Supplier Responsibility

Suppliers shall establish a process to communicate the TTTECH AUTO Supplier Code of Conduct or comparable requirements to their own, next-tier suppliers and to monitor supplier compliance with the requirements.

## TTTech Auto Supplier Code of Conduct

### 7.0 Document Information

#### 7.1 References

The following standards have been used in preparing this Code and may be useful sources of additional information.

- [ILO Fundamental Conventions](#)
  - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No.87)
  - Right to Organise and Collective Bargaining Convention, 1949 (No.98)
  - Forced Labour Convention, 1930 (No.29)
  - Abolition of Forced Labour Convention, 1957 (No.105)
  - Minimum Age Convention, 1973 (No.138)
  - Worst Forms of Child Labour Convention, 1999 (No.182)
  - Equal Remuneration Convention, 1999 (No.100)
  - Discrimination (Employment and Occupation) Convention, 1958 (No.111)
  - Occupational Safety and Health Convention, 1981 (No.155), and the Promotional Framework, 2006 (No.187)
- Other relevant ILO Conventions
  - Maternity Protection Convention, 1919 (No. 3)
  - Maternity Protection Convention (Revised), 1952 (No. 103)
  - Maternity Protection Convention, 2000 (No. 183)
  - Violence and Harassment Convention, 2019 (No.190)
- Dodd-Frank Wall Street Reform and Consumer Protection Act:  
<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>
- Eco Management & Audit System:  
[www.quality.co.uk/emas.htm](http://www.quality.co.uk/emas.htm)
- Ethical Trading Initiative: [www.ethicaltrade.org/](http://www.ethicaltrade.org/)
- ILO Code of Practice in Safety and Health:  
[www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf](http://www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf)
- ISO 14001: [www.iso.org](http://www.iso.org)
- National Fire Protection Agency:  
[www.nfpa.org/catalog/home/AboutNFPA/index.asp](http://www.nfpa.org/catalog/home/AboutNFPA/index.asp)

## TTTech Auto Supplier Code of Conduct

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: [www.oecd.org/corporate/mne/mining.htm](http://www.oecd.org/corporate/mne/mining.htm)
- OECD Guidelines for Multinational Enterprises: [www.oecd.org/mne/](http://www.oecd.org/mne/)
- OHSAS 18001: [www.bsigroup.com/en-GB/ohsas-18001-occupational-health-and-safety/](http://www.bsigroup.com/en-GB/ohsas-18001-occupational-health-and-safety/)
- Responsible Business Alliance (Formerly the Electronic Industry Citizenship Coalition): <http://www.responsiblebusiness.org/>
- SA 8000: [www.cepaa.org](http://www.cepaa.org)
- Social Accountability International (SAI): [www.sa-intl.org](http://www.sa-intl.org)
- Universal Declaration of Human Rights: [www.un.org/Overview/rights.html](http://www.un.org/Overview/rights.html)
- United Nations Convention Against Corruption: [www.unodc.org/unodc/en/treaties/CAC/](http://www.unodc.org/unodc/en/treaties/CAC/)
- United Nations Global Compact: [www.unglobalcompact.org](http://www.unglobalcompact.org)
- United States Federal Acquisition Regulation: [www.acquisition.gov/far/](http://www.acquisition.gov/far/)

### 7.3 Revision History

Document Author	Date	Description of Change	Document Owner
In case of questions or change proposals please contact the latest document author and owner.			