

Code of Conduct for Business Partners

Our suppliers and business partners (collectively referred to as suppliers) undertake to comply with the following principles and requirements in all their business activities and supply chains and to take appropriate measures to ensure compliance. The MINDA Group expects its suppliers to pass on these requirements to their own business partners and suppliers and to regularly monitor the compliance.

I. Compliance with laws and business ethics

Compliance with law is a matter of course for the MINDA Group and an integral part of our corporate principles. We expect the same from our suppliers.

Compliance with laws

The MINDA Group expects its suppliers to fulfill their social responsibility in all business activities, to comply with the applicable laws and regulations and to work in accordance with this Code of Conduct and the principles and standards set out therein.

Avoiding corruption and dealing with conflicts of interest

The MINDA Group expects its suppliers to consistently reject any form of corruption, anti-competitive behavior and unfair business practices, to comply with the applicable laws and to take appropriate precautions for prevention, such as the implementation of internal guidelines, training and sanctions in the event of violations. Our suppliers must not misuse invitations and gifts to employees of the MINDA Group to influence them and must not demand inappropriate advantages from them. They are expected to maintain open, fair and reliable relationships with customers, suppliers, service providers as well as with the employees of the MINDA Group. Conflicts of interest are to be avoided and business decisions in connection with the MINDA Group are to be made exclusively on an objective basis.

Money laundering and terrorist financing

The MINDA Group expects its suppliers to comply with the legal obligations to prevent money laundering and terrorist financing and not to participate directly or indirectly in such activities.

Fair competition

The MINDA Group expects its suppliers to act in accordance with national and international antitrust and competition laws and not to participate in price fixing, market sharing, agreements on customers or bid rigging.

Our suppliers are committed to implementing legal and honest business practices, respecting intellectual property rights and other industrial property rights and complying with contracts.

Import and export control

The MINDA Group expects its suppliers to comply with the applicable foreign trade, customs and embargo regulations.

Dealing with plagiarism and intellectual property

The MINDA Group requires its suppliers to implement, maintain and continuously develop effective methods and processes to prevent counterfeit parts from entering the supply chain.

Should counterfeit parts nevertheless come into circulation, the supplier concerned must immediately stop distribution, block the parts concerned and store them securely on the instructions of the responsible MINDA employee as soon as they are discovered. The supplier is obliged to analyze the origin and identity of the parts, to inform the MINDA Group accordingly and to notify potential recipients immediately of the distribution of the counterfeit parts. The MINDA Group will also ensure that any plagiarism detected is reported to its own customers immediately.

Confidentiality and data protection

The MINDA Group expects its suppliers to protect the trade and business secrets of the MINDA Group that are entrusted to them during the cooperation and to use them exclusively in connection with the cooperation. In addition, the applicable data protection laws must be strictly complied with.

Data security

The MINDA Group expects its suppliers to implement appropriate security measures for data security (e.g. access restrictions, security guidelines, audits, etc.) to ensure the integrity, availability and confidentiality of data. In particular, the aspect of cyber security is to be observed with the necessary care.

Financial responsibility and disclosure of information

The MINDA Group expects its suppliers to ensure that all business transactions are booked correctly, completely, properly, fairly, consistently and promptly. The legal framework for proper accounting and financial reporting must be strictly adhered to.

II. Human rights and labor standards

Respect for human rights and fundamental freedoms is of top priority for the MINDA Group. We expect our suppliers to share and implement this attitude in their business activities.

Human rights

The MINDA Group expects its suppliers to respect the protection of international human rights within their sphere of influence and to comply with international standards such as the UN conventions. They have to ensure that they are not involved in human rights violations - this also applies to the involvement of public or private security service providers.

The freedom of speech, personal rights and the privacy of employees must be respected.

Child and forced labor

The MINDA Group expects its suppliers to strictly reject all forms of child and forced labor and to respect the rights of children and young people. The age limit for employment must not be below compulsory school age and in no case below 15 years. In addition, employees must not be exposed to a dangerous, unsafe or unhealthy working environment.

Indigenous peoples and local communities

MINDA Group expects its suppliers to respect and protect the rights and interests of Indigenous peoples and local communities and population groups in accordance with international standards. Suppliers should act appropriately to ensure that their activities do not have a negative impact on indigenous peoples and local communities.

Geopolitical neutrality

The MINDA Group expects its suppliers to ensure that they do not participate in any way in armed conflicts or human rights violations in potentially affected or already affected areas. The cultural and religious heritage of all people must be respected and, in cooperation with local decision-makers, potential conflicts should be identified at an early stage to avoid adverse effects of any kind.

Freedom of association and right to collective bargaining

The MINDA Group expects its suppliers to respect the fundamental right to freedom of association and the right to collective bargaining within the limits of national laws. Furthermore, there must be no negative consequences for employees who participate in such activities.

Interpersonal relationships

The MINDA Group expects its suppliers to fully respect the personal dignity of everyone and to ensure that all employees treat each other fairly and respectfully. Any form of bullying behavior, verbal, physical and/or sexual coercion, use of violence and/or harassment must be actively prevented and must not be encouraged under any circumstances.

Equal opportunities and principle of non-discrimination

The MINDA Group expects its suppliers not to tolerate any discrimination, disadvantage or preferential treatment of employees based on gender, skin color, nationality, disability, political conviction, ethnic or social origin, religion, age, trade union activity, sexual orientation or other reasons.

Suppliers should advocate gender-neutral equality. The personal dignity, privacy and personal rights of each individual must be respected. Discrimination, harassment or a hostile work environment shall not be tolerated; instead, a positive work environment free from discrimination and harassment shall be created. When recruiting, applicants should be evaluated according to ethical criteria and without discrimination or bias.

Occupational health and safety

The MINDA Group expects its suppliers to ensure a safe, healthy and hygienic working environment to prevent occupational accidents and work-related illnesses.

MINDA Group suppliers should also contribute to the health, satisfaction and long-term performance of their employees through preventive occupational health and safety and health-promoting measures. It is their duty to inform their employees in accordance with their function about applicable health and safety requirements and to ensure that these are complied with.

Working hours, remuneration and social benefits

The MINDA Group expects its suppliers to comply with the applicable statutory provisions and company regulations on working hours, paid vacations and public holidays as well as the relevant standards of the conventions of the International Labor Organization (ILO). Remuneration and social benefits must comply with the applicable statutory and company regulations.

III. Sustainability agreement / Environmental, climate and species protection

Active environmental, climate and species protection are significant to the MINDA Group, as the competitiveness of products and production processes can only be ensured in the long term through the efficient use of resources. We regard environmentally conscious behavior and the responsible use of natural resources as an ethical and entrepreneurial duty. In this way, we contribute to the preservation of natural resources, biodiversity and the protection of our climate - also for future generations.

Environmental, climate and species protection

The MINDA Group expects its suppliers to comply with the applicable environmental regulations and to assume responsibility for treating our natural resources with care and actively contributing to the protection of the environment, climate and biodiversity. This includes the continuous reduction of our own environmental impact and risks. Compliance with social, ecological and economic standards is a basic prerequisite for successful cooperation. Suppliers should also communicate and ensure compliance with the MINDA Group's sustainability requirements within their own supply chain.

Greenhouse gases and

The MINDA Group expects appropriate measures to be taken at all levels of the supply chain to reduce the carbon footprint and thus contribute to achieving the targets agreed at the UN Climate Change Conference in Paris and the 1.5 degree target of the Intergovernmental Panel on Climate Change (IPCC).

All suppliers and their subcontractors are required to find cost-effective solutions to increase energy efficiency and to monitor and minimize energy consumption and greenhouse gas emissions.

Our suppliers are also encouraged to promote the change to renewable energy sources.

Resource efficiency and recycling economy

The MINDA Group expects its suppliers to ensure responsible procurement of raw materials. This includes the establishment and application of an appropriate environmental management system. Suppliers must assess the impact of their activities on biodiversity, climate change and water shortage and implement appropriate reduction measures.

In addition, the MINDA Group expects suppliers to take measures to avoid or minimize harmful soil changes, water pollution, air pollution, noise emissions or excessive water consumption. Furthermore, strategies and measures for reducing emissions, reuse and recycling are to be implemented. Suppliers are obliged to take suitable and appropriate measures to avoid waste, reuse resources, promote recycling and ensure the safe and environmentally friendly disposal of residual waste, chemicals and waste water.

Land use and deforestation

The MINDA Group expects its suppliers to protect biodiversity and to help prevent the ongoing deforestation of forests. Valid laws for the protection of biodiversity must be complied with.

Land, forest and water rights and forced evictions

The MINDA Group expects its suppliers to observe the ban on unlawful forced evictions and the unlawful expropriation of land, forests and water, especially if their use secures the basis of human life.

Conflict minerals / Critical substances

The MINDA Group expects its suppliers to take appropriate measures to avoid the deliberate purchase and use of conflict materials that are mined under ecologically and socially unacceptable conditions. If a product contains conflict minerals such as tin, tantalum, tungsten, cobalt, gold or their ores, transparency along the entire supply chain must be established immediately.

IV. Implementation

Reporting and dealing with violations

Suppliers can report indications of compliance violations, including suspected corrupt practices, anti-competitive behavior or money laundering, to MINDA Group contacts. In addition to the internal contacts, they can also confidentially contact the external ombudsperson and the electronic whistleblower system at www.minda.com. The ombuds office, including the electronic whistleblower system, also accepts complaints in accordance with Section 8 of the Supply Chain Due Diligence Act. Further information can be found on our website www.minda.com

Implementation of the requirements and verification by the MINDA Group

The MINDA Group is entitled to verify compliance with the Code of Conduct by its suppliers in connection with the provision of its services, for example by inspecting relevant documents and/or through on-site visits.

Suppliers shall ensure that the content of the MINDA Group's Code of Conduct is implemented and promoted in their own companies as well as among their suppliers and business partners. In addition, the suppliers undertake to introduce their own Code of Conduct in accordance with the standards of the MINDA Group. They communicate the content of the Code of Conduct in an appropriate manner to their own suppliers, whom they commission in connection with the provision of services for the MINDA Group and ensure that their suppliers also comply with comparable values and principles.

As part of the risk management, the MINDA Group will review business relationships with suppliers and business partners regularly and as required, focusing in particular on potential sustainability risks, especially regarding human rights and environmental protection, as well as cyber risks. Based on the results, a risk classification of suppliers and business partners is conducted and appropriate measures to mitigate and eliminate identified risks are initiated. The MINDA Group attaches immense importance to verifying compliance with its requirements through suitable measures such as audits and self-assessment questionnaires.

Should a business partner fail to comply with a provision of this Code of Conduct, the MINDA Group expects them to take appropriate remedial action. In the event of suspected non-compliance with our requirements (e.g. through negative media reports or other indications), the MINDA Group expects the supplier or business partner to inform us immediately of their findings and to provide information in response to our inquiries. The MINDA Group reserves the right to terminate contracts with suppliers and business partners who cannot prove that they comply with the Business Partner Code of Conduct.

The Code of Conduct for Suppliers and Business Partners of the MINDA Group is an integral part of all contracts between the MINDA Group and its suppliers and business partners, including their sub-suppliers and affiliated companies.