

# CODE OF CONDUCT

## CODE OF CONDUCT FOR PARTNERS

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## 1 Introduction - Scope of Application

The Code of Conduct of Steyr-Automotive GmbH ("Steyr Automotive") is based on our values and contains rules for ethical and legally impeccable actions of any individuals working for or with us. Mutual appreciation and respect as well as tolerance, honesty and fairness in our daily dealings with our business partners characterize us, as do responsible and sustainable actions.

This Code of Conduct applies as an integral part of all our business activities worldwide, in particular to all agreements between Steyr Automotive and its partners.

## 2 Our values

By implementing our Code of Conduct, we commit ourselves to the values laid down in a wide range of international conventions, in particular those of the International Labor Organization (ILO) and the United Nations Declaration of Human Rights. We are also committed to the values set out in the UN Conventions on the Rights of the Child and on the Elimination of All Forms of Discrimination against Women, as well as those underlying the OECD Guidelines for Multinational Enterprises.

Emphasizing the following values is of particular importance to us:

### **Steyr Automotive stands for respect, transparency and honesty:**

Mutual respect and appreciation are unconditionally self-evident for us, transparency and honesty are crucial for building trust. Trust is a key factor for long-term successful cooperation.

### **Steyr-Automotive complies with all applicable laws:**

We respect the laws and regulations of all countries in which we operate. Our Code of Conduct is based on all current and future national and international laws, regulations, conventions and standards.

### **Steyr Automotive does not tolerate corruption:**

We are specifically concerned to prevent any form of corrupt behavior. Abuse of granted authority includes, in particular, demanding, offering or accepting an undue advantage. We do not tolerate any form of corruption.

In particular, this means not soliciting, accepting or granting bribes. We grant or accept hospitality, invitations, gifts or similar benefits only in compliance with the relevant laws, generally applicable business practices and to the customary extent. We provide any form of remuneration exclusively for legal services. We permit the flow of money exclusively for and in accordance with lawful business transactions.

### **Steyr Automotive believes in free competition:**

We are opposed to any form of anti-competitive behavior. In particular, we do not tolerate any price agreements or price fixing, any unlawful exchange of information on data relevant to antitrust law, any sharing of customers or markets, or any other agreements or concerted practices between companies aimed at restricting free competition.

**Steyr Automotive is committed to data protection:**

We undertake to collect and use or process all personal data exclusively in compliance with the applicable data protection regulations and to reliably protect all personal data collected against any unauthorized access. Personal data will be processed exclusively with respect for the fundamental rights of the data subjects.

**Steyr Automotive is committed to acting in an environmentally conscious manner:**

Our goal is to reduce negative environmental impacts by protecting the environment, conserving natural resources and continuously striving to minimize our ecological footprint, particularly through careful use of existing resources, use of alternative energy sources and innovative approaches to demand reduction.

**Steyr Automotive at all times respects and protects confidentiality and intellectual property of third parties:**

The confidential handling of sensitive information and data internally and externally is a matter of course for us. We respect confidential information as well as intellectual property of our partners and protect them in particular from misuse, unjustified disclosure, theft and improper handling.

### **3 Expectations towards our partners**

In the same way that Steyr Automotive considers itself bound by the values set out in this Code of Conduct, these values do also apply to all our partners.

**1. General Expectations:**

Just as we are committed to our values, we expect the same from our partners. They should always strive not only to fulfill all the requirements of this Code of Conduct themselves, but also to ensure that the values set out here are shared by their own contractual partners.

In addition to respectful cooperation, we expect honest and transparent handling of data and facts in particular.

Furthermore, we expect our partners to be proactive in complying with our requirements in order to limit the risk of a breach of the provisions of our Code of Conduct as far as possible.

**2. Compliance with Applicable Laws:**

Like us, all of our partners will at all times comply with all applicable federal, state, local, national, international and foreign laws. This applies in particular to anti-corruption and anti-money laundering laws, competition and antitrust laws, export control laws and tax laws. Our partners will also ensure that all legally required permits, approvals, licenses, and registrations are in place.

**3. Free competition:**

Our partners will respect all applicable laws and regulations relating to free competition and will at all times comply with competition and antitrust laws. In particular, they will not enter into any unfair agreements, including prohibited price agreements, engage in market sharing or customer allocation or engage in any other illegal conduct with the purpose of restricting competition.

#### **4. Compliance with data protection rules and regulations:**

Our partners undertake to comply unconditionally with all data protection requirements. Whenever one of our partners collects personal data or comes into possession of personal data, this partner must handle such data with care and protect it. The collection, storage, use, processing and transfer of personal data of individuals may only be carried out in accordance with the law and the agreement.

#### **5. Acting environmentally conscious:**

Like us, our partners strive for continuous improvement in the environmental compatibility and sustainability of their services. This is not limited to compliance with all relevant environmental and energy laws and other requirements. In addition, raw materials, energy, water and other goods are used as sparingly as possible in order to conserve existing resources. Residual materials and waste are recycled as far as possible or disposed of in an environmentally friendly manner.

#### **6. Confidential information and intellectual property of third parties:**

We expect our partners to handle sensitive information and data with confidentiality, both internally and externally, and to treat all confidential information and trade and business secrets with discretion at all times. Like us, our partners will respect and protect proprietary information and intellectual property at all times.

## **4 Consequences of non-compliance**

The imperative to comply with standards as well as to follow expected behaviors must not be toothless. Steyr Automotive therefore verifies compliance with the standards and rules set out in our Code of Conduct through sustainability audits and assessments as required.

We will not tolerate non-compliant behavior to specifications in the Supplier Code of Conduct. Partners who violate this Code of Conduct may be held accountable to protect our integrity and that of our compliant partners. This means in particular the right to charge our partners for any additional costs resulting from non-compliance with the Code of Conduct. A serious breach of the requirements may also be considered a material impairment of the business relationship with a partner.

Lack of willingness to cooperate to end the misconduct or to remedy any consequences resulting from such misconduct within a reasonable period of time, or the seriousness of the violation itself, may also constitute grounds for premature termination of the business relationship.

Steyr, March 2022

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Mag. Florian Mayrhofer  
Director  
Steyr Automotive GmbH

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Dipl. Ing. Suleyman Kocak  
Director  
Steyr Automotive GmbH

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**With our signature, we confirm that we have taken note of and are committed to the values set out in the Code of Conduct.**

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Place/Date

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