

# ContiTech Vibration Control GmbH (“OESL”) Business Partner Code of Conduct

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## 1. Sustainable Business Practices

ContiTech Vibration Control GmbH and the associated OESL entities under common control of the same legal entity (collectively referred to as 'OESL') place sustainability and integrity at the core of their business. OESL is committed to the Ten Principles of the United Nations Global Compact, covering human rights, labor, environmental protection, and anti-corruption. OESL is also committed to honesty and integrity with respect to its business conduct towards employees, customers, suppliers, competitors, and other stakeholders. Furthermore, OESL is committed to respecting human and environmental rights in its business activities and along the supply chain.

Sustainable business practices and integrity are rooted in OESL's company values, Codes of Conduct, respective rules and policies as well as international frameworks including the United Nations Sustainable Development Goals (SDGs), the United Nations Global Compact, the OECD Guidelines on Multinational Enterprises (MNEs) and the United Nations Guiding Principles on Business and Human Rights with specific reference to the International Labor Organization (ILO) Conventions and Recommendations. OESL expects all of its Business Partners to act with the same fairness, honesty, responsibility and dedication to sustainability and integrity in all aspects of their business. This Business Partner Code of Conduct highlights important standards consistent with OESL's values and which we expect each Business Partner—including but not limited to suppliers, consultants, vendors, brokers, contractors, agents, landlords, and others—to observe and strictly adhere to.

## 2. 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.

### **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 with monopolies, unfair competition, 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 price fixing or market allocations; and will comply with antitrust regulations dealing specifically with relationships to distributors.

### **Combatting Corruption**

OESL does not tolerate any form of corruption. The Business Partner will comply with applicable laws and regulations concerning corruption and bribery, 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 any payment or other benefit to any individual or company for the purpose of influencing a decision in violation of applicable laws.

### **Export and Import Regulations**

The Business Partner will comply with all applicable import and export control laws, including sanctions, embargoes and other laws, regulations, government orders and policies controlling the transmission or shipment of goods, software, technology, services and payments.

### **Prevention of Money Laundering and Terrorist Financing**

Business Partners will strictly adhere to all applicable laws and regulations governing money laundering and the prevention of terrorist financing and abstain from engaging in such activities.

### **Data Compliance**

The Business Partner will strictly comply with all applicable national and international laws and regulations governing data protection, data security and other data not being personal. The handling of data should be transparent and responsible.

### **Artificial Intelligence**

If a Business Partner develops or uses AI, it will be done in an accountable, fair, explainable, and controlled way. Business Partners will ensure that their usage of AI complies with all applicable national and international laws and regulations and respects ethical standards.

### **3. Conflict of Interest**

Employees are expected to act in the best interest of their company. Private interests and personal considerations must not affect any business decision. OESL and the Business Partner will avoid any activity or situation which may lead to a conflict of an employee's private interest with a Business Partner and OESL's business interest. Business Partners who become aware of a conflict of interest will immediately notify OESL.

### **4. Good Working Conditions and Human Rights**

The Business Partner will respect internationally recognized human rights as set forth in the Universal Declaration of Human Rights and standards by the ILO and provide healthy and fair working conditions globally. In accordance with local law, these include:

- Prohibition of forced labor, including modern slavery, human trafficking and unethical recruitment practices
- Prohibition of child labor
- Maintaining an inclusive and cooperative environment with no retaliation, free from violence or harassment
- Rejection of any form of discrimination (e.g., nationality, ethnicity, gender, disability, age, sexual identity or sexual orientation, religion and beliefs, social status, racially motivated discrimination)
- Provision of transparent and fair remuneration and benefits, at least equivalent to the legal minimum wage
- Reasonable working hours and sufficient resting periods
- Respecting the right to freedom of association and collective bargaining
- Creating safe and healthy work environments
- Responsible security practices by all security personnel used or contracted by the Business Partner
- Acknowledging and respecting land use, customary rights and associated rights from local communities, indigenous people and individuals

OESL supports the United Nations Women's Empowerment Principles and strongly encourages Business Partners to formally support the UN Women's Empowerment Principles in their own operations and supply chains.

## **5. Environment and Climate Protection**

The Business Partner will operate its business in a safe and responsible manner based on a systematic management approach, protect the environment and comply with applicable national and international regulations as well as OESL rules. Business Partners will use resources in a sustainable manner by reducing consumption of energy, water, raw materials and supplies, and maintain adequate environmental protection management procedures (climate protection, air quality, responsible chemicals management, soil protection, protection of water bodies, biodiversity, waste treatment and handling, noise prevention and prevention of deforestation). Requirements by the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal must be followed.

## **6. Safety and Health**

The Business Partner will operate its business in a safe and responsible manner and is committed to manufacture and deliver safe products to OESL, and provide a safe, healthy and ergonomic working environment that supports accident prevention and minimizes exposure to health risks to employees and contractors. A safety and health management system for continual improvement must be implemented, including emergency management, fire prevention and responsible management of chemicals. Requirements set forth by the Minamata Convention of Mercury, the Stockholm Convention on Persistent Organic Pollutants, and the ILO Occupational Safety and Health Convention 155 must be followed.

## **7. Supply Chain Due Diligence**

Business Partners will implement due diligence processes to identify, prevent and mitigate risks for negative human rights and environmental impacts in their supply chains, including appropriate grievance mechanisms and reporting, based on the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Business Partners will comply with all applicable laws concerning supply chain due diligence.

## 8. Minerals from Conflict Affected and High-Risk Areas

As part of overall supply chain due diligence, Business Partners are expected to support due diligence and traceability throughout their supply chains for all minerals, be aware of applicable legal requirements in relation to minerals from conflict-affected and high-risk areas and ensure compliance with such laws, in line with the OECD Due Diligence Guidance.

- Perform due diligence on supply chains to determine whether products sold to OESL contain critical minerals or materials
- Complete the most recent versions of relevant reporting templates such as CMRT & CRT / EMRT provided by the Responsible Minerals Initiative (RMI), based on accurate and truthful information from suppliers; be ready to provide current and updated information to OESL and work towards eliminating non-conformant, sanctioned and high-risk smelters

## 9. Technical Compliance

Business Partners who deliver materials or components that enter OESL products or provide goods or services used for production will develop, manufacture and supply products (including systems, hardware and software) and services that comply with valid binding product requirements:

- Product Safety: freedom from unacceptable risk for consumers caused by a product
- Product Conformity: fulfillment of requirements regarding product-related technical compliance obligations, including homologation, certification procedures and advertising
- Product Environmental Compliance: includes the Product Environmental Footprint (e.g., emission, consumption and resource efficiency); assessment of significant environmental aspects during the entire product life cycle and minimization of impacts
- Product Cybersecurity & Privacy: absence of unreasonable risk of unauthorized manipulation (Integrity), inhibiting (Availability), and access (Confidentiality) to products and their functions; technical measures to protect personal identifiable information (PII) throughout the life cycle

- Intellectual Property: respect and lawful use of third-party intellectual property; active prohibition of counterfeit parts along the supply chain; ensure products do not infringe third-party rights by conducting and documenting searches

Compliance with legal technical regulations, applicable external standards and norms, and OESL technical compliance requirements must be ensured throughout the product life cycle. Business Partners will enable employees via adequate structures and processes and fully cooperate with OESL in technical compliance processes, providing required transparency. Any potential infringement must be notified to OESL immediately in writing.

## **10. Business Information and Intellectual Property**

Business Partners must ensure that any sensitive business information or trade secrets gained through business activities with OESL are held in strict confidence and not improperly used or disclosed. Business information must be appropriately collected, processed, secured and stored based on its criticality. Business Partners will respect OESL's registered and unregistered intellectual property, protect and secure it as confidential information (if not already disclosed), and not use it for any other purposes than those explicitly agreed unless admissible under applicable law. OESL's IP must not be used for or in connection with counterfeits or products not manufactured for OESL.

## **11. Business Continuity**

With regards to business continuity and the supply chain, Business Partners will constantly perform comprehensive activities of identifying and assessing risks. For identified risks, mitigation measures as well as backup and continuity plans are carried out and tested on a regular basis to minimize the impact of interruptions and disruptions for operations supporting OESL business.

## **12. Compliance with this Business Partner Code of Conduct**

OESL regards the provisions of this Business Partner Code of Conduct—amended from time to time—as essential for the business relationship between OESL and the Business Partner. In case of significant breaches, OESL reserves the right to

terminate the business relationship subject to applicable laws. Business Partners will support OESL's implementation of legally required and risk-based due diligence processes by actively participating in related initiatives, e.g., self-assessment questionnaires or formal certification of compliance. OESL reserves the right to conduct or require an audit of the Business Partner's compliance with this Code. Past third-party audits may be considered equivalent. Audits will be scheduled at mutually agreed business hours and prepared by the Business Partner with appropriate documentation demonstrating adherence. Where appropriate, Business Partners will participate in initial or further training measures proposed by OESL. Business Partners will use best efforts to be familiar with the business practices of their suppliers, subcontractors and other business partners and require them to comply with this Code or the values laid down herein.

### **13. Grievance and Complaints Mechanism**

Business Partners, their employees, stakeholders and rights-holders are encouraged to report any violations of this Business Partner Code of Conduct via the OESL Integrity Hotline, with all relevant information and access to the reporting portal available on our [Integrity & Whistleblower website](#). Business Partners shall support any investigations into alleged violations and should provide or support appropriate grievance/complaints mechanisms as part of their own due diligence efforts.

We hereby confirm that we share, respect and adhere to and apply the Business Code values as stated in the above Business Partner Code of Conduct.

Company Name:

Location:

Date and Signature:

Function of Signee:

ContiTech Vibration Control GmbH  
Jädekamp 30, D-30165 Hannover  
and the associated OESL entities under  
common control of the same legal entity  
(collectively referred to as 'OESL')

