

Gentherm is committed to the highest standards of product quality, safety and business integrity. We want to ensure that working conditions in our supply chain are safe, that workers are treated with respect and dignity, and that our manufacturing processes are environmentally friendly and safe. Therefore, Gentherm has created this SUPPLIER CODE OF CONDUCT defining the basic requirements placed on our suppliers of goods and services concerning their responsibilities towards their stakeholders and the environment.

The supplier declares herewith:

- **Legal compliance**

- to comply with the laws of the applicable legal systems
- to develop, implement and maintain methods and processes appropriate to its products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products
- to establish effective processes to detect counterfeit parts and materials and, if detected, quarantine the materials and notify the OEM customer and/or law enforcement as appropriate
- to accurately record, maintain and report business documentation including, but not limited to, financial accounts, quality reports, time recording, expense reports and submissions to customers and regulatory authorities, when appropriate
- to maintain books and records in accordance with applicable law and generally accepted accounting principles

- **Labor and Human Rights**

- to respect the personal dignity, privacy and fundamental human rights of each individual
- to uphold equal opportunities for and to prohibit discrimination or harassment based on race, age, sex, national origin, religion, sexual orientation, gender identity and/or expression, disability, or any other status protected by applicable law
- to prohibit discrimination or discrimination of any form, and to support minority, indigenous people, and women's rights
- not to use forced or involuntary labor of any sort, including indentured labor, bonded labor, prison labor, or any similar form of non-voluntary working agreement
- to prohibit the hiring of employees under the age of 15, or higher based on the local legal minimum working age / required schooling age. Some exemptions may be made for internships, apprenticeships, or other similar learning opportunities.
- to provide safe and healthy working conditions for all employees. This includes compliance with local health and safety laws, as well as compliance with locally established, internal policies and practices
- to honor the right to reasonable compensation and guarantee the applicable national statutory minimum wage
- to respect the maximum number of working hours determined in the applicable laws
- to acknowledge, as far as legally possible, the right of free association of employees and to neither favor nor discriminate against members of employee organizations or trade unions.

GENTHERM	Supplier Code of Conduct
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- to operate in-line with the Gentherm Global Human Rights Policy (available [here](#)), and to work to ensure that all member of the Suppliers Supply Chain that support Gentherm products operate in a similar manner
- **Corruption, Extortion, Bribery**
 - to tolerate no form of corruption, extortion and bribery
 - not to offer or take receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust
- **Health and Safety**
 - to take responsibility for the health and safety of its employees
 - to provide training and ensure that employees are educated in health and safety issues
 - to establish reasonable occupational health and safety management rules
 - to control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases
- **Environment & Sustainability**
 - to ensure that all internal processes and products delivered to Gentherm fully comply with all applicable laws, in particular those regarding conflict minerals, those related to hazardous / restricted substances, and those related to environmental protection.
 - to, when applicable, implement and maintain a certified environmental management system (EMS) which is compliant to ISO 14001.
 - to implement and maintain a robust sustainability program, with an emphasis on minimizing environmental impact.
 - to align with the Environmental and Sustainability requirements detailed in the Gentherm Supplier Requirements Manual, Section 3.5 ([available here](#)).
 - to avoid or continuously reduce all forms of waste as well as emissions of air, water and soil
 - to minimize the negative impact on and review the possibilities to halt and reverse biodiversity loss, land use, and deforestation.
 - to prohibit unlawful eviction and unlawful taking of land, forests and waters.
- **Supply Chain**
 - to promote compliance with the principles of this Code of Conduct among its suppliers
 - to consider the compliance with these principles when selecting suppliers
 - to have implemented a conflict-free sourcing policy to ensure that so-called “conflict minerals” are not used by their suppliers and sub-suppliers throughout the whole supply chain.

Company Name: _____

Place and date of signature: _____

Name/Title/Signature: _____