Supplier Code of Conduct

Preamble

WITTE Automotive stands for powerful know-how in development and production of vehicle access systems. Our lock-, handle- and hinge systems are used in hoods, doors and seats in almost every auto brand.

The companies belonging to the WITTE Automotive Group [see http://www.witte-automotive.com/live/Corporate-Company-Structure/corporate-structure.aspx] - hereinafter jointly referred to as "WITTE" - strive to achieve growth based on a socially responsible conduct in all spheres in which they pursue their business activities and in all countries in which they operate.

WITTE expects its suppliers to support its efforts by observing basic ethical principles and statutory provisions and by their responsible approach to their production processes. It is in this context that WITTE has developed this Supplier Code of Conduct and requires its suppliers to comply with it.

Contents

1. General Principles, Laws and Statutes

   The supplier commits to upholding its social responsibility in all business dealings. In all its business activities and decisions, the supplier shall respect the laws in effect and any other applicable provisions in the countries where it is active.

2. Prohibition of Corruption and Bribery

   The supplier assures not to practice or tolerate any form of corruption, extortion or embezzlement. Unethical behaviour may not be used to unlawfully influence others in business dealings by exchanging gifts or offering or granting other benefits either at home or abroad. The same applies to the unlawful acceptance of benefits.


   The supplier respects and supports compliance with the internationally recognized human rights and ensures not to participate in human rights violations.

   Child labour as defined by the ILO conventions (International Labour Organization) as well as national provisions is prohibited and any form of exploitation of children and adolescents will not be tolerated. The supplier assures that the production and / or processing of the supplied goods is being carried out without exploitative child labour defined in the ILO conventions.

   Any form of forced or compulsory labour including involuntary prison labour will be refrained from by the supplier.

   Working hours are set according to the current laws, the industry standards or the applicable ILO conventions. Overtime shall be voluntary and employees are entitled to at least one day off after six consecutive working days. Compensation and social benefits have to be granted in accordance with the basic principles of minimum wages, overtime and the statutory social security systems / social welfare systems.
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4. Health, Safety and Environmental Protection

In order to act in harmony with the environment and to avoid hazards to humans and the environment, the supplier observes all applicable health, employment and environmental-related laws and other specifications.

5. Prohibited substances and materials

All the supplies, products or parts bought from the supplier by WITTE, whether they are standard or specifically developed by the supplier for the Group, must not contain any product, material or substance prohibited by the legislations or regulations applicable in the supplier’s country, the European Union and, more generally, in all of the countries in which these supplies, products or parts are marketed and used. If applicable to the goods delivered to WITTE the supplier also complies with its obligations concerning the area of ‘conflict minerals’.

6. Adherence to Antitrust law

The supplier will conduct its business in compliance with the principles of fair competition and in accordance with all applicable antitrust laws.

7. Freedom of Association

The supplier respects the rights of employees to associate freely, join or not join trade unions, seek representation and join workers’ councils. Employees should be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

Confirmation of the WITTE Supplier Code of Conduct

We acknowledge receipt of the WITTE Supplier Code of Conduct and confirm the compliance with the contents for all deliveries and services for the WITTE Group. We undertake to require our own suppliers to comply with the provisions pursuant to this Code of Conduct. We are perfectly aware that WITTE will consider any major infringement of the above obligations by us as a breach of contract and that WITTE will reserve the right to take appropriate measures.

Date    Name    Function

Signature / Company stamp

Velbert, March 2015