



**Astemo**  
Mobility Beyond

# Astemo Group Code of Conduct

Based on our core MISSION, VISION, and VALUES, we at Astemo have aimed to contribute to realizing a sustainable society and prosperous lives by providing world-leading advanced mobility solutions. Contributing to the development of automotive societies around the world, we have grown together with people who hold diverse values. This growth has been the result of our ethical approach to our customers and society.

Amidst the great change in the environment surrounding Astemo's business, the expectations of our customers and society at large are becoming more advanced and broader with each passing year. To meet those expectations and further strengthen the trust of our stakeholders in Astemo, each of us must act ethically in accordance with our MISSION, VISION, and VALUES.

Therefore we have created the Astemo Group Code of Conduct, which establishes the standards of behavior that should be practiced by Astemo Group colleagues around the world. We ask that each of you be aware that your actions represent Astemo, and that you behave ethically in accordance with this Code of Conduct.

## MISSION · VISION · VALUES



### MISSION = WHY

Astemo's "reason to exist" and "mission to be fulfilled" in society

### VISION = WHAT

The "desired state" that Astemo should strive to achieve in 10 years

### VALUES = HOW

The "values" and "decision-making standards" that each person at Astemo upholds and prioritizes

## Be Aware

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Appreciate Diversity, Equity and Inclusion  
Provide a Workplace Free from Harassment  
Promote Health and Safety  
Invest in Our Communities

## Speak-up Channels

## Why Astemo Has a Code

You make countless decisions at work each day, which our Code can help guide you to navigate challenging situations.

### The Code enables you to:

- Comply with Astemo's policies and protocols, applicable laws and regulations, as well as contracts
- Conduct yourself honestly and ethically
- Understand what Astemo expects from you

## Who Is Covered by Astemo's Code

The Code applies to anyone who works for or represents Astemo. The Code also applies to board of directors members, management, employees and contractors of Astemo.

Astemo also expects business partners to adhere to behaviors consistent with our Code as well as applicable laws and regulations when working with or on behalf of Astemo.

If applicable local laws are more restrictive than this Code, you must comply with those local laws. Non-compliance can result in disciplinary action, fines, penalties or termination.

*If there are discrepancies between the translated versions of this Code, Japanese version will prevail.*



## Required values and decision-making standards

You are responsible for acting ethically in both words and action. In all situations, understand and practice "Integrity"—one of Astemo's VALUES and a decision-making standard held in high regard—and act with fairness, honesty, and transparency.

Doing what is right includes avoiding participation in any fraudulent, illegal, or illicit activities, or actions perceived as such.

### *Integrity*

*Be a world role model of ethical behavior, integrity and transparency*

*We place great importance on maintaining a high level of compliance awareness and responsibility to quality. With a commitment to doing the right thing for society and ethical accountability, we strive for transparent organizational operations where all employees engage in open communication.*

## What Employees Need to Do

**Be knowledgeable.** Read and be familiar with the Astemo's Code, policies and protocols as well as local policies, procedures and protocols. Complete your compliance training promptly. Pay attention to activities that are inconsistent with doing what is right.

**Follow the law.** Learn about applicable laws and regulations and how to apply them to your job. If you are unsure about applicable laws or regulations, speak with your manager or a Human Resources, Compliance or Legal team member.

**Ask for help.** Speak with your manager or a Human Resources, Compliance or Legal team member before acting when an answer is unclear.

**Speak up.** Raise concerns about potential misconduct or violations of our Code, policies and protocols, laws and regulations. Cooperate fully and truthfully if you are part of an investigation.

## What Leaders Need to Do

**Model the Code and our MISSION, VISION, and VALUES.** Make ethical decisions, live out our MISSION, VISION, and VALUES, and demonstrate them in everything you do.

**Set expectations.** Discuss the importance of ethics and let employees know what you expect of them.

**Be informed.** Refer to the Code, know where to go for resources and answer employee questions.

**Talk about the Code.** Engage your team in discussions during team meetings about doing business ethically and honestly.

**Be responsive and promote a speak-up environment.** Encourage employees to come to you with ethical conduct questions or concerns. Listen to them carefully and offer guidance. Refer them to our speak-up channels when necessary.

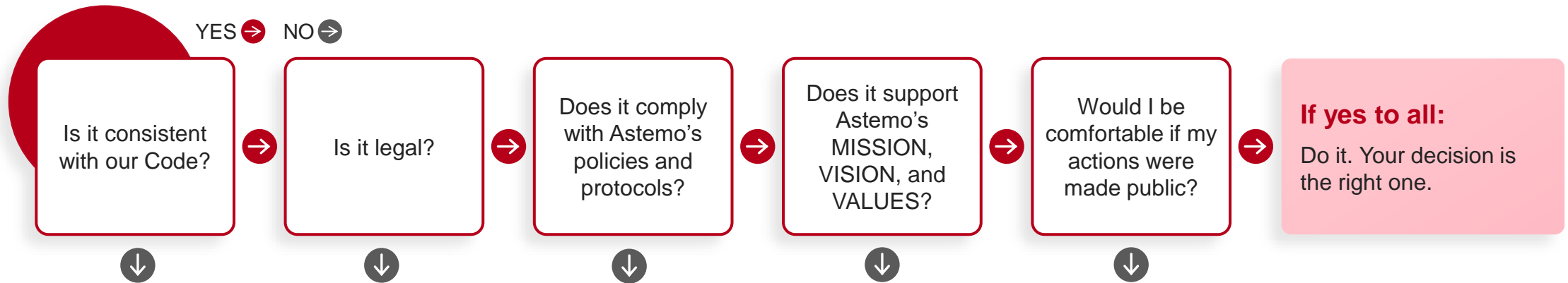
**Take action.** If you become aware of a violation or potential misconduct, speak up immediately. Never retaliate or allow others to retaliate.



## How You Can Make Good Decisions

Doing what is right and ethical is our goal.

If you are in a situation where the ethical choice is not clear, **ask yourself:**



### If no to any:

Do not do it. It may put you, someone else or Astemo at risk.

### If not sure about any questions:

Discuss it with your manager or a Human Resources, Compliance or Legal team member.

## How You Can Report a Concern

Maybe you sense that something is not right in your work environment. Perhaps you saw something or heard about actions that may violate our Code, Astemo's policies and protocols or laws and regulations. If so, you have a responsibility to report potential misconduct even if you are uncertain that a violation has occurred.

## Speak-up Channels

Astemo offers a variety of speak-up channels for more help and to report concerns.



### Speak to

- Your manager
- Next-level manager or another manager you trust; or
- Human Resources, Compliance or Legal team

Contact the Astemo Global Compliance Hotline, which is:



### Use hotline

- Operated by an independent third party
- Available 24/7 and allows you to remain anonymous, where permitted by law.



### Web access

Instructions on how to contact the hotline can be found on the Astemo intranet and on posters posted at each site.



### Call

Call your country-specific toll-free number, which is listed on the hotline's webpage or on posters. Translation services are available.

## What is Retaliation?

Any action that would deter someone from reporting a concern or participating in an investigation.

Examples of retaliation include demotion, harassment, job reassignment, threats or other actions taken against someone because they raised a concern or participated in an investigation.

## Zero-Tolerance for Retaliation

Astemo values your help in avoiding and uncovering possible misconduct. Astemo prohibits retaliation against anyone who shares a concern in good faith or who participates in an investigation, and will investigate any alleged retaliation. Employees engaged in retaliation will be subject to disciplinary action.



## What Happens When You Report a Concern

When you report a concern, you help us to handle issues properly, address problems before they occur and remedy past events. You also help build mutual trust and with our customers and business partners.

01



### You make a report in good faith.

You may choose to report anonymously, where permitted by law.

It helps the investigation if you provide your name and/or contact information.

02



### Your report is logged in the concerns management system.

03



### Your report is routed to the appropriate internal resources.

04



### We develop an investigation plan.

05



### The investigation proceeds.

Participate fully in an investigation if you are asked.

06



### The allegations are verified or found to be without merit.

07



### The appropriate actions are taken.

Determine if any process or program enhancements are needed.

Determine if policies or procedures need to be modified.

Determine if disciplinary action is needed.

Other actions as appropriate.

## Safeguard Our Assets

Astemo and its employees protect electronic, financial and physical assets provided or made available to you throughout your employment.

### Our Commitment

Astemo provides resources to you to help manage our business effectively and efficiently while serving our customers. Guard these resources against abuse, carelessness, fraud, loss and theft by using them according to Astemo's and protocols.

### In Your Daily Work

**Know what to protect.** Example of Astemo assets include:

- **Physical assets:** Buildings, equipment, office furniture and tools.
- **Technology:** Computers, hardware, phones, tablets, software and access to systems.

**Secure Astemo's assets.** Do not use Astemo Assets for personal benefit. Do not dispose of or sell Astemo's assets without appropriate approval.

**Report misuse.** If you see someone engaging in an unethical activity or know someone is misusing assets, speak with your manager or a Human Resources, Compliance or Legal team member.



## Protect Our Intellectual Property

Astemo protects and uses intellectual property, including our brand.

### Our Commitment

We treat Astemo's intellectual property as a valuable Astemo asset and essential to our competitive advantage. We will effectively use intellectual property for the sustainable development of our business.

### In Your Daily Work

**Protect Astemo's intellectual property.** Implement appropriate protections, such as filing an application for registration or entering into non-disclosure agreement, before using intellectual property for our business or disclosing confidential information outside Astemo.

**Respect third parties' intellectual property.** Respect the intellectual property of others and ensure we use it only where we have obtained the right to do so from the intellectual property owner.

## Intellectual property

Intellectual property is a valuable, intangible asset which are derived from creative works.

Examples include:

- Brand names
- Designs
- Ideas
- Inventions
- Software
- Trade secret
- Works of art

Patents, registered trademarks, copyrights or other legal measures protect intellectual property.

## Protect Non-Public Information

Astemo and its employees handle information with care, protecting it from attacks, disclosure or misuse.

### Our Commitment

We are committed to keeping our non-public information protected and safe. We also respect our business partners and customers by not disclosing their confidential or proprietary business information.

### In Your Daily Work

**Access only the information you need.** Never access information unless you have authority to do so, and use Astemo-approved tools when you share and store information.

**Protect your Astemo user account information and password.** Never share this information with anyone. Follow IT policies.

**Use strong email security practices.** Review emails carefully and report suspicious emails immediately to the IT Information Security team. Never click on any unfamiliar links or respond to unusual requests. Do not use Astemo passwords for personal accounts.

## Material non-public information

Information that would affect an investor's decision to buy or sell a company's securities. Examples include information about Astemo's acquisition or divestiture plans, competitive intelligence, financial information, long-term strategies as well as research and development.

## Select Business Partners Carefully

Astemo is committed to doing business ethically and legally, and seeks to work with business partners who operate to the highest standards of integrity and quality.



### Our Commitment

Before entering into business with a business partner, Astemo completes a risk-based screening or reputational due diligence process with potential business partners. We periodically repeat this process for business partners with whom Astemo has a long-term relationship.

### In Your Daily Work

**Choose wisely.** If you are responsible for business partners, engage your Compliance or Procurement team to help perform due diligence. This screening process identifies a business partner's potential risk and capabilities, experience, financial status, price, quality and reputation.

**Voice your concerns immediately.** If you work with business partners, confirm they understand the importance of complying with laws and aligning to our MISSION, VISION and VALUES. Monitor their performance to ensure they meet their obligations. Read and stay current with your business partner's financial, legal or reputational status, especially if the business partner is in a high-risk country. If you learn about information or suspect activity that could put Astemo at risk, voice your concerns immediately.

## Identify and Manage Conflicts of Interest

Astemo's employees have interests and relationships outside of work but act in Astemo's best interest.

### Our Commitment

We do not allow our personal interests to affect the business decisions we make as Astemo employees. When our outside activities conflict or appear to conflict with our responsibilities as an Astemo employee, we disclose situations that could be considered a conflict of interest.

### In Your Daily Work

**Disclose conflicts of interest.** Disclose as soon as you become aware of an actual, potential or perceived conflict of interest to your manager. Agree upon a mitigation plan and follow the plan.

**Seek advice.** When in doubt, consult the Compliance or Legal team for guidance.

## Conflict of interest

Defined as when a person chooses personal gain over duties to Astemo or uses their position for personal gain. The appearance of a conflict can damage Astemo's reputation.

### Is It a Conflict? Ask Yourself:

Could my personal interests or relationships influence the decisions I make?



If **yes**, it is most likely a conflict of interest.



Seek guidance when you are not sure.

Could it look that way to someone else?



If **yes**, it is most likely a conflict of interest.



Seek guidance when you are not sure.

## Maintain Accurate Financial Records

Astemo presents an honest and accurate financial image of its business.



### Our Commitment

We are committed to accurate recordkeeping and reporting to help Astemo meet our legal and regulatory requirements and protect shareholder value.

### In Your Daily Work

**Properly record transactions.** Never alter, conceal, make false statements and entries or omit the true nature of any transaction. Regardless of the value, record and classify transactions in reasonable detail, in the proper accounting period as well as the appropriate account and department. Do not keep hidden financial accounts or unrecorded funds.

**Manage records properly.** Follow policies that relate to disposal, maintenance and storage of documents. Never destroy information needed for an audit, investigation or legal proceeding. If you receive a legal hold notice, follow the guidelines in the notification. And if you are unsure about what is required, check with the Legal team and document retention policies. Speak up. Use one of the speak-up channels if anyone asks you to falsify a financial record or if you suspect accounting practices mishandling. Also, contact one of the speak-up channels if you suspect misuse of our funds or property or our customers or business partners.

**Speak up.** Use one of the speak-up channels if anyone asks you to falsify a financial record, or if you suspect accounting practice mishandling. Also, contact one of the speak-up channels if you suspect misuse of our funds, property, our customers or business partners.

## Prevent Money Laundering

Astemo guards against using our products or services or transactions to launder the proceeds of crime.

### Money laundering

This illegal process disguises funds created through criminal activity such as drug dealing, fraud, human trafficking, tax evasion or terrorism. It makes the funds look as though they are legitimate, usually by transferring the proceeds through legitimate businesses. It also includes using legitimate funds to support criminal activity or terrorism.

### Our Commitment

We are committed to conducting business only with customers and business partners involved in legitimate business activities and with money from legitimate sources. We comply with anti-money laundering and anti-terrorism laws in all countries where we operate.

### In Your Daily Work

**Be knowledgeable.** Read and stay current with the Code and Astemo's policies and protocols. Complete mandatory ethics and business conduct training promptly.

**Conduct due diligence.** Screen prospective business partners to ensure they are involved in legitimate business activities.

**Know the laws and regulations.** Comply with anti-money laundering laws and regulations. Consult with a Compliance or Legal team member if you have questions or need help.

**Speak up.** If you encounter something suspicious, consult with your manager or a Compliance or Legal team member.

**Stay alert.** Watch for activities and transactions that are more susceptible to acts of money laundering and require increased monitoring.

**Take a stand.** Remember that by preventing money laundering, you are protecting Astemo and preventing a crime.



## Give and Receive Gifts, Travel and Entertainment Responsibility

Astemo employees act responsibly when giving and receiving gifts, travel and entertainment.

### Gifts, travel and entertainment guidelines

Use good judgment when accepting gifts, travel or entertainment and respect the recipient's own business ethics policies or protocols.

#### When you are accepting gifts, travel or entertainment:

- Identify the business purpose in advance.
- Both parties must be present.
- Avoid accepting gifts and entertainment during a bidding process.
- Avoid accepting gifts and entertainment, such as travel and lodging, premier sporting events that are above nominal values.
- Attend entertainment in a setting suitable for conducting business.

#### When you are offering gifts or entertainment:

- Speak with your manager if the value of the gift or entertainment is extravagant.
- Ensure the event is in a setting appropriate for conducting business.
- Report entertainment costs accurately for recordkeeping purposes.

### Our Commitment

Astemo values the relationships with our business partners and customers. We provide business courtesies — gifts, travel or entertainment — when it supports a legitimate business purpose and is reasonable and appropriate under the circumstances. We do not offer gifts, travel or entertainment that may unduly influence a business decision or is contrary to local law. Likewise, we do not accept gifts, travel and entertainment if the giver expects favorable treatment or improperly influence a business decision.

### In Your Daily Work

**Know when to say “No.”** Offers of gifts, travel or entertainment that do not comply with our policies and protocols can also create a conflict of interest. Know what is allowed—and what is not—and turn down offers that violate our policies or protocols or that someone might perceive as a violation.

**Explain our protocol on gifts, travel and entertainment to new business partners.** The exchange of gifts, meals, entertainment and hospitality helps build better relationships with customers and business partners. Although local customs about gifts and entertainment vary, do not accept a gift if it will obligate, appear to obligate or influence your decision making. A good time to explain our protocol is several weeks before holidays or periods in which it is socially customary to give gifts.

## Safeguard Confidential Business Information and Personal Data

Astemo is committed to handling confidential business information responsibly.



### Our Commitment

We protect Astemo's confidential business information and take precautions to protect information from unauthorized access and disclosure. We also protect Astemo's customers' and business partners' confidential business information.

### In Your Daily Work

**Respect the trust that businesses place in you.** When dealing with confidential business information, show that you understand and respect its importance to the person and Astemo.

**Tell people how you are using the information.** Be honest and transparent about how you will use confidential business information.

**Protect the information.** Safeguard business information from unauthorized access or disclosure. Report any known or suspected unauthorized access or disclosure to a Data Protection, Legal or Compliance team member as soon as possible.

**Follow data protection laws and our policies.** Learn about our data policies, procedures, and the laws that apply to you and observe them when handling data.

**Seek guidance.** If you have questions about data protection, contact a Data Protection, Legal or Compliance team member.

## Build Trust with Customers

Astemo places the highest value on our interactions with customers, recognizing that a long and fruitful customer relationship is one of our most valued assets.



### Our Commitment

We provide products and services that meet the needs and requirements of our customers. To ensure quality and safety, we comply with relevant laws as well as with standards and conditions of customer contracts, setting additional standards where necessary.

### In Your Daily Work

**Serve our customers.** Develop, produce or provide products and services that meet the needs and requirements of our customers. Comply with customer contracts, relevant laws and standards, ensure quality and safety while considering environmental and societal effects.

**Communicate with customers.** Represent our products and services accurately by making competitive comparisons fairly while promising what we can deliver ethically and legally. Address customer complaints or defects quickly and identify causes to eliminate them in the future.

**Properly record testing and inspection.** Never alter, conceal, make false statements and entries, or omit the true nature of any testing and inspection.

**Seek guidance.** If you have questions about quality and safety in connection with customer interactions, contact a Quality Assurance, Legal or Ethics and Compliance team member.

## Develop Relationship with Procurement Partners

Astemo treats procurement partners with fairness, honesty and respect.



### Our Commitment

We expect our procurement partners to uphold values like ours and conduct business in a manner that does not cause adverse effects on people and our planet. By mutually adhering to contractual conditions and promoting ethical and responsible business practices, we mitigate supply chain risks and leverage our purchasing power to drive positive social and environmental outcomes.

### In Your Daily Work

**Find qualified procurement partners.** If you are responsible for selecting procurement partners, review factors such as the business stability, delivery time, license fees, price of the materials, services, quality, reliability and technological capability. Also, check their adoption of social responsibility practices, including abolishing unfair discrimination, eliminating child or forced labor and environmental conservation.

**Know when to say “No.”** Offers of gifts, travel or entertainment that do not comply with our policies and protocols can also create a conflict of interest. Turn down any gifts, travel or entertainment from procurement partners in procurement transactions.

**Speak up.** If you believe that a procurement partner violates laws or regulations, consult with your manager or a Human Resources, Compliance or Legal team member.

## Compete Fairly

Astemo is committed to fair competition and abides by applicable competition laws.

### Honest methods to gather competitive information

- Online research
- Looking at their social media channels
- Customer feedback
- Competitor's job openings

### Our Commitment

We compete fairly and comply with competition laws in all countries in which we do business. We know that everyone benefits from a competitive marketplace, so we follow the antitrust and fair competition laws where we operate. We also avoid the appearance of unfairly restricting another company's ability to compete against Astemo.

### In Your Daily Work

**Obey competition laws.** Never enter into an oral or written agreement or understanding with a competitor to:

- Divide markets or customers.
- Exchange or discuss sensitive information such as prices, customers, discounts, market share, product development plans, capacity, sales territories, sales volumes, supply terms or strategic plans.
- Fix prices.
- Manipulate a competitive bidding process.

**Seek guidance.** Competition and anti-trust laws are complex and often situation specific. If you have questions, ask a Legal or Compliance team member, particularly for help with:

- Control of the supply of consumables servicing and spare parts;
- Loyalty or volume discounts;
- Exclusive distribution arrangements;
- Territorial restrictions.

**Be mindful of appearances.** Avoid contact with competitors that might raise suspicion of improper or inappropriate conduct.

**Gather competitive information fairly.** If you gather information about our competitors, use honest methods. Do not encourage anyone to give you confidential information. Do not engage in inappropriate discussions or anti-competitive conduct while attending an industry association meeting or trade show. If you become aware of this behavior, distance yourself from it and notify a Compliance or Legal team member as soon as possible.

## Comply with Trade Compliance Laws

Astemo exports and imports goods worldwide, following international trade laws and export controls.



### Our Commitment

We comply with national and international export control regulations that control the cross-border transfer of our products and services, economic sanctions and customs laws.

### In Your Daily Work

**Understand export and import policies.** Export controls can apply to the physical movement of goods and intangible transfers of software and technology. Exports include hand-carried goods or a laptop containing software or technical information across a border.

**Be informed.** Before exporting goods, know what you are exporting, its export classification, the destination country, the recipient and end-user, as well as the intended end use.

**Comply with trade regulations.** Obtain required export licenses before proceeding with any export. Comply with the license terms or any exemption requirements. Contact your International Trade team if you are unsure about the laws, customs and practices that govern a trade transaction.

## Prevent Bribery and Corruption

Astemo does not tolerate acts of bribery or corruption.

### **Our Commitment**

We are committed to upholding the highest standards of business ethics while preventing bribery and corruption. We do not offer or accept anything of value to keep business, secure business or gain an unfair advantage.

### **Anything of value**

Offers or provision of cash, donations to nonprofits (charities), gifts, entertainment, business opportunities, meals, employment, products or services can be a bribe. There is no minimum or maximum amount associated with this term.

### **Bribery or corruption**

Giving or receiving anything of value in exchange for an improper decision or action.

### **Facilitation or grease payment**

Small payments that are made to a government official to speed up routine government actions like processing paperwork, delivering mail or installing phones.

### **Government official**

Defined as employees of any government anywhere in the world or employees of government-controlled entities, this also includes political parties and party officials, candidates for political office, employees of public international organizations, such as the United Nations.

## In Your Daily Work

**Be knowledgeable.** Read the Code and Astemo's policies and protocols. Complete ethics and business conduct training promptly.

**Know the laws and regulations.** Comply with applicable anti-bribery and anti-corruption laws and regulations. Consult with a Compliance or Legal team member if you have questions or need help.

**Conduct due diligence.** Before entering a business relationship, engage your Compliance team to help perform due diligence on business partners. Select only those who align with our Values and our commitment to do what is right.

**Refuse to offer, pay or accept bribes.** Report any request for—or offer of—a bribe or kickback to your manager or a Human Resources, Compliance or Legal team member.

**Give and receive gifts, travel and entertainment responsibly.** Ensure that gifts, travel or entertainment are not given or accepted in circumstances in which they could be—or give the appearance of being—bribes. Bribes to gain favor are unacceptable in all circumstances. Laws prohibiting bribes to government officials and, in some cases employees of commercial enterprises, can carry severe monetary and criminal penalties while negatively affecting Astemo's reputation.

**Limit the use of petty cash.** Astemo does not permit facilitation payments unless there is an immediate threat to life, safety, security or freedom. If you make a payment under these circumstances, report it to a Compliance or Legal team member as soon as you can.

**Do not make facilitation payments.** Astemo discourages the use of petty cash in our offices around the globe. If local management approves the use of petty cash for valid business purposes, document withdrawals and maintain appropriate documentation to record accounting entries accurately.

**Speak up.** If you encounter something suspicious, consult with your manager or a Human Resources, Compliance or Legal team member before proceeding.



## Communicate Responsibly

Astemo understands our words have an impact, so we communicate thoughtfully and responsibly.



### Our Commitment

Our reputation is one of our greatest assets, and it is up to each of us to protect it. Use social media wisely, being responsible for what you post. For outside inquiries about Astemo's business, please refer them to our Communications team.

### In Your Daily Work

**Post responsibly on social media.** Make it clear in your posts or profile that your views are your own. Never disclose confidential information about Astemo, our business partners, customers, or competitors. Never post anything that might constitute bullying, harassment, intimidation, or a threat. Be mindful that social media posts are usually permanent and global in reach.

**Help Astemo speak with one voice.** Never speak for Astemo or your company if you are not authorized to do so. Remember to receive approval from your manager and, if necessary, also from Astemo's Branding and Corporate Communications team before you discuss your role as an Astemo employee outside of Astemo.

## Trade Securities Fairly and Legally

Astemo promotes trust by supporting fair and open securities markets.

### Insider Information

Information about a public company that has not been made public, and that can affect the company's stock price positively or negatively.

- Examples:
- Corporate partnerships
  - Pending merger or acquisition
  - Product recall
  - Earnings shortfall

### Insider Trading

Insider trading is when someone who has insider information trades a public company's stock.

- Examples:
- Buying or selling securities based on insider information
  - Sharing non-public information about Astemo companies to friends and family who trade the stock

### Our Commitment

We do not trade based on insider information or tip others by sharing that information to trade. The board of directors, management and employees trade only based on publicly available information.

### In Your Daily Work

**Do not trade on insider information.** It is illegal to buy or sell Astemo stock or shares in our business partners if you have information unknown to the public.

**Do not share insider tips.** Do not share insider information outside of Astemo, even with family members or friends. Never recommend or suggest that anyone else buy or sell securities (often stock) of any company when you have insider information about that company.

**Speak up.** Consult with a Compliance or Legal team member if you are unsure about a situation or circumstance before providing information or executing a trade.

## Care For Our Planet

Astemo strives to address environmental issues and achieve a sustainable society. This is realized through developing and supplying environmentally friendly products using advanced technology, further promoting energy conservation, and utilizing renewable energy.



### Our Commitment

We believe in operating a sustainable business to preserve our planet and follow applicable laws and regulations that affect Astemo. We will collaborate with employees, business partners, customers and investors to realize a decarbonized society where greenhouse gas emissions such as carbon dioxide are net zero. We will also work to create a resource-efficient society that efficiently uses water and other resources while reducing chemical substance emissions.

### In Your Daily Work

**Learn about Astemo's environmental strategies.** Help Astemo achieve its environmental vision, long-term environmental targets, environmental action plan and mid-term management plan.

**Follow laws and regulations.** Learn about Astemo's environmental strategies. Understand and follow environmental laws and regulations that apply to the business and your work, as well as Astemo's policies and protocols.

**Minimize adverse environmental effects.** Understand the direct and indirect effects of your daily actions on the environment and minimize the adverse effects such as carbon dioxide emissions, pollution or waste.

## Respect Human Rights

Astemo conducts business in a way that supports and respects human rights.

### Human rights particularly relevant to the workplace are:

- Abolition of slavery and all forms of forced or compulsory labor;
- Freedom of association;
- Equal pay for equal work;
- Equality at work;
- Just and favorable remuneration;
- Non-discrimination; and
- Organization and participation in collective bargaining

### Our Commitment

We respect the human rights of all those involved in our business activities. All human beings are born free and equal in dignity, fairness, respect and rights.

We follow the international conventions on human rights and labor laws, as well as the national laws and regulations in each market where Astemo operates. In instances of internationally recognized human rights conflicting with national laws, in which the latter are less protective of human rights, we will follow processes that seek ways to honor international human rights principles. For example, we respect the individual rights of children, linguistic or religious minorities, indigenous people, migrant workers and their families, persons with disabilities and women.

### In Your Daily Work

**Respect human rights and freedoms.** Read the Astemo Group Human Rights Policy and avoid infringing the rights of others. Abide by international standards and avoid causing or contributing to adverse human rights impacts.

**Comply with Astemo's commitment to human rights.** Do not permit child, forced, prison or trafficked labor. If you recruit or hire employees, adhere to national laws and regulations.

**Speak Up.** If you suspect a human rights violation, report it to your manager or another speak-up channel. Astemo will promptly investigate concerns and pursue action to mitigate any adverse human rights issues.

## Appreciate Diversity, Equity and Inclusion

Astemo believes diversity and inclusion are crucial to building innovation, growth and a long-term sustainable business.

### Our Commitment

We promote diversity, equity and inclusion, equal employment opportunities, and fair treatment in the workplace. Diversity and inclusion support the diverse needs of society and our customers, and everyone benefits from the richness of different perspectives and points of view.

Diversity, Equity and Inclusion are the source of our innovation and growth.

Astemo has a place for everyone, welcoming differences in colleagues' background, age, gender, sexuality, family status, disability, race, nationality, ethnicity and religion.

We respect and value these and other differences because only through difference can we understand our markets, create better ideas and drive innovation that contributes to society.

At Astemo we treat everyone fairly, recognizing the differences to enable everyone to contribute.

With a diverse workforce, broad experience, and an inclusive culture, we will meet our customers' needs and drive our company's sustainable growth.

Appreciate Diversity, Equity and Inclusion

## In Your Daily Work

**Embrace our diversity.** Treat each other with respect and dignity. Understand the culture and viewpoints of others, so that Astemo benefits from the creativity and innovation that results from employees with different experiences, perspectives and cultures working together.

**Focus on fairness.** Practice equal opportunity in every action and embrace the diversity of all Astemo employees. Do not discriminate against any employee or applicant.

**Promote trust and respect.** Promote and encourage an inclusive work environment, free of harassment. Create an atmosphere where everyone can express their opinions, encouraging people to speak up and listen carefully.

**Promote equal employment opportunities.** Discrimination is never accepted at Astemo and might be illegal in some locations. Do not discriminate against applicants, employees or business partners based on characteristics such as:

- Age
- Citizenship status
- Color
- Gender
- Gender identity or expression
- Genetic information (or those of a family member)
- Marital status
- Medical condition or disability
- Military or veteran status
- Pregnancy status
- Race, national origin or ancestry
- Religion or religious creed
- Sex
- Sexual orientation
- Any other characteristic protected by applicable laws



## Provide a Workplace Free from Harassment

Astemo believes that everyone deserves respect and a workplace free from harassment.

### Our Commitment

We do not tolerate harassment by anyone at Astemo, and work to ensure that everyone feels comfortable and respected at work. It is everyone's responsibility to prevent any type of harassment.

### In Your Daily Work

**Speak up.** Sometimes harassment can involve persistent mistreatment that threatens someone's physical or emotional wellbeing. If you see or experience bullying or intimidating behavior, do not let it continue—you have a responsibility to speak up.

**Recognize signs of harassment.** When behavior interferes with someone's work or creates a hostile environment, it may constitute harassment. It can take various forms and be physical, sexual, verbal or visual.

## Harassment

Unwanted, unwelcome, and uninvited behavior that demeans, offends or threatens an individual and results in a hostile environment. Examples include bullying, intimidation, physical aggression or stalking.

## Promote Health and Safety

Astemo works to create a healthy, safe, secure, and wellbeing work environment.

### Astemo Group Health & Safety Policy:

1. Compliance with voluntary control standards as well as applicable laws and regulations,
2. Raising health & safety consciousness (a workforce and workplace that observe rules) and prevention of work accidents, fires, traffic accidents, etc. through precautionary measures against various risks,
3. Maintaining and improving health & safety actions based on the industrial health & safety management system,
4. Preservation/improving of mental and physical health by systematic health care and acting in detailed manner, and
5. Minimizing damages by taking response measures against various risks in both normal times and in emergencies.

### Our Commitment

We work together to ensure our safety by adopting practices to prevent work-related accidents and promote employees' and families' mental and physical health. In addition, we will work to secure employee safety and business continuity following natural disasters such as earthquakes, tsunamis and floods or cyberattacks and terrorism.

### In Your Daily Work

**Prevent safety risks.** Comply with health and safety policies to ensure safe and healthy workplaces in support of our philosophy of Health and Safety Always Comes First. Be proactive to protect your own health and safety as well as the safety of those around you. Use appropriate personal protective equipment to help prevent injuries and illnesses. Report incidents, injuries and near misses to your manager immediately.

**Maintain a safe workplace.** Identify and address risks while finding ways to improve our health and safety practices. Immediately report violence or threats of violence by or against any employee, procurement partner or visitor to your manager.



## Invest in Our Communities

Astemo encourages employees to take an active role in making a difference in their community or globally in their daily work, or through social contribution activities.

### In Your Daily Work

**Contribute responsibly.** Astemo encourages you to make personal contributions to causes and organizations you support. Follow our policies and regulations when making contributions. Do not pressure other employees, business partners or customers to contribute to or join your preferred nonprofits (charities), groups or political activities.

**Respect differing political views.** If you engage in civic activities or share political beliefs, do not use Astemo's time to do so. Make it clear that your perspective is your own. Review the Conflicts of Interest protocol and disclose the conflict, if applicable. Speak to your manager if you plan to seek or accept a public office, engage in political activities or have questions.



Astemo offers a variety of speak-up channels for more help.

If you have questions about the Code of Conduct and Astemo Group compliance policies and protocols:



**Speak to**

- Your manager
- A more senior manager, or another manager you trust
- Human Resources, Compliance or Legal team

If you want to report potential misconduct or ethical concerns:



**Speak to**

- Your manager
- A more senior manager, or another manager you trust
- Human Resources, Compliance or Legal team



**Online**

Instructions on how to contact the hotline can be found on the Astemo intranet and on posters posted at each site.



**Call**

Call the toll-free number for your country listed on the hotline's webpage or on posters. Translation services are available.

**Astemo**

Mobility Beyond