

Supplier Code of Conduct



Preamble

At Joyson Safety Systems (meaning Joyson Safety Systems Auto Safety Holdings S.A. and its direct and indirect affiliates), we consider sustainability to be an essential component of our business processes. As a global leader in mobility safety, we purchase raw materials, commodities and services from suppliers worldwide to ensure the ongoing success of our customers by providing innovative solutions for products and services which exceed industry standards and meet customer requirements.

Joyson Safety Systems evaluates and engages with qualified suppliers on an objective basis grounded in fairness. When selecting suppliers, we assess each supplier's ability to satisfy our business and technical needs and requirements. We make purchasing decisions based on the cost and benefit to Joyson Safety Systems. All agreements are negotiated in good faith and must be fair and reasonable for both parties.

This Supplier Code of Conduct highlights important standards that are consistent with Joyson Safety Systems' values and applies to people and companies that do business with Joyson Safety Systems (Suppliers). We expect that our Suppliers will not only meet their contractual obligations, but will comply with laws, regulations, and conduct themselves consistent with Joyson Safety System's Guiding Principles, Code of Ethics and Business Conduct, and this Supplier Code of Conduct. Our Suppliers are required to familiarize themselves with the [Joyson Code of Ethics and Business Conduct](#).

Fair Treatment of Employees

Our Suppliers must observe the fundamental rights of their employees based on the applicable national labor laws. The following rules are aligned with the International Labor Organization's (ILO), Declaration on Fundamental Principles and Rights at Work.

Respecting Human Rights

We expect our Suppliers to conduct their business in a manner that respects the human rights and dignity of all, and support international efforts to promote and protect human rights, including an absolute opposition to slavery, human trafficking, and forced labor.

Child Labor

Our Suppliers shall only employ persons who have reached the minimum legal age for work according to the laws applicable in the country of employment. Moreover, our Suppliers respect and uphold children's rights.

Freedom of Association

We expect our Suppliers to respect freedom of association and obey all laws on working hours and compensation. Our Suppliers shall grant their employees the right to articulate their interests within the framework of the labor laws in force in their country.

Equal Opportunities

Our Suppliers do not tolerate discrimination based on characteristics such as a person's race, color, gender, national origin, age, religion, disability, marital status or sexual orientation.

Fair Working Conditions

Our Suppliers shall pay wages and social benefits equal to or higher than the rates prescribed by national or regional laws and regulations, authorities, legal standards, or other labor agreements. The applicable regulations governing working hours and vacation entitlements shall be observed.

Occupational Health and Safety

At the minimum, our Suppliers shall comply with national standards of workplace safety and hygiene and take appropriate measures to ensure that the relevant occupational health and safety requirements are met, in order to ensure safe and healthy working conditions.

Conduct in Business Environment

Maintaining Data Integrity

At Joyson Safety Systems, we have a responsibility to ensure that our products are designed, manufactured, tested and suitable for use based on data that is accurate, reliable, and complete. Product quality is our highest priority, and data integrity is a fundamental aspect of our company's Quality Management System.

We expect our Suppliers to adhere to sound data integrity principles to ensure that data and records provided to Joyson Safety Systems is attributable, legible, contemporaneous, original, and accurate.

We expect our Suppliers to refrain from any conduct that calls into question the integrity of data provided to Joyson Safety Systems including data falsification, making unauthorized changes or substitutions to data, destroying, deleting, or overwriting data and to report any issue that impacts the integrity of our data (for example, errors, omissions, or international data manipulation). We expect our Suppliers to familiarize themselves with the Company's data integrity policies and adhere to the following Data Integrity Principles

Data Integrity Principles

- The Supplier is responsible for ensuring that test data is (a) attributable, legible, contemporaneous, original, and accurate and (b) generated and acquired, recorded, reported, retained and disposed of in accordance with applicable law and the standards agreed with Joyson Safety Systems.
- The Supplier shall create and maintain attributable, legible, complete, consistent and accurate records of all tests, data values and data analyses and will not engage in any form of testing or data manipulation, including but not limited to the following: (a) intentionally report data values that are not the actual values obtained; (b) intentionally report the dates and times of data analyses that are not the actual dates and times of the data analyses; or (c) intentionally omit data values (in whole or in part) in reports.
- The Supplier will inform Joyson Safety Systems of any reporting of non-authentic data by it to Joyson Safety Systems without undue delay after the supplier becomes aware thereof.
- The Supplier will appropriately communicate these data integrity principles to and will ensure compliance with these data integrity principles by, all its employees and contract workers which fulfill supplier's contractual obligations towards Joyson Safety Systems.

Prohibition of Corruption and Bribery

At Joyson Safety Systems, we believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs. We do not pay or accept bribes,

kickback, or facilitation payments, at any time for any reason.

We expect our Suppliers to comply with all applicable anticorruption laws. and to ensure compliance with all United Nations (UN) and Organization for Economic Co-operation and Development (OECD) conventions against corruption. In particular, our Suppliers are expected to ensure that their employees, subcontractors and agents do not offer, promise or grant any advantages to any Joyson Safety Systems employees or related parties with the goal of securing an order award or any other form of preferential treatment in their business transactions.

Invitations and Gifts

At Joyson Safety Systems, we do not accept or provide gifts, favors, or entertainment-even if complies with our policies-if the intent is to improperly influence any decision. We expect our Suppliers to refrain from presenting any invitations or gifts to our employees to gain any form of influence.

Any invitations or gifts extended to Joyson Safety Systems employees or related parties, if any, must be reasonable and suitable with a view to scope and design, i.e. they must be of low financial value, comply with applicable laws and regulations, and reflect ordinary local business customs.

We also expect our suppliers to refrain from asking Joyson Safety Systems employees or related parties for any inappropriate advantages.

Preventing Conflicts of Interest

In business dealings with us, we expect our Suppliers to make decisions based on objective criteria only. Suppliers shall not at any time consider any factors that might influence their decisions due to private, business or other conflicting interests, including but not limited to the interests of relatives and other related parties.

Unrestricted Competition

At Joyson Safety Systems, we believe in free and open competition and never engage in inappropriate practices that may limit competition. We expect our Suppliers to always compete in a fair manner and to comply with applicable antitrust laws and regulations. Our suppliers are expected not to enter with competitors into agreements that might constitute a breach of antitrust law, nor to take advantage of any dominant market position they might hold.

Money Laundering

At Joyson Safety Systems, we expect our Suppliers to comply with all applicable laws and regulations governing the prevention of money laundering and not to participate in any money laundering activities.

Conflict Minerals

At Joyson Safety Systems, we expect our Suppliers to adhere to all applicable conflict minerals laws and regulations. If a product contains one or more of the conflict minerals (tin, tantalum, tungsten and gold or their ores) as defined in the Dodd-Frank Wall Street Reform and Consumer Protection Act or similar legislation, we expect our Suppliers to provide, on request, transparency on the supply chain up to the smelter, including all certifications and information relating to Conflict Minerals, as defined in the Act or other laws or regulations, in such form and at such time as requested by Joyson Safety Systems. Suppliers shall also contractually require their supply base and sub-suppliers to comply with these obligations.

Reporting Integrity and Compliance Issues

Suppliers will provide an adequate mechanism for their employees to report integrity or compliance issues, quality, and product safety issues without fear of retaliation. Suppliers will have procedures in place to appropriately review and investigate reports and take corrective action if necessary.

Product Safety, Health, and Environment

At Joyson Safety Systems, we recognize environmental and societal responsibilities. We are committed to sustainability and to minimizing damage to the environment as well as any potential harm to the health and safety of employees, customers, and the public. We expect our suppliers to support Joyson Safety Systems in these efforts.

We expect our Suppliers to comply with applicable laws and regulations on environmental protection to preserve resources and protect the environment, including but not limited to requiring design and materials to maximize the recycling of the products supplied to Joyson Safety Systems, as well as the materials and components incorporated in the products, properly handling, processing, using, transporting, storing, and disposing of hazardous waste, and utilizing reusable packaging whenever possible.

Compliance with the Code of Conduct

We expect our Suppliers to communicate the content of this Code of Conduct to all third parties they engage to fulfill their contractual obligations toward Joyson Safety Systems, to observe its principles when selecting subcontractors, and to ensure subcontractors and other third parties engaged by Suppliers comply with its requirements.

Joyson Safety Systems reserves the right to audit the Supplier's compliance with this Supplier Code in an appropriate manner. Any audit will be scheduled at business hours mutually agreed with the Supplier and by the Supplier providing an appropriate level of documentation which substantiates in a clear and transparent manner its adherence to this Supplier Code.

Any violation of the principles and requirements set out in this Joyson Safety Systems Supplier Code of Conduct will be regarded as a serious violation by the Supplier regarding its contractual obligations towards Joyson Safety Systems.

If Supplier is suspected of violating any of the principles or requirements laid out in the Joyson Safety Systems Supplier Code of Conduct (e.g. based on negative media reports or other information available to Joyson Safety Systems), Joyson Safety Systems reserves the right to request from the Supplier that all relevant information be disclosed.

If a supplier evidently fails to fulfill any of the principles or requirements set out in this Joyson Safety Systems Supplier Code of Conduct or refuses to pursue and implement measures for improving its sustainability performance, after having been given a reasonable period of time to remedy the failure, Joyson Safety Systems reserves the right to immediately terminate any or all contracts with the Supplier for cause.

Reporting Integrity and Compliance Issues to Joyson Safety Systems

At Joyson Safety Systems, acting with ethics and integrity is central to how we conduct our business. We set high standards for ethical behavior and expect our Suppliers to meet our standards and live our Guiding Principles, even under the most challenging circumstances. We expect our Suppliers to be honest and transparent in conducting business and to have the courage to do what is right. Subject to any restrictions imposed by law, Suppliers will promptly inform Joyson Safety

Systems of any concern related to the Supplier Code of Conduct or the Joyson Code of Ethics and Business Conduct. To report a concern, Suppliers may contact their purchasing representative. Suppliers also have the option of contacting the Joyson Safety Systems Compliance Hotline.

The Joyson Safety Systems Compliance Hotline is a service run by independent third-party providers of corporate compliance services and gives Suppliers the opportunity to report integrity or compliance issues.

Suppliers in North and South America, Europe and Africa, and Japan and Asia (excluding China) may submit reports to the Joyson Safety Systems Compliance Reporting Hotline by clicking on the following link which includes the country specific phone numbers: www.joysonsafety.ethicspoint.com

Suppliers in China may submit reports to via the methods below, including the website link:

- (1) Toll Free Line: 400-8383-022
- (2) Website link: www.jss-speakup.cn
- (3) Email: Speakup@jss-speakup.cn

Individuals filing reports can remain anonymous, as permitted by law.

Revision History

Revision:	Revision Date:	Description of Change	Reviewed by:	Process Owner Name:
001	5/16/2019	Initial release.	M. Wehner, P. O'Brien, L. Buonomo, D. Fenice	Michael Orzinski
002	6/26/2019	Administrative update: remove address from page 6.	Daniele Fenice	Michael Orzinski
003	01/29/2020	<i>Remove last sentence on page 5, "A copy of the reporting numbers and addresses are also attached as an appendix"</i>	<i>D. Fenice E. Uttermohlen</i>	<i>M. Orzinski</i>



JOYSON
SAFETY SYSTEMS