



# Supplier Code of Conduct

*An integral part of Standard Profil Group Ethics Code*

*Effective February 2026*



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# 01 INTRODUCTION



**“WE CONTRIBUTE TO  
THE DEVELOPMENT  
OF THE SOCIETY  
IN WHICH WE LIVE  
WITH OUR  
ETHIC CODES”**

Dr. Klaus Elmer / CEO

Sustainability, ethical conduct, and responsible business practices are integral to the long-term success of Standard Profil Group<sup>1</sup>. As a global automotive supplier operating across multiple countries and markets, we recognize that our responsibilities extend beyond our own operations and include our entire supply chain.

This Supplier Code of Conduct defines the minimum standards and principles that Standard Profil Group expects its suppliers, contractors, and business partners<sup>2</sup> to respect and apply in all aspects of their business activities. These expectations are derived from our corporate values, our Code of Ethics, and internationally recognized standards related to human rights, labor practices, environmental protection, and ethical business conduct.

Standard Profil Group builds its business relationships on honesty, transparency, integrity, and mutual trust. We expect our suppliers to share these values and to conduct their operations in compliance with applicable laws, regulations, and contractual obligations.

Suppliers are also expected to take appropriate measures to ensure that these principles are respected within their own organizations and supply chains.

Adherence to this Supplier Code of Conduct is a prerequisite for doing business with Standard Profil Group. Regardless of any contractual arrangements, we expect our suppliers to acknowledge these standards and to actively contribute to responsible, sustainable, and ethical business practices throughout the supply chain. Where the requirements of this Code differ from applicable law, suppliers must follow the stricter standard.

<sup>1</sup> Standard Profil Group (SP Group) refers to all legal entities

<sup>2</sup> Business Partners refer to natural or legal persons with whom SP Group maintains or intends to establish business relationships.

# 02 OUR CORE VALUES & COMMITMENTS

**Our shared values define who we are as Standard Profil and guide how we expect our business partners to conduct themselves. These values form the foundation of our culture, decision-making, and relationships across the entire supply chain. Every supplier is expected to understand, uphold, and reflect these values in all business activities.**

# Our Core Values

## HONESTY, INTEGRITY AND TRANSPARENCY

We adopt the virtues of honesty, integrity, and transparency in all our activities and communications. These principles form the foundation of mutual trust and guide how we conduct business, make decisions, and represent Standard Profil. Acting with integrity means upholding ethical standards, complying with laws and internal rules, and avoiding any behavior that could compromise our values or reputation.

## CONTINUOUS IMPROVEMENT AND QUALITY

Continuous development is a core expectation at Standard Profil. We consistently strive to enhance our performance, strengthen our capabilities, and ensure effective outcomes in every process. Quality is central to all operations, reflecting our commitment to excellence and to meeting the expectations of customers, employees, and stakeholders.

## HEALTH AND SAFETY

We prioritize healthy, respectful, and safe working environments. Standard Profil prohibits all forms of harassment, violence, or behavior that may endanger physical or psychological well-being. Ensuring safety requires awareness, precaution, and accountability at every level, and it is essential for sustaining a productive and responsible workplace.

## SUSTAINABILITY

We are committed to protecting the environment and future generations. This includes minimizing adverse effects on health, safety, and the environment; complying with environmental regulations; and fostering responsible use of resources. Our sustainability approach also incorporates respect for human rights, equal treatment of all individuals, and ethical, socially responsible conduct across all operations and supply chains.



# 03 WORKING TOGETHER EXPECTATIONS FOR SUPPLIERS

## Principles Guiding Our Supplier Relationships

### *Standards For Supplier Selection*

Standard Profil expects its suppliers and business partners to conduct their activities responsibly, ethically, and in alignment with our [Code of Ethics](#) and applicable legal requirements.

Compliance with these ethical principles is a fundamental prerequisite for entering into, and continuing, any business relationship with Standard Profil.

We select and evaluate suppliers transparently and impartially, choosing partners who operate at the required quality, safety, and ethical standards.

Suppliers are expected to understand and follow our Code of Ethics, protect confidential information, and ensure that their employees and subcontractors act in accordance with these expectations.

No business is conducted with parties who violate laws or fail to behave ethically. Standard Profil examines concerns or potential violations case by case and takes appropriate action, which may include corrective measures or, if necessary, termination of the business relationship.

## Diversity & Inclusion

At Standard Profil, we value a **diverse and inclusive** ↗ workplace where every individual is treated with dignity, fairness, and respect. We welcome different backgrounds, perspectives, and experiences, knowing that diversity strengthens our culture and contributes to innovation and sustainable progress.

**Discrimination of any kind is not tolerated.**

We expect our business partners to uphold these principles by ensuring equal opportunities for all and maintaining workplaces free from harassment, bullying, or unfair treatment. Suppliers must not discriminate based on gender or gender identity, ethnicity, race, nationality, social background, religion or beliefs, disability, age, or any other personal characteristic, and should foster inclusive environments where everyone can fully participate and thrive.

## Health, Safety & Environment

Standard Profil is committed to ensuring that all work is carried out safely and responsibly, in line with the principles of Occupational Safety First and Respect for the Environment and Future Generations. We identify health, safety, and environmental risks, take preventive measures, and work continuously to avoid accidents, injuries, work-related illnesses, or negative environmental impacts.

We expect our suppliers to follow the same approach: work must be organized so that all employees can perform their duties safely and without endangering their health, while minimizing environmental harm. This includes complying with all applicable HSE legislation, implementing effective controls, and ensuring that workers receive appropriate training and understand relevant procedures. No individual may act—or allow others to act—in a way that compromises safety, or environmental protection.

## Conflicts Of Interest

Standard Profil requires that all business decisions are made impartially and free from improper influence. Personal or financial interests must never affect—or appear to affect—professional judgment. Our [Code of Ethics](#) prohibits providing or accepting gifts, commissions, or benefits that could impair objectivity or create unfair advantage.

We expect our suppliers to avoid conflicts of interest in all dealings with Standard Profil. Suppliers must not use intermediaries to bypass ethical or legal responsibilities, and any situation that could create a real or perceived conflict must be disclosed immediately. All interactions with Standard Profil must remain transparent and guided by professional integrity.

## Confidentiality

Standard Profil requires all confidential information to be handled with care and protected against unauthorized use or disclosure. This includes technical, commercial, financial, strategic and personal data, as well as trade secrets and all non-public information belonging to Standard Profil or its stakeholders. Our [Code of Ethics](#) requires that such information be used only for legitimate business purposes and safeguarded at all times.

We expect our suppliers to apply the same level of protection by ensuring secure handling, storage and transmission of information, and by preventing disclosure to third parties without proper authorization. Suppliers must also respect and protect the confidential information of other business partners. All documents and data must be returned or destroyed when no longer needed, and no individual may act—or allow others to act—in a way that compromises information security or company assets.

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## Grievance Mechanisms & Non-Retaliation

Suppliers must establish and maintain a grievance mechanism that is accessible to their employees, subcontractors, and other relevant stakeholders.

This mechanism must allow concerns to be raised confidentially—and, where legally permissible, anonymously—related to ethical conduct, human rights, labour conditions, health and safety, or environmental practices.

Suppliers must ensure that all concerns are investigated appropriately, corrective actions are taken where needed, and no individual faces retaliation for reporting in good faith.





## Compliance with Laws

### *Compliance with product requirements*

Standard Profil requires its suppliers to comply with all applicable local, national, and international laws in every jurisdiction where they operate. This includes regulations related to business conduct, labour practices, environmental protection, data privacy, trade, and product compliance.

Suppliers must ensure that all products, materials, and services delivered to SP comply with relevant legal and regulatory requirements—as well as applicable technical specifications, chemical regulations (such as REACH or local equivalents), safety rules, and testing or certification obligations.

Products must meet all **contractually agreed criteria** at the time of delivery, and suppliers must promptly inform Standard Profil of any potential risks or uncertainties related to regulatory interpretation or product conformity and are expected to maintain documentation demonstrating compliance and provide it to SP upon request, in line with the [Supplier Quality Manual](#)↗.

Compliance with these laws and product requirements is essential for maintaining responsible and transparent business relationships with Standard Profil.

## Tax & Customs Regulations

Suppliers must comply with all applicable laws governing the taxation of goods and services, as well as the import and export of materials, equipment and information.

This includes accurate and complete declarations, correct payment of taxes and duties, and accurate origin, classification, and valuation information.

## Antitrust And Fair Competition

Suppliers must comply with all competition and antitrust laws. Any form of collusion, price-fixing, bid-rigging, market allocation or other practices that restrict fair competition is strictly prohibited.

Suppliers must conduct their business independently and avoid any behavior that could distort or limit free and fair markets.

## Export Control

Suppliers must comply with all export control laws and restrictions governing both tangible and intangible goods, including software, technology and technical data.

These rules must be followed when transferring or sharing items subject to export licensing, restricted use, or dual-use classifications.

## Economic Sanctions and Anti-Money Laundering

Suppliers must comply with all applicable sanctions regulations, including restrictions on countries, entities, individuals and goods subject to embargoes.

Suppliers must also observe laws prohibiting money laundering and terrorist financing and maintain risk-based controls to detect and prevent suspicious transactions.

Appropriate due diligence on relevant business partners must be conducted to identify and mitigate potential sanctions or AML risks.

## **Anti-bribery and Anti-corruption**

Suppliers must strictly prohibit bribery, facilitation payments, kickbacks, or any form of improper advantage. Offering, giving, requesting, or accepting anything of value that may influence business decisions is not permitted.

Suppliers must also maintain accurate, complete, and transparent books and records that truthfully reflect all transactions and business activities and must ensure their employees, agents and intermediaries uphold the same standards.

## **Intellectual Property Protection**

Suppliers must respect and protect Standard Profil's intellectual property rights, including patents, designs, trade secrets, know-how and proprietary information.

Unauthorized use, copying, transfer, disclosure or reverse-engineering of intellectual property is strictly prohibited.

## **Data protection and information handling**

Suppliers must safeguard all personal data and business information shared with them and comply with applicable data-protection and privacy laws. This includes secure handling, restricted access, proper retention, and responsible disposal of personal and confidential information.

## **Responsible use of AI**

Suppliers must ensure that digital tools, automated systems, and artificial intelligence are used lawfully, ethically, and responsibly. This includes avoiding discrimination, bias, manipulation, privacy violations, or misuse of data, and ensuring that AI systems are transparent and secure throughout their use.



# Sustainability and Human Rights

## *Respect for Human Rights*

Standard Profil and its suppliers are expected to respect and support internationally recognized human rights as set out in the United Nations Global Compact, the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights (UNGPs), and other relevant international standards.

These frameworks guide our expectations for responsible conduct, fair treatment, safe workplaces, and respect for human dignity.

Suppliers must ensure compliance with human rights throughout their operations and business relationships, and avoid contributing to any form of abuse, including in conflict affected or high risk areas. We encourage suppliers to align their practices with the UN Sustainable Development Goals (SDGs) and to strengthen their human rights performance as part of a responsible and sustainable partnership with SP.

It is our ambition that not only we, but also our business partners, acknowledge the following principles of social responsibility and human rights:

## Prohibition of Child Labor

Suppliers must prohibit child labor in accordance with national laws and international standards on minimum working age. No worker may be employed in conditions that interfere with their safety, well-being, or education.

## Prohibition of Forced Labor and Modern Slavery

Suppliers must not use any form of forced, bonded, trafficked, or involuntary labor. All work must be voluntary, and workers must have the right to leave employment freely and without threat or penalty.

## Non-Discrimination and Equal Opportunity

Suppliers must not discriminate based on gender or gender identity, race, ethnicity, nationality, social background, religion or beliefs, disability, age, sexual orientation, or any other personal characteristic. Employment decisions must be based on qualifications, skills, and performance.

## Freedom of Association and Collective Bargaining

Suppliers must respect workers' rights to join or not join organizations of their choosing and to participate in lawful collective bargaining activities without fear of retaliation.

## Fair Working Conditions

Suppliers must provide fair wages, lawful working hours, and working conditions that meet or exceed legal and industry standards. This includes ensuring fair remuneration that supports decent living conditions and reflects respect for workers' dignity and well-being.

Employment must be based on freely chosen relationships, free from coercion or exploitation, and all workers must be treated with fairness, respect, and professionalism.

## Health and Safety at Work

Suppliers must ensure safe and healthy working conditions and take preventive measures to avoid accidents, injuries, and occupational illnesses.

Workers must receive appropriate training and be protected against unsafe or unhealthy practices.

## Responsible Sourcing of Raw Materials

Suppliers involved in sourcing raw materials must implement due-diligence processes to avoid contributing to human-rights abuses in conflict-affected or high-risk areas (CAHRAs). This includes minerals such as tin, tantalum, tungsten, gold (3TG) and other high-risk materials like cobalt or mica.

Suppliers must comply with applicable conflict-minerals regulations and [Supplier Quality Manual](#) requirements, including providing smelter/refiner information where needed for traceability.

## Protection of Local Communities and Indigenous Peoples

Suppliers must respect the rights, cultures, and livelihoods of local and Indigenous communities that may be affected by their operations. Where relevant, suppliers are expected to obtain Free, Prior and Informed Consent (FPIC) before undertaking activities that could impact land, resources, or community rights.

Suppliers must avoid causing or contributing to adverse impacts on communities and take corrective action if such impacts occur.

## Use of Public and Private Security Personnel

Suppliers must ensure that any public or private security personnel acting on their behalf conduct their activities lawfully and with full respect for human rights.

Security providers must not engage in intimidation, harassment, excessive force, or any action that may endanger workers, communities, or individuals interacting with supplier operations.

## Protection of Human Rights Defenders

Suppliers must not tolerate or contribute to threats, retaliation, intimidation, or harm against individuals or groups who raise human-rights, environmental, safety, or ethical concerns in good faith.

Concerns must be addressed responsibly, and those who speak up must be protected from adverse consequences.

## ***Environmental Protection***

Standard Profil is committed to protecting the environment and acting responsibly toward current and future generations. In line with our Code of Ethics, we work to prevent environmental harm, use resources efficiently, and continuously improve the ecological performance of our operations.

We support global efforts to address climate change, including the objectives of the Paris Agreement, and we recognize the importance of reducing our environmental footprint as expectations and ecological challenges continue to rise.

We expect our business partners to share this commitment by complying with environmental laws, managing environmental risks responsibly, and implementing practices that conserve resources, prevent pollution, and support long-term sustainability.

Protecting the environment and respecting the needs of future generations is a fundamental principle of Standard Profil and a prerequisite for maintaining a responsible and sustainable partnership with our suppliers.



## Climate Protection

Suppliers must work to reduce their environmental impact by managing energy use responsibly, limiting greenhouse-gas emissions, and supporting the transition toward lower-carbon operations.

They are expected to identify chemicals and other substances that may pose environmental or health hazards and ensure their safe handling, storage, transport, recycling, and disposal in line with legal requirements. Effective waste-management practices must be implemented to minimize pollution and support a more circular approach in material use.

## Resource Conservation

Suppliers must manage resources efficiently and promote responsible use of energy, water, and raw materials. They should implement strategies that support emission reduction, reuse, and recycling, and seek opportunities to reduce consumption throughout their operations.

Water must be managed responsibly to avoid harmful impacts on local sources and communities, while materials must be selected and used in a way that supports long-term environmental sustainability.

## Biodiversity

Suppliers must respect natural ecosystems and avoid practices that may negatively affect biodiversity, protected areas, or sensitive habitats.

Standard Profil aligns with international biodiversity goals and expects its business partners to support the preservation of natural environments, contribute to the restoration of ecosystems where possible, and manage land use responsibly to minimize long-term impacts.

Suppliers must avoid illegal deforestation and inappropriate land conversion in their own operations and supply chains, particularly for forest risk commodities such as rubber, timber, or palm oil. Land use must preserve forests and natural ecosystems and comply with applicable deforestation and land use regulations.

Suppliers are expected to identify and mitigate environmental impacts associated with land use and support long term ecosystem protection.

## *Animal Welfare*

Where activities involve animals, suppliers must ensure responsible treatment consistent with recognized welfare principles and applicable laws.



# 04 IMPLEMENTATION OF THE SUPPLIER CODE OF CONDUCT

Standard Profil requires its suppliers to establish and maintain effective processes to ensure compliance with this Supplier Code of Conduct.

In alignment with our Code of Ethics, suppliers must communicate these expectations within their organizations, cascade them through their supply chains, and ensure that employees, subcontractors and business partners understand their responsibilities through appropriate training and awareness measures.

Suppliers are expected to implement appropriate management systems, conduct regular due-diligence and risk assessments, and take corrective actions when gaps or concerns are identified.

They must cooperate fully with Standard Profil in audits, assessments and information requests, and report any potential violations without delay.

Compliance with these expectations is essential for responsible and long-term cooperation with Standard Profil.

# 05 REPORTING MISCONDUCT AND CORRECTIVE ACTIONS

Standard Profil expects suppliers to report any suspected breaches of laws, policies and other regulations. Concerns may relate to ethical conduct, human rights, environmental practices, confidentiality, or any behavior inconsistent with our standards.

Reports can be submitted confidentially through Standard Profil's reporting channel, via [ethics@standardprofil.com](mailto:ethics@standardprofil.com), or the 24-hour (toll-free) hotline: +90 212 444 70 82

Notifications to the Ethics Committee are handled in strict confidentiality, and examinations or investigations are

carried out by independent experts. Reports may be submitted in the supplier's native language (your letter or e-mail shall be translated).

Standard Profil strictly prohibits any form of retaliation against individuals who raise concerns in good faith. Suppliers are required to cooperate fully with any review or investigation. Where violations are confirmed, suppliers may be required to take corrective actions, and serious or unresolved cases may result in modification or termination of the business relationship.

# 06 ADDITIONAL RESOURCES

To support compliance with this Supplier Code of Conduct, Standard Profil provides access to [Company Policies](#). These include the Standard Profil Code of Ethics, the Supplier Quality Manual that outline the standards expected throughout our supply chain.

Suppliers are encouraged to familiarize themselves with these resources and integrate the relevant requirements into their own management systems.

Further information on Standard Profil's environmental, social, and governance commitments can be found in our [Sustainability Report](#), corporate sustainability principles, and publicly available policies on topics such as human rights, diversity and inclusion, environmental protection, and responsible sourcing.

These documents provide additional context to support responsible and long-term cooperation with Standard Profil.

# REFERENCES

- [Universal Declaration of Human Rights and the two Covenants \(1948\)](#)
- [ILO Conventions, including No. 138 \(Minimum Age\) and No. 182 \(Worst Forms of Child Labour\)](#)
- [UN Guiding Principles on Business and Human Rights \(2011\)](#)
- [OECD Guidelines for Responsible Business Conduct \(2023 Edition\)](#)
- [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas \(2016 Edition\)](#)
- [UN Global Compact](#)
- [UN Sustainable Development Goals](#)
- [UN Climate Change](#)
- [United Nations Declaration on the Rights of Indigenous Peoples \(2007\)](#)
- [Automotive Industry Guiding Principles \(2022\)](#)
- [German Supply Chain Due Diligence Act \(2021\)](#)
- [EU Corporate Sustainability Due Diligence Directive \(CS3D\)](#)
- [EU Critical Raw Materials Act \(2020\)](#)
- [GHG Protocol](#)

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# Acknowledgment

By signing below, you agree that you have read this Supplier Code of Conduct and agree to abide by all its terms.

Supplier Company Name:

Company Representative Signature:

Company Representative Name:

(Printed)

Date: