

## Customers

- **vosla** deals with customers in a fair way so that sustainable and long-term relationships can/could be created
- **vosla** defines its products & processes in a way, that all standard-criteria, in terms of quality and lifetime are met or surpassed
- **vosla** does not deliver goods to organizations, related to criminality, break of human rights or basic environmental standards
- **vosla** shall comply with all applicable export controls and sanctions rules, laws and regulations issued by the United Nations Security Council and the European Union (export control)

## Suppliers

- **vosla** does not source goods or services from organizations, related to criminality, break of human rights (esp. child labor, forced working contracts, compliance with national working time laws) or basic environmental standards
- **vosla** deals with suppliers in a fair way so that sustainable and long-term relationships can/could be created

## Conflict Minerals and due diligence acc. to Regulation (EU) 2017/821

- **vosla** engaged itself not to support the unethical and inhuman behavior of the Democratic Republic of the Congo which is partly financed through Conflict Minerals.  
Conflict minerals, as defined by the U.S. Dodd-Frank Act of 2010 and the RMI (Responsible Minerals Initiative), are tin, tungsten, tantalum and gold and their compounds, the mining and sale of which may help finance armed conflict in high-risk areas
- **vosla** feels responsible to use only conflict minerals from certified sources for its own products and those of its suppliers and uses for this purpose the supplier surveys provided by the RMI (Responsible Minerals Initiative) and the certificates provided by the RMI
- **vosla** requests its suppliers of conflict minerals to submit a CMRT-Report to us and to investigate along their supply chains to identify the origin of these conflict minerals and to provide us the smelters by name and ID, as demanded in the CMRT-report template
- **vosla** recognizes the need to address issues related to human rights violations, child labor, environmental pollution or working conditions in the extraction of raw materials
- **vosla** therefore implements Regulation (EU) 2017/821 regarding conflict minerals and due diligence in the sourcing process

- **vosla** publishes the CMRT Report on our website and has set up a dedicated e-mail address<sup>(1)</sup> for any complaints regarding conflict minerals and due diligence  
(1) beschwerdestelleconflictminerals@vosla.com

## Employees

- **vosla** is doing all, that is reasonable and practicable, to protect the health and safety of its employees and those employees of third companies, working at the premises of **vosla**
- Every employee has equal opportunities and will be treated equally in employment and occupation regardless of personal background, race, gender, nationality, age, sexual preference or religious belief. The same applies to the recruitment of employees. **vosla** strives to offer equal pay for equal work performed at equal levels. No form of harassment or discrimination will be tolerated.
- Remuneration is being organized according the relevant collective labor agreements.
- **vosla** expects its employees to be fully dedicated to the proper fulfillment of their jobs and to avoid any (potential) conflict of their personal or business activities and financial interests with such commitment. Any engagement outside **vosla** and any financial interest (direct or indirect such as via a family member or acquaintance) which could give rise to a conflict of interest should always be promptly disclosed in writing to the next level of management and HR.
- Financial reward received for services rendered to third parties should be made over to **vosla**. However, if the service in question is rendered largely in the employee's own private time, management may grant the employee permission to retain all or part of the compensation. The same applies to the compensation received in respect of part-time academic posts held. This provision does not apply to compensation for services rendered by a person in his private time, which are not related in any manner to his professional activities for **vosla**.

## Business integrity

- **vosla** insists on honesty, integrity, and fairness in all aspects of its business. Bribes in any form – paid or received - are unacceptable. **vosla** strives to comply with the highest levels of transparency and accountability throughout the company. Records of transactions should be maintained in an accurate, complete and timely manner.
- Gifts to external parties (including invitations to sports or other hospitality events as a guest of **vosla**) may only be given as a business courtesy, provided such practice is accepted, locally and in the industry, and is in compliance with applicable laws. Gifts may not be given in the form of cash. Furthermore, the gift should not have a value that may influence a business decision and/or may

lead to a relationship of dependency or create the appearance of an impropriety. Awarding gifts must be approved by top management upfront.

- The acceptance of gifts or personal favors of commercial value to a **vosla**-employee or a member of her/his family is not permissible. When refusing a gift would be discourteous, the gift must be promptly handed over to HR. **vosla** usually donates such gifts to charitable institutions.
- **vosla** shall not make payments or donations, in money or in kind, to political parties, political organizations or individual politicians
- **vosla** only makes payments to the provider of goods or services received. There must be no 'off the books' or secret accounts. No payments will be channeled through third parties or paid to employees of the business partner.
- The remuneration of Third Parties (incl. commissions) may not exceed the normal and reasonable commercial rates for the legitimate, clear and demonstrable service, rendered by the Third Party.

### Ensure reliable internal controls

- F&A management is responsible for assessing the quality of business controls, including internal controls over financial reporting, as well as to implementing control improvements and takes immediate action to resolve any control weaknesses.

### Handling/Storage

- Our products are labelled, stored and shipped exclusively according to the defined packaging guidelines.
- The storage of our products by the customer must accordingly take place under the responsibility of the customers.

### Standards

- The process-specific requirements of **AIAG** for the automotive industry regarding **CQI**,
- such as the **ECE R37** convention
- and **ANSI** are applied in **vosla** GmbH.

### Data privacy / Disclosure

- **vosla** regards information for the purpose of its business as an asset that must be protected against loss, infringement and improper use and disclosure. **vosla** is committed not to make use of information disclosed to it by a third party, if it is suspected that the discloser thereby violates an obligation of confidentiality, unless the information: a) is generally available to the public other than as a result of disclosure by **vosla**; b) has been independently developed by **vosla**; or c) becomes available to **vosla** either on a non-confidential basis from a third party, who is not bound by any confidentiality obligations or by operation of law.

### **Whistleblower protection**

- Any person who in good faith reports a breach by another employee of the GBP will be protected from retaliation by his or her superiors and the Company. Complaints may be submitted on an anonymous basis. Such information must be provided to the company's CEO or HR.