

# KIRCHHOFF Automotive Anti-corruption Policy

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Corruption undermines foundations of our business, destructs competition and damages growth and development of our Company. Local and international laws applicable to KIRCHHOFF Automotive (KA) business activities around the world, forbid KIRCHHOFF Automotive Employees from engaging in corruption, such as bribery involving Customers, Suppliers and other Business Partners, as well as Officials in business-surrounding.

In accordance with well-established principles, as described in KIRCHHOFF Automotive Code of Conduct, KIRCHHOFF Automotive has a strong commitment to operate in accordance with responsible, ethical and sound business principles and comply with all applicable laws and regulations.

KIRCHHOFF Automotive specifically does not permit or tolerate engagement in any form of corruption.

All KIRCHHOFF Automotive business entities are responsible for understanding the specific anti-corruption laws applicable to its operations and countries, and for adopting additional anti-corruption policies and guidance as necessary to comply with those laws.

It has to be minded that extraterritorial application of several anti-corruption laws implies that it is not enough to observe local law when dealing abroad.

Unconditional compliance with this KIRCHHOFF Automotive Anti-corruption Policy is mandatory for all KIRCHHOFF Automotive Employees at all times, and no KIRCHHOFF Automotive Employee may authorize another KIRCHHOFF Automotive Employee to deviate from this Policy.

Managers are responsible for making this Policy and Anti-corruption Guidelines known in their organization and promote a culture of compliance awareness and compliance monitoring.

Any failure to comply with applicable anti-corruption law, will be considered a serious breach of the Employee's obligations towards KIRCHHOFF Automotive and may result in termination of the employment or other applicable sanctions.

In extension to this Anti-Corruption Policy, KIRCHHOFF Automotive expects its Suppliers and other Business Partners to set, live-by and comply with the equivalent standards and does not accept in this context, any behaviors that would constitute a violation of laws or could suggest a conflict of interest, or be perceived as an improper attempt to influence business decisions.

KIRCHHOFF Automotive has developed and openly communicated to KA Employees and KA Business Partners the grievance and non-retaliation management system, consisting of the Whistleblowing Policy and guidelines.

Each KA Employee or Business Partner should report through the KA whistleblowing system, any incident if they suspect that an act of bribery or corruption is committed by another employee regardless of their job position. This also refers to the acts of bribery or corruption committed by persons representing Customers, Suppliers, Competitors or other Business Partners. KA assures all KA Employees and KA Business Partners that they can disclose violations in confidence and without fear of retaliation as a consequence of the issue they disclose.

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22.10.2020

