

	Litens Automotive Group CODE of CONDUCT and ETHICS for SUPPLIERS	POL-00014 / 2
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Statement of Purpose

This Code of Conduct and Ethics for Suppliers sets forth the basic principles we are committed to with respect to our dealings with all our Suppliers and acts as a guide to assist our Suppliers in meeting the ethical standards expected of them. The Senior Management of Litens Automotive Group (“Litens”) has adopted this Code of Conduct and Ethics for Suppliers to highlight our commitment to company culture rooted in fairness, integrity, honesty and concern for people.

Scope of Application

This Code of Conduct and Ethics for Suppliers applies to all our Suppliers on global basis and will be promptly and consistently enforced. Failure to comply will lead to commensurate action, proportionate to the breach. In the case of a serious breach, Litens reserves the right to immediately terminate any and all business relationships with the Supplier.

Conducting Business within Appropriate Laws with Integrity, Fairness and Respect

Litens believes in conducting business with integrity, fairness and respect, complying with both the letter and spirit of applicable laws, rules and regulations in the countries in which we conduct business. Our employees will not, directly or indirectly, offer bribes, kickbacks, or other similar payments, nor promise any other improper benefit for the purpose of influencing any customer, supplier, public official or any other person, nor will they, directly or indirectly, accept bribes, kickbacks or any other improper benefit which could influence or appear to influence them in the performance of their duties. We expect our Suppliers to have policies and procedures in place that ensure absence of similar corrupt practices with their own employees. We will manage our supplier relationships in good faith and we expect suppliers to exercise similar discretion in our relationship and in their relationship with their suppliers.

Respect for Human Rights

Litens supports and respects the protection of international proclaimed human rights within our sphere of influence and will ensure that we are not complicit to human rights abuses. We foster a work environment that is free from discrimination, harassment, intimidation and hostility of any kind.

We practice the principle of equal employment opportunity without regard to race, religion, age, gender, disability, sexual orientation, nationality or political affiliation, or any other personal characteristic protected by applicable law. We expect our suppliers / partners to follow the same standards.

Global Working Conditions

Litens is committed to maintaining global working conditions and standards that result in dignified and respectful treatment of all employees within our supply chain. It is therefore Litens' expectation that our suppliers will have appropriate policies, procedures and systems in place, to support the following standards:

- Child labor shall not be utilized. Underage labor, as defined by local labor law, will not be utilized unless it is part of a government approved training or apprenticeship program that clearly benefits the participants.
- Any form of forced or compulsory labor is prohibited.
- Workers, without fear of reprisal, intimidation or harassment shall be able to communicate openly with management regarding working conditions. They shall also have the right to associate freely and join labor unions and workers' councils in accordance with local laws.
- Workers shall be protected against any form of harassment and discrimination in any form, including but not limited to gender, sex, age, religion, disability and political beliefs.
- Workers shall have a safe and healthy workplace that meets or exceeds all applicable standards for occupational health and safety.
- Workers shall be compensated with wages and benefits that are competitive and comply with local law, including minimum wages, overtime hours and legally mandated benefits.
- Working hours shall comply with all applicable local laws regulating hours of work.
- It is our expectation that all our suppliers will maintain these global working conditions in all their operations, while also promoting adoption of these principles with their own suppliers.

Environment, Health and Safety

We are committed to work with our Suppliers and business partners in order to create and maintain a safe and healthy working environment that meets or exceeds industry standards and regulations in all jurisdictions in which we perform business activities.

We conduct our business in an environmentally responsible manner in accordance with the appropriate legislation and regulations in each of the jurisdictions in which we operate and strive to meet or surpass the environmental performance requirements of international standards governed by ISO 14001. We expect our Suppliers to act similarly.

We support avoiding materials and methods posing environmental and health risks when alternatives are available and we will work to minimize the impact of our operations on the environments in which we operate. We expect our Suppliers to act similarly.

Violations

Reports of violation of this Code of Conduct for Suppliers may be done anonymously and confidentially to Litens General Counsel for the Partnership for investigation and appropriate action. Reports can be lodged in any of the business languages used at Litens locations across the world via postal mail, e-mail or telephone.

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Litens General Counsel will not disclose the identity of the person(s) reporting suspected misconduct unless the individual(s) consents to disclose or required by law. The individual(s) will not be discriminated against because of lawful acts in furtherance of this policy.

This Code of Conduct has been approved and adopted by Senior Management and can only be amended or waived by the same. Any amendments or waivers shall be disclosed.
