

SMIA contract number:

Code of Conduct

between

Samvardhana Motherson Innovative Autosystems B.V. & Co. KG

Siemensstr. 8
96247 Michelau

- hereinafter „SMIA“ -

und

- hereinafter „supplier“

Preamble

For suppliers of Samvardhana Motherson Innovative Autosystems B.V. & Co. KG

SMIA is committed to its social responsibility in free, open global trade, and undertakes to uphold the principles of social responsibility. We help and encourage our suppliers to apply/incorporate these into their respective business policies. We deem this a beneficial basis for further developing business relations in the future.

The following Code of Conduct defines SMIA's principles and requirements for all its suppliers regarding their responsibility for people and the environment. SMIA reserves the right to amend the requirements of this Code of Conduct accordingly in the event appropriate changes are made to SMIA's principles of social responsibility. In this case, SMIA expects its suppliers to accept said changes.

The supplier hereby declares:

1. Compliance with laws

- It will uphold the applicable laws and regulations established in the respective legal system(s).

2. Ban on corruption and fraud

- It will not tolerate any form of corruption or fraud, or get involved in this in any way.
- It will uphold the internationally recognised competition regulations.

3. Respect for human rights

- It will uphold the internationally recognised human rights.
- It will ensure equal opportunities during employment processes, and refrain from engaging in any discrimination.
- It will promote equal treatment of its staff, regardless of gender, race, skin colour, disability, origins, religion, age or sexual orientation.
- It will respect each individual's personal dignity, privacy and personal rights.
- It will not tolerate unacceptable treatment of workers, such as mental hardship, sexual or personal harassment or discrimination.
- It will not employ anyone against their will or force anyone to work.
- It will not, under any circumstances, engage in, accept or support human trafficking.

4. Working conditions

- It will ensure appropriate remuneration, corresponding to at least the respective national legal standards/the level of the national economic sectors/industries.

- It will uphold the respective national regulations and agreements on working hours and regular paid leave.
- It will not exceed the respective legal and/or collective bargaining standards applicable in the countries regarding working hours, including overtime.

5. Freedom of association

- It will recognise employees' freedom of association, insofar as this does not conflict with national legal regulations.

6. Ban on child labour

- It will not employ anyone whose age falls below the respective national laws/collective bargaining agreements. In countries falling under the exception for developing nations in the ILO Convention 138, the minimum age may be lowered to 14 years.

7. Employee health and safety

- It will ensure occupational health and safety at the workplace as per the national regulations
- It will support constant further developments to improve working environments.

8. Environmental protection

- It will uphold international, European and national environmental standards.
- It will establish and use an appropriate environmental management system.

9. Energy efficiency

- SMIA places great emphasis on using resources efficiently, including when selecting its suppliers and products.

10. Supply chain

- It will appropriately uphold the Code of Conduct at its suppliers' end.

11. Waiver of conflict minerals

- In accordance with the Dodd Frank Act (Paragraph 1502) and the planned European act on conflict minerals, the supply chain must be checked, and the use of conflict minerals avoided/substituted. Insofar as conflict minerals cannot be substituted, the supplier will only buy from smelters validated in accordance with the CFS programme, and which are listed as "CFS Compliant Smelters".
- To the extent conflict materials are used for the supplier's products, the supplier will complete the EICC's conflict minerals questionnaire once a year and forward this to SMIA. The "CFS Compliant Smelter" list and conflict minerals questionnaire are available at <http://www.responsiblemineralsinitiative.org>.

12. Supplier's declaration:

We hereby confirm:

- We have received the Code of Conduct for SMIA suppliers, and hereby commit to upholding the principles and requirements of this Code of Conduct in addition to our obligations established in the supply contracts signed with SMIA.
- This declaration is governed by federal German law {or the law of the country to which it applies}, under exclusion of the rules referring to other legal systems.

City, date

Signature

Name (block letters), position

Company stamp

*This document must be signed by an **authorised** representative of the company, and returned to SMIA within 10 working days of receipt.*