

# Code of Conduct



# Foreword

*At FORVIA, our success is built on the trust and respect we earn from our clients, stakeholders, partners and each other. As a clear expression of the values which are the foundation of our shared culture, our Code of Conduct serves as a constant guide to help us navigate challenges, make informed decisions, and uphold, without exception, the standards that define our Group.*



*This Code isn't just a set of rules—it reflects the principles we embody in our decisions and actions at FORVIA, and it continues to shape our company every day. By adhering to these guidelines, we uphold our high standards of integrity and ensure that we remain accountable, transparent and true to FORVIA's values.*

*Each FORVIA employee receives a copy of this Code and must comply with the principles and rules it sets forth, both in their internal and external interactions. They are encouraged to ask questions if needed and reflect on how we can all live up to these standards.*

*Our shared commitment to principles and rules set forth in this Code of Conduct will continue to ensure that FORVIA remains a company we can all be proud of. Together, we will continue to act with the highest integrity and foster a positive, inclusive, and ethical environment that strengthens our company and our impact on the world.*

**Martin FISCHER**  
Chief Executive Officer, FORVIA

# Foreword

*As CEO of FORVIA HELLA, a company of the FORVIA Group, I am proud to reaffirm our commitment to ethical and responsible conduct regardless of our role or position. Our shared values are the compass that guides our actions and decisions every day.*



*Each of us plays an essential role in shaping a culture built on integrity, accountability, and mutual respect. This Code of Conduct reflects that culture and provides a clear framework to help us navigate challenges and act with consistency and purpose.*

*Living by this Code means holding ourselves and each other to high standards, asking questions, and doing what's right—even when it's difficult. Whether leading teams, collaborating across functions, or engaging with partners, our ethical behavior strengthens trust and drives sustainable success.*

*Let us continue to lead by example and uphold the values that make FORVIA a company we're proud to be part of.*

A handwritten signature in blue ink, which appears to be 'BSB', written in a stylized, cursive manner.

**Bernard SCHÄFERBARTHOLD**  
Chief Executive Officer, FORVIA HELLA

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*Equal rights is one of FORVIA's basic principles. For better readability, where the following text refers to a specific gender, it should be understood to address all genders.*







# Upholding FORVIA's values





## Upholding FORVIA's values



*FORVIA's continued success and reputation depends on each of us always behaving lawfully and honestly. As a baseline, the FORVIA Group companies and their employees must respect the laws and regulations in force in the countries in which they are based as well as our internal policies. We must also go further and uphold FORVIA's values, in particular respect, accountability and teamwork in our daily work. Breaches are not tolerated and can result in severe consequences for the FORVIA Group and those involved.*

### 1.1. Scope of Application

This Code applies to and is binding for all organizational units in which the FORVIA Group directly or indirectly holds a majority share.

It applies also to and is binding for employees of the FORVIA Group regardless of our position, function or level of employment.





# Labor & Human Rights Principles

# Labor & Human Rights Principles



*We strive to cultivate an environment where teamwork and respect are self-evident. We treat our employees, business partners and other third parties with dignity, respect and in observance of the internationally recognized human rights standards and we act in accordance with the following principles.*

## 2.1. Diversity and Inclusion

We value diversity and we encourage an inclusive work environment.

We respect all employees, business partners and other third parties regardless of gender, ethnic origin, social background, nationality, skin color, sexual orientation, religion or belief, union activity, age, disability and other characteristics protected by law.

Employees are recruited based on qualifications and skills and promoted based on their performance and potential. We reject any behavior that creates an offensive, hostile or intimidating work environment as well as all forms of harassment, including sexual harassment and mental or physical abuse.



## 2.2. Equality of Treatment

In its recruitment actions and career management, we undertake not to engage in discrimination based on age, gender, skin color, nationality, religion, health or disability, sexual orientation, political or philosophical opinions or trade union membership. All employees have the right to work in a healthy environment, free from any form of hostility or harassment qualified as unlawful under the regulations and practices in force in the countries where the Group does business. In particular, FORVIA forbids any unlawful conduct construed as sexual or moral harassment.

## 2.3. No Child Labor

We reject all forms of child labor. The childhood, dignity, health, safety, and education of children must be respected and protected. The minimum age of employment of young people, as well as their health, safety and morals in an employment relationship shall comply with the provisions of the core ILO Conventions<sup>1</sup>.

## 2.4. No Forced Labor

We reject all forms of forced or compulsory labor, modern slavery and human trafficking and do not make use of any forms of forced and compulsory labor in our activities. All practices shall be in line with the core ILO Conventions<sup>2</sup>.

<sup>1</sup>ILO C138 - Minimum Age Convention (1973) and ILO C182 - Worst Forms of Child Labour Convention (1999)

<sup>2</sup>ILO C29 - Forced Labour Convention (1930), ILO C105 - Abolition of Forced Labour Convention (1957) and Protocol of 2014 to the Forced Labour Convention (1930).

## 2.5. Freedom of Expression and Social Dialogue

The FORVIA Group seeks to develop a relationship of trust at all levels of the company by inviting its employees to express themselves freely, in particular regarding the improvement of their workplace environment. The quality of discussion and communication between each employee and their superior is a central component of the Group's social dialogue. The FORVIA Group undertakes to inform and consult in a timely manner the employee representatives in each legal entity or the employee representatives at European level, and to conform to the legal obligations specific to each country.

## 2.6. Freedom of Association

The FORVIA Group recognizes the existence of trade unions worldwide and the right of workers to form the union organization of their choice and/or to organize workers' representation in accordance with the laws and regulations in force. It undertakes to protect union members and leaders and not to make any discrimination based on the offices held.

## 2.7. Contractual Policy

The FORVIA Group undertakes to promote a policy of consultation and negotiation. Given its decentralized legal and managerial structure, this policy is enshrined in collective bargaining agreements signed with the individual establishments, on the one hand, and companies, on the other.

## 2.8. Industrial and Social Redeployment

Due to its program-based activity, the FORVIA Group must constantly adapt to the life cycle of vehicles (launch, development and end of life), and must accompany its customers in their international growth. The Group's industrial and social redeployment constantly supports these changes. Whenever possible, the FORVIA Group will adopt a forward-looking approach to its industrial and social redeployment operations in order to limit the social impact.

## 2.9. Development of skills

### 2.9.1. Insertion and Development of Training

The FORVIA Group undertakes to promote professional training to encourage the professional insertion of talent, by fostering:

- Access to the various types of contracts available to students throughout their studies (apprenticeship contracts in particular)
- Access to internships in the company

We shall make every effort to provide each employee, whatever their place of work in the world, age, gender or position, with access, throughout their career, to the necessary training to enable them to carry out their activity and to forge their career path.

### **2.9.2. Professional Development and employability**

Given the specific nature of its activities and the need to capitalize on its expertise to ensure control over its programs, the FORVIA Group considers the internal development of its workforce's employability a priority. FORVIA encourages each employee to participate actively in their professional development and undertakes to ensure equal opportunities for professional development and mobility. FORVIA encourages geographic and professional mobility within the company to develop its workforce's employability. Particular attention is paid to managing internal mobility to make sure of its short- and medium-term relevance.

### **2.9.3. Working hours and Remuneration**

Working hours shall not exceed the maximum set by the applicable local law. Furthermore, the remuneration paid to employees shall accord with all applicable local laws on remuneration, which includes laws on the minimum wage.





# Environment, Health & Safety (EHS), Product Safety



# Environment, Health & Safety (EHS), Product Safety



*Our responsibility for the health and safety of our employees, customers and suppliers and controlling our environmental impact is paramount.*

## 3.1. Health & Safety in the workplace

The FORVIA Group undertakes to implement active policies and methods to prevent risks that may affect employee health and safety, to regularly check their correct application and measure their efficiency. In particular, the FORVIA Group undertakes to ensure its officers and employees take responsibility for protecting health and preventing accidents in the workplace, and to ensure the design and development of its products and production facilities in such a way as to promote the best working conditions possible. All subcontractors working on the premises of FORVIA Group companies shall be expected to apply these health and safety policies and to conform to all legislation in force in the relevant countries.

### 3.2. Environmental Protection

We place great value on innovation and are committed to ensuring sustainability. This means continuously optimizing products and technologies in keeping with responsible resource management, preventing negative impacts on the environment, compliance with environmental laws and standards in development and production and continuously seeking new potential for environmental protection. In product and technology development we strive to reduce consumption of resources and increase efficiency. In addition, we have an individual responsibility to minimize environmental impact by using environmentally conscious practices as a regular part of daily business.

### 3.3. Product Safety, Security and Conformity

Our highest priority is top quality products that are safe, secure and meet legal requirements. Products are evaluated and monitored by strict quality management systems. They undergo a monitoring process throughout development, production and following market launch. We are responsible for identifying, reporting, and escalating suspected safety, security or conformity issues proactively to the respective roles. Where necessary we report shortcomings to the relevant authorities and take the necessary measures to ensure safe, secure and compliant products.



# Fair Business Practices





# Fair Business Practices



*We are confident that we can win business based on the quality and value of our products. We do not resort to unfair or illegal methods to win in the market.*

## 4.1. Fair Competition

We are committed to competing fairly and respecting the rules and laws governing competition throughout the world. They forbid any written or informal understandings, agreements, plans, arrangements, or coordinated behavior (collusion) among competitors intended to restrict or result in restriction of competition.

This includes in particular that we:

- Do not share with competitors commercially sensitive information, relating to prices, market share, strategies, market entries/exits, inventories and production capacities, negotiations strategies with suppliers or customers, employee's salaries/wages (with any company); and
- Do not engage in price-fixing, market allocation in terms of projects, customers or territories, and bid rigging (including sham offers) with competitors.

We are mindful of what we discuss with business partners, especially competitors, and how we get competitive information. We are extra careful when attending meetings of industry associations or other working groups such as cooperation projects or industry standardization activities.

The abuse of dominant market position vis-à-vis suppliers or customers as well as the control or restriction of the resale prices of our customers are also prohibited. Furthermore, the proper implementation of merger control procedures is required with regard to cooperations and transactions.

We are committed to monitoring due conformity with these commitments by providing any additional information that an employee or officer may request and by promoting good knowledge of the FORVIA Group's commitments with regards to fair competition throughout the Group.

## **4.2. Fair Competition**

### **4.2.1. No Corruption**

We do not tolerate corruption in any form. We comply with the local and international laws which prohibit corrupt business practices in dealing with third parties (public officials and private sector companies). Transparent and correct business practice is mandatory and always possible. We do not give or take bribes from our partners, neither directly nor indirectly by involving a third party, and gifts and hospitalities from customers and service providers are in accordance with local law and our internal procedures.

We strictly prohibit all political contributions and all illegal payments as they may be construed as attempts to influence government or administrative decisions in matters affecting FORVIA. Even the appearance of impropriety must be avoided.

For more details on our internal rules on anti-corruption:

- HELLA Anti-Corruption Policy
- FAURECIA Code of Conduct for the Prevention of Corruption

### **4.2.2. Truth and Accuracy of accounts, books and records**

All assets, liabilities, expenses, and other transactions carried out by companies in the FORVIA Group must be recorded in the companies' books and accounts which are to be kept truthfully and accurately, in accordance with the applicable accounting principles, rules, and laws. No undisclosed funds or unrecorded assets of the FORVIA Group companies or subsidiaries shall be established or maintained for any reason whatsoever. Documents pertaining to commercial or financial transactions must reflect these transactions faithfully. No payment may be approved or made with the intention or understanding that all or any part of such payment is to be used for any purpose other than that described in the documents supporting said payment. No false or artificial entry may be made in the books and records of the FORVIA Group or its subsidiaries for any reason whatsoever.

### 4.3. Conflict of Interest

A conflict of interest exists when an employee or a close relative is liable to benefit personally from a transaction involving FORVIA. Every Forvian facing a conflict of interest must declare it through the tools put at their disposal by the Group. Some employees are more exposed to conflict-of-interest risk due to their position and therefore are required to make an annual declaration. When in doubt, the employee must refer to their superior or Human Resources Manager or the Regional Compliance Officer to determine whether or not the transaction in question constitutes a conflict of interest and adopt appropriate remedial actions.

A conflict of interest may exist with external partners, such as suppliers or consultants. It is the responsibility of each Forvian to promote the Group's best interests without reliance on favoritism resulting from personal relationships or using any discriminatory criteria forbidden by the present Code of Conduct.

### 4.4. Anti-Money Laundering

We fulfill all our legal obligations to prevent money laundering. We must be attentive to and report to the responsible finance department any unusual financial transactions, especially those involving cash, or behavior that creates a suspicion that the money involved was obtained through illegal means or other money laundering activities that may have occurred.





# Handling Information



## 5.1. Confidential Information

We shall not disclose business information that is not public. Information is treated as confidential and may not be shared with unauthorized persons unless doing so is required by law. This standard also applies to confidential information that belongs to our customers or other business partners. The obligation to maintain confidentiality continues even after the termination of an employee's contract of employment or the termination of the contract with the business partner. The direct or indirect use of confidential business information for personal benefit, for the benefit of third parties and/or to the detriment of the FORVIA Group is prohibited.

## 5.2. Insider Information

We deal with and publicize insider information in accordance with applicable laws governing the capital market. Insider information is any related information that may significantly affect the price of shares (or other financial instruments), and which has not been made public. This information must be treated as strictly confidential, even towards close relatives, and handled with due care. It may not be disclosed internally or externally or used for trading (or making recommendations on the trading) of securities.

### 5.3. Public Communication

Official statements on behalf of the FORVIA Group or a company may only be made by people who are authorized to do so. While FORVIA respects the right to free speech, as employees, we must ensure that our appearance in public does not damage FORVIA's reputation. When expressing opinions in private, it must be made clear that the opinions expressed are our own and do not belong to the FORVIA Group.



# Data Privacy





## Data Privacy

*We respect the privacy of our employees and business partners and recognize that healthy relationships are built on trust. Each individual has the right to determine whether their personal information is disclosed and how it is processed. Therefore, we protect the individual's right to data privacy. Our use of personal information is transparent. Employees and business partners may, at any time, decide if and how their personal data is used or processed, unless it is otherwise required by law, or its use is necessary for FORVIA's business processes. Personal information is only collected, processed and used to the extent that applicable laws and internal policies permit.*





# Cyber Security







*FORVIA applies a holistic approach to cybersecurity to secure its business and minimize cybersecurity risks. We protect the confidentiality, integrity and availability of any type of information (e.g. electronic or physical) according to its classification. We adhere to the need-to-know and least-privilege principles when granting access to information or IT systems.*

*Ensuring information security is not only a management responsibility. All employees as well as the business partners contracted by FORVIA are responsible for information security within their respective fields of activity. Every employee must comply with the corporate security policies, be aware of potential security risks and report suspicious events.*



# Handling of Company and Third-party Property & Intellectual Property

# Handling of Company and Third-party Property & Intellectual Property



*All tangible and intangible assets and property, including property and resources ("Property") belonging to FORVIA and any third-party Property placed into FORVIA's care, must be handled with care and protected from loss and misuse to prevent serious harm to FORVIA. Property may only be used for business purposes. Private use must be authorized in advance. Third-party Property, particularly intellectual property, may only be used when authorized. Private use of third-party Property is prohibited.*



# Foreign Trade & Export Control and Tax





## 9.1. Foreign Trade & Export Control

As a global company, FORVIA is committed to complying with all local and international trade regulations and import/export control laws related to our international business transactions. All FORVIA employees must refrain from transactions recognized as not being permissible by applicable national or international export control regulations. Before engaging with new business partners, employees must ensure that the contact or cooperation is not restricted or prohibited by national or international sanctions lists. Before processing a shipment or other transfer of commercial or non-commercial commodities, software or technology, physically or electronically, within or outside FORVIA, employees must ensure that the goods are not subject to export control restrictions and / or that any required export / re-export licenses have been obtained. Each of us contributes to adhering to the laws, regulations and internal FORVIA rules in these fields.

## 9.2. Tax

FORVIA assumes responsibility for its tax obligations. To do so, we comply with all tax laws in force in the countries in which we conduct business. This includes the application of the arm's length principle as the international transfer pricing standard. Here too, each of us contributes to adhering to the laws, regulations and internal FORVIA rules in this field.





# Complying with the Code of Conduct



# Complying with the Code of Conduct



## 10.1. Responsibility

### 10.1.1. Employee's Responsibility

We are all required to adhere to the FORVIA Code and to adopt its principles as the binding standard for our day-to-day work.

### 10.1.2. Management Responsibility

FORVIA managers at all levels are particularly required to model their behavior after this Code and to ensure that this Code is adhered to in their area of responsibility. Managers must take all necessary steps to ensure that their employees are aware of the principles contained in this Code and to enable them to act lawfully and to follow this Code on a day-to-day basis.

## 10.2. Speak Up Culture

If an employee becomes aware of any potential infringement of the rules outlined in this Code or related FORVIA Group internal policies, they may bring the matter to the attention of management through our reporting channels.

### 10.2.1. Direct Reporting

Generally, the first point of contact for questions related to this Code of Conduct or potential breach of this code is the direct supervisor. Where circumstances make this impossible, concerns can be addressed to the managing director, the plant manager or another member of the management team. Additionally, where a breach is suspected, it may also be reported directly to the Compliance Team.

### 10.2.2. Our Online Reporting Systems

**tellUS!**

**speak<sup>up</sup>**

If for any reason direct reporting is not possible, serious infringements should be reported through our online reporting systems: **tellUS!** (<https://hella.whistleblownetwork.net/frontpage>) or **Speak Up** ([www.faurecia.ethicspoint.com](http://www.faurecia.ethicspoint.com)) to report violations of the rules set out in this Code, notably related to (but not limited to):

- Corruption
- Anti-competitive practices
- Human rights and/or environmental violations
- Harassment in the workplace
- Accounting irregularities
- Breach of confidentiality
- Other serious crimes constituting a threat or serious harm to public interest.

### 10.3. Dealing with Reported Breaches

The above-mentioned points of contact must exercise the necessary diligence to follow up on the relevant information they receive. If there is a sufficient initial indication of a breach of the Code, the person who has been contacted may call the Compliance Team or other departments, such as the Corporate Audit department, to assist in establishing further facts in the matter and taking any necessary measures. All information received is always treated confidentially. FORVIA will protect reporting persons who have acted in good conscience and to the best of their knowledge with all means available against potential retaliation that may result from reporting a suspected breach. When employees self-report any breaches which they have made, they will not receive protection from disciplinary sanctions but the fact they volunteered the information will count in their favor.

### 10.4. Breaches and Sanctions

Any infringement of the present Code, whatever the way it is brought to light, may be sanctioned by FORVIA. These sanctions may include disciplinary sanctions up to and including dismissal, depending on the seriousness of the infringement and the applicable laws and regulations. Infringements could also result in criminal or civil sanctions for the individual.



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**FORVIA**  
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