



Supplier Code of Conduct.

www.gabocom.com



Supplier Code of Conduct.

As a global technology company enabling a safer, greener and more connected future, it is central to gabocom's values to act responsibly, to comply with all applicable laws and regulations, to respect human rights and the environment, and to always do the right thing, the right way. gabocom expects these same values to apply to all of our Suppliers.

The gabocom Supplier Code of Conduct ("Code") is a key component of our efforts toward responsible sourcing and sets out essential expectations to ensure that gabocom's Suppliers are ethical, compliant and trustworthy. This Code reflects applicable laws, in particular supply chain due diligence laws, and widely accepted international standards.

As we face global challenges, it is critical that every gabocom Supplier understands and complies with the principles set out in this Code. gabocom is committed to operating in a socially responsible manner and expects Suppliers throughout the supply chain to provide services, products and materials from socially responsible sources. Importantly, gabocom expects its Suppliers to provide transparency of their full supply chains to demonstrate their commitment to responsible sourcing.

We expect you, as an gabocom Supplier, to ensure that the principles of this Code are adhered to by all Suppliers within your own supply chain. This Code is part of any contract for the purchase of goods or services by gabocom from any Supplier.

We thank you for your partnership and your cooperation.



Social.

gabocom is guided by international standards, such as the requirements of the International Labour Organization ("ILO") and expects its Suppliers to adhere to the ILO standards. Specifically, gabocom requires its Suppliers to apply the following principles to all workers, including temporary, migrant, student, contract, direct employees and any other type of worker ("workers"):

1. SUPPORT FOR A SAFE AND HEALTHY WORKPLACE

Workplace health and safety is an gabocom core value that extends to the workplaces and workers of its Suppliers. Thus, Suppliers agree to follow all occupational health and safety laws, regulations, standards and policies at all of their work locations.

Suppliers also agree to evaluate and mitigate risks of incidents at work or work-related health hazards, in particular due to (1) safety standards, machinery, equipment, maintenance or facilities; (2) exposure to substances, such as chemical or biological substances; and (3) ergonomic risk or occupational injury.

Suppliers agree to have zero tolerance for violence or weapons in the workplace, and to prohibit any worker from working under the influence of alcohol, drugs or medication that may diminish workers' ability to perform their jobs safely. When Suppliers provide workers with accommodations, they must be in accordance with all local occupational health & safety regulations and ensure that workers are provided with safe and hygienic sanitation and facilities. There should be no harsh or inhumane treatment of workers of any kind, including but not limited to corporal punishment, mental or physical coercion, verbal abuse, sexual abuse or the threat thereof. Suppliers should not hire or use public or private security forces for protection of Suppliers' projects without proper supervision and training to avoid torture, cruel, inhumane or degrading treatment, risks to life and limb, or impairment of freedom of association.

2. HUMAN RIGHTS

Suppliers agree to comply in all business locations with applicable human rights laws, including those relating to slavery and human trafficking, as well as applicable supply chain due diligence laws. Further, neither gabocom's Suppliers nor their own Suppliers will use or tolerate forced or involuntary labor, including slavery and human trafficking, practices akin to slavery or other forms of oppression in the workplace, or any type of child labor that fails to comply with ILO Conventions 182 (prohibiting the worst forms of child labor) and 138 (setting minimum working age standards).

Suppliers agree not to charge their workers excessive fees related to recruitment, accommodations or travel (particularly related to trans-border migration). Suppliers agree not to confiscate their workers' identity documents or passports.

3. WAGES, BENEFITS & WORKING HOURS

Suppliers will comply with local laws on minimum wages, work hours and working conditions, and will provide their workforce with reasonable periods of rest and leave for illnesses and emergencies. gabocom encourages Suppliers to provide their workers with a living wage, which is enough to maintain a normal standard of living.

4. FREEDOM OF ASSOCIATION

Suppliers will protect freedom of association, the freedom to strike and the right of collective bargaining for all their workers to the extent permitted by local laws. Workers and/or their representatives should be able to join and actively engage in associations and openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

5. Diversity and Non-Discrimination

Suppliers agree to promote diversity, equity and inclusion at all levels of their workforce and supply chain. Suppliers also agree not to discriminate based on ethnicity, color, religion or belief, political opinion, gender, age, social or national origin, sexual orientation, gender identity, marital status, veteran status, health status or disability or any other characteristic protected by law. Suppliers also agree to protect the rights of vulnerable groups within their supply chains

Environmental.

1. ENVIRONMENTAL STEWARDSHIP

Suppliers agree to have an environmental management system that follows all applicable local, national and international laws, conventions, regulations and standards, including applicable supply chain due diligence laws, to ensure to all stakeholders that the environmental impact of their operations is being measured and monitored for any necessary improvement. Suppliers' management systems should continually assess and seek to reduce the adverse impact of their facilities and products on the environment and on the communities in which they operate.

2. RESPECT AND PROTECTION FOR THE ENVIRONMENT

Suppliers agree to join gabocom in our dedication to the protection of human health, natural resources, animal welfare, and the global environment, not only by complying with the law, but also by integrating sound environmental practices into their business decisions. Suppliers should not engage in any acts constituting or aiding unlawful eviction or unlawful taking of land or other property, such as forests or water.

3. REDUCTION IN ENVIRONMENTAL IMPACT

Suppliers agree to conserve natural resources, and to recycle materials at every stage of the product life cycle. Suppliers agree to refrain from causing harmful soil change, pollution or emissions (air and noise). Suppliers also agree to support the elimination of materials and methods that pose environmental and health risks (or hazards) and agree to work to reduce the impact of their operations and that of their own Suppliers on the environment.

Suppliers' environmental systems should reduce the impact on the environment in areas such as the following:

- Waste generation and disposal
- Greenhouse gas emissions (Scope 1, Scope 2 and Scope 3)
- Renewable energy %
- Water quality and consumption
- Biodiversity impact

Upon request, Suppliers shall provide gabocom with data to demonstrate reduction of environmental impact, including covering each of the above areas.

4. RESPONSIBLE SOURCING

gabocom is committed to operating in a socially responsible manner and expects Suppliers throughout the supply chain to provide products, materials and services from socially responsible sources. Growing concerns for human rights violations and child labor, for example, in the mining of minerals have highlighted the need for due diligence in the responsible sourcing of all minerals.

Suppliers agree to responsible sourcing, including of any raw materials, and agree to comply with regulations that may apply to their business regarding the exploitation and trade of minerals originating in conflict-affected and high-risk areas such as the Democratic Republic of the Congo and adjoining countries.

Further, Suppliers agree to provide transparency of their full supply chain to evidence their responsible sourcing of all products, materials and services and compliance with all applicable laws and regulations.

Governance & Compliance.

1. APPLICABLE LAWS, REGULATIONS AND POLICIES

Suppliers are expected to comply with all the laws, regulations and gabocom policies that apply to their line of business, wherever business is conducted. Suppliers are encouraged to align their sustainability activities with the Sustainability Development Goals ("SDGs").

2. AVOIDANCE OF CONFLICT OF INTEREST

Suppliers will take steps to avoid, and promptly disclose to gabocom, any actual or potential conflict of interest with an gabocom worker that affects the worker's ability to make unbiased decisions at gabocom.

A conflict of interest may exist when someone with whom an gabocom worker has a Personal Relationship works for or owns a company that is a Supplier. "Personal Relationships" include but are not limited to: (i) immediate family members, such as spouses, partners, children or parents; (ii) extended family members, such as aunts, uncles, cousins, nieces, or nephews; or (iii) other close relationships (e.g., business, financial or romantic). A conflict of interest may also exist if an gabocom worker has Outside Employment with or Business Ownership in a Supplier. "Outside Employment" includes but is not limited to performing as a worker, a consultant, an independent contractor or a volunteer. "Business Ownership" is defined as owning a material financial interest in a company.

3. Avoidance of Improper Gifts and Entertainment

All gabocom workers must abide by gabocom's policies, including its Anti-Corruption, Gifts and Entertainment Policy. If Suppliers ever provide gifts or entertainment to gabocom workers, they must (i) never be in cash, cash equivalents, checks, gift cards or gift certificates; (ii) be infrequent, modest and not lavish; (iii) be freely offered without any pressure to impact the outcome of a transaction; (iv) involve a proper business purpose for gabocom; and (v) may require gabocom Legal & Compliance pre-approval in advance.

Suppliers agree to ask gabocom workers about compliance with gabocom's policies prior to providing any gifts or entertainment to an gabocom worker.

4. Anti-Corruption

Suppliers agree to comply with all applicable anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. Neither gabocom's Suppliers nor any of their own Suppliers, subcontractors or agents, or anyone acting on their behalf, will solicit, accept or attempt to accept, or give or attempt to give, directly or indirectly, a bribe, kickback or anything of value to improperly influence the decisions of government officials or commercial business partners, such as customers or suppliers. Suppliers agree to have reasonable procedures to inform and train their workers so as to promote compliance with these laws.

5. FAIR COMPETITION

Everyone benefits from fair, free and open markets, and gabocom works to outperform its competition fairly and honestly. Suppliers agree to compete strictly on the merits of their products and services and make no attempts to restrain or limit trade in violation of applicable antitrust or competition laws.

6. COMPLIANCE WITH TRADE RESTRICTIONS AND CONTROLS

Suppliers agree to comply with applicable global trade and sanctions laws and regulations, including, but not limited to, (i) obtaining all required permits, licenses and/or authorizations required prior to the import, export, reexport or transfer of controlled goods or technology; (ii) prohibiting exports, reexports or transfer to sanctioned countries; (iii) prohibiting imports from, or dealings in property originating in a sanctioned country; and (iv) prohibiting any business or other dealings, either directly or indirectly, involving or otherwise with any sanctioned country or restricted party.

Governance & Compliance.

7. DATA PRIVACY AND PROTECTION

gabocom and its Suppliers shall each be responsible for complying with all applicable data privacy and protection laws, and ensuring compliance via a Data Privacy program. Unless otherwise agreed, gabocom is the controller of personal data processed on gabocom's behalf in Supplier engagements. If and to the extent Suppliers are required to process personal data while supplying goods or services, they acknowledge and agree that they shall:

- process the personal data only on documented written instructions from gabocom;
- implement technical and organizational measures required to ensure a level of security appropriate to the risk of the processing;
- ensure that persons authorized to process the personal data have committed to confidentiality;
- not sell personal data processed in their engagement with gabocom, and shall only share data onward, or engage sub-processors, with the specific or general authorization of gabocom, in which case Suppliers shall engage such sub-processors under substantively similar terms to those set out in this section;
- put in place appropriate technical and organizational measures to assist gabocom to respond to requests from data subjects;
- assist gabocom in complying with gabocom's obligations in relation to, as applicable, data protection impact assessments (including risk management and privacy by design/default), data breach management, including notifications to relevant supervisory authorities, and any related communications to data subjects;
- at gabocom's discretion, delete or return all the personal data to gabocom after the end of the provision of processing services, unless required by law to store copies of the personal data;
- make available to gabocom all information necessary to demonstrate compliance with its obligations under relevant data protection legislation, including allowing for and contributing to audits related to Suppliers' processing of personal data;
- where required by gabocom, or by applicable law, apply appropriate contractual measures by entering into a binding written agreement to reflect and supplement the provisions in this section; and
- notify gabocom of any personal data breach without undue delay, and cooperate and assist in mitigation measures. Notification should be accompanied by any relevant documentation to allow gabocom, if necessary, to inform the appropriate Data/Supervisory Authority.

8. PRODUCT QUALITY, PRODUCT SAFETY AND COUNTERFEIT PARTS

Suppliers shall ensure that their products meet all applicable quality standards and that they put in place quality standards and assurance processes to identify potential defects and implement corrective actions and to facilitate the delivery of a product that meets or exceeds applicable requirements, including but not limited to all applicable safety standards. Suppliers shall develop, implement and maintain adequate processes to detect counterfeit parts and materials.

9. SPEAKING UP AND ANTI-RETALIATION

gabocom counts on its Suppliers to speak up if something seems unethical or appears to violate this Code, the Code of Ethical Business Conduct, gabocom's policies, or the law. We are committed to maintaining a culture where everyone feels free to share concerns and speak up without the fear of retaliation.

gabocom encourages its current and former workers and any current and former gabocom stakeholders, such as Suppliers, agents, contractors, customers, or any other third parties, to report concerns regarding legal and ethical issues. Identifying such issues promptly allows gabocom to conduct a timely investigation and minimize any potential impact by addressing and mitigating concerns. gabocom expects its Suppliers to fully cooperate in the investigation or mitigation of any potential concern or violation.

Governance & Compliance.

gabocom will not tolerate any form of retaliation against anyone or any Supplier who makes a complaint, raises a concern, or provides information in good faith about actual or potential misconduct.

Suppliers can raise any concerns through a variety of channels, via email, telephone, or an in-person meeting.

As a general guideline, the first person to approach when raising a concern is an gabocom Buyer. Questions or concerns can also be raised with other members of the gabocom Supply Chain Management Team or the gabocom Legal & Compliance Team (reachable at ethicsandcompliance.feedback@aptiv.com).

In addition, concerns can be raised electronically through the Aptiv Drive Line – our Ethics Helpline – at driveline.aptiv.com; and Suppliers have the option of doing so anonymously.

10. MANAGEMENT PROCESSES

Suppliers agree to have management processes that:

- a. Ensure that management is accountable for compliance, performs audits against this Code and its agreements with gabocom, and complies with laws and regulations that apply to their activities.
- b. Require risk assessments and implement risk management systems that mitigate risks to human rights, the environment, health and safety, and labor practices, as well as risks to responsible sourcing and lawful business practices.
Risk assessments and risk management processes should include due diligence measures to prevent, mitigate and end identified risks or violations and to facilitate continuous improvement. Suppliers shall provide supporting documentation when requested by gabocom.
- c. Ensure regular training to educate workers about compliance with the principles of this Code and applicable laws.
- d. Ensure the integrity of financial reports and information in accordance with applicable, generally accepted standards.
- e. Provide for communication channels that allow workers to report concerns or unethical practices within the Supplier organization, including informing workers and their own Suppliers about the gabocom Drive Line – our Ethics Helpline.
- f. Design and oversee policies for the ethical conduct of business within their organization, including without limitation policies governing fair competition, anti-corruption, gifts and entertainment, conflicts of interest, commercial bribery, bribery of government officials, respect of confidential information and intellectual property, and others.
- g. Cascade the requirements of this Code down to their own Suppliers and require them to cascade down to their supply chain. Suppliers should apply the same obligations to all workers, including the contractors working on their production sites, and labor agencies.
- h. Promote the well-being of the communities in which they conduct business.
- i. Document compliance with this Code and keep such documentation for at least three years.

11. RIGHT TO AUDIT

gabocom reserves the right to verify Supplier compliance with this Code. This verification may take a variety of different forms, including but not limited to written documentation, questionnaires, inspections, on-site audits, use of third-party experts, or similar requests throughout the Suppliers' supply chain.



Contact.
personal. competent.

gabo Systemtechnik GmbH
a HellermannTyton Company
Am Schaidweg 7
94559 Niederwinkling
GERMANY

Tel. +49 9962 950-200
Fax. +49 9962 950-202

info@gabocom.com
www.gabocom.com