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hennigesautomotive.com

Supplier Code of Conduct Policy

Effective Date: 8/1/2026

Introduction

Henniges Automotive is committed to conducting its business in an ethical, responsible, and sustainable manner. As part of this commitment, we expect our suppliers and business partners to adhere to high ethical and social standards. This Supplier Code of Conduct outlines the principles and expectations that suppliers must follow when conducting business with Henniges Automotive.

Compliance with Laws and Regulations

Suppliers must comply with all applicable laws, regulations, and international standards relevant to their business operations, including but not limited to labor laws, environmental laws, health and safety regulations, and anti-corruption laws.

Conflict Materials

Conflict minerals, including tin, tantalum, tungsten, and gold (commonly referred to as 3TG), have been associated with human rights abuses and conflict financing in certain regions around the world. Henniges Automotive expects our suppliers to:

- Comply with all applicable laws and regulations related to conflict minerals.
- Provide materials that are sourced ethically and in a manner that does not support armed conflict, human rights abuses, or environmental degradation.
- Implement due diligence processes to identify the source of conflict minerals in their supply chain.
- Cooperate with Henniges Automotive's efforts to assess supplier compliance and responsible sourcing practices.
- Promptly provide requested information and documentation related to conflict minerals.

Labor and Human Rights

Suppliers must respect internationally recognized human rights and fundamental labor rights throughout their operations and supply chains. Forced, bonded, trafficked, prison, or involuntary labor; child labor; worker-paid recruitment fees; retention of identity documents; harassment; abuse; and unlawful discrimination are prohibited.

Suppliers must maintain a social policy that provides:

- Fair wages, benefits, working hours, and safe, healthy working conditions that comply with applicable law.
- Equal opportunity, respectful treatment, fair recruitment, and appropriate protections for vulnerable workers.

- Respect for freedom of association, collective bargaining, and workers' ability to raise concerns without retaliation.
- Risk-based due diligence, confidential grievance channels, timely corrective action and remediation, and equivalent expectations for sub-suppliers and labor agencies.

Suppliers must assign responsibility for implementing this policy, train relevant personnel, maintain appropriate records, monitor compliance, and provide supporting information to Henniges Automotive upon request.

Discrimination

Suppliers shall not discriminate against employees or job applicants based on race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, or any other protected characteristic.

Freedom of Association

Suppliers shall respect the rights of workers to associate freely, form or join labor unions, and engage in collective bargaining as permitted by local laws.

Working Conditions

Suppliers must ensure that working hours, wages, and benefits comply with applicable laws and industry standards. Overtime work should be compensated appropriately.

Health and Safety

Suppliers must provide a safe and healthy working environment for employees, taking necessary measures to prevent accidents, injuries, and occupational diseases. Workers should have access to clean drinking water, sanitary facilities, and appropriate protective equipment.

Environmental Responsibility

Suppliers are expected to minimize their environmental impact by:

- Complying with environmental laws and regulations.
- Implementing measures to conserve energy, prevent pollution when possible and reduce greenhouse gas emissions.
- Managing waste responsibly through recycling and proper disposal methods.
- Promoting sustainable sourcing and production practices.

Ethical Business Practices

Suppliers must conduct their business with integrity, transparency, and honesty. This includes:

- Avoiding any form of bribery, corruption, or unethical practices.
- Maintaining accurate financial records and reporting.
- Protecting intellectual property rights and confidential information.

Accountability and Consequences

Failure to comply with this Supplier Code of Conduct may result in corrective actions, including but not limited to termination of the supplier relationship. Henniges Automotive reserves the right to conduct audits and inspections to verify compliance.

Conflicts of Interest

Suppliers must avoid actual, potential, or perceived conflicts of interest that could improperly influence, or appear to influence, business decisions involving Henniges Automotive. A conflict may arise when personal, financial, family, employment, ownership, or other interests interfere with a supplier's duty to act objectively and in the best interests of the business relationship.

Suppliers must promptly disclose any actual, potential, or perceived conflict of interest to Henniges Automotive, including:

- Personal, family, or close relationships with any Henniges Automotive employee who may influence supplier selection, contracting, pricing, payment, quality, or performance decisions.
- Direct or indirect ownership, investment, financial interest, outside employment, or board participation involving Henniges Automotive, a competitor, another supplier, or a customer.
- Gifts, entertainment, favors, travel, employment opportunities, or other benefits that could create an obligation or improperly influence a business decision.
- Any other circumstance that could impair, or reasonably appear to impair, independent judgment or fair dealing.

Disclosure does not necessarily prohibit the business relationship; however, suppliers must cooperate with Henniges Automotive in reviewing and appropriately managing or eliminating the conflict. Suppliers may not participate in, direct, or influence a related decision until the conflict has been disclosed and written direction has been provided by Henniges Automotive.

Communication and Reporting

Suppliers must promptly report suspected or actual violations of this Code, applicable law, or Henniges Automotive requirements, including undisclosed conflicts of interest, bribery, fraud, retaliation, human rights concerns, safety issues, environmental violations, falsification of records, or other unethical conduct. Suppliers must also report violations or non-compliance identified within their own operations or supply chains when they may affect Henniges Automotive.

Reports should include sufficient factual information to allow a reasonable review and may be submitted through the channels below. Suppliers must cooperate fully with any inquiry or investigation, preserve relevant records, and maintain confidentiality to the extent permitted by law. Henniges Automotive prohibits retaliation against any person who, in good faith, raises a concern, reports suspected misconduct, or participates in an investigation. Knowingly false reports or intentional failure to disclose a known conflict or violation may result in corrective action, up to and including termination of the supplier relationship.

How to Report a Complaint:

Email: compliance.committee@hennigesautomotive.com

MAIL: Henniges Automotive
C/O Internal Audit
2750 High Meadow Circle
Auburn Hills, MI 48326

Review and Updates

This Supplier Code of Conduct may be reviewed and updated periodically to reflect changes in laws, regulations, or business practices. Suppliers will be notified of any changes, and their compliance will be expected accordingly.

By entering into a business relationship with Henniges Automotive, suppliers agree to abide by this Supplier Code of Conduct and commit to upholding the highest ethical standards in their operations.

Supplier Company Name: _____

Authorized Company Representative
Signature _____

Authorized Company Representative
Name (Printed) _____

Date: _____