



YAZAKI EUROPE CODE OF CONDUCT



V.1

The Yazaki Spirit

不屈の意志
奉仕の精神
先見性



FORESIGHT

*The ability to see beyond
immediate concerns*



SERVICE MIND

*The desire to serve the best
interests of our partners*



FORTITUDE

*The will to see matters
through to the end*

Foreword by the Management Board

Dear Team Members:

As a privately held company and premium Japanese automotive supplier, our ambition is to be recognized as the “Best in Class” supplier of Electronic Distribution Systems, Components and Instrumentation. We strive to be the benchmark on a global level and the company of choice for our customers and our employees.

This Code of Conduct will support us in achieving these targets in a socially responsible manner and to act ethically and in compliance with all applicable laws and/or internal rules.

Therefore, we ask every employee and our suppliers to carefully read and to follow the principles in this document.

Our Code of Conduct, in conjunction with our CSR and Human Rights Policy, will help us to ensure a workplace where everyone can share a sense of ownership for Yazaki success by creating an atmosphere defined by a performance-based culture and strong teamwork.

Thank you for your support,

Munenori Yamada

Chairman

Yazaki Europe Ltd

Hans Lemmens

President & CEO

Yazaki Europe Ltd

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1 Our Responsibility in the Workplace

1.1 Leading by example

We expect our managers and leaders to promote a culture of integrity by making ethical decisions.

As managers and leaders we have to be role models. We have to provide guidance to our teams by acting ethically, honestly and in compliance with all applicable laws and/or internal rules in everything we say and do.

We have to encourage our employees to raise their concerns and to speak up if they consider issues unethical, illegal and/or in violation of Yazaki rules.

1.2 Learning from mistakes

We promote a culture where we openly and transparently deal with mistakes.

We expect to address bad news first. Wrong decisions and mistakes have to be recognized, discussed, corrected and prevented from recurring. Our employees shall have no concerns to speak up about possible mistakes. We treat our employees disclosing their mistakes fairly.

1.3 Ensuring a safe and healthy workplace

We offer and maintain a safe and healthy working environment for our employees.

We comply with all applicable local safety regulations and use the required safety equipment. We never put the health and safety of our colleagues at risk. We do not work under the influence of alcohol or drugs.

We immediately report any potential health and safety risk or accident to the EHS & Risk Management Department and stop the use of unsafe machines and equipment. In the event of an emergency, we take action placing the highest priority on protecting the lives of employees and local residents.

1.4 Fair working conditions

We provide fair working conditions to all our employees.

We adhere to applicable labor laws and regulations, including wages, working hours and other benefits in accordance with Yazaki minimum standards.

1.5 Personal security in critical areas

We avoid any security risks in the countries to which we travel.

As Yazaki has operations worldwide, even in places where the security situation is critical, it is of utmost importance that we inform ourselves in advance of any travel. We do not expose ourselves or our colleagues to unnecessary risks. We anticipate security measures for safe travel and follow security recommendations as defined by the EHS & Risk Management Department.

In case of travel related security incidents, we immediately inform the EHS & Risk Management Department.

1.6 Data protection and privacy

We ensure the proper use and protection of personal data and privacy.

We collect and process personal data carefully and responsibly and only for legitimate purposes. We protect personal data against loss, modification and unauthorized use. We respect everyone's privacy.

In case of doubt about the proper collection and processing of data, we ask the Data Protection Department for advice. We immediately inform our Data Protection Department in case of any data breach involving personal data.

1.7 Protection of intellectual property

We encourage innovative thinking and ideas as a means of developing intellectual property.

We protect Yazaki's own intellectual property rights and respect the legitimate intellectual property rights of others. As our technological lead and further business growth is based on our intellectual property rights (including copyrights, software, designs, know-how, patents and trademarks) we ensure that they are protected against any violation by third parties and/or unauthorized disclosure.

We report suspected violations of our intellectual property rights to our IT and Engineering Department.

1.8 Protection of resources

We use Yazaki's property and assets carefully, sustainably and only for business purposes.

We ensure that our resources (including mobile phones, computers, copiers, etc.) are used responsibly and economically and not for private purposes. We protect resources from loss, theft, fraud and misuse. We also protect information as one of our most important assets. We do not disclose confidential information about our operations to unauthorized third parties.

2 Our Responsibility as a Business Partner

2.1 Prohibition of bribery

We do not give or take bribes.

We do not influence a business decision or obtain a business advantage by giving or taking benefits (including cash, gifts, invitations and/or anything else of value). We impress our business partners (including customers, suppliers, consultants, agents, and other third parties.) only through our superior products, technology, reliability and quality of services. By doing so, we protect Yazaki and ourselves from administrative and criminal investigations, sanctions and reputational damage.

If we are unsure whether to accept or offer a benefit, we ask the Compliance Department for advice. We report suspected activities where illegal benefits have been given or taken to the Compliance Department.

2.2 Gifts and invitations

We accept and offer gifts and invitations only in line with applicable laws and/or internal rules.

We are aware that the exchange of gifts and invitations is culturally significant for developing and maintaining business relationships in many countries. However, we only accept or offer reasonable, and appropriately priced drinks and meals in the context of business meetings. We may also accept or give simple office and promotional materials with advertising logo.

In case of doubt, we contact our superior or the Compliance Department.

2.3 Dealings with public officials

We interact honestly and fairly with Public Officials.

We are aware that Public Officials (including any employee, officer, director, agent, consultant or board member of any governmental or administrative body at any level) often have their own strict internal rules for the acceptance of benefits from private business. We respect and adhere to these rules even if such benefits are expected or supposedly customary for official business. We also do not use third parties to unlawfully or improperly influence public officials.

In case of doubt, we contact the Compliance Department.

2.4 Conflicts of interest

We only make business decisions in the best interest of Yazaki.

We anticipate and avoid situations where our business decisions might be affected by personal relationships, benefits to family members, our own financial interests, voluntary work, secondary employment, political interests or other private interests.

We assess ourselves whether we can avoid or resolve a conflict of interest. If we cannot avoid or resolve it, we disclose the conflict before it affects our business decisions.

We can disclose a conflict to our superior, the HR Department or the Compliance Department.

2.5 Fair and free competition

We comply with all applicable competition laws and are committed to support fair, free, undistorted, and effective competition.

We are committed to a well-functioning competition which is fundamental for growth and employment and ensures innovation and best prices in the interest of all market players and the final consumer.

We do not participate in illegal exchanges of competitively sensitive information. We do not participate in cartels (price fixing, allocation of markets or customers, etc.) and do not engage in an abuse of market power. Such misconduct can lead to severe fines and significant reputational damages.

We remove and distance ourselves from conduct that violates competition laws and notify the Compliance Department immediately.

In case of doubt, we ask the Compliance Department for competition law advice before we act.

2.6 Accounting and financial reporting

We enhance the transparency in our business activities through timely and proper accounting and financial reporting.

We maintain books and records that accurately reflect our business and financial situation. We know that the reliability and integrity of Yazaki's accounting and reporting obligations are important to build and retain the trust of business partners, the general public and public authorities. We ensure that these obligations are fulfilled and that Yazaki's books and records are prepared in accordance with applicable laws and internal rules and standards.

2.7 International trade

We comply with export controls and economic sanctions.

We ensure that cross-border deliveries of goods, services, software or other technical know-how are in compliance with applicable export regulations. We verify that such deliveries do not involve restricted or sanctioned individuals, entities, regions or countries. We are aware that violations thereof may result in severe penalties and sanctions.

We consult the Global Trade Compliance Department for any questions about the scope of applicable export controls or any other import and export trade compliance laws.

2.8 Prevention of money laundering

We fight against money laundering and terrorism financing.

We verify the identity and economic background of our business partners. We check the origin of payments to ensure they come from legitimate sources. We ensure that Yazaki's resources are not made available to support terrorist activities and/or organizations.

We report suspicious activities and transactions to the Compliance Department.

2.9 Prohibition of insider trading

We do not use non-public information of our business partners to trade on it or to share it with others.

We process non-public information of our business partners only internally. We do not share such information with any outside party, including family members. We also do not induce third parties to use such information for any financial transactions.

3 Our Responsibility as a Member of Society

3.1 Respect for human rights

We respect human rights throughout our operations.

We uphold and respect international standards for human rights, which include the International Bill of Human Rights and the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization. We ensure that we are not using forced or child labor. We respect the freedom of association and the right to collective bargaining.

We also request our business partners to make every effort to respect human rights.

3.2 Respect for diversity and non-discrimination

We respect the diversity of our employees and provide equal opportunities to all our employees.

We value what each individual brings to our teams regardless of their ethnic decent, origin, nationality, religion, ideology, gender, sexual orientation, gender identity, age, disability, medical condition, race, color or their social background or any other characteristics. We provide equal employment opportunities and the observance of "equal pay". We eliminate any form of discrimination.

We embrace diversity actively and support inclusion to better understand and meet the needs and expectations of an increasingly diverse and global customer base.

3.3 Prohibition of intimidation and harassment

We do not tolerate any form of intimidation, harassment or other offensive behavior.

We see a respectful cooperation between our employees on all levels as a source for efficiency, innovation, productivity and competitiveness. We are committed to create a fair, tolerant, respectful and friendly working environment. We will not accept that colleagues treat each other with disrespect.

3.4 Quality and safety of products

We ensure the safety and the high quality of our products and services.

We listen to our customers and make all efforts to understand their needs and meet their expectations. We continuously improve and develop innovative products and services. This helps to ensure consistent high quality and safety of Yazaki's products and services. At the same time, we ensure the physical safety and well-being of end consumers.

3.5 Product compliance

We ensure the conformity of our products with applicable laws and/or internal rules.

We keep our technical promises not only by complying with the text of the law, but also by the spirit of the relevant regulations.

We will follow-up and report any conformity defects of our products to the Quality Department, even if there are solely indications of such defects.

3.6 Protection of the environment

We all contribute individually to Yazaki's responsibility to society and to a sustainable development of the Earth.

We protect the environment. We do so by focusing on environmentally friendly, advanced and efficient technologies as well as environmental awareness and we actively promote environmental conservation activities to ensure that a rich global environment is passed on to the next generation. We use our resources in a responsible and sustainable way.

3.7 External communication and use of social media

We do not make any form of external publication or statement for Yazaki on our own.

When stating our opinions in public, at events or on social media, we make it absolutely clear that we are expressing our personal opinion.

We align upfront with Corporate Communications before we provide any statement to media (including TV and newspapers) or social media as well as during speeches, lectures, interviews and panel discussions or other means.

3.8 Contribution to local communities

We contribute to local communities by respecting local cultures and practices.

We actively participate in local events and festivals to build trust with local communities and we conduct activities to develop local communities in partnership with local residents and promote social issues, education, science, art, culture, sports, and protection of the environment.

4 Our responsibility for the compliance with this Code of Conduct

4.1 Doing the Right Thing

This Code of Conduct cannot provide specific answers to every question and situation. Nevertheless, our objective should be to do the right thing. If the right thing is not clear, we ask ourselves the following questions:

- > Do we think what we are doing is right?
- > Is our activity legal?
- > Would we feel comfortable having it reported in public?
- > Will we feel comfortable talking about it with our family?
- > Will you stake your reputation on it?

If we answer "YES" to all of these questions, our activity is probably okay. However, if we answer "No" or "Maybe" to any of the questions, we should pause and contact our superior or the relevant departments mentioned in the Code of Conduct or the Compliance Department.

4.2 Reporting of violations

If we suspect a violation of the Code of Conduct, any other Yazaki rule, or illegal/unethical behavior, we can report it to the whistleblowing hotline. The whistleblowing hotline can be reached at <https://yazaki-europe.ethix360.com>.

In addition to the above-mentioned whistleblowing hotline, we may report violations also to our superior or to the Compliance Department (compliance@yazaki-europe.com).

We can report violations confidentially and anonymously.

4.3 Internal investigations

Yazaki will take all reports of violations seriously and conduct internal investigations in an objective and neutral manner. At the end of an investigation, if necessary, Yazaki will implement appropriate consequences including disciplinary measures.

4.4 Protection of whistleblowers

Yazaki does not tolerate any discrimination, intimidation or retaliation against whistleblowers. Such behavior constitutes a serious breach of duties under the employment contract, which can lead also to disciplinary measures. The same applies if a whistleblower makes a report in bad faith. This is the case when the whistleblower had no factual indications to believe that the information reported was correct at the time when it was reported.