

Document Name:	Rev. Level	Rev. Date	Page
STRATTEC--Supplier Code of Conduct	-	(8/2022)	1 of 5



Supplier Code of Conduct

Preamble

STRATTEC Security Corporation hereinafter jointly referred to as STRATTEC strives to achieve growth based on a socially responsible conduct in all spheres in which they pursue their business activities and in all countries in which they operate.

STRATTEC expect its suppliers to support its effort by observing basic ethical principles and statutory provisions and by their responsible approach to their production processes. It is in this context that STRATTEC has developed this Supplier Code of Conduct and requires its supplier to comply with it.

1. General Principles, Laws and Statutes

The supplier commits to upholding its social responsibility in all business dealings. In all its business activities and decisions, the supplier shall respect the laws in effect and any other applicable provisions in the countries where it is active. Suppliers will obtain and keep current all required environmental permits, approvals, registrations and follow their operational and reporting requirements,

2. Prohibition of Corruption and Bribery

The supplier assures not to practice or tolerate any form of corruption, extortion or embezzlement. Unethical behavior may not be used to unlawfully influence others in business dealings by exchanging gifts or offering or granting other benefits either at home or abroad. The same applies to the unlawful acceptance of benefits.

3. Human Rights / Child Labor / Forced Labor / Working conditions / Discrimination

The supplier respects and supports compliance with the internationally recognized human rights and ensures not to participate in human rights violations.

Child labor as defined by the ILO conventions (International Labor Organization) as well as national provisions is prohibited and any form of exploitation of children and adolescents will not be tolerated. The supplier assures that the production and / or processing of the supplied goods is being carried out without exploitative child labor defined in the ILO conventions.

Any form of forced or compulsory labor including involuntary prison labor will be refrained from by the supplier.

Working hours are set according to the current laws, the industry standards or the applicable ILO conventions. Overtime shall be voluntary and employees are entitled to reasonable periods of rest and leave for illness and emergencies. Compensation and social benefits have to be granted in accordance with the basic principles of minimum wages, overtime and the statutory social security systems.

Document Name:	Rev. Level	Rev. Date	Page
STRATTEC--Supplier Code of Conduct	-	(8/2022)	2 of 5

4. Health, Safety and Environmental Protection



In order to act in harmony with the environment and to avoid hazards to humans and the environment, the supplier observes all applicable health, employment and environment related laws and other specifications.

The supplier takes a holistic approach towards its business decisions in particular with regard to avoidable negative social and environmental impacts. By developing and applying more contemporary processes the supplier aims to minimize the consumption of energy and resources.

The supplier strives to continuously reduce its waste and (greenhouse gas) emissions. In order to track these objectives, the supplier regularly evaluates its climate footprint (corporate carbon footprint). In this respect, the supplier shall exploit any potentials to use renewable energy sources.

Air quality: To protect human life and the environment air quality objectives according to the laws and regulations shall be observed and the reduction of air emissions systematically pursued.

Water quality and consumption: An integral part of the supplier's environmental objectives shall be the reduction of water consumption and the preservation of water quality by minimizing the contamination risk of wastewater and by monitoring wastewater being discharged to the environment through processes.

Solid Waste: Suppliers will implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

Emergency Preparedness: Suppliers will work to actively identify and assess potential emergency situations and events and minimize their impact by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Suppliers will execute emergency drills at least annually or as required by local law. Emergency plans should include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans.

Animal Welfare: Suppliers will respect the welfare of animals and provide humane treatment. No animal should be raised and killed for the single purpose of being used in automotive products.

STRATTEC expects the supplier to have management systems for environmental protection as well as occupational health and safety in place which preferably are certified according to an internationally approved norm. In this way the supplier manages, assesses and monitors the associated impacts of its business activities and improves its corresponding performance continuously.

5. Prohibited substances and materials

All the supplies, products or parts bought from the supplier by STRATTEC, whether they are standard or specifically developed by the supplier for the company, must not contain any product, material or substance prohibited by the legislations or regulations applicable in the supplier's countries, the European Union and more generally, in all of the countries in which these supplies, products or parts are marketed and used. If applicable to the goods delivered to STRATTEC the supplier also complies with its obligations concerning the area of, conflict minerals.

6. Adherence to Antitrust law

The supplier will conduct its business in compliance with the principles of fair competition and in accordance with all applicable antitrust laws.

Document Name:	Rev. Level	Rev. Date	Page
STRATTEC--Supplier Code of Conduct	-	(8/2022)	3 of 5

7. Compliance with Trade Restrictions & Controls

The supplier agrees to comply with the applicable legal licensing requirements and restrictions on exports and trade dealings, including bans on exports to a prohibited country, bans on imports from, or dealings in property originating in a sanctioned country or financial transactions and dealings involving a sanctioned country or designated individuals and entities. In addition, the supplier agrees to comply with regulations that may apply to your business regarding the exploitation and trade of conflict minerals originating in the Democratic Republic of the Congo and adjoining countries.

Sourcing and use of prohibited and critical (but permitted) materials:

All the supplies, products or parts bought from the supplier by STRATTEC, whether they are standard or specifically developed by the supplier for STRATTEC, must not contain any product, material or substance prohibited by the legislations or regulations applicable in the supplier's country, and, more generally, in all of the countries in which these supplies, products or parts are marketed and used.

Counterfeit Parts: The supplier develops, implements and maintains methods and processes appropriate to its products and services to minimize the risk of introducing counterfeit parts and materials into products.

Export and Import Regulations: The supplier ensures to comply with national and international import and export control laws. These comprise but are not limited to sanctions, embargos and other laws, regulations and directives controlling the transmission or shipment of goods, technology and payments.

8. Freedom of Association

The supplier respects the rights of employees to associate freely. Employees should be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

9. Privacy and Intellectual Property

Confidential information is to be used appropriately and safeguarded accordingly. The supplier ensures that the privacy and intellectual property rights of business partners and supplier's employees are protected. In this respect the supplier commits to implement technical, organizational, and other measures as are necessary to prevent unauthorized use of, or access to, confidential information.

10. Data Protection

In order to ensure the human right to the protection of personal data, the supplier has to comply with all valid and effective obligations resulting from legal regulations concerning data protection. More specifically the supplier undertakes to adopt and comply with all technical and organizational measures to prevent unauthorized or accidental access to, or alteration, destruction or loss of personal data of the STRATTEC employees. In the case of any breach of personal data security, the supplier informs STRATTEC without undue delay about such breach.

STRATTEC reserves the right to conduct audits and take further measures in coordination with the supplier to verify compliance of the points mentioned.

11. Management Systems

Suppliers will develop and implement an appropriate internal management system to comply with applicable laws and the content of this Code. Suppliers will be able to demonstrate compliance with this Code upon STRATTEC's request and will take any action to correct any noncompliance. If requested, suppliers will complete questionnaires or participate in on-site assessment or audits. The management system should contain the following elements:

Document Name:	Rev. Level	Rev. Date	Page
STRATTEC--Supplier Code of Conduct	-	(8/2022)	4 of 5

- Leadership Commitment
- Stakeholder Engagement
- Improvement Objectives
- Training
- Communication and Documentation
- Supplier Responsibility
- Risk Assessment and Management

12. Whistleblower and Non-Retaliation

STRATTEC encourages supplier to have a policy in place to facilitate disclosures of questionable practices, encourage proper individual conduct and alert the Audit Committee of potential problems before they have serious consequences. Shareholders, associates and other interested parties may submit complaints or concerns regarding the accuracy of our financial statements, press releases or other public disclosures, accounting, internal accounting controls or auditing matters.

Subject to any restriction posed by law, suppliers will promptly inform STRATTEC of any concern related to issues governed by this Code and collaborate with STRATTEC in subsequent investigations.

When potential adverse impacts are discovered, suppliers will investigate, and where appropriate, will engage with potentially affected stakeholders and/or their representatives with the aim of identifying mutually agreeable solutions or remedies and providing for or cooperating in their remediation through legitimate processes. Suppliers will cascade this expectation through their own supply chains.

Confirmation of the STRATTEC Supplier Code of Conduct

We acknowledge receipt of the STRATTEC Supplier Code of Conduct and confirm the compliance with the contents for all deliveries and services for the STRATTEC Company. We undertake to require our own suppliers to comply with the provisions pursuant to this Code of Conduct. We are perfectly aware that STRATTEC will consider any major infringement of the above obligations by us as a breach of contract and that STRATTEC will reserve the right to take appropriate measures.

Supplier Name	Legal Representative Name	Legal Representative Title

Legal Representative Signature / Date

Document Name:	Rev. Level	Rev. Date	Page
STRATTEC--Supplier Code of Conduct	-	(8/2022)	5 of 5

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DOCUMENT REVISION LOG

Revisions level may not contain the letters I, O, Q, S or Z.			
Rev.	Date	Section(s)	Description
-	3/19	N/A	Initial Release into VKMS
A	8/2022	4, 7, 9, 10 & 11	Updated sections 4 and 7. Added sections 9, 10 and 11
B	8/22	1, 4, 7 and 12	Updated Sections 1, 4, 7 and 12. A section was added as section 11. Section11 become section 12.
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