



Business Partner Code of Conduct

HDT Automotive, Inc and its affiliated companies (“HDT”) expect all of its Business Partners including, but not limited to suppliers, consultants, vendors, brokers, merchants, dealers, contractors, agents and others, to engage in responsible supply chain practices and to comply with this Business Partner Code of Conduct (this “Code”). The provisions of this Code are in addition to, and not in lieu of, the provisions of any legal agreement or contract between a Business Partner and HDT. Should there be a conflict of terms between this Code and the specific arrangement, the terms of such other arrangement shall prevail. In the case of a conflict between what local law requires and the standards of this Code, each supplier must meet the higher standard.

HDT expects its Business Partners to hold their supply chain, including subcontractors, third party labor agencies and any contract and seasonal workers, to the same standards contained in this Code.

Ethical

Conflict of Interest: Employees of HDT are to act in the best interest of the Company. Accordingly, employees shall not have any financial interest, familial relationship or employment arrangement with a Business Partner that may conflict, or appear to conflict, with the employee’s obligation to act in the best interest of HDT. A Business Partner becoming aware of a conflict-of-interest situation will immediately notify HDT of this.

Anti-Bribery and Anti-Corruption: HDT does not tolerate any form of corruption. HDT prohibits Business Partners from giving or promising to give anything of value to any person or entity for the purpose of obtaining an improper business advantage. Business Partners must conduct business with integrity and in full compliance with all applicable laws and regulations pertaining to bribery and anti-corruption, including those concerning foreign corrupt practices and laws that require keeping accurate books and records.

Fair Competition and Anti-Trust: Business Partners will operate honestly and ethically throughout the supply chain and in accordance with all applicable anti-trust laws, trade practice laws and any other competition laws, rules and regulations.

Supply Chain Due Diligence and Conflict Minerals: Business Partners will implement due diligence processes and comply with all applicable laws concerning supply chain due diligence to mitigate risk. For products or services provided to HDT that contain tin, tungsten, tantalum, gold or any other material or derivative designated by the U.S. States Department as a “conflict mineral,” Business Partners must be able to disclose supply chain mapping back to the primary origin. Business Partners are required to assure that conflict minerals are being sourced from mines and smelters outside The Democratic Republic of the Congo (“DRC”) or an adjoining country (collectively, the “Conflict Region”) or, if sourced within the Conflict Region from mines and smelters that have been certified by an independent party as DRC conflict free. To the extent any Business Partner does not currently have this capability, such Business Partner is required to disclose its future plans to do so. Business Partners shall make all disclosures to HDT within a timely manner.



Export and Import Regulations: Business Partners will comply with all applicable import and export control laws, including without limitation, sanctions, embargoes and other laws, regulations, government orders and policies controlling the transmission or shipment of goods, technology, and payments. HDT will not enter into business transactions with or involving any Sanctioned Country, Region or Person.

Prevention of Money Laundering: Business Partners will comply with all applicable statutes governing the prevention of money laundering and not to participate in any money laundering activity.

Confidentiality and Data Security: Business Partners will protect and secure HDT's registered and unregistered intellectual property as confidential information (whether in paper, electronic or other media). Business Partners who have been given access to confidential information as part of our relationship shall not share this information with anyone unless authorized to do so, in writing, by HDT, even after our business relationship ends. If a Business Partner believes it has been given access to HDT's or any other third party's confidential information in error, the Business Partner shall immediately notify its contact at HDT and refrain from further distribution of the information.

Business Partners will comply with all applicable laws and regulations concerning the use and handling of personal data. Business Partners must also abide by appropriate technical and organizational data security controls. Any cybersecurity incidents must be reported to HDT in a timely manner.

Reporting: Business Partners shall create internal programs, processes and procedures for handling reports of workplace grievances. Business Partners shall also promptly report actual or suspected violations of the law or this Code to HDT.

Good Working Conditions & Human Rights

Human Rights: Business Partners shall comply with health and safety management system international standards (e.g. ISO 45001 or equivalent). Business Partners are expected to develop and implement their own programs focused on worker safety and well-being. HDT requires each of its Business Partners to conduct its activities in accordance with the following:

- The Ten Principles of the United Nations Global Compact
- The Universal Declaration of Human Rights
- The International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work
- The United Nation's Sustainable Development Goals

Forced Labor: HDT's Business Partners are prohibited from using forced, imprisoned, bonded, indentured or slave labor, all forms of human trafficking and unethical recruitment practices.

Child Labor: Business Partners shall ensure that no underage labor has been used in the procurement, production or distribution of their goods or services. Business Partners must observe the minimum age for employment stipulated in national legislation.



Wages, Benefits & Working Hours: Business Partners shall provide employees with fair remuneration and benefits that meet or exceed the countries legal minimum standards. Business Partners shall comply with all applicable laws regulating working hours and sufficient resting periods.

Freedom of Association and Collective Bargaining: Business Partners shall recognize and respect the right to collective bargaining and the rights of employees to associate or not to associate with any group, as permitted by law and in accordance with all applicable laws and regulations.

Employment Status: Business Partners shall employ only workers who are legally authorized to work in their location and facility and are responsible for validating employees' eligibility to work through appropriate documentation.

Anti-Discrimination and Fair Treatment: Business Partners shall maintain an inclusive and cooperative environment free from violence or harassment with no retaliation. Business Partners shall encourage a diverse workforce and treat employees with fairness, dignity, and respect. Any form of discrimination, including but not limited to, nationality, ethnicity, gender, disability, age, gender identity or sexual orientation, religion and beliefs, social status or any racially motivated discrimination shall be rejected.

Overall Safety Culture and Corporate Responsibility

Health and Safety: Business Partners shall provide employees with a safe, respectful, clean, healthy, and ergonomic work environment that supports accident prevention and minimizes exposure to health risks. Each Business Partner will meet or exceed applicable laws and industry standards in this area. Business Partners will maintain a continuous improvement program in workplace safety, which includes, but is not limited to, emergency management, fire prevention and responsible management of chemicals.

Environment: Business Partners shall operate their Facilities in a safe and responsible manner that complies with all environmental laws, including laws and international treaties relating to waste disposal, emissions, discharges, and hazardous and toxic material handling. Business Partners shall manage, measure, and minimize the environmental impact of their facilities and demonstrate continuous improvement in areas such as energy, air, water, waste, carbon, raw materials and supplies. Business Partners must comply with and be certified to all applicable environmental management system international standards (i.e. ISO 14001 or equivalent). Business Partners will look to conserve resources and protect the communities and environment that surround them.

Chemical Compliance: Business Partners shall maintain programs that actively manage and comply with the requirements of all applicable chemical-related laws, such as Europe's REACH and RoHS and the automobile industry's International Material Data System.



Product Integrity: Business Partners will develop, manufacture and supply products complying with the respective requirements regarding state of the art Product Integrity, including but not limited to:

- **Product Safety:** products do not lead to any unreasonable health, safety or environmental risk. This applies to both the intended use and foreseeable misuse of the products as well as the usage of restricted materials.
- **Product Compliance:** products comply with the applicable legal and technical regulations in the country of use. This explicitly includes prohibiting the use of any counterfeit parts (plagiarism) or material from unapproved sources along the supply chain.

HDT must be notified immediately, in writing, of any potential infringement to Product Integrity.

Business Continuity: With regards to business continuity and supply chain, the Business Partner is to constantly perform comprehensive activities of identifying and assessing risks. Any identified risks will require mitigation measures as well as backup and continuity plans to be carried out and tested on a regular basis to minimize the impact of interruptions and disruptions for operations supporting HDT business.

Compliance with this Business Partner Code

The provisions of this Code, which may be amended from time to time, are essential for the business relationship between HDT and the Business Partner. Therefore, compliance to the provisions herein is essential for the business relationship between HDT and the Business Partner.

In case of significant breaches to this Code by the Business Partner, HDT reserves the right to terminate the relationship with the Business Partner subject to applicable laws.

The Business Partner will support HDT's implementation of legally required and other due diligence processes by actively participating in related initiatives, i.e. self-assessment questionnaires. HDT reserves the right to audit their Business Partner's compliance with this Code. Any audit will be scheduled for a mutually agreed to time and date, the Business Partner will provide an appropriate level of documentation which substantiates in a clear and transparent manner their adherence to this Code.

The Business Partner will use its best efforts to be familiar with the business practices of its suppliers, sub-contractors and other business partners and to require all such suppliers, sub-contractors and business partners to comply with this Code or the values laid down herein. The Business Partner and HDT will discuss any questions in relation so this Code in a trustful and respectful manner.



We hereby confirm that we share, respect, adhere to and will apply the Business Code values as stated in the above Business Partner Code of Conduct.

Legal Company Name

Name of Signee & Position Title

Date (MM/DD/YYYY)

Signature