



Code of Conduct

Our common principles

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Foreword



Meilai Feng,
CEO

**Dear Colleagues,
Dear Partners,**

as a company with locations in several countries and globally positioned business partners, BH SENS interacts with people of many different nationalities and cultures. As one of the world's largest manufacturers of tire pressure monitoring systems, we know that we can only achieve our goals with mutual respect, reliability, sustainable action and integrity.

Our six company principles on the topics of **safety, environment, humanity, quality, partnerships and solutions**, reflect the values that are of great importance to us both in decision-making and in everyday business. Based on this, we have developed this comprehensive Code of Conduct. This is the guide for our BH SENS family, from behavior to decision-making. Our managers serve as role models in this regard. It is important for me to emphasize that consistent implementation leads to the following behaviors:

Sense of responsibility

We act professionally and stand by our responsibilities. We do not give up until the goal has been achieved.

Self-motivation

We constantly improve and develop ourselves, especially in the areas of technology, science and organization.

Communication

We like to share our knowledge and successes with each other. Collegial interaction is encouraged. We are a team - a family.

By implementing and following the established behaviors, we will be able to further strengthen BH SENS' good reputation with our business partners and customers. We are a company with which people like to do business and which itself acts as a reliable partner. We can only be successful in the long term if we act in a targeted and flexible manner, applying the company's internal guidelines and country-specific laws.

It is therefore a personal request of mine that every employee at BH SENS worldwide represents our company accordingly and that we communicate the same values and standards everywhere. By internalizing this Code of Conduct and putting it into practice, we will live up to our responsibility as a trustworthy automotive supplier.

Bretten, January 2024

Meilai Feng, CEO

Integrity and values

Integrity is the basic requirement for our business relationships and for trusting cooperation between all employees and business partners. Our economic actions as a company and the behavior of every individual at BH SENS must be guided by ethical principles, law and order, generally applicable standards as well as internal company rules and our corporate values.

Integrity includes the ethical aspects of our actions and means that we align our actions with ethical standards. It goes beyond simply adhering to rules and regulations and appeals to our “inner compass” to distinguish between what is right and what is morally objectionable.

As an independent family company, BH SENS operates in a value-oriented manner. Respect and responsibility characterize our corporate culture. Integrity determines our economic actions and our interactions with one another. Our shared values form the foundation for the success of BH SENS.

With this Code of Conduct, we support the employees and business partners of BH SENS in complying with all relevant laws and regulations on which our business activities are based and therefore jointly ensure integrity.

Note: Our worldwide branches are generally combined under our brand name BH SENS. The principles described here have global validity.

Definition of BH SENS employees

All employees working for BH SENS, including managers, part-time employees, short-term employees, trainees and interns. For reasons of readability, only the male form is used when referring to people.

Our values

Safety is a matter close to our hearts.

Our products increase road safety and help to reduce the number of traffic accidents.

We take responsibility for our environment.

The eco-friendly and efficient use of resources is important to us.

We stand up for humanity and solidarity.

Mutual respect and appreciation is the motto of our BH SENS family, whose members support each other and engage locally.

We stand for quality without compromise.

Our products are characterized by high standards, absolute value and our endeavors to ensure that we never receive a complaint.

Our values strengthen our partnerships.

We are a reliable, trustworthy business partner. Honesty and loyalty are the cornerstones of a successful working relationship.

Our flexibility guarantees solutions.

Short decision-making processes and rapid implementation ensure maximum satisfaction for all parties involved.



SAFETY



ENVIRONMENT



HUMANITY



QUALITY



PARTNERSHIPS



SOLUTIONS

Our Code of Conduct

The ethical requirements in the business world are becoming increasingly demanding, and acting and setting an example with integrity play an immensely important role. That is why we have documented our claim to value-oriented, economic behavior in this Code of Conduct.



Interesting facts about this subject:

Contact your supervisor first and/or directly the responsible Compliance Manager if you have something you do not understand about this Code of Conduct, are unsure or need advice. In the chapter “Help and contact” you will find further information regarding the contact persons.

Who does this Code of Conduct apply to?

BH SENS is a global company. People from many nations and with different backgrounds work together here. This Code of Conduct is a commitment to our values and reliable, sustainable actions. It forms a general framework for everyday business and is aimed at all of us, regardless of which country or function we work in. To ensure that there are no violations of the Code of Conduct, it is the responsibility of each of us to familiarize ourselves with the contents of the Code of Conduct, to align our own behavior with it and to take it into account when making decisions. All managers at BH SENS have a role model function and the task of bringing the Code of Conduct into the company and monitoring compliance with it.

This Code of Conduct also applies to our customers, suppliers and service providers. It is the basis for a reliable, fair partnership in accordance with the law and regulations.

What do I have to adhere to ?

This Code of Conduct, which is binding for all of us, translates our claim to value-oriented, economic behavior into practical principles of conduct, which are summarized in three chapters:

- **Integrity in business**
- **Integrity in the workplace**
- **Sustainability and social responsibility**

Our Code of Conduct sets a Group-wide minimum standard, which is specified in internal company guidelines and instructions. It provides orientation and security for our actions, but cannot and should not provide detailed instructions for all situations. In addition, we continually familiarize ourselves with the legal regulations and the BH SENS guidelines that are relevant to us.

Additional regulations can be defined to take local particularities into account, but these must not contradict this Code of Conduct. If customs, legal regulations or other rules at the local level differ from the provisions of this Code, the stricter provisions must be observed.

This Code of Conduct may not be circumvented through contractual agreements or comparable measures.



A woman with her hair in a bun, wearing a dark blue shirt with white polka dots, is seen from the side. She is looking towards a large, out-of-focus screen that displays a presentation. The background is a dimly lit room, possibly a conference room or office. The text "Integrity in business" is overlaid in the bottom left corner.

**Integrity in
business**



1. Antitrust law



Question:

A former colleague who now works for a competitor asks you to share information about the pricing structure of BH SENS. Are you allowed to do that?

Answer:

No! If you share such information, you will be violating antitrust law. Information that goes beyond publicly available information may not be passed on to competitors.

BH SENS is committed to its social responsibility in an open and fair world trade and is committed to adhering to the principles of social responsibility. As an innovative company with years of global experience, BH SENS stands for a socially, economically and ecologically balanced and sustainable way of doing business. Compliance with applicable national laws, regulations and ordinances as well as the relevant internationally recognized standards, guidelines and principles. In particular, the principles of the UN Global Compact, UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the United Nations (UNO) conventions and the core labor standards of the International Labor Organization (ILO), Declaration of Fundamental Principles and Rights at Work (Geneva, 06/98) of the International Labor Organization (ILO) is a matter of course for BH SENS.

2. Plagiarism and intellectual property

The company will implement appropriate methods and processes to ensure the high quality and originality of its products.

Procedures for identifying plagiarism and counterfeit intellectual property are established. If such violations are discovered, the owner of the intellectual property will be informed and further measures will be decided in coordination with the authorities.

The company is committed to educating its employees about the importance of protecting intellectual property.

The company will comply with national and international laws and implement regulations for the protection of intellectual property and measures and processes to monitor compliance with these laws.



Do:

Participate in regular training on the importance and protection of intellectual property by the company.

Report an intellectual property infringement directly to your manager.



Don't:

Do not withhold any information during inspections.

3. Prevention of corruption



Do:

Customer gifts in the form of marketing giveaways (such as calendars, pens, etc.) can be accepted in individual cases. The same applies to moderate invitations to a meal (after/during the business visit), which reinforce the good business relationship.



Don't:

Accepting cash, cash equivalents (e.g. checks) or vouchers as well as gifts or invitations given to family members or relatives is prohibited.

We apply the highest level of integrity in all business activities and relationships. For all business partners, we have stipulated compliance with national and international anti-corruption and bribery laws in a supplier code. The business partner must reject and prevent any form of corruption, including "facility payment", in the context of business activities. He must ensure that employees, subcontractors or representatives do not give, offer or accept bribes, kickbacks or other improper payments or advantages. This also applies to any type of criminal activity, such as fraud, breach of trust or crimes against competition.

BH SENS does not tolerate any conflicts of interest, such as taking personal advantage of positions or activities, and expects the same from its business partners. Suspected cases that are related to business activities can be reported to the central reporting point set up for this purpose.

4. Conflicts of interest

We have regulated conflicts of interest that may arise from overlapping professional and official functions in all of our employment contracts; every secondary activity must be checked and approved by management before being carried out.



Question:

You are negotiating with a service provider where a person close to you is employed in sales (key position). How should you behave?

Answer:

Caution! You are in a conflict of interest and could even unconsciously give the service provider an advantage. Speak to your superior to resolve the conflict in accordance with the requirements of the BH SENS Code of Conduct.

5. Accounting, transparency



Question:

A colleague whose annual budget has already been exhausted asks you whether some costs for a service provider can be booked with you since you still have enough budget. Are you allowed to do that?

Answer:

The deliberate incorrect allocation of costs constitutes manipulation of financial records. The booking must always be made according to the cause! Exceptions must be discussed with management.

We value transparency in our business documents. All records or reports, such as annual financial statements, business reports, audit reports and all other business documents must be accurate, complete and truthful.

6. Money laundering and financing of terrorism

Applicable laws against money laundering and the financing of terrorism as well as trade regulations and restrictions are complied with.

This applies in particular to anti-terrorism regulations, compliance with embargoes as well as bans and approval requirements in connection with the movement of goods, the use of technologies and the procurement of services.



Do:

Always record all cash flows in our books and recording systems.

Be vigilant and report unusual transactions or changes to bank details that deviate from the standard process.



Don't:

No establishing of dubious business relationships with partners who do not follow the law and use illegal business practices.

7. Export controls and trade restrictions



Question:

Since BH SENS does not produce military products, I don't have to worry about sanctions and embargoes. Is that correct?

Answer:

No! Sanctions and embargoes are not just about which products are delivered, but also where (possibly to countries for which embargoes have been imposed), to whom (possibly people/companies that have been placed on sanctions lists) and for what.

As a global company, we comply with all national and international trade regulations as well as the legal requirements for import and export control regarding our international trade relationships. These requirements that must be adhered to include the legal regulations on economic sanctions and regulations on combating terrorism.

Each of us contributes to compliance with the laws, regulations and internal regulations in this area.





**Integrity in
the workplace**



8. Equal opportunities, anti-discrimination

Diversity, fairness and respect are a matter of course for us! BH SENS promotes diversity. We value fair and respectful treatment of one another and respect the dignity of the individual. Any form of discrimination based on ethnicity, national or social origin, skin color, gender and age, religion and belief, political activity, trade union membership, sexual orientation, or other personal characteristics is prohibited. We do not tolerate bullying behavior, verbal coercion, physical violence or sexual harassment.

We punish any kind of misconduct with appropriate measures. Arbitrary sanctions, fines, other penalties or disciplinary measures have no place with us.



Do:

Treat everyone respectfully and fairly.

Take action if you witness bullying or discrimination or become aware of it in any other way.

The financial compensation including fringe benefits is based on the applicable legal, collective bargaining and company regulations. We also have a “Benefits for you” program, where additional services are offered.



Don't:

Examples of harassment include:

derogatory comments, jokes, slurs, pranks and insults.

Unwanted physical contact and sexual advances.

9. Occupational safety and health protection

We are committed to adhering to the highest standards of occupational health and safety. We ensure that all employees can work in a safe and healthy working environment. We comply with all relevant laws and regulations and are committed to continually improving our occupational safety and health precautions. We expect our employees, suppliers and service providers to comply with all occupational safety and health protection requirements.



Question:

What should I do if I suspect a safety problem?

Answer:

Stop your activity immediately if there are not safe working conditions. In unsafe situations, contact your supervisor immediately.



10. Information security and data protection



Question:


An important project needs to be finished and I would like to continue working on it from home. Am I allowed to do that?

Answer:

Only use the options that BH SENS offers you for mobile working. Company data may not leave the BH SENS network, for example, be copied to private USB sticks. The use of private devices for company purposes is prohibited.

We protect our knowledge from misuse and unauthorized disclosure! Information, whether physical or digital, represents a particularly important asset for our company that we must protect from any unauthorized access. Sensitive company information may therefore only be used for business purposes.

Information and documents classified accordingly may not be passed on to third parties or unauthorized employees or stored on unencrypted external data carriers, forwarded to private email accounts or made accessible to the public in any other way. We oblige our business partners to protect existing delivery and contractual relationships with BH SENS and thus also our know-how by means of the implementation, monitoring and continuous improvement of technical and organizational measures.



At BH SENS, personal data may only be collected and processed if there is a legal basis and it is necessary in the context of business tasks. Trade and business secrets as well as the rights of third parties, such as patents, copyrights, etc., must be protected.

11. Company property

All employees at BH SENS are encouraged to handle company property properly and carefully and receive regular training.



Do:

Contact your supervisor or works security if an unauthorized person is present at your workplace.

Treat company property with the same care and respect as you would private property.



Don't:

Never use company property or the property of our business partners for your personal gain.

12. Freedom of association and the right to collective bargaining

BH SENS respects the fundamental right to freedom of association and the right to collective bargaining within the framework of national laws and ensures that these are not impaired.

Due to the full adherence to the IG Metall Baden-Württemberg collective agreement, all regulations are adhered to, particularly with regard to pay, working hours and child labor.



Question:

Who can I contact if I am not sure whether the employee representatives need to be consulted on a particular issue?

Answer:

Please contact your local Human Resources department, who will be happy to assist you with this issue.



**Sustainability
and social
responsibility**



13. Child labor, forced labor, working hours

We respect human rights! We adhere to international regulations for the protection of human rights, such as the core labor standards of the International Labor Organization (ILO). We reject any form of child labor within the meaning of the ILO convention and national regulations. Young employees must not be exposed to dangerous, unsafe or health-damaging situations.

We do not tolerate any form of forced labor or involuntary prison labor that violates human rights. We do not tolerate slavery or human trafficking. We also require our business partners to adhere to these standards strictly.



Do:

If you have evidence of human rights violations: do not ignore them, but inform your superior or local management.

14. Donations and sponsorship

We are transparent with donations and sponsorships! BH SENS sees itself as a responsible member of society. That is why we are committed to social issues in various ways, for example through donations and other forms of social commitment. However, we do not support political parties, political candidates or organizations affiliated with or similar to a political party. Donations and sponsoring must always be approved before a commitment is made.



Question:

The local football club asks if BH SENS can sponsor the shirts. How should you react?

Answer:

Contact the local Managing Director and the Compliance Manager and ask for approval.

15. Environmental and climate protection

We are committed to considering environmental and climate protection in all aspects of our business activities. We are committed to the sustainable use of resources, protecting the environment and reducing greenhouse gas emissions.

We comply with all applicable environmental laws and regulations and are committed to minimizing the impact of our activities on the environment. In addition, we respect land, forest and water rights and are committed to a transparent and responsible supply chain.



Do:

Replace business trips with digital meetings wherever possible.

Turn off electrical devices, computers, screens, lights, etc.

Turn down heating and air conditioning.

Avoid waste and suggest improvements.

Our employees receive training to ensure they contribute to an environmentally conscious workplace and work together to achieve our sustainability goals.



16. Sustainability supply chain

There is a separate code of conduct for our suppliers, the content of which is identical to this Code of Conduct.

It is important for us to emphasize the following additional points:

Product responsibility and quality

All products and services must meet the contractually agreed quality and safety criteria upon delivery and be safe to use for their intended purpose. To ensure the health and safety of automotive end customers, the relevant national and international regulations on product responsibility (e.g. product liability, take-back obligations, product labeling, warranty provisions) must be observed by the business partner and agreed with BH SENS.



Do:

Actively ensure product and quality responsibility from the supplier in the form of drawings and contracts.

Active consultation in the supply chain and with service providers to ensure compliance with substance bans and the reporting of conflict materials, for example.

Avoiding minerals from conflict and risk areas

We commit our suppliers to responsible sourcing. Standardized reporting formats are used for communication along the supply chain.

Dealing with substance bans

Substances that are subject to legal restrictions or prohibitions may only be present in the delivered parts, materials or in the products contained therein in accordance with these regulations (e.g. Chemicals Prohibition Ordinance, End-of-Life Vehicles Ordinance, REACH Regulation (EC) No. 1907/2006 as amended).

The Code of Conduct for our suppliers can also be found online at www.bh-sens.com/cocsupplier.



Don't:

No side agreements or verbal agreements.

17. Product responsibility

All BH SENS products and services meet the contractually agreed quality and safety criteria upon delivery and can be used safely for their intended purpose. To ensure the health and safety of automotive end customers, BH SENS complies with the relevant national and international regulations on product responsibility, such as product liability, take-back obligations, product labeling and warranty provisions.



Question:

You suspect that a supplier does not comply with the required quality and safety criteria. How should you react?

Answer:

Contact your supervisor or the responsible quality colleague immediately.

Help and contact

Phone:

+49 7252 970-0

The first point of contact for questions and uncertainties is the respective supervisor. It is the job of our managers to be role models and to ensure that all employees know, understand and apply this Code of Conduct.

In addition, the Managing Directors support all employees with compliance-related topics and questions.

If the topics concern the Whistleblower Protection Act, please contact our internal reporting office at:

a.zimmermann@consilium-zimmermann.eu

**When responsibility
becomes the main thing.
WE are BH SENS.**

Huf Baolong Electronics Bretten GmbH

Gewerbestr. 40

75015 Bretten | Germany

Phone: +49 7252 970-0

E-mail: info@bh-sens.com

www.bh-sens.com