



## CODE OF CONDUCT

### Genesee A&B, LLC (GAB) Policy Statement

GAB aspires to be the best Precision Metal Stamping & Assembly Company in the world, as measured by customers, employees, and shareholders. Part of this vision is to achieve and maintain the position as the sustainability leader in our industry. This means growing sustainably with the greatest integrity and the best environmental performance.

GAB is dedicated to being a responsible employer and a good corporate citizen, with products and solutions that contribute to improving people's lives around the world. All our activities - including the sourcing, manufacturing, distribution and sale of our products - must be conducted with respect and consideration for human rights, for human safety and health, and for the environment.

We strive for continuous improvement with sustainability as a core focus in all our operations.

### Scope of Application

The Code is applicable to all locations and units within GAB, and compliance is required of suppliers.

### Accountability

It is the responsibility of the management to implement and ensure compliance with the Code. This responsibility includes regular education of employees.

Employees are responsible for acting in accordance with this Code. Employees are encouraged and expected to report incidents of non-compliance. There will be no retaliation or other negative consequences for reporting on such incidents.

Employees and managers who violate the Code may be subject to disciplinary action, up to and including dismissal, depending on the facts and circumstances.

### Provisions

**Laws and regulations** --All GAB units and suppliers shall operate in full compliance with relevant laws and regulations applicable to their operations and employment in the countries in which they operate. This is a minimum requirement in all sections of this Code.

**Suppliers** -- All suppliers shall agree to comply with the GAB Code of Conduct and Workplace Standard. It is the responsibility of the supplier to require that their suppliers comply with the provisions in the Code and Standard. On request, the GAB supplier shall be able to inform GAB which suppliers they use, and demonstrate that these have received and understood the provisions in the Code.

Suppliers will ensure that the sourcing of materials in products, parts or components supplied to GAB does not directly or indirectly contribute to human right abuses in conflict-affected and high-risk areas.

**Corruption, bribery and business ethics** -- GAB does not tolerate corruption, bribery or unethical business practices in any form. All GAB units and suppliers, and their employees, shall refrain from offering, giving, demanding or receiving bribes or any other improper benefits.

**Child labor** -- Child labor is not tolerated in any form. Unless local law stipulates a higher age limit, no person younger than the age for completing compulsory education or younger than 15 shall be employed.

For authorized minors, management is responsible for providing age-appropriate working conditions, hours of work and wage, in compliance with applicable local law.

If a child is found working at a site where GAB products or components are produced, all actions taken must be in the best interest of the child, and all remediating actions must be taken to maintain or improve the child's social situation.

**Forced labor** -- Forced, involuntary, or trafficked labor is not tolerated in any form. This includes indentured, bonded, and unapproved prison labor, and other forms of working against one's own will or choice.

**Security arrangements** -- Security practices must at all times be performed in full respect of human rights and applicable legislation. The use of force must be avoided to the extent possible.

**Health and safety** -- All employees shall be provided with a safe and healthy working environment and, when applicable, safe and healthy residential facilities, with applicable local law as a minimum. The unit should take appropriate action to prevent, and manage, potential workplace accidents and illnesses.

**Non-discrimination** -- GAB recognizes and respects diversity and cultural differences. All employees shall be treated strictly according to his or her abilities and qualifications in any employment decisions, including but not limited to hiring, advancement, compensation, benefits, training, layoffs and termination.

**Harassment and abuse** -- No employee shall be subject to physical, sexual, psychological or verbal harassment, intimidation or abuse.

**Disciplinary action and grievances** -- Disciplinary actions shall be conducted in a manner to ensure the fair and humane treatment of employees. No employee shall be subject to corporal punishment. Progressive disciplinary action shall be applied. Employees are encouraged and expected to report concerns and suspected breaches of this Code and are assured that there will be no retaliation or other negative consequences.

**Working hours** -- GAB recognizes the need for a healthy balance between work and free time for all employees. Employees shall not, on a regularly scheduled basis, be required to work a standard work week of more than 48 hours per week or a total work week of more than 60 hours (including overtime).

Except in extraordinary business circumstances, all workers shall be entitled to at least one day off in every seven-day period.

**Compensation** -- Wages, including overtime compensation and benefits, shall equal or exceed the level required by applicable law. Genesee encourages consideration of the cost for meeting basic needs of the workers and their families, as part of defining wage levels.

**Freedom of association and collective bargaining** -- All employees are free to exercise their legal rights to form, join, or refrain from joining organizations representing their interests as employees. No employee shall be subject to intimidation or harassment in his or her peaceful exercise of these rights.

The employees' right to collectively bargain shall be respected.

**Environmental management** -- All units shall operate in full compliance with applicable environmental legislation and Genesee-specific requirements. A management system shall be in place, aimed to continuously improve the unit's environmental standards and performance. Each unit shall identify all relevant environmental aspects and take appropriate actions to address these, including resource consumption, emissions, chemicals and waste.

**Monitoring and compliance** -- The management is responsible for regular and documented monitoring and review of the compliance with this Code by its unit. Management is also responsible for maintaining adequate documentation to demonstrate compliance by its suppliers.

As a condition of doing business with GAB, suppliers must permit GAB and its designated agents (including third parties) to perform audits, including confidential employee interviews.

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