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SCHAEFFLER

Business Partner Code of Conduct | 2024 Schaeffler Group

Transparency, Trust, and Teamwork



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Foreword



Dear Business Partners,

The Schaeffler Group is a publicly listed family company with a strong set of fundamental values that were established by the company's founders. Striving for success means striving to achieve the highest possible quality and to create first-class technology. In this context, the merger with Vitesco Technologies Group AG in 2024 is an important strategic step to give the Schaeffler Group an even more future-oriented positioning. Together, we want to create a Motion Technology Company that builds on the existing strengths of both companies.

In order to operate stronger together in the future, all business activities are based on a clear set of values for responsible business conduct as outlined in this joint Group Business Partner Code of Conduct applicable to all existing and future business partners of the Schaeffler Group.

Responsible business conduct must address increasing due diligence requirements regarding the sourcing of raw materials from conflict-affected and high-risk areas of the world, respect for human rights along the value chain and aiding the halting of climate change as well as meeting the increasing scarcity of resources to ensure sustained business success.

The Schaeffler Group is responding to these challenges by taking into account sustainability aspects in its procurement activities and supplier management and striving to source responsibly wherever possible. In addition, the Schaeffler Group has set a target to achieve climate neutrality in its supply chains by 2040 and has set an internal target of reducing CO₂ emissions by 25% by 2030.

As a global family business with a strong foundation in its values, respect for human rights is an indispensable part of corporate responsibility and corporate culture. The company also expects the same of its business partners. That is one important reason why Schaeffler publishes this Business Partner Code of Conduct, which focuses more strongly on relevant human rights topics. This involves not only compliance with the respective local legal provisions but also orientation towards the policy and the statement on respect for human rights that Schaeffler developed and published in 2023.

To realize these goals and ambitions, the Schaeffler Group relies on the cooperation, commitment, transparency, and trust of its business partners to work together as equals. The Schaeffler Group expects its business partners to meet the social and sustainability standards by which we measure ourselves to jointly rise to the challenge and make a difference.

We strengthen these values by means of a suitable system of monitoring and auditing in addition to active communication with you as Business Partner, and we expect your support to implement these standards and minimum requirements in the upstream and downstream value chain.

On behalf of the Schaeffler Executive Board, I count on your contributions because only by working together can we master the challenges of the future.

Best regards,

A handwritten signature in blue ink that reads "Klaus Rosenfeld". The signature is written in a cursive, flowing style.

Klaus Rosenfeld
Chief Executive Officer
Schaeffler AG

Preamble

INTEGRITY, FAIRNESS, AND MUTUAL RESPECT ARE THE CORNERSTONES WITHIN THE SCHAEFFLER GROUP UPON WHICH ACTIONS AND BUSINESS RELATIONSHIPS ARE BASED. THE SCHAEFFLER GROUP LIVES UP TO ITS CORPORATE RESPONSIBILITY AND THEREBY CREATES THE PREREQUISITES FOR THE GROUP'S SUSTAINED SUCCESS, AND A SUSTAINABLE FUTURE.

This Business Partner Code of Conduct was approved by the Executive Board of Schaeffler AG with the full support of the Schaeffler family.

It describes the standards and minimum requirements of conduct that the Schaeffler Group adheres to and expects the Business Partners to observe as a mandatory basis for business relationships with the Schaeffler Group.

The standards and minimum requirements defined herein are based on fundamental principles of social, environmental and governance responsibility that are consistent with applicable laws and operate in line with established international standards. In situations when the Code goes further than applicable laws and regulations, the Code applies only to the extent permissible under applicable mandatory laws and regulations.

Not all herein defined standards for human rights and related environmental due diligence obligations might be material to the Business Partner's business activities in an equal manner.

The Business Partner is expected to establish a due diligence process and management systems appropriate to its size and business activities, for its own operations and value chain. Thereby identifying, mitigating, and preventing environmental, human rights, and business ethics risks material to its business activities its best ability and within its sphere of influence by means of adequate measures.

The Schaeffler Group expects the Business Partner to make a best and risk-based effort to cascade the herein defined standards and minimum requirements throughout their supply chain, incl. its subcontractors and providers of contract labor.

When entering a business relationship with the Schaeffler Group by order acceptance, placement and / or delivery of product or service, the Business Partner agrees to the defined standards and minimum requirements of this Code. The version published and valid at the time of entering the business relationship with the Schaeffler Group shall apply.



Scope of application

This Business Partner Code of Conduct applies to all natural or legal persons who sell or provide products, processes, or services to the Schaeffler Group¹, either directly or via third parties, e.g., affiliated companies, distribution partners, subcontractors, and agents (hereinafter referred to as “Business Partner”).

¹ The term “Schaeffler Group” refers to i.e., Schaeffler AG and all Group companies in which Schaeffler AG directly or indirectly holds a majority stake.

1 FUNDAMENTAL PRINCIPLES AND CONDUCT REGULATIONS

1.1 Acting with integrity

The Schaeffler Group is a fair and reliable partner, adheres to all applicable laws and regulations, and acts with integrity and transparency towards its Business Partners. After all, transparency generates trust, and trust is the foundation of successful and long-term business relationships. The Schaeffler Group expects the same from its Business Partners. Business Partners must adhere to all applicable laws and regulations in their business activities and along their value chain. In interactions with the Schaeffler Group and other third parties, Business Partners act as fair and reliable partners and in a cooperative manner.

The Schaeffler Group only maintains business relationships with those Business Partners whose business conduct conforms to the standards and requirements of conduct specified in this Business Partner Code of Conduct.

1.2 Handling group assets and information with due care

If any assets of the Schaeffler Group are placed at the disposal of the Business Partner, e.g., machines or operating materials, information technology, software, data, or intellectual property, the Business Partner handles these exclusively in the Schaeffler Group's interest, keeps them in proper condition and protect them against unauthorized access.

1.3 Proper conduct in public

Business Partners refrain from making any public statements relating to the Schaeffler Group or from using the Schaeffler logo for their own purposes without the written approval of Schaeffler Group's Corporate Communications department. In addition, sponsoring activities with a connection to or a reference of business relationships with the Schaeffler Group must be approved in writing by Schaeffler Group's Corporate Communications department.



2 BUSINESS ETHICS

2.1 Anti-corruption and anti-money laundering

Business Partners abstain from any conduct that may give the impression of a business decision being influenced in an impermissible manner. Business Partners refrain from participating in or endorsing any corrupt practices, including the offering or acceptance of bribes, excessive gifts, or hospitality, as well as facilitation payments, including to public officials.

Business Partners neither facilitate nor participate in activities connected with money laundering and the funding of terrorism and report all financial transactions that may give just cause to suspect money laundering to the respective authorities.

2.2 Data protection and data security

Business Partners implement adequate technical and organizational measures to ensure the protection and security of personal data, as well as confidential information, against misuse, loss, destruction, and manipulation. Business Partners uphold the privacy rights of individuals and third parties during all data processing activities, in compliance with all applicable laws and regulations.

2.3 Financial reporting, accurate records and disclosure of information

Business Partners conduct their business activities in a transparent manner and follow the principle of proper accounting and (if applicable) financial reporting at all times. Business Partners disclose financial and non-financial information to the relevant authorities in accordance with applicable regulations.

2.4 Conflicts of interest

Business Partners ensure that their employees avoid and, when a conflict cannot be avoided, disclose situations where their financial or other interests' conflict with job responsibilities, or situations giving any appearance of impropriety.

2.5 Intellectual property rights and prohibition of counterfeit parts

Business Partners respect intellectual property rights as well as the business secrets of the Schaeffler Group and other parties. Business Partners do not introduce counterfeit or any other diverted parts or materials into deliverables and services provided to the Schaeffler Group.

2.6 Technical compliance

Business Partners adhere to technical product-related binding obligations. This means adherence to applicable laws, regulations, and other normative legal acts, the state-of-the-art applicable at the time of the products being put into circulation, as well as contractually agreed technical specifications with the Schaeffler Group to avoid that products harm the life and limb of people or the environment. The Schaeffler Group expects Business Partners to monitor and manage technical compliance risks over a product lifecycle.

2.7 Export controls, trade, and economic sanctions

Business Partners comply with applicable restrictions on the import, export and trade of goods, services, knowledge, software and technology from prohibited countries, regions, companies, entities, or individuals.

Upon request, Business Partners provide the Schaeffler Group immediately with any verification and information related to the business relationships with the Group.

Business Partners are expected to ensure, by means of suitable processes, that business transactions and activities with the Schaeffler Group, as well as with any third party, do not contravene applicable export control and sanction laws and restrictions.

2.8 Fair competition

Business Partners refrain from participating in any practices that infringe competition and antitrust laws and ensure that this expectation is also fulfilled throughout the value chain.

Technical Compliance

2.9 Taxes and customs

Business Partners adhere to applicable tax laws and customs regulations.

2.10 Cyber security

Business Partners are expected to ensure appropriate and effective cyber security measures in accordance with applicable laws, regulations, and industry standards, to protect the confidentiality, integrity and availability of data and IT systems.

The Schaeffler Group recommends its Business Partners to implement end-to-end cybersecurity measurements to safeguard critical IT systems and sensitive information from unauthorized access, to prevent security breaches and to maintain confidentiality.

2.11 Artificial intelligence

The use of artificial intelligence offers great economic potential and is essential for competitiveness. The Schaeffler Group recommends the future-oriented use of artificial intelligence by its Business Partners.

However, those Business Partners that develop or use artificial intelligence are expected to ensure that artificial intelligence is used and handled responsibly in accordance with Schaeffler values, as well as regulatory and ethical requirements.

2.12 Data integrity

Business Partners ensure that products or services delivered to the Schaeffler Group are designed, manufactured, and tested and are suitable for use based on data that is accurate, reliable, and complete.

The Schaeffler Group expects its Business Partners to comply with all data usage rights, in particular the scope of permission or licenses granted to them in relation to data that is provided to them by the Schaeffler Group.

Business Partners are recommended to adopt best practices for state-of-the-art cross-company data exchange regarding data governance, data quality, as well as data sharing.

2.13 Insider information

Insider information, i.e., specific information that, should it become publicly known, could significantly influence the price of listed securities, must be treated as strictly confidential. Business Partners with access to insider information must not use this information for the purpose of trading with securities or other financial instruments, or for any other purpose prohibited by law.

Business Partners are not authorized to pass on insider information to third parties or to utilize it for the purpose of making recommendations regarding the buying or selling of securities or other financial instruments, or for any other purpose prohibited by law.

In case where a Business Partner has been added to an insider list by the Schaeffler Group, the Business Partner must confirm that they acknowledge their obligations arising from their position as insider under legal and administrative regulation in writing.

Anti-Money Laundering

Export Control

Tax



3 PROTECTION OF THE ENVIRONMENT

3.1 Acting with sustainability in mind

Business Partners are expected to develop, implement, and promote a proactive approach to environmental responsibility through environmental protection practices, conserving natural resources and reducing overall environmental footprint of production, goods, and services throughout their life cycle.

Business Partners are expected to observe regulations regarding prohibited and declarable substances, e.g., the End-of-Life Vehicles Directive (ELD Directive), Restriction of Hazardous Substances in Electrical and Electronic Equipment Directive (RoHS Directive), and Registration, Evaluation, Authorization and Restriction of Chemicals Regulation (REACH Regulation), and, upon request, provide the Schaeffler Group with corresponding verifications.

In addition, the requirements of the international Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants, as well as Basel Convention on Hazardous Waste are expected to be observed.

3.2 Climate protection and carbon neutrality

Business Partners are expected to actively protect the climate, for example by increasing energy efficiency, generating, or purchasing renewable energy, as well as taking other measures to reduce CO₂ emissions.

Upon request, Business Partners disclose the carbon footprint, or any other sustainability related information, for products delivered to the Schaeffler Group, or processes and services relating to business activities with the Schaeffler Group.

The Schaeffler Group recommends its Business Partners to set science-based and time-bound emission reduction goals and renewable energy objectives that are aligned with the Paris Agreement and put in place measures that drive forward the decarbonization of the value chain.

3.3 Responsible soil, water, air and noise emission management

Business Partners are expected to systematically monitor, disclose, appropriately control, minimize, and to the extent possible, eliminate emissions contributing to water, air, soil, and noise pollution, as well as excessive water consumption to mitigate adverse impacts that can significantly impact the natural bases required for the production of food or the health of persons.

Business Partners are expected to reduce the consumption of water, effectively reuse, and recycle water with responsible treatment of wastewater discharges. Particularly in areas of water scarcity, water extraction must be minimized and access to drinking water as well as sanitary facilities should be provided.

Where appropriate, Business Partners are expected to assess the environmental impacts of discharges on soil quality to prevent soil erosion, nutrient degradation, subsidence, and contamination.

Business Partners are recommended to assess and prevent potential impacts from flooding as a consequence of rainwater run-off, at a minimum as required by and in accordance with applicable law.

3.4 Responsible chemical management

Business Partners are expected to identify, manage, minimize and, where possible, eliminate the use of restricted substances in their manufacturing processes and finished products and to actively investigate suitable substitutes to ensure regulatory compliance and maintain product and environmental stewardship.

Chemicals and other materials posing a hazard to humans or the environment, are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal of.

3.5 Responsible waste management and circular economy

Business Partners are expected to identify, manage, reduce, reuse, recycle, and responsibly dispose of waste. Every type of illegal treatment or disposal of waste is prohibited.

Business Partners are expected to use natural resources in a sustainable manner by demonstrably reducing consumption of energy, water, raw materials, and supplies. The Schaeffler Group expects its Business Partners to foster a circular economy approach from the design to the manufacturing of products and support the use of sustainable, renewable natural resources.

3.6 Animal welfare

If the business operations of Business Partners involve the risk of harm to animals, Business Partners are encouraged to support animal welfare.

3.7 Biodiversity, land use and deforestation

Business Partners are expected to safeguard protected ecosystems and to ensure that its own business activities do not contribute to or benefit from the illegal conversion of natural ecosystems, including illegal deforestation in accordance with applicable laws and international standards.

3.8 Environmental permits and reporting

Business Partners uphold, maintain, and keep current all required environmental permits, approvals, and registrations and follow their operational and reporting requirements.



4 HUMAN RIGHTS AND WORKING CONDITIONS

4.1 Respect for human rights

Business Partners respect the dignity and human rights of workers, local communities, and other third parties by preventing and addressing adverse impacts on human rights linked to its business activities.

Business Partners are expected to operate in close alignment with

- the UN International Bill of Human Rights,
- the UN Guiding Principles on Business and Human Rights,
- the ten principles of the UN Global Compact,
- the core labor standards of the International Labor Organization (ILO),
- the OECD Guidelines for Multinational Enterprises.

4.2 Prohibition of child labor and protection of young workers

Business Partners do not tolerate child labor of any kind within its own operations or value chain. Business Partners observe the minimum employment age, that must not be lower than the school-leaving age of the country of business activities or be below 15 years of age.

Persons under the age of 18 are in need of special protection and must not be hampered in their development and education. Business Partners ensure that persons under the age of 18 do not perform work which, due to its nature or the circumstances in which it is performed, would endanger their safety, health, or morals.

4.3 Prohibition of forced labor and modern slavery

Business Partners do not tolerate forced or compulsory labor, modern slavery, involuntary or exploitative labor, bonded labor, human trafficking, or other forms of exploitation defined as work required of a person, under threat of punishment, or for which the person has not volunteered as well as human trafficking.

Business Partners prohibit physical punishment and does not violate a person's right to freedom of movement. Employees must be able to leave factory premises at any time without giving reasons.



The Schaeffler Group expects its Business Partners to implement adequate measures to identify, prevent, mitigate, and monitor forced labor risks and violations and to support the Schaeffler Group in meeting applicable reporting, disclosure and import requirements.

4.4 Ethical recruiting

Business Partners do not mislead or defraud potential employees. This includes providing false information regarding the nature of work, working conditions, benefits, working location, accommodation, as well as associated costs.

Business Partners must not require recruiting fees prohibited by applicable local laws and should align its recruiting practices with international standards. Employees' identity documents must not be confiscated, manipulated, or destroyed or employees by other means restricted in accessing their identification documents.

Employees of Business Partners receive a written contract or employment notification containing an accurate and truthful description of their rights and responsibilities. The document must be provided in a language that is accessible to the employee according to local law. The Schaeffler Group expects its Business Partners to provide the document before any activities that are related to the assumption of work, at the latest on the day of commencement of work.

4.5 Promotion of health and safety

Business Partners ensure health and safety at work and to protect their employees against work-related hazards in the form of accidents, hazardous substances, and excessive physical and mental stress by meeting or exceeding applicable local laws for safety and occupational health, as well as fire safety legislation. Business Partners provide their employees with the necessary working tools, materials, and adequate protective equipment.

Business Partners are expected to organize working hours and overtime in such a way that occupational accidents due to physical and mental fatigue are avoided and the health of employees is maintained.

Business Partners are expected to implement and operate an adequate occupational health and safety management system for its own operations and value chain, including its subcontractors. Focus must be placed on employees who are in particular need of protection, such as minors, pregnant employees, and persons with physical impairments. Upon request, Business Partners provide the Schaeffler Group with a corresponding certificate or provide evidence in another suitable manner.

Business Partners are recommended to systematically investigate the root cause of incidents and maintain a corrective action system to ensure that measures that have been taken to minimize the chance of a recurrence are implemented. Business Partners are encouraged to develop emergency preparedness and response plans and to continuously improve working conditions and provide all employees with regular access to relevant training.

4.6 Respect of freedom of association and right to collective bargaining

Business Partners respect the employees' right to associate freely, join or not join labor unions, bargain collectively, seek representation and join worker's council. Business Partners do not use security forces to interfere with freedom of association.

Business Partners seek engagement with its employees in good faith and allow their employees to communicate openly regarding working conditions without fear of reprisal, intimidation, or harassment.

4.7 Prohibition of discrimination and promotion of diversity

Business Partners treat all people with respect and dignity and strive to develop and promote inclusive cultures where diversity is valued and celebrated. No person must be exposed to or threatened with rough or inhumane treatment in the workplace. This particularly includes sexual harassment, corporal punishment, mental and physical coercion, insults, and the verbal abuse of employees in its employment lifecycle.

Business Partners prohibit discrimination or harassment of any kind including discrimination based on age, gender, sexual orientation, ethnicity or national origin, disability, pregnancy, religion or ideology, political affiliation, union association, genetic information or marital status, skin color, social background, or other characteristics protected by law. Business Partners provide equal opportunities in employment and apply the principle of equal pay for equal work.

The Schaeffler Group expects its Business Partners to promote women's rights and to protect vulnerable groups among its employees by suitable means.

4.8 Promotion of adequate compensation and working hours

Business Partners pay adequate wages and comply with all applicable local labor regulations, e.g., regarding working hours, remuneration, and social benefits. Business Partners ensure that overtime does not exceed the legally defined limits.

Compensation must be at least in accordance with the locally applicable minimum wage regulations and unauthorized wage deductions or the withholding of wages as a disciplinary measure is prohibited. Social benefits may be claimed by employees in accordance with applicable laws (e.g., sick leave). If statutory social insurance exists, payment of the contributions shall be mandatory.

4.9 Use of public and private security personnel

Business Partners using its own security personnel to protect their operations must ensure that the employed security forces receive adequate instruction and training and observe the prohibition on harassment, abuse, and punishment or any other form of violence at work.

In case of the commissioning of security personnel, Business Partners must not hire or use private or public security forces if, due to a lack of instruction or control on the part of the company, the prohibition of torture and cruel, inhuman, or degrading treatment is disregarded, or life and limb are injured in any other way.

4.10 Protection of human rights defenders

The Schaeffler Group expects their Business Partners to not interfere with the work of human rights defenders in accordance with applicable laws and to respect their right to freedom of expression, peaceful assembly, and freedom of association. A human rights defender is defined as an individual or group who acts to promote, protect, or strive for the protection and realization of human rights and fundamental freedoms through peaceful means.

Business Partner are expected to speak out against any form of intimidation, threat, defamation, or criminalization of human rights defenders and to seek dialog with human rights defenders in good faith.

4.11 Protection of local communities and indigenous peoples

Business Partners are expected to respect the rights of local communities and Indigenous peoples on decent living conditions, education, employment, and social activities. Business Partners respect the right to Free, Prior, and Informed Consent (FPIC) where their business activities affect them and the lands on which they live, with particular consideration for the presence of vulnerable groups.

4.12 Protection of land rights and prohibition of forced evictions

Business Partners avoid forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests, and waters that violate legitimate tenure rights.

5 RESPONSIBLE SUPPLY CHAIN MANAGEMENT

5.1 Due diligence and responsible purchasing

The Schaeffler Group expects its Business Partners to conduct due diligence on their direct suppliers and subcontractors in accordance with the OECD Due Diligence Guidance for Responsible Business Conduct appropriate to their size and circumstances to promote transparency and traceability.

The Schaeffler Group recommends its Business Partners to develop and implement responsible purchasing practices in line with applicable law, following a risk-based approach, and according to their respective size and capacity.

5.2 Responsible sourcing of conflict minerals and critical raw materials

The Schaeffler Group maintains an adequate due diligence system for Conflict Minerals and Critical Raw Materials, including the 3TG materials tin, tantalum, tungsten, and gold, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the Responsible Minerals Assurance Process (RMAP).

Business Partners that use raw materials that originate from conflict-affected and high-risk areas in their products or transport those through conflict-affected areas must maintain an adequate due diligence process in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas to minimize the risk of actual and potential adverse impacts along the value chain.

Business Partners must identify the presence and source of minerals by using the Responsible Minerals Initiatives (RMI) reporting templates on a regular basis and provide this information upon request to the Schaeffler Group. This information serves as the basis for Schaeffler Group's reporting and is made available to the Group's customers upon request in the form of the Conflict Minerals Reporting Template (CMRT), Extended Minerals Reporting Template (EMRT) and Pilot Reporting Template (PRT).



Business Partners must exclude smelters or refiners for the abovementioned raw materials that have not been declared conformant by the RMI audit protocols.

The Schaeffler Group recommends its Business Partners to source raw materials in their supply chains from audited sources, such as Responsible Minerals Initiative or Standard for Responsible Mining from the Initiative for Responsible Mining Assurance (IRMA) certified locations.

6 COOPERATION AND IMPLEMENTATION

Business Partners will have a greater impact on, and a better chance of identifying, preventing, mitigating, and remediating adverse environmental or social impacts in their organizations and value chains by working together.

Business Partners should collaborate and, unless stricter binding legal standards apply, at a minimum make a best and risk-based effort to take corresponding measures to ensure their operation is consistent with the standards and minimum requirements of this Business Partner Code of Conduct. Business Partners are expected to act transparently, constructively, cooperatively, and with due diligence in relation to the Schaeffler Group and to cascade the standards and minimum requirements of this Business Partner Code of Conduct to its business partners and subcontractors.

The Schaeffler Group expects active participation and support from its Business Partners. Upon request, Business Partners provide the Schaeffler Group with complete and accurate materials and information on its due diligence process and required management systems. Business Partners acknowledges the right of the Schaeffler Group to audit the due diligence processes and management systems to verify that they are operating consistent with the requirements of this Business Partner Code of Conduct, if there is evidence of an increased risk of a violation.

Business Partners are expected to participate in derived action plans or training on adequate due diligence processes and expectations of the Schaeffler Group upon request. The Schaeffler Group encourages its Business Partners to use standardized tools and shared solutions.

The Schaeffler Group insists on transparency and compliance, and non-conformance with the standards and minimum requirements defined in this Business Partner Code of Conduct or applicable reporting obligations may result in withdrawal of business relationships with the Schaeffler Group. This also applies if Business Partners do not cooperate appropriately or fail to take necessary or agreed measures.



7 REPORTING OF MISCONDUCT AND WHISTLE- BLOWING SYSTEM

Improper behavior of any kind will be actively addressed within the Schaeffler Group. The Schaeffler Group whistleblowing system is available to its Business Partners, their employees or other third parties. Whistleblowers are encouraged to speak up freely and without fear of repressive measures and to report any violation of the standards and requirements defined herein to the Schaeffler Group using the Schaeffler Group's whistleblowing system.

7.1 Reporting of misconduct

If Business Partners become aware that provisions of this Business Partner Code of Conduct have been violated in its own business area or in its value chain, Business Partners must immediately take appropriate remedial action. In addition, Business Partners are expected to inform the Schaeffler Group (investigations@schaeffler.com) immediately of any confirmed violation of obligations arising from the Business Partner Code of Conduct, that occurred in their own business area, their value chain or of any other official investigation. Business Partners include an equivalent reporting obligation in contracts with subcontractors, where subcontractors being required to submit the corresponding whistleblowing reports to the Business Partner.

The Schaeffler Group expects its Business Partners to support in clarifying the facts should either the Schaeffler Group or the Business Partners become aware of a potential compliance violation related to their business relations.

7.2 Whistleblowing system

Notifications about violations, specifically illegal business practices or potential human rights violations, can be made at any time using the Schaeffler Group's whistleblowing system. This system is available in a number of languages and allows anonymous, confidential, specially encrypted, secure communication with the investigation team of the Schaeffler Group's Compliance and Corporate Security department.

Business Partners must use their reasonable best efforts to make their employees, as well as value chain and potential affected stakeholders, aware of the available Schaeffler Group channels for reporting misconduct. Business Partners are expected to make a grievance mechanism in line with UN Guiding Principle 31 available to rightsholders potentially affected by their business activities, or at a minimum support or recommend an existing external grievance mechanism.

The mechanism must allow concerns related to business ethics, human rights, or any other risks addressed in this Business Partner Code of Conduct to be raised anonymously, confidentially and without retaliation.

The Schaeffler Group's whistleblowing system can be reached by the following means:

Post	Schaeffler AG Forensics and Investigations Industriestrasse 1 – 3 91074 Herzogenaurach Germany
24/7 telephone hotline	+49 30 99257146 (German, English, French) Availability by phone in other languages: Spanish +1 213 2791015 Portuguese +55 61 35507564 Chinese 10800-320-0116 (only to be reached with the provider China Telecom)
If you are asked to enter a Company Access Pin, please enter: 3758	
E-mail	investigations@schaeffler.com
Online reporting channel	https://www.bkms-system.net/schaeffler

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