



Astemo
Mobility Beyond

Astemo's Expectations of Business Partners

Astemo, Ltd.
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While seeking to work with business partners who operate at the highest standards of integrity and quality, Astemo is committed to conducting business ethically and legally. It expects business partners to adhere to behaviors consistent with the Astemo Group Code of Ethics and Business Conduct as well as applicable laws and regulations.

Astemo also expects business partners to understand the importance of aligning with Astemo's Mission, Vision and Values, while conducting business in a manner that does not adversely affect people and our planet. As a Astemo business partner, Astemo expects you to abide by and communicate these expectations to your employees, contractors, and business partners when working with or on behalf of Astemo.

Based on our core MISSION, VISION, and VALUES, we at Astemo have aimed to contribute to realizing a sustainable society and prosperous lives by providing world-leading advanced mobility solutions. Contributing to the development of automotive societies around the world, we have grown together with people who hold diverse values. This growth has been the result of our ethical approach to our customers and society.

Amidst the great change in the environment surrounding Astemo's business, the expectations of our customers and society at large are becoming more advanced and broader with each passing year. To meet those expectations and further strengthen the trust of our stakeholders in Astemo, each of us must act ethically in accordance with our MISSION, VISION, and VALUES.

Therefore we have created the Astemo Group Code of Conduct, which establishes the standards of behavior that should be practiced by Astemo Group colleagues around the world. We ask that each of you be aware that your actions represent Astemo, and that you behave ethically in accordanc

MISSION • VISION • VALUES



MISSION = WHY

Astemo's "reason to exist" and "mission to be fulfilled" in society

VISION = WHAT

The "desired state" that Astemo should strive to achieve in 10 years

VALUES = HOW

The "values" and "decision-making standards" that each person at Astemo upholds and prioritizes

Astemo is committed to complying with applicable laws and regulations while upholding the highest standards of business ethics and conduct. As an Astemo business partner, you are expected to promote transparency and accountability in your business activities, including the implementation of effective processes and procedures to:

Prevent bribery and corruption, complying with applicable anti-bribery and anti-corruption laws and regulations. Refrain from offering or accepting anything of value to maintain or secure business, or to gain an unfair advantage. Refrain from making facilitation payments on behalf of Astemo unless there is an immediate threat to life, safety, security, or freedom. If you make a payment under these circumstances, notify Astemo immediately.

Give and receive gifts and entertainment responsibly. Refrain from offering or receiving gifts and entertainment on Astemo's behalf that are contrary to local laws or could be perceived as unduly influencing a business decision. Do not provide Astemo with cash or cash-equivalent gifts.

Conduct business transactions with transparency while accurately recording and classifying transactions in your company's accounting books and records. Do not keep hidden financial accounts or unrecorded funds. Report relevant information in accordance with applicable laws and regulations.



For security trade control, comply with national and international trade compliance laws, export control regulations, economic sanctions, and customs laws that control international transactions of products and services. Obtain the required export licenses before proceeding with any exports and comply with the license terms or any exemption requirements.

Compete fairly and comply with antitrust and competition laws in all countries in which you do business with, or on behalf of, Astemo. Refrain from entering into an agreement with a competitor to divide markets or customers, fix prices, manipulate the competitive bidding process, or exchange or discuss Astemo's confidential, sensitive information. Refrain from abusing or exploiting a dominant market position to secure unfair terms or to unfairly consolidate or strengthen market power.

Prevent money laundering and comply with anti-money laundering as well as anti-terrorism laws and regulations. Avoid activities associated with criminal acts, including money laundering or terrorist financing.



Identify and manage conflicts of interest and avoid situations in which personal interests, outside activities, financial interests, or relationships conflict or appear to conflict with the interests relating to Astemo activities. Do not allow business dealings with, or on behalf of, Astemo to be influenced by personal considerations or relationships.

Conduct due diligence regarding your business partners and mitigate risks discovered before they begin working for or on behalf of Astemo. Monitor their performance to ensure they meet your and Astemo's expectations.

Astemo works to create a healthy, safe, and secure work environment. As an Astemo business partner, you are expected to:

Understand and follow Astemo's health and safety requirements when working with or on behalf of Astemo.

Develop a safe, secure, and healthy workplace for everyone involved in Astemo business activities.

Comply with applicable laws and regulations regarding health and safety.

Continually be involved in health and safety activities to prevent occupational injuries and sickness.

Through its social innovation business, Astemo will address environmental issues and achieve a higher quality of life as well as contribute to realizing a sustainable society. As an Astemo business partner, you are expected to:

Understand and follow environmental laws and regulations that apply to Astemo business activities.

Understand the direct and indirect effects of your business activities on the environment and minimize adverse effects such as carbon dioxide emissions, pollution, or waste.



Astemo conducts business in a way that supports and respects the human rights of all those involved in Astemo's business activities while following international conventions on human rights, labor laws, national laws and regulations. As a Astemo business partner, you are expected to:

Respect human rights, abide by international standards, and avoid causing or contributing to a negative impact on human rights.

Comply with applicable laws, rules, and legal requirements for abolishing slavery and all forms of forced or compulsory labor.

Not permit child, forced, or trafficked labor.

Comply with Astemo's commitment to human rights, uphold the human rights of workers, and treat them with dignity and respect.

Promote equal employment opportunities. Do not discriminate against anyone involved in your business activities.

Respect employees' freedom of association and the right to collective bargaining.



Astemo is committed to handling confidential business information responsibly. Astemo takes precautions to protect Astemo's and business partners' information from unauthorized access and disclosure, following applicable data protection laws when handling employees' personal data. As an Astemo business partner, you are expected to:

Handle Astemo's confidential business information with care, protecting it from attacks, disclosure, or misuse.

Protect non-public information of Astemo by adopting industry best practices.

Observe and adhere to all applicable data privacy laws and regulations on the collection, processing, and securing of Astemo employees' personal data.

Respect the intellectual property of Astemo and provide appropriate protections before using Astemo's intellectual property.



Speak up and Report a Concern

Astemo encourages everyone who works for or represents Astemo to speak up whenever they have a concern or see something wrong. As an Astemo business partner, you are expected to:

Create an environment to freely voice concerns in your organization, not tolerating any form of retaliation against individuals who raise concerns in good faith or who participate in investigations.

Have effective channels available for your employees, contractors, and business partners to raise concerns regarding violations, potential misconduct, unethical behavior, or unsafe actions.

Have adequate processes in place to ensure concerns are taken seriously, evaluated and managed appropriately, and treated with the utmost confidentiality.

Contact Astemo to report any violations, or suspected unethical or potentially harmful acts involving Astemo's business activities. You may inform a member of Astemo's management or use the Astemo Global Compliance Hotline, which is available 24/7 and allows anyone to remain anonymous, where permitted by law.

Share the contact details of the Astemo Global Compliance Hotline with your employees, contractors, and business partners who work for or on behalf of Astemo. The contact details are provided below.



[To reach the Astemo Group Compliance Hotline](#)

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