

# METEOR

## Corporate Social Responsibility Code of Conduct



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## Preamble

The following code of conduct constitutes the corporate social responsibility of the Meteor group and pictures the voluntary self-commitment of Meteor which represents Meteors own expectation as well as the expectation of the shareholder. Meteor knows its responsibility as a corporate citizen and acts according to this. This code of conduct founds on the moral standards of the United Nations, International Labor Organization and the Organization for Economic Cooperation and Development.

The self-commitment of this CSR – Code of Conduct expresses the aspiration of Meteor for fair and sustainable standards in labor and social conditions, engagement for the environment, and customer dialogue. Meteor is convinced that high standards in product quality and manufacturing processes are going together and that both are legitimate expectations of our partners and customers.

This Code of Conduct endeavors Meteor to constant improvement of performance, product and supply quality, worldwide. Every local Meteor company can set higher standards than they are written down in this Code of Conduct.

All standards of this Code of Conduct effect every person at Meteor. In addition, Meteor spreads these standards to all partners in its supply chain, these include e.g. suppliers, vendors, consultants, independent contractors, agents. Supply chain compliance with the commitments is of utmost importance. Meteor is responsible to establish standards and improve and implement necessary measures according to the code of conduct.

## A. General Regulations

### *Anti-Corruption and Anti-Money Laundering*

Meteor does not participate in or endorse any corrupt practices in whatever form, including offering or accepting bribes, excessive gifts or hospitality or facilitation payments. Meteor does not facilitate or supports money laundering. We report any suspicious transactions and are alert for signs of money laundering.

### *Data Protection and Data Security*

Meteor respects the privacy and civil liberties in respect of the collection, retention, use or dissemination, as well as any other processing of personal data.

### *Financial Responsibility/Accurate Records*

Meteor performs its business dealings in a transparent manner and accurately reflects them in the companies' financial reports and filings. Suppliers should confirm an adequate financial reporting system control is in place.

### *Disclosure of Information*

Meteor discloses financial and non-financial information in accordance with applicable regulations and prevailing industry practices.

### *Conflicts of Interest*

Meteor ensures that its employees avoid and disclose situations where their financial or other interests could conflict with job responsibilities, or situations giving any appearance of impropriety.

#### *Counterfeit Parts*

Meteor minimizes the risk of introducing counterfeit and/or diverted parts and materials into deliverable products and adhere to relevant technical regulations in the product design process.

#### *Intellectual Property*

Meteor respects all valid intellectual property rights.

#### *Export Controls, Trade, and Economic Sanctions:*

Meteor complies with applicable restrictions on the export or re-export of goods, software, services and technology, as well as with applicable restrictions on trade involving certain countries, regions, companies or entities and individuals.

#### *Grievance Mechanism*

Meteor establishes an effective grievance mechanism in line with UN Guiding Principle 31 that allows concerns related to business ethics, human rights, or any other topic to be raised anonymously, confidentially and without retaliation.

#### *Remediation*

Meteor provides for or cooperates in remediation through legitimate processes when its business activities cause or contribute to adverse environmental or social impacts.

#### *Non-retaliation*

Meteor avoids any form of threats, intimidation, and physical or legal attacks against stakeholders, including those exercising their legal rights to freedom of expression, association, peaceful assembly and protest against its business activities.

## **B. Environment**

At Meteor we recognize the urgent need to address the impact of greenhouse gases (GHGs) on global warming. Energy efficiency is a crucial aspect of our efforts. We are also dedicated to embracing renewable energy sources. Furthermore, we are actively pursuing decarbonization throughout our value chain. By implementing emission reduction strategies, investing in low-carbon technologies, and collaborating with partners, we aim to minimize our carbon impact and foster a greener business ecosystem. Meteor fulfills the legal requirements regarding the environment and uses natural resources responsibly.

#### *Carbon Neutrality*

Meteor strives 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 entire value chain.

#### *Water Quality, Consumption & Management*

Meteor minimizes water consumption, effectively reuses and recycles water with responsible treatment of wastewater discharges and prevents potential impacts from flooding as a consequence of rainwater run-off, as required by and in accordance with applicable law.

#### *Air Quality*

Meteor routinely monitors and discloses, appropriately controls, minimizes, and to the extent possible, eliminates emissions contributing to air pollution, as required by and in accordance with applicable

law. Meteor assesses cumulative impacts of pollution sources at its facilities and mitigate its pollution levels accordingly.

#### *Responsible Chemical Management*

Meteor identifies, minimizes, and eliminates the use of restricted substances in manufacturing processes and finished products to ensure regulatory compliance. Meteor is also aware of any use of restricted substances in processes and finished products, and actively investigates suitable substitutes to maintain product and environmental stewardship.

#### *Circularity*

Meteor promotes closed loop systems by supporting the use of sustainable, renewable natural resources while reducing waste and increasing reuse and recycling.

#### *Animal Welfare*

Meteor respects the five animal freedoms formalized by the World Organization for Animal Health (OIE) concerning animal welfare. No animal should be raised and killed for the single purpose of being used in an automotive product.

#### *Biodiversity, Land Use and Deforestation*

Meteor protects ecosystems, especially key biodiversity areas, impacted by its operations, and avoids illegal deforestation in accordance with international biodiversity regulations, including the IUCN Resolutions and Recommendations on Biodiversity.

#### *Soil Quality*

Where appropriate, Meteor monitors and controls its impact on soil quality to prevent soil erosion, nutrient degradation, subsidence and contamination.

#### *Noise Emissions*

Where appropriate, Meteor monitors and controls the levels of industrial noise to avoid noise pollution.

## **C. Human Rights and Working Conditions**

Meteor respects the human rights of workers, local communities, and other relevant stakeholders, prevents and addresses adverse human rights impacts linked to its business activities, in accordance with the UN Guiding Principles on Business and Human Rights.

#### *Child Labor and Young Workers*

Meteor observes the minimum employment age in their business activities and throughout their supply chain in accordance with the ILO Minimum Age Convention and shall ensure that child labor is not tolerated in any form.

#### *Wages and Benefits*

Meteor provides their workers with remuneration in accordance with applicable regulations and prevailing industry practices; such remuneration should be adequate to cover basic needs and enable a decent standard of living for the workers and their families, which includes respecting minimum wages, overtime compensation, medical leave, and government-mandated benefits.

#### *Working Hours*

Meteor complies with local laws and collective bargaining agreements (where applicable) regarding working hours or should comply with the ILO Standards on Working Time\* in the absence of relevant local regulations.

#### *Modern Slavery*

Meteor prohibits any forms of forced, bonded or compulsory labor, including human trafficking.

#### *Ethical Recruiting*

Meteor does not mislead or defraud potential workers about the nature of the work, ask workers to pay recruitment fees, and/or confiscate, destroy, conceal, and/or deny access to worker passports and other government-issued identity documents. Workers must receive a written contract or employment notification at the start of their recruitment in a language well understood by them, stating in a truthful, clear manner their rights and responsibilities.

#### *Freedom of Association and Collective Bargaining*

Meteor allows workers to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation, or harassment. Meteor respects worker rights to associate freely, to join or not join labor unions, bargain collectively, seek representation and join workers' councils.

#### *Non-Discrimination and Harassment*

Meteor does not tolerate any form of discrimination or harassment in respect of employment and occupation and provides equal employment opportunities regardless of worker or applicant characteristics such as age, gender, sexual orientation, gender identity, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union association, covered veteran status, genetic information, or marital status.

#### *Diversity, Equity, and Inclusion*

Meteor develops and promotes inclusive cultures where diversity is valued and celebrated, and everyone can contribute fully and reach their full potential. Meteor encourages diversity in all levels of their workforce and leadership, including boards of directors. *Women's Rights*  
Meteor provides equal opportunity in employment and commits to equal pay for equal work.

#### *Rights of Minorities and Indigenous Peoples*

Meteor respects the rights of local communities to decent living conditions; education, employment, social activities; and the right to Free, Prior, and informed Consent (FPIC) to developments that affect them and the lands on which they live, with particular consideration for the presence of vulnerable groups.

#### *Land Rights and Forced Eviction*

Meteor avoids forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.

#### *Private or Public Security Forces*

Meteor does not commission or use private or public security forces to protect the business project if, due to a lack of training or control on the part of the company, the deployment of the security forces may lead to violations of human rights.

## D. Health and Safety

Meteor provides workers a safe and healthy working environment that meets or exceeds applicable local laws and industry standards for safety and occupational health. Meteor implements a management system for a safe and healthy working environment.

### *Workspace*

Meteor provides a working environment that meets or exceeds local and national safety, occupational health, and fire safety legislation, in addition to encouraging remote workers to understand and apply best practices.

### *Personal Protective Equipment*

Where applicable, Meteor provides its workforce with necessary Personal Protective Equipment (PPE) and ensures that the personnel understands how and when it needs to be applied.

### *Emergency Preparedness*

Meteor reduces the risk of occupational hazards and develops an emergency preparedness and response plan.

### *Incident and Accident Management*

Meteor implements hazard and risk analysis systems to minimize the potential for incidents or accidents at the workplace. An investigation system drives to determine the root cause, and a corrective action system ensures all permanent measures have been taken to minimize the chance of a recurrence.

### *Contractors*

Meteor properly manages the health and safety of contractors as part of a company's extended supply chain. Meteor coordinates its procurement processes to identify hazards and to assess and control risks arising from the contractor's business activity with Meteor, and the company's business activity that impacts the contractors' workers.

### *Machine Safety*

As a responsible company, safe use and maintenance of machinery in the workplace a crucial aspect of our commitment in reducing the number of accidents and injuries in the workplace. We understand that regular maintenance plays a vital role in preventing malfunctions, minimizing downtime, and ensuring a safe working environment for our employees.

### *Workplace ergonomics*

Through our commitment to workplace ergonomics with the aim of reducing strain, fatigue and injuries, we aim to create a culture that promotes employee well-being, reduces the risk of injuries, by improving product design and workspace arrangements. This includes desk height, chair height, manual handling and heavy lifting.

### *Handling of chemicals and/or biological substances*

We provide guidance to our employees on how to handle chemicals and/or biological substances without harm to health. We strive to adequately control exposure to agents/substances, both chemical and biological, in the workplace, that cause ill health.



### *Fire protection*

In ensuring the safety of building occupants and assets, fire protection systems are vital. Meteor ensures that the workplace has smoke alarms, fire exit signs and lighting, fire escape ladders and if necessary, and fire prevention systems such as fire extinguishers and sprinklers.

## **E. Responsible Supply Chain Management**

Meteor selects business partners that comply with the practices of responsible business conduct and cascade the Guiding Principles along the supply chain. Meteor implements a supplier management system.

### *Due Diligence*

Meteor conducts due diligence on its direct suppliers and subcontractors in accordance with the OECD Due Diligence Guidance for Responsible Business Conduct, promotes transparency and traceability and uses its best efforts to implement the ESG standards further along the supply chain, and cascade the Guiding Principles further along the supply chain.

### *Responsible Sourcing of Raw Materials and Minerals*

Meteor sources raw materials and minerals used in its products by developing a management system that promotes supply chain traceability and transparency, and by implementing due diligence measures in accordance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

### *Fair Competition and Anti-Trust Compliance*

Meteor commits itself to fair competition practices and adherence to anti-trust laws and regulations. Meteor requires these standards from its suppliers as well. Suppliers are required to define and implement similar fair competition and anti-trust standards within their own supply chains, specifically targeting their tier-1 suppliers. These requirements aim to foster fair competition while promoting sustainability in the supply chain, creating a level playing field for all stakeholders involved.

## **F. Execution of Code of Conduct**

For the execution of standards of this Code of Conduct Meteor implements processes and trains all employee to the intentional behavior.

### *Forced Labor*

To prevent any kind of forced labor, the local plant managers revise working conditions of employees, business partners and suppliers on a regular base. This happens in a reasonable pattern and only in an expected and accepted way. No executive of Meteor can hire employees from a suspicious source if there is any doubt to promote forced labor. If any doubt of forced labor is upcoming, the person who recognizes the forced labor must claim it to the compliance manager via email to [compliance@meteor.de](mailto:compliance@meteor.de).

### *Child work*

The local executives mustn't hire employees under the minimum age written down in this Code of Conduct. Local HR proves the identity of an employee before the signing of a labor contract. In case of



any doubt about the age of an employee, local executives are instructed to prove the employee's identity. The work conditions and legal requirements of employees under the age of 18 refer to local legal restrictions. The local executives are responsible to comply with the law. Children under the age of 15 are prohibited in manufacturing areas.

#### *Harassment*

Physical integrity and human dignity are ultimate purposes of Meteor for the employees. Meteor stands for a zero tolerance against any kind of harassment. Whenever any local executive gains knowledge, that an employee suffers from corporal punishment, sexual, mental, or verbal harassment he/she immediately must intervene. The offender must be punished with further labor and legal consequences.

#### *Compensation*

Local HR Managers report minimum legal compensation to the local executives. Local HR is responsible to check minimum wage and compare with the local salary levels at Meteor. Before any contractor can work with Meteor, local HR must ensure, that the contractors pay minimum wages. Paychecks must be clear and easy to understand.

#### *Working Hours*

Local HR provides adequate measures to keep and document the working hours at Meteor. A measure is adequate if it is either digital or paper based and fulfills the local legal requirements. Local executives are responsible for granting sufficient time for recovery to the employees.

#### *Antidiscrimination*

Local HR provides non-discrimination work environment and divers and non-discriminating internal and external recruiting processes. Local executives supervise the processes.

#### *Health and Safety*

Local executives are responsible to ensure and improve health and safety standards due to local legal requirements. In addition, Meteor sets high standards for a healthy and safe work environment. Further standards are directed by internal operating instruction papers, trainings, and on-going safety instructions. Only fulfilling minimum standards is not satisfying for Meteor.

#### *Freedom to form a coalition*

No employee will be discriminated by the fact, that he is a member of a union, works council, or party. Meteor allows union work in patters and under the restrictions of law.

#### *Environment*

Meteor supports and enhances the "Automotive Industry Guiding Principles to Enhance Sustainability Performance in the Supply Chain". Local executives make sure, that the principles are known by local management teams and that the guiding principles are implemented in all sequential steps of the supply chain. Further local legal requirements are prior to the principles.

Bockenem, January 2025

CEO

Christian Schneider