

SUPPLIER CODE OF CONDUCT



LINK[®] driven to *outperform*[®]



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1.0 PURPOSE

A Supplier Code of Conduct is a set of guidelines and expectations that Link establishes for its suppliers to ensure ethical, social, and environmental responsibility throughout the supply chain. The purpose of such a code is to promote responsible business practices, sustainability, and compliance with legal and ethical standards. As stated in our Code of Conduct Policy *“Link prefers to work with component suppliers, consultants, distributors, and other business partners that share the principles expressed in this Code of Conduct. Link encourages its business partners to apply standards of business conduct consistent with the principles of this Code of Conduct to create a sustainable and robust supply chain.”*

2.0 SCOPE

As a supplement to Link’s Code of Conduct, Terms & Conditions, and Supplier Quality Manual, the contents of this Supplier Code of Conduct policy apply to all OEM Link suppliers of materials and services.

3.0 RESPONSIBLE SOURCING

Link and its suppliers shall implement appropriate measures to avoid or refrain from using substances and materials with adverse effects on the environment or health of its team members or that come from unapproved conflict-affected and high-risk areas. We will comply with all applicable import and export laws. Link and its suppliers will make decisions solely based on objective criteria to avoid conflicts of interests, breaches of confidentiality and intellectual property rights, and all forms of corruption.

4.0 SUPPLY CHAIN SUSTAINABILITY

Along with Link, our suppliers shall implement appropriate measures to avoid or refrain from using substances and materials with adverse effects on the environment or health of its team members or that come from unapproved conflict-affected and high-risk areas. We will comply with all applicable import and export laws. Suppliers shall make decisions solely based on objective criteria to avoid conflicts of interests, breaches of confidentiality and intellectual property rights, and all forms of corruption.

Requirements on Business Partners

Link prefers to work with component suppliers, consultants, distributors, and other business partners that share the principles expressed in our Code of Conduct. Link encourages its business partners to apply standards of business conduct consistent with the principles of our Code of Conduct to create a sustainable and robust supply chain.

5.0 ELEMENTS OF A ROBUST SUSTAINABILITY PROGRAM

Modeled from sustainability program expectations given to Link from various customers and assessed through SUPPLIERASSURANCE, an AIAG Preferred Provider, Link encourages all suppliers to develop policies, procedures, and programs to address the human rights supply chain traceability & due diligence requirements to meet the demands of evolving global supply chain legislation such as UFLPA and the German Due Diligence Act.

5.1 Human Rights & Working Conditions Policy

A strong Human Rights & working conditions policy should cover the topics of child labor and younger workers, wages and benefits, working hours, modern slavery, ethical recruiting, freedom of association and collective bargaining, non-discrimination and harassment, women’s rights, diversity/equity/inclusion (treating everyone with respect), rights on minorities and indigenous peoples, land, forest, and water rights and forced eviction, and use of private or public security forces.

5.2 Health and Safety Policy

An effective Health and Safety policy should cover the use of PPE, machine safety, emergency preparedness, incident and accident management, workplace ergonomics, handling of chemicals and/or biological substances and fire protection. It also should include strong training plans to ensure awareness and understanding of the various policies.

5.3 Business Ethics

A strong business ethics policy should create expectations regarding anti-corruption and anti-money laundering, data protection and data security, financial responsibility (accurate records), disclosure of information, fair competition and ant-trust, conflicts of interest, counterfeit parts, intellectual property, export controls and economic sanctions, and whistleblowing and protection from retaliation practices.



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5.4 Environmental Policy

An effective environmental policy should incorporate what the supplier is doing and measuring with respect to GMG emissions, energy efficiency, renewable energy, decarbonization, water quality and consumption & management, air quality, responsible chemical management, sustainable resources management, waste reduction, reuse and recycling, animal welfare, biodiversity, land use and deforestation, soil quality, and noise emissions.

It is also encouraged to develop an energy management system to create meaningful metrics to manage renewable energy sources. If possible and applicable, try to develop science-based targets (SBTi) that target the reduction of GHG emissions.

5.5 Responsible Supply Chain Management and Sourcing of Raw Materials.

The Sustainable Minerals Program aims to identify suppliers whose parts contain [Conflict Minerals](#) and/or [Cobalt](#) and to conduct an assessment on the origin of those substances in order to secure that no social nor environmental abuses are connected to the parts the Link group purchases. This assessment is performed using the tools (CMRT & EMRT) and the methodology provided by the [Responsible Minerals Initiative](#).

We are looking for your company's response regarding both [Conflict Minerals](#) and [Extended Minerals](#) through the latest templates. You should also be aware that we will only be accepting CMRTs and EMRTs in the latest version of the template; older versions are not acceptable.

If your products do not contain any Conflict or Extended Minerals you will still need to complete the reporting templates annually.

Link uses the IMDS (www.mdsystem.com) as the system for suppliers to report and declare the substances used in your parts. Each supplier will create an MDS in IMDS and submit the MDS to us for review. We will review the MDS and then either accept or reject. An MDS accepted by Link means that the information in the MDS and substances in your part meet our requirements. A MDS can be rejected for several reasons, such as incorrect part number, prohibited substances and incorrect tree structure. Suppliers will be notified with Link's "Supplier Quality Requirements Request Form" and submissions sent to Link IMDS account 107688.