

Code of Conduct for Business Partners



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Foreword

Manthey is a global company with desirable products, a long tradition and strong values. Integrity, compliance and sustainability are a matter of course for management and employees and are the basis for the company's success.

As a manufacturer of premium products, our customer's expectations are, rightly so, especially high. The customers want to be able to identify themselves with Manthey in an unconditional manner. That is why Manthey is committed to act responsibly and exemplary in every situation. Manthey expects such behavior not only from its employees but also from its business partners in order to guarantee long-term success. This includes adhering to applicable laws at all times, respecting ethical values and acting sustainably.

With this Code of Conduct for Business Partners, Manthey defines the fundamental principles to ensure compliance by business partners. This applies to all interaction with customers, business partners, suppliers, competitors and public officials in addition to dealing with their own employees.

The Code of Conduct for Business Partners is a summary of the most important principles. As a guideline, they define Manthey's expectation beyond legal requirements for all business partners.

Meuspath, March 2021.

Manthey-Racing GmbH



Nicolas Raeder
Managing Director



Martin Raeder
Managing Director

Scope

The “Volkswagen Group requirements for sustainable development with regard to the relationship with business partners (Code of Conduct for Business Partners)” apply to Manthey (Manthey-Racing GmbH and its subsidiaries, together “Manthey”). You can find these requirements under the following link: <http://www.vwgroupsupply.com> (--> Cooperation --> Sustainability). The “Volkswagen Group requirements for sustainable development with regard to the relationships with business partners (Code of Conduct for Business Partners)” are supplemented by the following Code of Conduct for Business Partners of Manthey.

The Code of Conduct for Business Partners is applicable to all business partners of Manthey. These include suppliers (every business partner which supplies goods, materials or services) as well as other partners who represent Manthey such as consultants, sales agents, lobbyists, importing agencies and dealers, sales-, marketing- and sponsoring partners, joint venture and consortium partners, etc. as well as their respective employees.

In the event that Manthey’s business partners appoint other third parties (subcontractors or representatives) in the context of business relations with Manthey, the business partners are obligated to forward this Code of Conduct for Business Partners to their respective business partners and to commit them accordingly.

Responsibility as a member of society

1. Human rights

Manthey’s business partners are committed to comply with internationally accepted human rights including the prevention of modern forms of slavery and human trafficking in the supply chain. They are to offer their employees fair working conditions, which at least meet the minimum standards mandated by applicable laws as well as the core labor standards prescribed by the International Labour Organization (ILO). They ensure that the work or service contract employee’s accommodations are adequate for the respective country of employment.

2. Equal opportunity and equal treatment

The business partners of Manthey ensure that equal opportunities are afforded to those in their respective organizations and do not tolerate discrimination in any form. They treat their employees equally regardless of ethnic or national origin, sex, religion, views, age, disability, sexual orientation, skin color, political views, social background or any other characteristics protected by law.

3. Freedom of association

Manthey's business partners are to respect the rights of employees to form and join labor unions and employee representations, where local laws do not restrict this. They ensure that employees who seek to improve working conditions do not have to worry about disadvantages.

4. Avoiding slavery and child labor

The business partners of Manthey tolerate no form of slavery or child labor. They ensure that employees can terminate their working relationship within a reasonable period of time and that the legal age minimum for employees is met. They especially comply with the minimum age employment standards prescribed by the International Labour Organization.

5. Fair compensation and working hours

Manthey's business partners ensure fair compensation to their employees in accordance with no less than the legal minimum wage requirements. In the event that such standards do not exist, the payment is based on industry-specific, local compensation and benefits standards, which allows employees a decent living. Working hours are at least equivalent to the applicable laws and industry-standards of the respective national economic sectors. The International Labour Organization's Convention on the limitation of working hours and rest periods is to be complied with as a minimum standard at any time.

6. Due diligence in the supply chain for minerals from conflict and high-risk areas

Manthey requires that its business partners involved in the supply chain avoid any minerals that are mined or refined in areas of conflict. Minerals are considered as conflicted when non-state militia groups are directly or indirectly supported through mining, transport, trading, handling, processing or export of such minerals. Information regarding business partners or subcontractors and their use of mined or refined minerals such as tin, tantalum, tungsten and gold must be submitted, if requested by Manthey.

7. Environmental protection

The business partners of Manthey comply with applicable environmental and energy laws, use natural resources efficiently and minimize the environmental impact with regard to production processes and products. They guarantee the environmental compatibility of their products and their production and are responsible for reducing emissions and the usage of energy and water. They comply with applicable emissions and wastewater regulations as well as cleaning requirements. The business partners also comply with waste disposal regulations. They avoid waste and attempt to utilize state-of-the-art materials in their business. In order to ensure this, they will implement a waste disposal concept focusing on state-of-the-art separation of waste at its point of disposal. The business partners comply with the legal requirements regarding the storage and handling of hazardous materials. A hazard risk analysis will provide the basis to identify potential substitute materials as well as providing safety measures for employees and the environment.

Environmental and energy topics should be considered early on in all relevant business processes and decisions such as investments and the planning of new buildings and plants. Corporations with a high relevance to the environment should test their environmental and energy management systems and possibly procure a certificate from an independent institution.

8. Product conformity and product safety

Manthey's business partners take responsibility concerning product conformity and safety. They comply with applicable product safety laws and regulations, especially the laws regarding safety, description and packaging of products as well as the usage of hazardous materials and minerals. They ensure that all delivered products and services meet the contractual terms regarding product conformity and product safety (and quality) and that they can be used safely for their intended purpose.

Responsibility as a business partner

9. Conflicts of interest

The business partners of Manthey make decisions exclusively on the basis of objective criteria and do not allow themselves to be swayed by personal interests or relations.

10. Prohibition of corruption

Manthey's business partners do not tolerate corruption and take measures to avoid it. They ensure that no inadmissible benefits or gratuities (such as gifts, invitations, donations or sponsoring engagements) are offered or accepted in business with customers, public officials or other third parties. This is especially relevant with regard to so-called "facilitation payments", i.e. illegal payments to public officials or authorities to speed up administrative matters.

11. Fair and free competition

The business partners of Manthey allow free and fair competition and comply with the applicable antitrust and competition laws. They do not enter into any anti-competitive agreements with competitors, suppliers or customers and do not abuse a potential dominant market position.

12. Prohibition of money laundering and terrorism financing

Manthey's business partners only do business with integer and well-known partners. They ensure that these comply with applicable money laundering prevention and combating terrorism financing law. Furthermore, they make sure that suspicious activities are reported to the relevant authorities.

13. Export control and customs

The business partners of Manthey comply with all provisions for importing and exporting goods, services and information. They fulfill the requirements of customs and foreign trade regulations in all countries of business activity.

14. Taxes, accounting and financial reporting

Manthey's business partners comply with the applicable tax laws and the statutory provisions for proper accounting. They report about their business activities truthfully and in accordance with applicable laws.

15. Retention of subcontractors

The business partners of Manthey are not only responsible for their own conduct but also for any intermediaries (subcontractors or representatives) that they retain in order to fulfill their business obligations for Manthey. They select these partners carefully based on objective criteria and in accordance with the principles of this guideline and make sure that they comply with them as well.

Responsibility in the workplace

16. Occupational safety and healthcare

The business partners of Manthey ensure safety and healthcare in the workplace, which meets the minimum legal standards. Manthey expects its business partners to avoid occupational safety and health hazards as well as work-related illness for their employees. Hazards are to be eliminated at the source. Technical and organizational safety measures have priority over personal safety gear in ensuring the prevention of accidents.

The business partners commit themselves to comply with occupational medical prevention and generally strive for an operational health promotion for continuous improvement of the work conditions.

17. Data protection

The business partners of Manthey comply with applicable data protection laws to protect the personal data of employees, customers, business partners and other affected parties.

18. Security and protection of information, know-how and intellectual property

Manthey's business partners protect the know-how, patents, operational and business secrets of Manthey and third parties reasonably and keep such information safe. Confidential information should not be published or disclosed to unauthorized third parties or be made available in any other form.

Adherence to the Code of Conduct for Business Partners

19. Obligations of business partners

The business partners of Manthey are obligated to comply with the principles of this guideline. They ensure that their employees are aware of and adhere to this Code of Conduct for Business Partners. They support their employees in acting legally and with integrity.

In addition to this, the business partners are obligated to forward this Code of Conduct for Business Partners to their respective business partners and to ensure that they conduct their business in accordance with this guideline.

The business partners of Manthey are obligated to report reasonable suspicions of potential violations related to Manthey to the Whistleblower System of Manthey. Violations are intentional or negligent violations of applicable law (e.g. laws, ordinances, etc.) or internal company regulations, particularly violations of the Code of Conduct as well as violations of contractual obligations by employees of Manthey that they commit in connection with or on the occasion of their work for Manthey. The Whistleblower System is responsible for the acceptance and processing of tips of potential violations by employees of Manthey. Every tip is treated confidentially, neutrally and fairly. Determined violations are promptly remedied and appropriately sanctioned. Whistleblowers do not have to fear sanctions or other disadvantages in submitting tips to the Whistleblower System. Whistleblowers and persons implicated are particularly protected by a fair and transparent process. The abuse of the Whistleblower System is not tolerated, but rather sanctioned. For submitting a tip, the Porsche internal Whistleblower Office and external lawyers (so-called ombudspersons) are available with various reporting channels. The ombudspersons are available to whistleblowers as contact persons around the clock via various reporting channels free of charge. They treat all instructions as part of their attorney-client privilege confidential and guarantee the whistleblowers (if needed) anonymity.

Contact data Porsche internal Whistleblower Office

Address Dr. Ing. h.c. F. Porsche AG
GR – Whistleblower Office
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Phone +49 (0)711 911 24444

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Contact data external Ombudspersons

	Attorney-at-Law Dr. Rainer Buchert	Attorney-at-Law Thomas Rohrbach
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24/7-Hotline +49 (0)69 65300490

Online www.porsche.com/whistleblower-system (here, information can be given to the ombudspersons via an anonymous mailbox using an alias name; so-called Business Keeper Management System/BKMS)

Manthey reserves the right to audit on a case-by-case basis the adherence to the principles of this guideline after prior notification to the business partner. Such audits will be conducted by experts along with representatives of the business partner in accordance with applicable local laws.

20. Legal consequences of violations of the principles of this guideline

Manthey considers the adherence to the principles of this guideline as essential for each contractual relationship. If the business partners do not comply with the principles of this guideline, Manthey is justified to terminate the business relationship in an extraordinary manner.

It is at Manthey's discretion to pass on such consequences and take alternative measures instead, if the business partner can credibly assure and prove that he has taken countermeasures immediately to avoid future violations.

21. Additional information and support

Further information about Manthey's compliance organizational and operational structure is available on the internet and presented in the current Annual and Sustainability Report of Manthey at:

www.manthey-racing.de/en/company/compliance

In addition, Manthey's business partners can contact the Central Compliance Help Desk of Porsche in the event of questions or tips regarding this guideline:

Contact data Manthey Compliance

Telefon +49 (0)2691 – 9338 890

E-Mail compliance@manthey-racing.de

Contact data central Compliance Helpdesk

Phone +49 (0)711 911 24860

E-mail compliance@porsche.de

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