



# ZF LIFETEC CODE OF CONDUCT

EDITION 2025

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# DEAR COLLEAGUES,

At ZF LIFETEC, our mission is to save lives. To achieve this mission, it is crucial to conduct business with credibility, fairness and in an ethical way, whilst prioritizing adherence to legal requirements. In order to ensure awareness of compliance and to avoid potential violations, we foster a culture of transparency and encourage all employees to speak up when facing any compliance risks and concerns.

As the management of ZF LIFETEC, we hold ourselves and each employee accountable in promoting ethical conduct and maintaining the highest levels of integrity across our organization. By adhering to this Code of Conduct, we build trust and enhance our reputation with colleagues, customers, suppliers, and other business partners. Integrity is not just a principle; it is the foundation of our success and the key to achieving extraordinary results.

At ZF LIFETEC, managers lead by example and provide guidance and support in making the right decisions. This Code of Conduct applies to everyone at ZF LIFETEC. That includes every full-time or part-time employee, at every level of the Company, all the way up to the executive management.

Any violation of the provisions of this Code of Conduct will not be tolerated and will result in appropriate consequences. Sometimes, the right course of action may not be immediately clear. When faced with such dilemmas, our Code of Conduct serves as a reliable compass, guiding us towards ethical decisions. It helps ensure that our actions align with our core values, providing clarity and direction.

Always ask yourself:

- Is this action consistent with our Code of Conduct?
- Is it legal? Does it follow our policies?
- Does it benefit the Company as a whole – not just a certain individual or group?
- Would I be comfortable if my actions were made public?

As individuals, we each contribute to maintaining and growing the standing of ZF LIFETEC. Let us embrace these principles and apply them each and every day in our daily operations.

Together, we can ensure that our organization upholds the highest ethical standards and continues to build and maintain trust with our stakeholders.



**Rudolf Stark**  
Chief Executive Officer  
ZF LIFETEC



**Ulf Loleit**  
Chief Financial Officer  
ZF LIFETEC



**Dr. Michael Eisenbarth**  
Chief Operating Officer  
ZF LIFETEC



# 01

OUR WORLD





# WE RESPECT EACH OTHER

**Cherishing our diversity and creating an inclusive environment where our employees are empowered and can reach their full potential is a key to our success.**

**Providing an environment** in which all employees are empowered, have a sense of belonging and the ability to rise to their full potential is vital to their success as well as the overall success of ZF LIFETEC.

The diversity of ZF LIFETEC's employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and prohibit discrimination or harassment, including on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, sexual orientation, gender identity or expression, age, marital status, mental or physical disability, or any other characteristics protected by law, as well as prohibiting any unwelcome physical or verbal advances.

Please be aware that discrimination and harassment may take any form — verbal, physical or visual — and includes jokes or use of slang that may be uncomfortable or offensive to others.

# WE TAKE CARE

**Our goal is to have an injury-free workplace and we aim to provide the safest facilities in our industry.**

**At ZF LIFETEC, we are dedicated to foster** a safe and healthy work environment that prioritizes the well-being of our employees, empowering them to be innovative.

To reach our goal to have an injury-free workplace and the safest facilities in the industry, we have established and maintain Health and Safety Management Systems. Our processes are designed to limit exposure to occupational hazards, prevent emergencies, and manage physically and mentally demanding work. Our facilities provide safe machines and equipment and are designed to provide healthy working conditions, potable water, and sanitary eating facilities.

ZF LIFETEC continuously improves its working conditions to keep employees healthy and not expose them to harm. Each employee is expected to follow health and safety rules and practices and report any incidents including near

ZF LIFETEC expects its employees to lead by example and do what they can to stop others from engaging in such behavior and prohibits retaliation against anyone who makes a good-faith complaint or participates in an investigation of such a complaint.

## EXAMPLE

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Question

"I suspect a colleague is being harassed – what do I do?"

Answer

If you see, experience or suspect harassment or discrimination, inform your manager or Human Resources or your local workers representative. We take this behavior seriously and do not tolerate retaliation against anyone who makes a report in good faith.

misses, accidents, risks or unsafe work conditions to their manager, supervisor, human resources or EHS. For sensitive information, such as at-risk behaviors or substance abuse a confidential communication channel is available via the Compliance Department.

## EXAMPLE

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Question

How can I contribute to an injury-free workplace?

Answer

Employees are encouraged to actively participate in EHS activities such as hazard identification, behavior-based safety programs, workplace ergonomic improvements, etc. as well as look after each other and act when it comes to safety.

# WE ARE TRANSPARENT

## **ZF LIFETEC needs accurate reporting of information in order to make responsible business decisions.**

**Accurate record keeping** and reporting helps us meet our legal and regulatory requirements. Maintaining financial and legal integrity also reflects positively on our reputation and credibility. Each of us – at every level of our Company – has a responsibility to ensure the accuracy of all Company records.

From resumes, time sheets and benefit claim forms to expense reports, quality assurance records, budget forecasts and regulatory filings, we all handle Company records. Be sure to follow all internal processes, policies, and generally accepted accounting principles so that our records accurately reflect all transactions. Be honest, accurate and complete in what you record. Correct time recording protects against exploitation.

Many employees regularly use business expense accounts, which must be documented and recorded accurately. If you are not sure whether a certain expense is legitimate, check with your supervisor.

All ZF LIFETEC's books, records, accounts, and financial statements must be maintained in reasonable detail, appropriately reflect our transactions, and conform to ZF LIFETEC internal controls and legal requirements. All unrecorded or "off the books" funds or assets are not tolerated.

Business records and communications often become public, and we should be careful to be accurate and thoughtful in what we say to avoid misunderstandings. This applies equally to e-mail, internal memos, and formal reports.

Records should always be retained or destroyed according to our record retention policies. In accordance with those policies, if requested to retain records, you should do so until the Legal Department informs you retention is no longer necessary. ZF LIFETEC is committed to ensure the accuracy of accounting transactions and financial reporting, as these are the basis for relevant decisions to steer our business.

Therefore, ZF LIFETEC'S financial records as well as compliance with this Code of Conduct are subject to risk-based control measures as well as to regular independent testing procedures by Internal Audit.

Thus, all reports must contain the necessary information on all transactions and be stored in accordance with corporate guidelines and applicable regulations.

All ZF LIFETEC employees must actively support these checks and control measures.

## **ZF Trustline**

We provide an anonymous grievance mechanism for compliance breaches such as antitrust, money laundering, labor related topics, human rights, and other values. All submissions made in good faith can be done without fear of retaliation at: [www.bkms-system.net/Trustline](https://www.bkms-system.net/Trustline)







# 02

## IN THE WORLD

# WE ARE TRUSTED PARTNERS

**Build trust and exceed expectations through your commitment to integrity in partnerships.**

**Our suppliers, customers, consumers, and other business partners** place a great deal of trust in our brand, and we strive to exceed their expectations. We see them as marketplace team members – essential to the growth and success of ZF LIFETEC.

Integrity is not a unilateral obligation – it is a responsibility that we share with our suppliers and business partners. That is why we require our suppliers and business partners to adhere to our Business Partner Code of Conduct. If you are responsible for a supplier relationship, help us ensure that we are doing business only with suppliers and business partners who share our commitment to doing what is right by including contractual provisions and, where applicable, supporting audits to ensure compliance.

If you are involved in selecting suppliers on behalf of the Company, make sure you are choosing objectively based on price, performance, and quality of product or service provided. Follow all procurement requirements.

Be fair and honest in your interactions with customers, suppliers, consumers, and business partners. Avoid anything

that even looks like a possible conflict of interest, and do not offer or provide anything to these business partners in exchange for an improper advantage for the Company.

If you work with a supplier or business partner, make sure that they know about and uphold their commitment to our values and policies.

If you are aware of a potential or actual violation of any element of the Business Partner Code of Conduct, or the law, by a ZF LIFETEC Business Partner, please report it to Corporate Compliance.

## EXAMPLE

### Question

"I'm responsible for hiring a new design partner. Coincidentally, a friend runs a design business - can I hire him?"

### Answer

You should disclose this potential conflict of interest to your manager to eliminate any impression of impropriety.





# WE ARE FAIR

**Our moral compass guides us to make fair decisions without exception.**

**ZF LIFETEC seeks to compete fairly and honestly**, and in full compliance with applicable laws and regulations, including international antitrust and competition laws.

In particular, we do not tolerate:

- Anticompetitive agreements or collusion with actual or potential competitors, including but not limited to agreements aiming at fixing prices or price components, limiting the type or quantity of products or service delivered, rigging bids or subdividing markets;
- Abuse of a leading market position;
- Vertical agreements which deter, prevent, or restrict fair and free competition in violation of applicable laws.

Our competitive position is based solely on our business success factors, especially emission reduction, vehicle safety, automation, and data. You should deal fairly and respectfully with ZF LIFETEC's customers, suppliers, and competitors. Stealing or otherwise taking proprietary or trade secret information without the owner's consent is prohibited. We should not take advantage of anyone through unfair dealing practices such as:

- Abuse or disclosure of privileged information;
- Misrepresentation of material facts;
- Collusion with competitors on pricing and other terms;
- Violating fair bidding practices including bidding quiet periods or providing information to benefit one vendor over others.

Such practices may also be illegal.

ZF LIFETEC carefully manages our engagement in government affairs and the public policy process and has internal teams that coordinate those efforts. Strategic decisions about advocacy are made at the highest levels and only approved personnel participate in this process.

We may engage in policy discussions where they matter to our business and customers, in areas including privacy, intellectual property, and sustainability. Here, we strive to help policy makers at every level of government understand our products, our innovations, and our business.

We never attempt to gain an unfair advantage through lobbying practices. With our global activities and when tapping into new markets, we strictly follow applicable trade regulations and adhere to rules and regulations governing import and export controls, as well as any applicable embargoes.

## EXAMPLE

### Question

**"A local well-known politician wishes to hold a media event at one of our facilities – can I approve it?"**

### Answer

**ZF LIFETEC maintains a non-partisan stance. Please refer this decision to the appropriate internal departments. Start with the External Affairs department when dealing with public officials. Additionally involve the Compliance Organization, when the value of the invite exceeds certain defined thresholds. If the press is invited, the Communications department must also be involved.**



# WE ARE ETHICAL

**Whether a decision is ethical and legal or not should be the guiding question for every ZF LIFETEC employee.**

**Corruption is banned** by international conventions, national laws, and internal guidelines. ZF LIFETEC does not tolerate any form of bribery among employees or business partners, or any business practices that could create the impression of improper influence. This applies irrespective of any alleged regional customs. The purpose of gratuities, whether business entertainment or gifts involving customers, suppliers, or other business partners is to create good will and good working relationships, not to gain an improper advantage.

ZF LIFETEC has a strong policy against offering or accepting any form of benefits to exert undue influence on individuals in the public or private sector. We do not tolerate the granting of benefits to public officials or government representatives to unlawfully promote business. This policy encompasses facilitation payments and indirect benefits through business partners or third parties.

Even the offer or request of Gifts and entertainment can be improper if they:

- Are cash or equivalent to cash;
- Are inconsistent with customary business practice;
- Are excessive in value;
- Could be seen as a bribe or payoff;
- Violate the law.

The offer or acceptance of cash gifts is prohibited. Please discuss with your Compliance Officer or Corporate Compliance any gifts of significant value or gifts that you believe may be inappropriate.

Money laundering (i.e., using transactions to conceal the illegal source of funds or make such funds look legitimate) is strictly prohibited. Any suspicious activity that you believe might involve money laundering should be reported to the ZF LIFETEC Anti-Money-Laundering Officer.

Here are some examples of suspicious activity:

- Payments in cash;
- Payments made in currencies atypical given the circumstances or differing from what is listed in the contract;
- Requests for payment amounts that differ from what is required in the contract; or
- Payments made by an individual or a company that is not party to the contract.



**A conflict of interest exists** when a person's private interest interferes or appears to interfere in any way with the interests of ZF LIFETEC. A conflict can arise when an employee takes actions or has interests that may make it difficult to perform his or her work for ZF LIFETEC objectively and effectively. Conflicts of interest may also arise when an employee, or members of his or her family, receives improper personal benefits as a result of his or her position at ZF LIFETEC. It is almost always a conflict of interest to work simultaneously for a competitor, customer or supplier.

## EXAMPLE

### Question

"I have been invited by one of our important clients to a gala event along with my family. Am I allowed to accept this invitation?"

### Answer

"Before making a decision, review the applicable policies on Granting and Accepting of Gratuities, and ensure that accepting this invitation would not create a conflict of interest. Consider the value of the invitation and the potential appearance of impropriety. If there are any uncertainties, contact corporate compliance directly and discuss the next steps with them."





## WE COMPLY

**We behave ethically and strive for excellence by producing high-quality, safe products that meet all applicable laws, regulations, and standards.**

**We hold ourselves to the highest standards** of legal and ethical conduct and are committed to making high quality products that are safe and comply with applicable laws, regulations, and standards.

We expect everyone in our Company to know and understand the requirements that apply to the production and distribution of our products, services and technologies.

These principles are implemented through ZF LIFETEC's policies, processes and structures, including ZF LIFETEC's Product Compliance Management System (PCMS), and all of our employees and officers are held to these standards. Ensuring product safety is a top priority at ZF LIFETEC.

Compliance with all applicable guidelines and regulations in all processes, products, and services is imperative. This includes adhering to the legal requirements for product safety in terms of development, manufacturing, use, and characteristics. The current state of knowledge and technological advancements are considered, as well as the safety expectations of end consumers throughout the entire product lifecycle.

### EXAMPLE

Plan for the Future

Legislation evolves quickly, so it is critical that we follow the ZF LIFETEC Way in order to make ourselves fit for the future. We must anticipate trends and regulatory requirements to ensure uninterrupted compliance group-wide.

# WE ARE SECURE

**You must not use or share any of ZF LIFETEC's confidential information for any purpose other than conducting ZF LIFETEC business.**

**You play a key role** in helping us protect ZF LIFETEC. Assets include ZF LIFETEC's proprietary information (such as intellectual property, confidential business plans, unannounced product plans, sales and marketing strategies, and other trade secrets), as well as physical assets such as cash, equipment, supplies, and product inventory.

All non-public information about ZF LIFETEC should be treated according to its confidentiality requirements.

- Watch what you say. Being aware of where you are, who is around you, and what they might see or overhear is an important way we all can protect ZF LIFETEC's intellectual property.
- Protect our assets. Keep track of the assets and information that ZF LIFETEC has entrusted to you, and prevent loss, misuse, waste, or theft.
- Set an example. Model behavior that protects our assets and information at all times.
- Be alert and aware. As our first line of defense, you are able to make smart security decisions, building a barrier between Cyber criminals and our infrastructure.

If you have any questions, please consult ZF LIFETEC's Corporate Security (corporate.security@zf-lifetec.com) or Cyber & Information Security.

We respect everyone's right to privacy and protect the personal data of our employees, suppliers, customers, and every other party with whom we have dealings. We keep such data secure, use it only for the intended business purpose, and do not keep it for longer than necessary.

**Contact Data Protection:**  dataprivacy@zf-lifetec.com

## EXAMPLE

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Question

"My Manager asked me to log to a Company system using her password to retrieve some reports- is this okay?"

Answer

**N. It is against ZF LIFETEC policy to share passwords. You should remind your manager that you do not have access to this system.**

# WE ARE MINDFUL - SOCIAL MEDIA & MARKETING CLAIMS

**The basis of any good relationship is trust.**

**When our customers do business** with us, they place faith in the claims we make about our products.

Our relationships with our suppliers, customers, consumers, and other business partners must be fair, positive, and productive, and always based on mutual trust and respect. Building these relationships is an ongoing process and requires an enduring commitment to high standards of business conduct. In every interaction we have with these parties, we must demonstrate honesty and a commitment to our values.

We should always speak the truth. Everything we tell our customers, suppliers, consumers, and other business partners must be truthful, including our product labels, advertising, and

other communications. Do not engage in any unfair, deceptive, or misleading practices. Reputations are hard won and easily lost. Use social media wisely and communicate responsibly. If you comment about ZF LIFETEC on social media, make clear you are not speaking on behalf of the company.

## EXAMPLE

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How does this affect me?

**If you are concerned that you may have sounded as though you were speaking for ZF LIFETEC in a social media post, contact your manager or the Communications Department so that we can respond and minimize any harm that may have been done.**



A person is shown from the side, working on a large architectural drawing spread out on a table. The drawing features a grid pattern, likely representing a building facade or a map. The person's hands are visible, and they are using a small tool to work on the drawing. The background is a blurred view of the drawing and the person's arm.

# 03

FOR THE WORLD



# WE CARE FOR THE PLANET

**We act in ways to prevent and minimize environmental impacts and create a more sustainable & better shared future.**

**Sustainability at ZF LIFETEC** makes a difference in people's lives, communities, and our planet. Our mission is to save lives. This includes taking action to protect the environment and make business decisions based on the principles of lasting values.

In the fight against climate change, the actions of each of us matter, with our products, ZF LIFETEC contributes to reducing emissions, protecting the climate, and enhancing safe mobility.

We contribute to the decarbonization goals along our value chain, together with our suppliers and business partners. We respect our planet's natural habitat and are committed to conserving resources, reducing environmental pollution (including waste minimization and adapting circular economy principles), and preventing environmental damages.

This commitment to sustainable environmental protection forms a basis for our work.

According to these principles, we are committed to environmentally friendly product design, reducing the environmental impact of our business processes, continually improving our energy utilization and environmental efforts.

As a technology provider, ZF LIFETEC continues to be dependent on the use of minerals that are often connected to the financing of conflicts or human rights violations (so-called conflict minerals). As part of our human rights due diligence, we take great effort to reduce their share and to effectively exclude critical sources.

## EXAMPLE

What can I contribute to protect the planet?

**Do your part by using resources responsibly, helping to curb emissions, following environmental laws and regulations, and participating in our sustainability, recycling, and replenishment efforts.**





# WE RESPECT OTHERS

**Characterized by mutual respect, trust, tolerance, and fairness.**

**We ensure that** we act in accordance with all internationally recognized human rights, such as expressed in the International Bill of Human Rights and the ILO Fundamental Principles and Rights at Work. We follow key international frameworks such as the UN Guiding Principles of Business & Human Rights, the OECD Guidelines of Multinational Companies and the principles of the UN Global Compact. ZF LIFETEC strongly believes in human dignity and equal rights and expects all employees and business partners to conduct in a way that ensures that human rights are respected.

We consider human rights in the recruitment, interaction, and promotion of employees, in our standards for health and safety and in the way we design and manufacture our products. We respect the dignity, privacy, and personal rights of every individual.

We condemn any form of modern slavery, such as human trafficking, forced labor, and exploitative child labor.

Forced, imprisoned, bonded, indentured, or slave labor and all forms of human trafficking are prohibited as they take advantage of people who are not able to consent to their actions.

Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development, as defined by the International Labor Organization, is inconsistent with ZF LIFETEC's values. At ZF LIFETEC, we always observe the minimum age for employment stipulated in national legislation, at least

however we follow the following: Children below the age of 15 are not to be employed and children below the age of 18 shall not be employed in positions that could jeopardize their health, safety, or morals.

We focus our efforts to create a climate between our employees and our business partners that is characterized by mutual respect, trust, tolerance, and fairness.


Upholding human rights as our social responsibility means that observing and complying with the law is a matter of course. We have a duty to observe the law under which we operate in all our business decisions. This legal obligation also extends to human rights issues in the supply chain. ZF LIFETEC has undertaken a "Commitment to Remedy" any violations once identified. We adhere to the relevant regulations concerning fair working conditions, including freedom of assembly, association, and collective bargaining. We promote social security in our sphere of responsibility and respect the right to freedom of opinion and freedom of expression. ZF LIFETEC thinks about the impact that our operation has on people internally as well as externally.

If you think that there may be any negative impact to anyone inside or outside of ZF LIFETEC, contact your manager, your workers representation or the ZF Trustline.

ZF LIFETEC is aware of our social responsibilities, we not only observe these standards, but exceed by being a part of the initiative "ZF hilft".

## ZF hilft

Further information about „ZF hilft“ can be found here:

 [www.zf-hilft.de/site/zfhilft/de/home/zf\\_hilft.html](http://www.zf-hilft.de/site/zfhilft/de/home/zf_hilft.html)

# WE ARE HERE TO HELP


Employees who have any questions or doubts on how to behave in compliance with the aforementioned rules can contact their supervisor at any time. Additionally, they can contact the Compliance Organization particularly the ComplianceHelpdesk, which is available to support our employees in all Compliance matters.

In addition, ZF LIFETEC has supplementary documentation to further clarify internal regulations and guidelines.

## Contact Corporate Compliance

Email: [compliance@zf-lifetec.com](mailto:compliance@zf-lifetec.com)

We provide an anonymous reporting channel for compliance breaches through the ZF Trustline:

 <https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=26zf6&c=-1&language=eng>

Our employees can find additional information on the intranet at: [Compliance@ZFLIFETEC](mailto:Compliance@ZFLIFETEC)

## **ZF LIFETEC**

ZF Airbag Germany GmbH  
Wernher-von-Braun-Straße 1  
D-84544 Aschau am Inn  
[www.zf-lifetec.com](http://www.zf-lifetec.com)