

Y-EMEA CODE OF CONDUCT

Ex-LG-xx-Y-009 Rev 1.0 20/Jul/2026



FOREWORD BY THE MANAGEMENT BOARD

Dear Colleagues,

Since its founding, Yazaki has grown through the trust of its customers, business partners, and employees. As a privately held Japanese company, we value responsible conduct, mutual respect, and long-term relationships, which are essential to our continued success.

The Y-EMEA Code of Conduct reflects these shared expectations and applies to everyone acting on behalf of Yazaki, including the Management Board. Each of us bears responsibility for acting ethically, lawfully, and with integrity in our daily work.

In updating this Code of Conduct, we have considered changes in our business environment and evolving expectations. The Code is grounded in the Yazaki Spirit, expressed through our Modern Values, and addresses emerging topics relevant to our operations today and in the future.

The Code of Conduct is intended to serve as guidance and support. We ask each of us to familiarize ourselves with it and apply it thoughtfully and consistently. When situations are unclear, we encourage consultation and open communication.

Through shared commitment and steady effort, we continue to build a culture of integrity and cooperation. We sincerely thank you for working together in this spirit.

Y-EMEA Management Board



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Y-EMEA



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INTRODUCTION

The Y-EMEA Code of Conduct helps each of us understand what it means to act in line with Yazaki's values in our everyday work. It is closely connected to and grounded in the Yazaki Group Corporate Philosophy Framework (Corporate Policy, Fundamental Management Policy, Sustainability Policy and Yazaki Group Code of Conduct). This framework is built on Yazaki's responsibility toward customers, people, society, and future generations.

While our corporate philosophy explains who we are and what we stand for, the Code of Conduct supports us in day-to-day decisions — in how we work with one another, interact with customers and business partners, and represent Yazaki. It gives practical guidance to help us act responsibly, ethically, and in line with the law.

The Y-EMEA Code of Conduct applies to everyone working for or on behalf of Y-EMEA (Yazaki Europe, Middle East, Africa NV and the entities and branches within its management scope). It provides a shared understanding of what is expected of us, across all regions and functions.

The foundation of our culture lies in the Yazaki Spirit, expressed through the three core principles of Service Mind, Fortitude, and Foresight, and embodied in our long-standing motto "One for All, All for One." This spirit reflects our belief that sustainable success is achieved through cooperation, shared responsibility, and respect for others.

As Yazaki continues its cultural journey, the Yazaki Spirit finds its practical expression in our Modern Values:

- **Service Mind** is lived through Teamplayer and Passion, shaping how we collaborate, respect differences, and contribute with purpose and commitment.
- **Fortitude** is reflected in Courage and Resilience, guiding us to take responsibility, address issues openly, learn from setbacks, and persevere.
- **Foresight** is expressed through Curiosity and Ambition, encouraging open thinking, continuous learning, openness to change, and a focus on future oriented solutions.

These values drive our actions and are closely connected to the rules and guidance set out in this Code of Conduct. Together, they form our ethical compass and provide direction, especially in situations where rules alone are not enough.

The purpose of this Code of Conduct is therefore not only to define rules, but also to support ethical decision making and integrity-based behavior across all business activities. By living the Yazaki Spirit and our values, and by speaking up when concerns arise, each of us contributes to a culture of trust, accountability, and responsible business conduct. In this spirit, "One for All, All for One" expresses our shared belief that we succeed together - by supporting one another, acting responsibly, and standing united in doing what is right for Yazaki, today and in the future.



THE YAZAKI SPIRIT



SERVICE MIND

The desire to serve the best interests of our partners

TEAMPLAYER
PASSION



FORESIGHT

The ability to see beyond immediate concerns

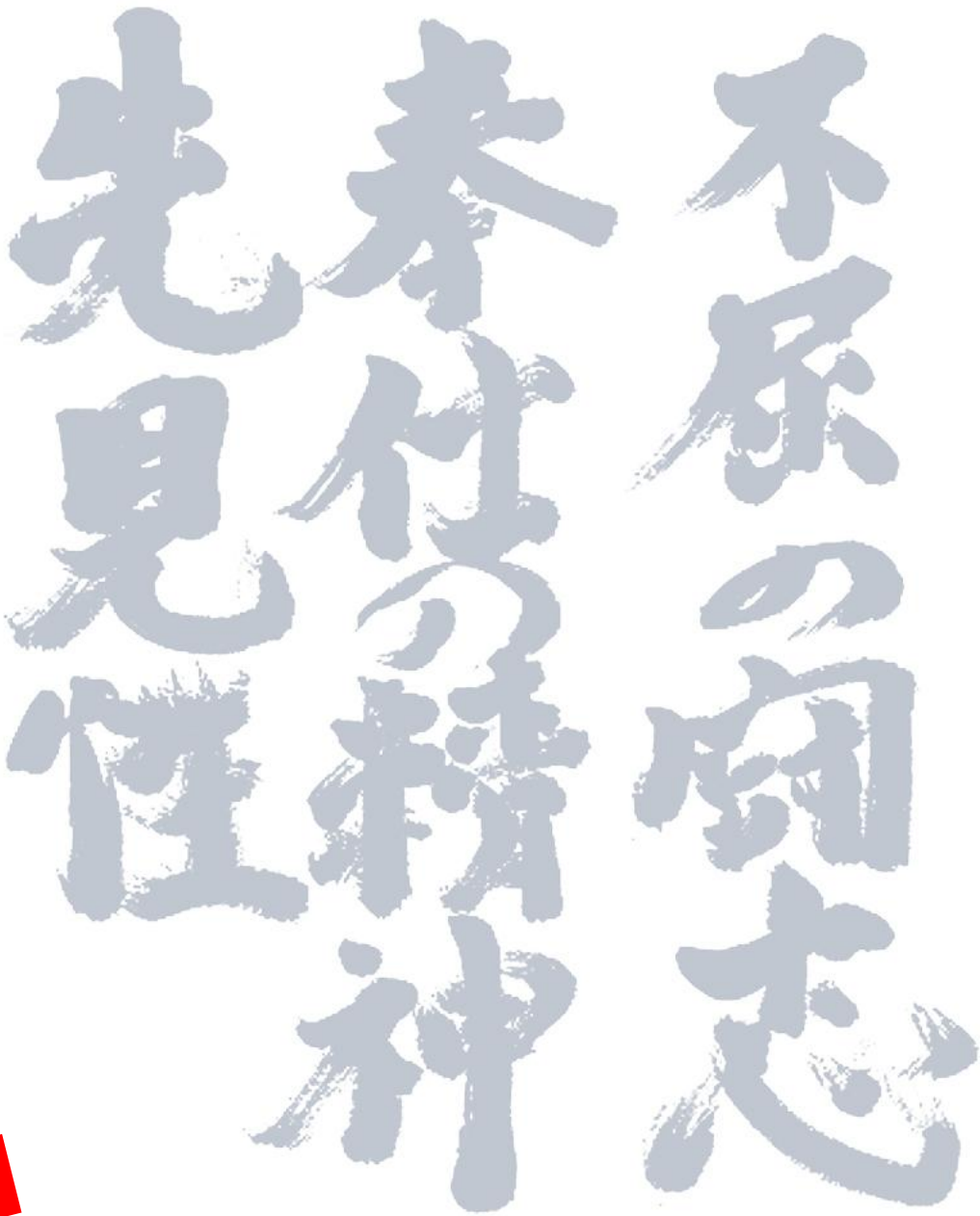
CURIOSITY
AMBITION



FORTITUDE

The will to see matters through to the end

COURAGE
RESILIENCE





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1. OUR RESPONSIBILITY IN THE WORKPLACE



1. OUR RESPONSIBILITY IN THE WORKPLACE

1.1 Leading by Example

Guided by Courage and a strong Teamplayer mindset, we lead by example in everything we do. We recognize that our culture is shaped not only by what we achieve, but also by how we achieve it. Through our daily decisions, actions, and interactions, we demonstrate integrity, accountability, transparency, and respect.

Our Commitments

We act as role models by demonstrating ethical, honest, and compliant behavior, providing clear guidance and setting expectations through our actions and decisions.

For more information:

Check the **Employment Policy** or reach out to the **HR Department** or your **Leader**.

1.2 Learning from Mistakes

Guided by Curiosity and Resilience, we promote a culture where mistakes are addressed openly and constructively. We recognize that learning from mistakes is essential for improvement and innovation, and we encourage transparency, accountability, and continuous learning.

Our Commitments

- We address mistakes openly and use them as opportunities to learn and improve.
- We take responsibility for our actions and address issues in a timely and transparent manner.

For more information:

Reach out to the **HR Department**.

1.3 Ensuring a Safe and Healthy Workplace

Courage guides us how we protect our employees. We speak up when something may represent a risk, take responsibility for ensuring safe conditions, and act proactively to identify and manage all kinds of risks, including physical, chemical, ergonomic, and psychological. With commitment, we continually promote safe practices, support a culture of prevention, and ensure that our approach to health and safety aligns with all applicable local laws, regulations, and internal standards across our operations.



1. OUR RESPONSIBILITY IN THE WORKPLACE

Our Commitments

Yazaki EMEA is committed to ensuring a safe and healthy workplace for all employees and stakeholders:

- We comply with all relevant laws, regulations, and internal policies for health and safety across our operations.
- We promote a strong culture of prevention, encouraging awareness, responsibility, and open communication regarding health and safety aspects.
- We integrate the management of physical, ergonomic, and psychological risks into our overall decision-making.
- We maintain emergency preparedness and response capabilities that prioritize the protection of human life and the safety of surrounding communities.
- We provide the necessary leadership, resources, and organizational support to continuously strengthen our health and safety culture.

For more information:

Check **Y-EMEA's Environment, Health & Safety Policy** or reach out to **EH&S Department**.



1.4 Fair Working Conditions

Guided by Resilience and a Teamplayer mindset, we are committed to providing fair, safe, and respectful working conditions for all employees. We comply with applicable labor laws and internal standards, while fostering a workplace that supports well-being, dignity, and equal opportunity. We continuously review and improve working conditions to meet the needs of our people and the organization.

Our Commitments

- We ensure fair, safe, and legally compliant working conditions, including fair remuneration and responsible management of working hours and rest periods in line with applicable legal legislation.
- We treat employees with respect and dignity and promote well-being, equal opportunities, and transparent employment conditions.

For more information:

Check the **Employment Policy** or reach out to the **HR Department**.



1. OUR RESPONSIBILITY IN THE WORKPLACE

1.5 Personal Security in Critical Areas

Resilience shapes how we prepare for and respond to security challenges. We remain aware, informed, and proactive, ensuring that our actions protect ourselves, our colleagues, and the communities we interact with. By anticipating risks, understanding local conditions, and complying with all applicable legal and regulatory requirements, we promote a culture in which personal security is a shared responsibility across all regions where we operate.

Our Commitments

Yazaki EMEA is committed to ensuring the personal security of employees traveling or operating in critical areas:

- We anticipate security measures for safe travel and follow security recommendations as defined by the EH&S Department and security tools.
- We implement standards of personal security, ensuring that travel-related risks are minimized across all global operations.
- We comply with all applicable local laws, and internal security guidelines.
- We evaluate and integrate local security conditions into our decision-making.

- We promote a preventive and responsible security culture, fostering awareness, preparedness, and we provide the necessary resources, guidance, and organizational support to enhance security awareness and resilience across all operations.

For more information:

Check **Y-EMEA's Environment, Health & Safety Policy** or reach out to **EH&S Department**.





2. OUR RESPONSIBILITY AS A BUSINESS PARTNER



2. OUR RESPONSIBILITY AS A BUSINESS PARTNER

2.1 Anti-Bribery and Anti-Corruption

Guided by Courage, we reject all forms of corruption and bribery. We take a clear stance and decline improper requests, even when doing so is uncomfortable. Driven by Curiosity, we ask questions, seek clarity, and document intent before acting. We pause when something does not feel right and speak up when we see behavior that could compromise our integrity.

We comply with all applicable anti corruption and anti bribery laws and regulations, including applicable extraterritorial legislation such as the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, as well as all relevant local laws.

Our Commitments

Yazaki has zero tolerance for any form of corruption:

- We do not give or take bribes.
- We do not influence decisions or gain business advantages by giving or receiving benefits.
- We do not make facilitation payments - no matter how small or 'customary'.
- We keep accurate books and records with full supporting documentation.

- We impress our business partners (including customers, suppliers, consultants, agents, and other third parties) only through our superior products, technology, reliability and quality of services.
- We do not link donations, sponsorships or community support to business decisions.
- We apply the same principles in public and private sectors and never use intermediaries to do what we may not do ourselves.
- We never ignore red flags or proceed when in doubt -silence is not an option. By doing so, we protect Yazaki and ourselves from administrative and criminal investigations, sanctions and reputational damage.



Recommended actions when you are requested to give a bribe or a “small fee”:

Decline immediately, pause the interaction, record key facts, and report to Corporate Compliance.

If there is an immediate, real risk to life or limb (extortion), prioritize safety, then report as soon as possible.



2. OUR RESPONSIBILITY AS A BUSINESS PARTNER



Red flag examples:

- Requests for cash, vouchers, crypto or private/offshore payments.
- Vague service descriptions, excessive commissions, or missing proof of work.
- Intermediaries recommended by public officials or bidders.
- Requests for hires, internships, donations, or sponsorships linked to business.
- Hospitality or travel offered during tenders, approvals, or negotiations.

For more information:

Check the **Y-EMEA Anti-Corruption Policy** or reach out to the **Corporate Compliance Department**.



2.2 Gifts and Invitations

At Yazaki, Resilience means standing firm in our values even when facing pressure, ambiguity, or different cultural expectations.

Our Commitments

- Y-EMEA follows a no-gift policy with very limited exceptions.
- We do not request, accept, offer, or give gifts, hospitality or invitations to events unless allowed under the Y-EMEA Anti-Corruption Policy and local law.
- We respect the gifts and hospitality rules of our customers, suppliers, and all other business partners.
- We document gifts or hospitality that we offer or receive.
- We ask Corporate Compliance Department in case of doubt.



Examples of gifts and hospitality in line with the Anti-Corruption Policy include:

- Office calendar with company logo
- Branded notebook
- Light lunch during a business meeting
- Flowers for International Women's Day
- Box of chocolates during Christmas season



2. OUR RESPONSIBILITY AS A BUSINESS PARTNER

2.3 Dealings with Public Officials

Being a Teamplayer means demonstrating integrity in our interactions with public officials, acting responsibly and transparently to protect each other, our colleagues, and the company.

Our Commitments

- We act honestly, transparently, and fairly in all interactions with Public Officials.
- We understand that Public Officials are subject to strict rules on accepting benefits from private companies. We comply with these rules fully, regardless of local customs, expectations, or business pressure.
- We never attempt to improperly influence Public Officials.
- We provide hospitality to public officials only when allowed under the Y-EMEA Anti-Corruption Policy and local laws.

We do not use intermediaries to circumvent rules. If a situation is unclear or feels uncomfortable, we act responsibly and protect the team by contacting the Corporate Compliance Department before taking any action.

“Public Official” means any person assigned and exercising a public service function as well as any individual running for or elected for political office.



2.4 Donations and Sponsorships

As Teamplayers and driven by Passion, we support initiatives that truly matter. We prioritize integrity by choosing our contributions carefully and declining any requests that conflict with our values.

Our Commitments

- We encourage employees to actively contribute to their communities through volunteering and social engagement.
- We make donations and sponsorships only when they are lawful, ethical, and aligned with Y-EMEA internal rules.
- We do not use donations and sponsorship to circumvent the prohibition on corruption, and do not create the appearance of undue influence.
- We support only legitimate organizations and socially beneficial initiatives that have passed appropriate due diligence checks.
- We follow the internal approval procedure and always obtain required authorizations prior to making any donation or sponsorship.
- We ensure that all approved donations and sponsorships are fully transparent and accurately documented in the financial records of the relevant Y-EMEA entity.
- We do not provide donations or sponsorships for individual benefit or personal causes, except in exceptional and justified cases where alignment with company values and a clear benefit to Yazaki are ensured.



2. OUR RESPONSIBILITY AS A BUSINESS PARTNER

- We do not give donations in cash, cash equivalents, or through company credit/debit cards.
- We do not provide donations or sponsorships in connection with pending or upcoming decisions affecting Y-EMEA.

For more information:

Check **Y-EMEA Donation & Sponsorship Policy** or reach out to the Corporate Communication Department.



2.5 Conflicts of Interest

Curiosity helps us look deeper and ask questions before acting. We make business decisions in the best interest of Yazaki, not based on personal gain or private interests. While we respect relationships and personal privacy, transparency enables us to manage potential risks responsibly. Information which is disclosed is handled confidentially and used solely to protect individuals and the company.

Our Commitments

- We actively anticipate and avoid situations where our decisions could be affected by factors not related to our work, including:
 - personal relationships or family connections
 - financial interests or investments
 - voluntary work or secondary employment
 - political activities
- We disclose potential or real conflicts as soon as we are aware of them to Line Manager and HR and escalate to the Corporate Compliance Department when needed.
- We work together on a resolution and document the outcome to ensure transparency and accountability. By doing so we prevent creating the impression of improper influence.

The following illustrative scenarios may create a real or perceived conflict of interest and must be disclosed early so they can be assessed and managed. A conflict of interest itself is not a violation, but non-disclosure can be. A conflict of interest is a situation that requires openness, transparency, and proper management in line with Yazaki values and internal policies.



2. OUR RESPONSIBILITY AS A BUSINESS PARTNER



Examples of conflicts of interest:

- Your spouse works for a company that supplies services to Yazaki, and you are involved in the supplier selection process.
- After an internal transfer or promotion, you gain authority over activities that involve a company or person with whom you have a personal or financial connection.
- You hold responsibilities in more than one function, entity, or project, and decisions in one role could affect outcomes in the other.
- You have just entered a close personal relationship with another employee who works on the same production line as you.
- You are offered an unpaid honorary role (e.g. advisory board, association representative) by an organization that interacts with Yazaki.
- Someone you are personally close to (close friend, partner) joins a company that later becomes relevant to your role at Yazaki.
- An employee engages in external advisory, consulting, or professional activities connected to companies they interact within their role at Yazaki.



Conflicts of interest are not always obvious. When something is unclear, feels uncomfortable, or requires a second opinion, we reach out to Corporate Compliance Department.

2.6 Antitrust & Competition Law

With Passion and Ambition, we strive at meeting our business objectives. By doing so, we trust on our strength in quality, service, price and innovation. Economic success can only be achieved in an environment of free competition and fair market conditions.

Our Commitments

- We do not enter into anti-competitive agreements or alignments with competitors, which include, but is not limited to
 - price fixing
 - allocation of markets (regions, products, customers)
 - bid rigging (= manipulation of RfQs)
- We do not engage in any form of collusive market behavior with our competitors, including
 - joint boycott of business partners
 - aligned approach towards customers and/or suppliers

2. OUR RESPONSIBILITY AS A BUSINESS PARTNER

- We do not exchange or share with competitors any competitively sensitive information, such as
 - prices and price parameters like discounts, surcharges, cost elements, calculation schemes, contract terms & conditions
 - cost breakdowns
 - capacities and planned investments
 - commercial strategies and future market behavior
 - upcoming or ongoing business opportunities such as RfQs from customers
 - confidential R&D projects or innovations
- We do not accept competitively sensitive information shared unilaterally with us; instead, we refuse and clearly distance ourselves from such undue exchange.
- We communicate and exchange information with competitors only in the context of legitimate business relationships and strictly apply the need-to-know principle; legitimate business relationships include
 - procurement from/sales to competitors
 - sub-contractor agreements
 - joint R&D projects and standardization initiatives

- We protect competitively sensitive information also internally in Yazaki, which means that
 - commercially sensitive information from external suppliers of EDS who are competitors of ECS, is not shared with colleagues in ECS.
 - commercially sensitive information from external customers of ECS, who are competitors of EDS, is not shared with colleagues in EDS.
 - access rights to sensitive data are managed through a functioning roles and responsibilities concept.
 - commercially sensitive information is shared on a need-to-know basis only.

“Need-to-know” means that share/exchange of data and sensitive information must be limited
(1) to what is strictly necessary for the legitimate business purpose, and
(2) to people who have a legitimate interest of receiving the data/information.



2. OUR RESPONSIBILITY AS A BUSINESS PARTNER



Contacts and meetings with business partners, particularly those who are at the same time our competitors, we handle with due care.

This also applies to industry association meetings or similar events where competitors are present. We only attend such meetings if

- a written agenda is provided upfront.
- the meeting is hosted by representatives of the association.
- all participants have agreed to and confirmed compliance with competition law rules.
- minutes are taken during the meeting and circulated to participants afterwards.

For more information:

Check **Y-EMEA Competition Law Policy** or reach out to the **Corporate Compliance Department**.



2.7 Accounting, Tax and Financial Reporting

With Passion and as Teamplayers, we enhance the transparency in our business activities through timely and proper accounting and financial reporting. With Courage we ensure the reliability and integrity of Yazaki's accounting, tax declarations and reporting obligations.

Our Commitments

- We comply with all applicable accounting and tax laws and regulations, apply internationally accepted accounting standards (including IFRS and local GAAP), and meet our tax obligations in a timely, accurate, and responsible manner.
- We maintain all necessary books and records that accurately reflect our business and financial situation, and thereby are the basis for providing true, fair and reliable financial statements.
- We design, implement and document adequate internal controls to mitigate risks in relation to our operations.
- We ensure that we identify, evaluate and assess our assets according to applicable standards.
- We apply a proactive asset management approach that enables business decisions which ensure appropriate investments while maintaining our capabilities and needed resources.
- We protect trust of our stakeholders, business partners, the general public and public authorities by making our annual financial statements subject to independent and objective external audits.



2. OUR RESPONSIBILITY AS A BUSINESS PARTNER

- We uphold transparency in our tax matters, providing complete and honest disclosure to tax authorities and cooperating fully with any tax inquiries or audits.
- We maintain integrity in our tax practices, ensuring our tax positions reflect genuine business activities and align with Yazaki's ethical standards.

For more information:

Check Finance Process flow in BIC or reach out to the **VCT & Finance Department**.



2.8 International Trade

With Teamplayer, we protect the company and each other by performing thorough screenings and escalating concerns early. Driven by Courage, we say no to any form of circumvention, regardless of commercial pressure. With Ambition, we strive for responsible global growth by ensuring that our activities meet international trade requirements.

Our Commitments

- We comply with all applicable international trade laws and regulations, including export controls, economic and trade sanctions, embargoes, customs requirements, import/export regulations, and other restrictive measures issued by national, regional, or international authorities.
- We maintain documented governance frameworks, internal controls, procedures, oversight mechanisms, and training programs to ensure these requirements are consistently, transparently, and effectively implemented, documented and monitored across our operations.
- We ensure that all cross-border transactions involving goods, services, software, or technology comply with applicable export control laws and internal policies. This includes verifying that no transaction directly or indirectly involves restricted or sanctioned individuals, entities, vessels, organizations, regions, or countries.
- We conduct risk based due diligence on all customers, suppliers, intermediaries, and third parties we intend to engage with. We immediately escalate concerns or red flags to the Global Trade Compliance Department.
- We expect our business partners to uphold equivalent international trade compliance standards and to apply a risk-based approach when selecting and monitoring their own partners.



2. OUR RESPONSIBILITY AS A BUSINESS PARTNER

- We consult the Global Trade Compliance Department whenever we have doubts regarding export control classifications, screening results, licensing requirements, customs or import/export obligations, or any other trade compliance matter before proceeding with a transaction.
- We cooperate fully and transparently with competent authorities and with customers requesting documentation to demonstrate trade compliance. We do not seek to circumvent sanctions, embargoes, export controls, customs requirements, or other international trade restrictions - even if doing so could appear to offer short-term commercial advantages.
- We understand that violations may lead to severe civil and criminal penalties, substantial fines, operational disruptions, reputational damage, and significant harm to society. We therefore act with integrity, vigilance, accountability, and transparency at all times.

For more information:

Check **Y-EMEA International Trade Compliance Rules** or contact the **Global Trade Compliance Department**.



2.9 Prevention of Money Laundering

We fight with Courage and Curiosity against money laundering and terrorism financing. With Passion, we have zero tolerance for related criminal activity.

Our Commitments

- We verify the identity and economic background of our business partners.
- We check the origin of payments to ensure they come from legitimate sources.
- We ensure that Yazaki's resources are not made available to support terrorist activities and/or organizations.
- We report suspicious activities and transactions to the Corporate Compliance Department.
- In case of potential infringements, we ensure cooperation with, and reporting to, competent authorities as may be required by law.

For more information:

Check Finance Process in BIC or contact the **Finance & Treasury Departments**.



2. OUR RESPONSIBILITY AS A BUSINESS PARTNER

2.10 Prohibition of Insider Trading

With Courage and Ambition, we prevent insider trading by restricting access to and use of commercially sensitive information of our business partners. We do not use information on our business partners for non-business-related purposes.

Our Commitments

- We do not use non-public information on business relations for personal gain. We never use such information for trading purposes and do not disclose it to others.
- We process non-public information of our business partners only internally.
- We do not share such information with any outside party, including family members.
- We also do not induce third parties to use such information for any financial transactions or other improper purposes.

2.11 Responsible Business Relations & Business Partner Due Diligence

For us, Ambition and Resilience are the foundation that enables us to realize our Business Strategy “Sustainable Growth Together”. Further to this Code of Conduct and the Y-EMEA Business Partner Code of Conduct, we pass on the requirements from our customers, the law and society in our value and supply chain in a responsible manner.

Our Commitments

- We select our business partners with due care and by implementing adequate, risk-based due diligence processes.
- We conduct risk based due diligence before entering any business relationship, and we use the results as part of our decision to select a business partner.
- We repeat due diligence on a periodic basis as part of the ongoing evaluation of the business relationship and the partner’s performance.
- We assess risks, including their impacts on our business activities, our customers, individuals, the environment and society. We factor the results into our decision to enter or continue the business relationship.
- In case of disputes in business relationships, we seek to apply a constructive approach that enables us to find balanced solutions.
- We cooperate cross-functionally and in collaboration with our business partners to address issues that impact the business relationship or our value chain.
- In case of supply chain related events or crisis, we strive to identify and implement solutions that maintain or improve resilience and business continuity.

For more information:

Contact the **Purchasing Department** and familiarize yourself with the **Y-EMEA Business Partner Code of Conduct**.





3. OUR RESPONSIBILITY AS A MEMBER OF SOCIETY



3. OUR RESPONSIBILITY AS A MEMBER OF SOCIETY

3.1 Respect for Human Rights

Guided by Courage and our Teamplayer mindset, we respect human rights in all our activities and business relationships. We treat every individual with dignity and fairness and act responsibly to prevent and address potential human rights risks, in line with internationally recognized standards.

Our Commitments

- We uphold internationally recognized human rights standards and ensure fair and humane treatment in our operations.
- We respect the rights of minorities, indigenous peoples, women, children, human rights defenders, and other vulnerable or marginalized groups, and avoid any negative impacts on them arising from our activities or business relationships.
- We prohibit all forms of forced labor, child labor, and exploitation, and expect the same standards from our business partners.
- We manage any use of private or public security forces in a manner that respects human rights, applying appropriate training, oversight, and control to prevent potential human rights violations.

In Yazaki, we respect internationally recognized human rights standards and frameworks, including:

- The International Bill of Human Rights
- The ILO Declaration on Fundamental Principles and Rights at Work
- The UN Guiding Principles on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises

We also support global initiatives promoting equality and inclusion, including our participation in the Women's Empowerment Principles (WEPs).

For more information:

Check the **Employment Policy**, **Recruitment Policy** or reach out to the **HR Department**.

3.2 Respect for Diversity and Non-Discrimination

Guided by Curiosity and our Teamplayer mindset, we value diversity as a source of strength and innovation. We embrace different perspectives, and experiences, recognizing them as a source of strength and innovation. We foster an inclusive environment where everyone has equal opportunities to contribute and develop.



3. OUR RESPONSIBILITY AS A MEMBER OF SOCIETY

- We ensure equal opportunities and do not tolerate discrimination based on any protected characteristic.
- We value individuals regardless of ethnic descent, origin, nationality, religion, ideology, gender, sexual orientation, gender identity, age, disability, medical condition, race, color, social background, or any other protected characteristic under applicable law.
- We promote an inclusive environment that respects diversity and supports individuals from underrepresented or vulnerable groups.

For more information:

Check the **Employment Policy, Recruitment Policy** or reach out to the **HR Department**.

3.3 Prohibition of Intimidation and Harassment

Guided by a strong Teamplayer mindset and Courage, we foster a workplace where everyone is treated with dignity and respect. Everyone has the right - and the responsibility - to contribute to a safe, respectful, and inclusive working environment.

Our Commitments

- We do not tolerate intimidation, harassment, bullying, sexual harassment, discriminatory harassment, or any other inappropriate behavior.

- We treat each other with respect and contribute to a safe and professional working environment.

For more information:

Check the **Employment Policy** or reach out to the **HR Department**.

3.4 Quality and Safety of Products

With Passion, we pursue excellence in product quality and safety without compromise. As Teamplayers, we work across functions and with our partners to prevent defects, resolve problems, and meet customer expectations. Supported by Resilience, we address challenges responsibly and take ownership of learning from issues as they arise.

Our Commitments

- We ensure the safety and the high quality of our products and services. Product quality and product safety are non-negotiable and shall not be compromised for cost, speed, or targets.
- We listen to our customers and make all efforts to understand their needs and meet their expectations. At the same time, we ensure the physical safety and well-being of end consumers.
- We continuously improve and develop innovative products and services. This helps to ensure consistent high quality and safety of Yazaki's products and services.



3. OUR RESPONSIBILITY AS A MEMBER OF SOCIETY

To support these commitments, we act with integrity in all quality-related activities:

- We maintain accurate, complete, and timely quality data and records and do not falsify or manipulate results or documentation.
- We manage nonconformances and deviations in a disciplined and transparent manner.
- We communicate openly during audits and in customer related quality matters.
- We uphold supplier quality integrity, including objective supplier evaluation and the proper handling of defective or suspect parts.
- We ensure measurement and test integrity by using only approved methods and properly calibrated equipment.

For more information:

Check **Yazaki EMEA Quality Policy** or reach out to the **EDS or ECS Quality Assurance Departments**.



3.5 Product Compliance

Product compliance relies on Courage and Resilience to uphold applicable requirements, address issues transparently, and continuously strengthen our processes over time.

Our Commitments

- We ensure the conformity of our products with applicable laws and/or internal rules.
- We keep our technical promises not only by complying with the text of the law, but also by the spirit of the relevant regulations.
- We follow-up and report any conformity defects of our products to the Quality Department, even if there are solely indications of such defects.
- Appropriate procedures are in place to address Substance of Concern (SoC) management and to ensure continuous compliance with relevant regulations, and customer-specific requirements within the industry.

For more information:

Reach out to the **Quality and Materials & Environmental Product Compliance Departments**.



3. OUR RESPONSIBILITY AS A MEMBER OF SOCIETY

3.6 Protection of the Environment

Resilience is at the core of how we work. We act proactively, embracing change and driving sustainable solutions, always looking beyond immediate needs to protect the environment for future generations. With Curiosity, we challenge existing practices, explore better alternatives, and seek continuous improvement.

Our Commitments

Yazaki EMEA is committed to protecting the environment and supporting sustainable development:

- We use natural resources responsibly and promote environmentally efficient and sustainable technologies.
- We optimize energy consumption through efficiency measures and the use of renewable electricity, where possible.
- We do our part to minimize the impact on climate change, advancing toward carbon neutrality.
- We manage water responsibly and prevent pollution of water, air, and soil.
- We protect biodiversity, ecosystems, and respect land, forest, and water rights, and we do not engage in, nor support, any acts constituting forced eviction.
- We minimize environmental impact by reducing waste, increasing reuse and recycling, and ensuring responsible chemical and material management.

- We promote circular economy principles, ensuring our products comply with environmental regulations and consider impacts across their full lifecycle, including use and end-of-life.
- We consider climate change, biodiversity, ecosystem health, and pollution integrating these factors into our decision-making, environmental planning, and daily operations.
- We comply with environmental laws and customer requirements and proactively pursue continuous performance improvement.

For more information:

Check **Y-EMEA's Environment, Health & Safety Policy** and reach out to the **EHS and Sustainability Departments**.



3.7 External Communication and Use of Social Media

Driven by Passion, we approach communication with care and responsibility, recognizing its impact on trust and reputation. As a Teamplayer, we ensure that what we share is aligned with company standards and contributes to a consistent and reliable representation of Yazaki.



3. OUR RESPONSIBILITY AS A MEMBER OF SOCIETY

Our Commitments

- We understand that any external communication - whether through traditional media, digital platforms, conferences, or social media - can influence how Yazaki is perceived.
- We exercise our freedom of expression responsibly, ensuring that personal views are clearly distinguished from official company position.
- We are committed to ensuring that all external communication is accurate, aligned with our corporate values and communication standards, and protects confidential information while supporting a strong and trustworthy brand image.

What This Means

To uphold this commitment, we

- do not speak on behalf of the company unless officially authorized.
- ensure that official external communications - such as press releases, media interviews, or content published on official Yazaki channels - are reviewed and approved by Corporate Communications. Routine business communication (e.g., customer discussions, operational exchanges) does not require such approval.
- follow Yazaki brand guidelines and use approved templates for all external presentations, conference materials, and public communications.

- clearly separate our personal opinions from official company positions when using personal social media accounts and do not imply that we represent the company.
- respect confidentiality, intellectual property, and privacy when sharing any information or content externally.



Recommended actions

- Use approved Yazaki templates, logos, and visual materials when preparing content for external communication.
- Contact your Local Communication Partner or Corporate Communications if you are unsure whether communication may be shared externally.
- Report any unauthorized or misleading use of the Yazaki name, logo, or brand identity on social media or other platforms to the Corporate Communications Department.

For more information:

Check the **Y-EMEA Corporate Communication Policy** or **Y-EMEA Social Media Policy** and reach out to the **Corporate Communications Department**.



3. OUR RESPONSIBILITY AS A MEMBER OF SOCIETY



3.8 Contribution to Local Communities

Guided by a strong Teampayer mindset and Ambition, we contribute to the development of local communities wherever we operate. We respect local cultures and practices and engage with communities in a responsible and meaningful way. Through our actions, we aim to create a positive and lasting impact beyond our business activities.

Our Commitments

As a member of the local communities, we promote social contribution activities and encourage and actively support our employees to participate in community activities:

- We consider the social circumstances of each community and act with respect for its culture and customs.
- We conduct and participate in activities for the community's sustainable development together with local residents and provide possible support. This includes activities to promote social issues, education, science, art, culture, sports, and protection of the environment.



4. OUR RESPONSIBILITY TO PROTECT INFORMATION, TECHNOLOGY, AND TRUST



4. OUR RESPONSIBILITY TO PROTECT INFORMATION, TECHNOLOGY AND TRUST



4.1 Data Protection and Privacy

With Courage and Resilience as our foundation, we understand data protection as a fundamental human right, in line with the UN Universal Declaration of Human Rights and the OECD Privacy Principles and process personal data lawfully, fairly and transparently - and safeguard the rights and freedoms of every individual whose data we handle.

Our Commitments

We process personal data in the course of our business activities across Europe, the Middle East, Africa and beyond. As a member of the global Yazaki Group, we are subject to the EU General Data Protection Regulation (GDPR) and the national data protection laws of all countries in which we operate. We ensure that adequate legal mechanisms are in place for any international transfer of personal data we are responsible for.

What this means

- We process personal data only for specified, explicit and legitimate purposes and only on the basis of a valid legal ground (such as contractual necessity, legal obligation, legitimate interest or consent).
- We diligently assess Data Protection Risks and apply the Principle of Privacy by Design accompanying our Business Owners for all processing activities along the lifecycle of all personal data.

- We collect and retain only the personal data that is strictly necessary for the purpose (data minimization) and delete or anonymize it when it is no longer needed (storage limitation).
- We strive for data quality by keeping personal data accurate and up to date and take appropriate steps to correct or erase inaccurate data without delay.
- We protect personal data against unauthorized or unlawful access, loss, destruction or disclosure, applying appropriate Technical and Organizational Measures.
- We never share personal data with third parties - including other Yazaki entities, suppliers or service providers - without a valid legal basis and, where required, a Data Processing Agreement or equivalent contractual safeguard.
- We respect the rights of data subjects, including the right of access, rectification, erasure, restriction, portability and the right to object.
- We report any suspected or confirmed personal data breach without undue delay to the responsible Data Protection Authorities and respect related Data Subject Rights.
- We regularly train our employees on Data Protection and ensure a valid awareness.

For more information:

Check **Y-EMEA Data Protection Manual** and the **related policies** or reach out to the **Corporate Data Protection & Information Security Governance Department**.



4. OUR RESPONSIBILITY TO PROTECT INFORMATION, TECHNOLOGY AND TRUST



4.2 Confidential Information & Information Security

As a Teamplayer with Courage we protect our information assets - and the information entrusted to us by our customers, suppliers and partners. Therefore, we design, operate and continuously improve our Information Security Management System (ISMS) certified in accordance with TISAX and ISO/IEC 27001, underpinning the trust of our automotive and other business partners across the globe.

Our Commitments

We are committed to ensure the Confidentiality, Integrity, Availability and Resilience of all Yazaki information, personal data and third-party information throughout its entire lifecycle. The Y-EMEA ISMS is designed to protect information assets from threats and risks - whether internal or external, deliberate or accidental. As a Premium Supplier to our Customers, TISAX certification is not merely a compliance matter - it is our license to operate.

Handling Confidential Information

To fulfill this commitment, Y-EMEA follows the four core principles of information security:

- **Confidentiality:** Information is accessible only to those who are authorized to access it.
- **Integrity:** Information must not be altered or destroyed in an unauthorized manner.

- **Availability:** Information and systems must be reliably accessible when needed by authorized persons.
- **Resilience:** Even in the event of disruption, disaster or attack, the Confidentiality, Integrity and Availability of information must be ensured.

What this means

- We apply the data classification rules set by Y-EMEA and handle information in accordance with its classification level.
- Before engaging supplier or service provider who will access Y-EMEA information assets, we follow a comprehensive Vendor Due Diligence Process to ensure risk-adequate safeguarding and binding contractual documentation.
- We ensure that confidential information is stored securely - whether in physical or digital form - and is accessible only to authorized individuals.
- We use Non-Disclosure Agreements before sharing any confidential information with external parties and ensure that the NDA process is managed through the appropriate Y-EMEA function.
- We apply the Clean Desk principle: secure sensitive documents and lock screens when leaving your workstation.
- We are vigilant against social engineering, phishing and other forms of cyber-attack. Do not click on suspicious links, open unexpected attachments or share credentials.

4. OUR RESPONSIBILITY TO PROTECT INFORMATION, TECHNOLOGY AND TRUST



- We immediately report any suspected or confirmed Information Security Incident internally to our designated Incident Response Team for further assessment and taking adequate countermeasures, and where required, externally to the competent Supervisory Authorities.

Confidential Information is non-public, sensitive data - including, but not limited to - customer and supplier data, personal data, technical drawings, prototypes, pricing information, financial data, business strategies, which is intended only for authorized disclosure as well as any information marked as confidential or which, by its nature, must be treated as such.



For more information:

Check **Y-EMEA Information Security Policy** and related internal standards or reach out to the **Corporate Data Protection & Information Security Governance Department**.



4.3 Protection of Intellectual Property

With Passion and Ambition, we value and protect Yazaki's intellectual property - as one of our most valuable business assets. We protect it vigorously, and we respect the intellectual property rights of others.

Our Commitments

We develop, acquire and use a wide range of intellectual property in the course of our business, including copyrights, designs, drawings, know-how, patents, prototypes, proprietary processes, software/coding, technical drawings, trademarks, trade secrets and utility models. This intellectual property belongs to the Yazaki Group and must be protected accordingly. At the same time, we respect the intellectual property rights of our customers, suppliers, competitors and other third parties - and we require all employees and business partners to do the same.

What this means

- We recognize that any intellectual property created in the course of employment belongs to Y-EMEA or, where applicable, to the Yazaki Group, unless otherwise agreed in writing.
- We protect Y-EMEA trade secrets and proprietary know-how against any unauthorized disclosure to any systems including cloud applications and AI tools.
- We use third-party intellectual property only in accordance with the applicable license terms and with prior authorization.
- We ensure that software installed on Y-EMEA systems is properly licensed and has been approved by the IT department.
- We take particular care when working with customer or supplier intellectual property and ensure that such information is adequately protected.

4. OUR RESPONSIBILITY TO PROTECT INFORMATION, TECHNOLOGY AND TRUST



- We inform management or the Y-EMEA Legal and Compliance function immediately if we become aware of any actual or suspected infringement of Y-EMEA's intellectual property by a third party, or if you are concerned that an activity may infringe the intellectual property rights of a third party.



For more information:
Check **Y-EMEA Information Security Policy** and **related internal standards** or reach out to the **Corporate Data Protection & Information Security Governance Department** as well as the **Corporate Legal Department**.

Questions relating to Software Licensing are to be directed to the Corporate IT Department.

4.4 Responsible Use of Artificial Intelligence

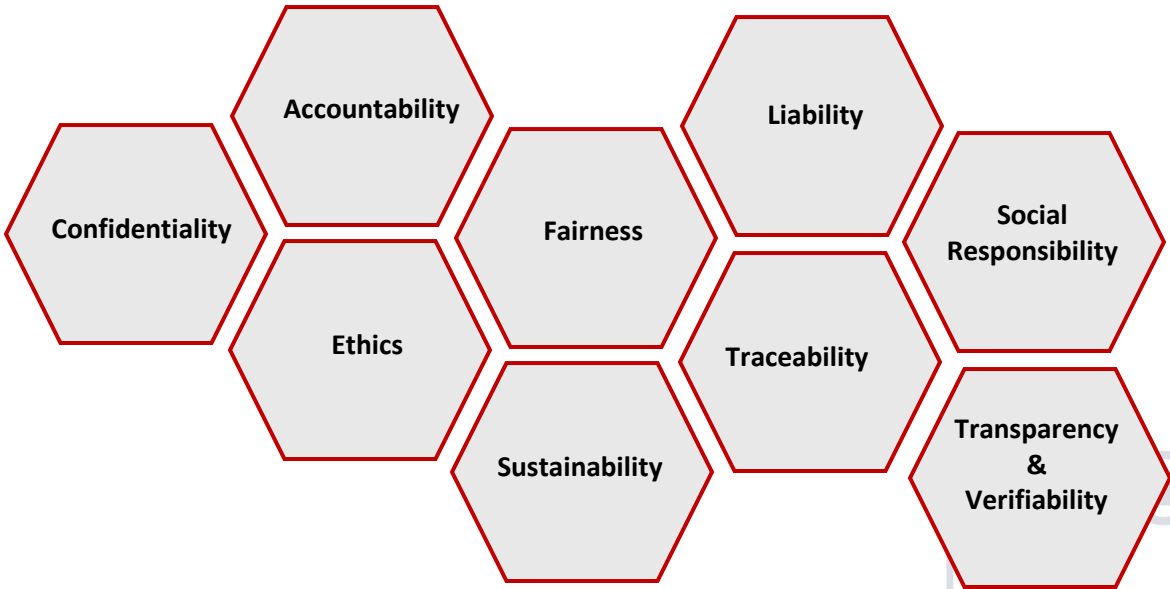
Artificial Intelligence (AI) offers both, various opportunities and risks for Y-EMEA that we need to adequately manage in order to enable efficiency, improve human decision-making and accelerate innovation. With Curiosity and Ambition Y-EMEA is committed to the ethical, transparent and responsible use of AI, in accordance with applicable laws and in a manner that protects and supports our employees, when doing business with our customers and suppliers.

Our Commitments

Taking into account the steady developments we continuously improve our Artificial Intelligence Management System (AIMS) to protect and facilitate our business operations with all our stakeholders.

Handling of Artificial Intelligence

To fulfill this commitment, Y-EMEA's AI Governance encompasses a comprehensive and balanced approach taking into account the principles of



4. OUR RESPONSIBILITY TO PROTECT INFORMATION, TECHNOLOGY AND TRUST



What this means

- We ensure compliance with the defined Y-EMEA AI Standards. We diligently assess AI Risks and apply the Principle of AI by Design along the lifecycle of all AI processing.
- We do not input personal data, confidential business information, trade secrets, technical drawings, customer or supplier data, or any other protected information into external AI systems.
- We always critically review AI-generated outputs before using, sharing or relying on them.
- We indicate the AI-related content we produce, use and submit and demonstrate our awareness for accountability.
- We comply with applicable AI laws and regulations when designing, operating and continuously improving AI tools.
- We strive for a high of quality of our data as a prerequisite for the use of AI tools and request our employees to actively contribute to the principle of quality.

For more information:

Check **Y-EMEA Artificial Intelligence internal standards** or reach out to the **Corporate Data Protection & Information Security Governance Department** as well as the **Corporate IT Department**.



4.5 Use and Protection of Company Resources

With Passion and Resilience, we use the information technology and other company resources to work effectively and responsibly. The use of these resources is governed by clear rules that help us to protect our information assets, respect privacy, maintain the integrity and resilience of our systems.

Our Commitments

Our information technology ecosystem encompasses both technical and non-technical sphere: information, communication, computers, laptops, smartphones, tablets, network systems, software applications, e-mail, internet access and other related equipment provided for the purpose of carrying out Y-EMEA business.

Every employee is responsible for the protection and appropriate use of the information assets entrusted to them. Physical assets, company premises, equipment and financial resources must be handled with care and used responsibly and in a manner that serves the company's interests.

What this means

- We provide information assets for business purposes. Limited personal use is only permitted based on a strict governance.
- We safeguard our systems via IT Security & Control measures and adequate training and awareness campaigns.

4. OUR RESPONSIBILITY TO PROTECT INFORMATION, TECHNOLOGY AND TRUST



- We use only the systems, applications and accounts granted solely within authorized scope and without circumventing IT Security Controls.
- We prohibit usage of Y-EMEA IT resources to access, store, send or distribute content that is illegal, pornographic, racist, violent, discriminatory, extremist or that otherwise violates applicable laws or internal standards.
- We apply a strict physical security governance to access and deliver services to our locations.

Other Company Resources

- Extending this obligation beyond IT we also use other company resources - including vehicles, equipment, tools and company premises - responsibly and (if not explicitly authorized) solely for business purposes and protect them against loss, damage, misuse or theft.
- We use financial resources in accordance with the applicable authorization and approval procedures. Company resources are neither used for private benefit nor for the benefit of third parties without authorization.
- We report any suspected misuse, loss or theft of company property immediately to the management or the relevant function.

For more information:

Check **Y-EMEA Technology Acceptable Use Policy** and reach out to the **Corporate Data Protection & Information Security Governance Department**, the **Corporate EH&S**, or **IT Department**.





5. OUR ETHICAL RESPONSIBILITY FOR COMPLIANCE



5. OUR ETHICAL RESPONSIBILITY FOR COMPLIANCE

5.1 Doing the Right Thing

Curiosity means taking a moment to pause, reflect, and ask the right questions before we act. Not every situation we face can be covered by rules or detailed guidance in this Code of Conduct. Therefore, acting responsibly requires an open and questioning mindset, combined with sound judgment and personal accountability. When we are unsure whether a course of action is appropriate, Curiosity helps us step back, consider the implications, and seek guidance rather than proceeding on assumptions.

Our Commitments

We commit to making thoughtful and well-informed decisions guided by ethical integrity, legality, and transparency. When situations are unclear or raise doubts, we do not ignore our concerns. Instead, we actively reflect on our actions and, where necessary, seek advice.

*If you are uncertain about “**doing the right thing**” in the context of Compliance, seek guidance from the **Corporate Compliance Department** (compliance@yazaki-europe.com) or your **local Compliance Representatives**.*

Compliance means following all applicable legal and internal requirements and acting in line with our ethical commitments.



What this means

We take time to reflect before acting and ask ourselves critical questions, including:

- Do we genuinely believe that what we are about to do is right?
- Is the activity lawful and compliant, and, if we think so, how have we checked that?
- Would we feel comfortable if this action became public?
- Would we feel at ease discussing it with our family or close peers?
- Are we willing to stand behind this decision with our personal reputation?



If we can confidently answer “**yes**”, our actions are likely appropriate.



If we answer “**no**” or “**maybe**” to any of them, we pause and seek guidance before acting. In case of doubt, we proactively contact our superior or the relevant departments identified in the Code of Conduct to clarify concerns and ensure the right course of action.

5.2 Reporting Violations

Speaking up requires Courage and a strong sense of responsibility. We expect everyone to always act in the best interest of Yazaki, to raise concerns and report suspected violations, even when doing so may feel uncomfortable. By addressing issues early, we protect Yazaki, our colleagues, Business Partners, Customers, and eventually the way we work together.



5. OUR ETHICAL RESPONSIBILITY FOR COMPLIANCE

Our Commitments

When we perceive factual indications for actual or potential violations, respectively, any suspicious activities in connection with Yazaki's business we report them in accordance with applicable laws, regulations, and the Yazaki Whistleblowing Policy.

*According to the Whistleblowing Policy, “**Violation**” means actual or potential violations of applicable laws, regulations, Y-EMEA Group internal rules as well as Unethical Behavior.*

*“**Unethical Behavior**” is behavior not within the range of social common sense or contrary to the purpose of applicable laws and regulations.*

What this means

- We submit reports on actual or potential violations through the [Yazaki EMEA SPEAK-UP LINE](#), our web-based Whistleblowing Hotline. This Hotline enables protected and confidential communication, including anonymous reports.

EMEA SPEAK-UP LINE



- We treat every report seriously.
- We refrain from misusing the Whistleblowing Hotline.
- We provide all relevant facts comprehensively and transparently, including evidence, and describe what exactly happened, in which way, when and where it happened and who was involved.
- As Managers, we recognize our heightened responsibility, especially in situations that are complex or uncomfortable. We therefore report actual or potential concerns of violations proactively and without delay, regardless of whether others have already raised them. We acknowledge that failing to report when timely action could have prevented or mitigated risks, threats, or harm may lead to a review of consequences, including disciplinary measures.

5.3 Handling and Investigating Reported Concerns of Violations

Curiosity and Courage shape how we address reported issues and concerns. We actively support compliance-related reviews and, where required, Internal Investigations into reported matters. Rather than overlooking problems, we seek to understand them fully and address their root causes in a constructive way.

*An **Internal Investigation** is a process-oriented and comprehensive fact-finding that considers forensic best practices. The process aims at refuting or confirming reported violations and associated internal control deficiencies.*



5. OUR ETHICAL RESPONSIBILITY FOR COMPLIANCE

What this means

- We keep in mind that fact-findings do not predict the outcome, but are necessary and inevitable for informed, fair, and balanced decisions.
- We support every fact-finding process that relates to an actual or potential compliance issue, either proactively as reporters or upon explicit request, including when we are not directly involved.
- We handle all case-related information as confidential and do not share it with others, unless explicitly allowed.
- We respect the rights of everyone involved in the process and uphold the Presumption of Innocence, meaning that a person is treated as innocent unless and until it is proven that they did something wrong.
- We implement adequate and proportionate consequences in case of confirmed violations, in line with zero tolerance principle and Y-EMEA Whistleblowing Policy.

5.4 Refraining from Retaliation

As Teamplayers we are committed to creating an environment where everyone feels safe to share issues and concerns. We encourage and protect those who speak up. By doing so, we reinforce accountability, trust, and credibility across our organization.

Our Commitments

Any act of (attempted) retaliation following a report on concerns of a violation constitutes a violation of employment duties, the Whistleblowing Policy, and may also violate applicable laws and regulations in certain jurisdictions.

*In general, **retaliation**, including attempts, in the context of Whistleblowing means any direct or indirect act or omission that causes, or threatens to cause, unjustified disadvantages to a person because they reported concerns or are involved in a related review.*

Retaliation can have many forms, for example, dismissal, demotion, harassment, discrimination, intimidation, or any other adverse treatment.

What this means

- We refrain from retaliation and do not tolerate retaliation by others.
- We report any presumed allegation immediately to the Corporate Compliance Department or locally designated persons. We know that confirmed allegations may result in appropriate disciplinary measures and even criminal complaints.



5. OUR ETHICAL RESPONSIBILITY FOR COMPLIANCE

- We protect those who report in “good faith”, i.e., on a factual basis to believe the information was accurate at the time of reporting. The scope of protection is determined on a case-by-case basis and can include measures like temporary adjustments of reporting lines or job duties, protection against unfair evaluations, disciplinary action against perpetrators, and other employment-related disadvantages.

For more information on handling reports and violations:

Check the **Y-EMEA Whistleblowing Policy**, including its annexes and localized country-specific versions, contact the **Corporate Compliance Department** (compliance@yazaki-europe.com), or the locally designated persons.



5.5 Compliance Awareness and Training

Inspired by Curiosity and Ambition, we cultivate a mindset of continuous learning. We ask questions, seek understanding, and translate learning into better decisions and responsible actions.

Our Commitments

- We regularly review training needs and require additional or role-specific trainings when laws, regulations, risks, or business activities change, or when compliance risks are identified. Refresher timelines, mandatory modules, and any additional training requirements are defined through the competent functions and communicated transparently and in advance.
- We ensure that all employees complete Code of Conduct training during onboarding and as part of defined refresher cycles, supporting our shared ambition to grow and improve.
- We complete assigned trainings with full focus, attention, and commitment. We recognize that learning is an essential part of acting with integrity and responsibility in our daily work.
- We create an environment that supports learning. As Leaders, we set the tone by facilitating sufficient time for trainings, encouraging open dialogue, and monitoring timely completion within our teams.
- We understand that completion of all required trainings is a shared responsibility and an essential part of maintaining a strong culture of ethics and compliance.

