## Supplier Code of Conduct

More Lives Saved – More Life Lived



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### Purpose & Scope

Sustainability performance is one of the deciding factors in Autoliv's sourcing strategy. This Supplier Code of Conduct ("Supplier Code") sets the expectations all suppliers must commit to as an Autoliv partner. It applies to all suppliers, their employees, agents, suppliers, and subcontractors who are doing business with or for Autoliv. To the extent not replicated in their own supplier contracts, all suppliers must ensure that their suppliers and subcontractors comply with applicable laws and regulations and with the principles expressed in this Supplier Code. All suppliers are expected to, at all times, carry out appropriate due diligence on their suppliers with a relation to Autoliv business.

This Supplier Code draws upon the Autoliv Code of Conduct (Saving Lives with Integrity) and the following charters and conventions, as well as relevant international laws and regulations:

- The United Nations Global Compact
- The United Nations Universal Declaration of Human Rights
- The United Nations Guiding Principles on Business and Human Rights
- International Labour Organization's Declaration on Fundamental Principles & Rights at Work

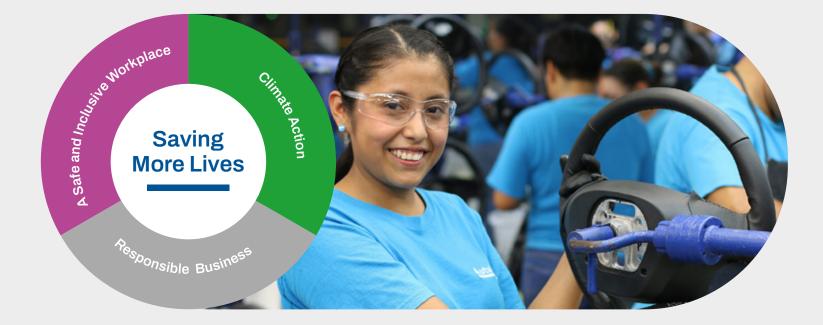
- OECD Guidelines for Multinational Enterprises
- The Global Automotive Sustainability Guiding Principles
- UK Modern Slavery Act

All suppliers must conduct themselves in accordance with relevant local laws and regulations. However, when the standards of this Supplier Code are stricter than local laws, all suppliers must follow this Supplier Code (except when doing so would be illegal).

We believe that complying with this Supplier Code and therefore following the standards that Autoliv expects of itself will lay the foundation for successful and sustainable business relationships.

### Sustainability Framework

Within Autoliv and across all suppliers, we look to organize our priorities and planning in alignment with our Sustainability Framework. The framework has Saving More Lives through our products and services at the heart of everything we do, supported by our commitments to Responsible Business, A Safe and Inclusive Workplace, and Climate and Environmental Action.



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### Saving More Lives

The Autoliv vision of Saving More Lives drives all our work, and it is an integral part of our sustainability agenda. Therefore, it is vital for Autoliv that all suppliers act consistently on good traffic safety principles whenever these are within their control and ensure the quality of products and services provided to Autoliv. We also ask all suppliers to follow the precautionary principle in their decisionmaking and actions. This means all suppliers must always take protective measures if there is reason to believe that a proposed action could negatively impact the environment or society or pose a health and safety risk.

#### Quality

Autoliv's products never get a second chance. Therefore, a relentless commitment to quality is at the core of everything we do. It is impossible for Autoliv to achieve this without the same focus coming from all suppliers. All products and services received from the suppliers must meet their stated contractual specifications and must be fit for their intended use. If a supplier has a concern or doubt regarding quality, they must raise this with Autoliv immediately.

#### **Traffic Safety**

We urge all suppliers to adopt a systematic way of working with road safety and to integrate the following into all relevant aspects of their operations:

- Have or seek to develop a clear policy and targets for strengthening road safety within their sphere of influence. The policy should describe the organization's approach to road traffic safety and a commitment to support within their value chain.
- Through our research and experience, we know the following measures make a significant impact on road safety: mandatory wearing of seatbelts (driver and passengers), zero tolerance for alcohol and use of mobile devices, procuring vehicles with high safety standards (both commercial vehicles and cars), rest/ break policies, and adherence to speed limits. All suppliers must follow Autoliv's key safety factors.
- Road Safety Footprint: All suppliers must work towards understanding and managing their Road Safety Footprint (injuries related to road traffic within their operations and supply chain). Autoliv strongly encourages all suppliers to begin by tracking the number of road traffic injuries occurring within their supply chain and then work systematically to improve their road safety measures to help drive down these numbers.
- Strongly encourage safety requirements to be cascaded down through their supply chain.

By encouraging all suppliers to reflect on their own traffic safety work, Autoliv helps amplify a positive and reinforcing impact that helps in Saving More Lives.

### Responsible Business

#### **General Expectations**

Working in adherence with all applicable laws and regulations is a basic requirement for all suppliers. We also firmly believe that working relationships based on high standards of ethics and integrity enable the most productive partnerships.

All suppliers should think proactively about the training, controls, and monitoring processes to help them implement their own responsible business practices, including business continuity plans, to appropriately manage their legal and compliance risks.

#### Anti-Corruption & Bribery

All suppliers must comply with global Anti-Corruption & Bribery regulations such as the US Foreign Corrupt Practices Act, the UK Bribery Act, and article 164 of the Chinese Criminal Code. Therefore, all suppliers must have zero tolerance for any form of bribery, in any business dealings, in any location. This means all suppliers must inform and monitor all employees, agents, and others working on their behalf to never offer, promise, request, or receive any-thing of value, either directly or indirectly (i.e., via a third party), to improperly influence or perform any business decision or task or to gain any other form of unfair advantage. This covers dealings with both private individuals and government officials.

Extra caution should be applied to dealings with government officials. Accurate books and records must be maintained to enable appropriate monitoring and review.

To the extent any gifts or hospitality are proposed between a supplier and Autoliv, this must be done with transparency and never in a manner that could raise allegations of bribery or the creation of a conflict of interest.

Should a supplier become aware of any incident or suspicion of bribery or corruption (including fraud, money laundering, embezzlement, or extortion) impacting their business dealings with Autoliv or involving any Autoliv employee, they must report this immediately. For reporting options please see <a href="https://www.autoliv.com/speak\_up">www.autoliv.com/speak\_up</a> on the Supplier Portal.

#### **Conflicts of Interest**

All suppliers, their employees, and their own suppliers must be encouraged and supported to make fair decisions based on objective criteria.

Adequate training should be provided to help identify and avoid conflicts of interest impacting any business dealings with Autoliv.

### Responsible Business

#### **Counterfeit Parts**

All suppliers must work to minimize the risk of introducing counterfeit parts and materials into deliverable products. To support this commitment, they must establish meaningful processes to detect counterfeit parts and materials.

Should a supplier become aware of counterfeit parts or materials impacting their dealings with Autoliv, they must report this to Autoliv immediately.

#### Data Privacy & Confidential Information

All suppliers must follow applicable data privacy laws and have appropriate systems, training, and controls in place to help ensure that personal data is only collected, used, stored, and deleted in accordance with these obligations. All suppliers must also ensure these data privacy obligations are followed by their own suppliers for any personal data shared by Autoliv with them or for any personal data they may collect regarding work involving Autoliv.

If a supplier becomes aware of a breach of personal data impacting Autoliv, they must report this to Autoliv without undue delay or as contractually agreed.

In addition to specific data privacy requirements, all suppliers must respect and protect entrusted confidential and sensitive information with due care. They must also ensure the cybersecurity of its operations by understanding the risks and implementing sufficient controls. All suppliers must report any suspected or alleged impermissible use of such sensitive and confidential information which could have a negative impact on Autoliv.

#### **Export Controls & Sanctions**

All suppliers must stay up to date with the global trade, export control, or economic sanction laws that impact their business dealings. These laws can cover a wide range of activities, and all suppliers must maintain appropriate systems and controls to support their adherence.

Should a supplier become aware of a breach or possible breach of any trade, export control, or economic sanction laws impacting their dealings with Autoliv in any way, they must report this to Autoliv immediately.

#### **Fair Competition**

All suppliers must comply with applicable competition and antitrust laws. All suppliers must avoid business practices that unlawfully restrain competition, including through price fixing, bid rigging, market allocation, and improper exchange of competitive information, whether with competitors or via their own suppliers. When interacting with competitors of Autoliv, all suppliers must not disclose any sensitive Autoliv information or facilitate such exchange.

All business statements and communications should be truthful and accurate.

### Responsible Business

#### Financial Responsibility & Accurate Records

All suppliers must maintain accurate business records across all elements of their business operations involving Autoliv from product inspections, time recording, and safety reporting through to financial accounting and environmental reports.

All suppliers must act in accordance with generally accepted accounting principles, and the accounting records must show the nature of all transactions in a correct and non-misleading manner.

This includes following obligations regarding expected disclosures of financial and non-financial information in accordance with applicable regulations and prevailing industry practices.

#### **Responsible Sourcing of Materials**

All suppliers are required to ensure that sourcing of materials and services to Autoliv is managed in an ethical, sustainable, and socially conscious manner. Sourcing policies should be aligned with the principles established by the International Labour Organization (ILO) and the United Nations Guiding Principles for Business and Human Rights (UNGPs). All suppliers must conduct appropriate due diligence to ensure any items sourced to Autoliv do not contribute to human rights abuses or ethical violations or negatively impact the environment.

These commitments must be supported and evidenced by appropriate due diligence across the entire supply chain, particularly regarding minerals and metals (e.g., cobalt sourcing details). Due diligence work must be available for Autoliv inspection upon request, and all suppliers must be willing to support Autoliv efforts to gain maximum transparency and traceability for all critical raw materials. Autoliv requires all smelters for cobalt and conflict minerals (3TG) to be compliant with the Responsible Minerals Assurance Process (RMAP), RMAP Conformant or Active, or open to RMAP audit.

#### **Responsible Tax Practices**

All suppliers must pay all tax obligations, meet relevant payment deadlines, and fully comply with all relevant tax laws and accounting rules and regulations in the tax jurisdictions in which they operate. All suppliers are expected to be open and transparent with tax authorities about their tax liability.



### A Safe & Inclusive Workplace

#### **General Expectations**

We can only perform at our best for extended periods if we feel safe and included. This is an imperative for Autoliv, not only because it is the right thing to do, but because it sustains our commercial ambitions.

#### Child Labor & Forced and Compulsory Labor

We have zero tolerance for any form of child or forced labor in any part of our supply chain. No supplier should have employees, contractors, or sub-suppliers younger than the age of 15, and all must be freely employed. Forced and compulsory labor covers any form of modern slavery, including debt bondage, prison labor, personal documents withheld by the employer, and human trafficking.

If a supplier becomes aware of a child or forced labor incident (or material allegations of such) within its own operations or those of a supplier, this information must be reported to Autoliv immediately.

#### **Fair Working Conditions**

All suppliers must ensure that working conditions for all employees comply with all relevant laws and regulations. This includes working hours and overtime, employment contracts, wages, and benefits.

#### **Freedom of Association**

All suppliers must respect the rights of their employees to form unions or other forms of employee associations recognized by local laws. Employees should be encouraged and provided opportunities to speak about their working conditions with management in a safe environment.

#### Health & Safety

In both the marketplace and the workplace, health  $\mathcal{E}$  safety is more than an element of our business – it is our business. Safety at work includes mental wellbeing as well as physical safety, and we fully expect that all suppliers have health  $\mathcal{E}$  safety as a critical priority with a goal of zero accidents. Responsibility for health  $\mathcal{E}$  safety starts with senior management. Health  $\mathcal{E}$  safety risks and hazards must be identified and appropriately mitigated, which should be evidenced through appropriate systems, controls, training, and performance monitoring. Autoliv encourages all suppliers to adhere to ISO 45001 (Occupational Health and Safety Management System).

#### Non-Harassment & Non-Discrimination

Autoliv does not allow any form of harassment or discrimination in the workplace, and this must also be the case for all suppliers. This includes any form of discrimination based on gender, gender identity, ethnicity, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social background, or other characteristics protected by applicable legislation.

### Climate & Environmental Action

#### **General Expectations**

Strong climate and environmental management are fundamental business responsibilities and success factors. At Autoliv we do not intend to simply follow market practices: we want to be a leader. To demonstrate and underpin this ambition, we have set clear climate ambitions:

- To be carbon neutral in our own operations by 2030
- Net-zero GHG emissions across our supply chain by 2040

To meet these ambitions, we must work in partnership with all members of our supply chain. We expect rigorous adherence to all environmental laws and regulations by all suppliers, supported by identification of relevant environmental impacts through strong environmental management systems, with applicable certifications where necessary and following applicable reporting requirements. We encourage all suppliers to adhere to ISO 14001 (Environmental Management Systems).

Autoliv expects all suppliers to systematically assess, measure, and continuously reduce their environmental impact in key areas such as energy efficiency, greenhouse gas emissions, water, waste, and air quality. Whenever possible we will share our ideas and experiences, and we expect the same openness from all suppliers.

#### **Chemical Management**

All suppliers must have clear procedures to enable identification and management of chemicals to ensure safe handling, movement, storage, use, recycling, and disposal.

All suppliers must identify, minimize, or eliminate the use of restricted materials. To meet these requirements, all suppliers must establish programs (International Material Data System) to collect data from their own component manufacturers, identifying all chemicals used which are classified as restricted substances according to local laws or common automotive industry standards.

#### **Energy & Greenhouse Gas Emissions**

All suppliers must set appropriate targets, aligned with Autoliv's climate ambitions, and be able to demonstrate and report on progress toward reducing greenhouse gas emissions within their own operations and throughout their own supply chain.

All suppliers must have an energy management program with goals for significant efficiency improvements and a program for increasing the use of renewable energy.

### Climate & Environmental Action

#### **Natural Resources & Waste Management**

All suppliers must set waste reduction targets and have plans in place for reduction, reuse, recovery, recycling, and disposal. Waste must be handled and disposed of methods which protect the health and safety of employees as well as the environment.

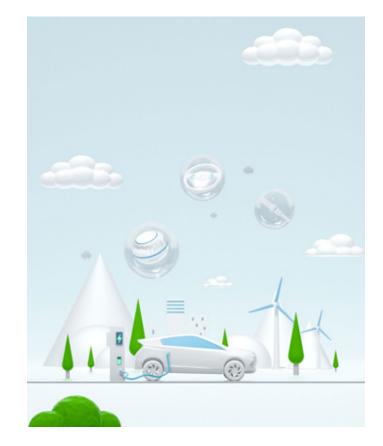
All suppliers must be able to demonstrate their planning and actions to increase the use of sustainable and renewable resources in an efficient manner such that waste and residual products are minimized over the product's life cycle. All suppliers are expected to apply relevant eco-design and circularity principles in their design and manufacturing, also taking into account end-of-life treatment.

#### Water & Air Quality

All suppliers must assess their water usage and develop a program for water preservation and usage reduction and adequately treat wastewater discharges.

Air quality shall be routinely monitored across a supplier's operations, and plans should be developed to minimize emissions.

Air quality emissions include for example volatile organic compounds (VOCs), corrosives, particulate matter (PM), ozone-depleting substances, air toxins, and combustion by-products generated across operations.



### Violations, Inspection Rights & Co-Operation

#### Violations of this code

If a supplier becomes aware of any potential violation of this Supplier Code, they should immediately inform their Autoliv contact. If a violation is confirmed, a corrective action plan is required. A violation may lead to the termination of business relations with Autoliv and action for damages, if appropriate.

#### Inspection Rights & Co-Operation

Autoliv has the right to verify adherence with this Supplier Code via questionnaires or on-site inspections (conducted by us or a designated third party), and all suppliers should provide all reasonable forms of co-operation with these efforts.

#### **Concerns relating to Autoliv**

If a supplier has a concern or allegation against Autoliv, it is likewise the case that this concern should be raised immediately, and we will seek to provide all reasonable assistance.



### Speak Up and Non-Retaliation

Any person involved with Autoliv activities must feel safe to speak up if they have a concern, problem, or question. That people know that they have this right cannot just be assumed, and we all have an active role to play in creating working environments where every person feels safe and empowered to speak up.

All suppliers must provide adequate systems, training, and leadership support to maintain healthy and effective "speak up" environments. As part of this, all supplier employees must know that they will be protected from any form of retaliation should they raise a concern, problem, or question in good faith.

We hope that any concern or problem a supplier may have can at first be openly discussed with their Autoliv contact. However, should this not be possible for any reason, they are welcome to use the confidential <u>Autoliv Speak Up Helpline</u>. More information regarding "speak up" channels can be found on the Autoliv Partner Portal or at <u>www.autoliv.com/speak\_up</u> Speak up.





### **Supplier Code of Conduct**

January 2023

