

HARMAN International Supplier Code of Conduct

Table of Contents

1.0 RESPONSIBLE BUSINESS PRACTICES	1
1.1 Integrity	1
1.2 Conflicts of Interest	1
1.3 Fair Competition	1
1.4 Disclosure of Information	2
1.5 Intellectual Property	2
1.6 International Trade Controls and Sanctions.....	2
1.7 Protection of Identity and Non-retaliation.....	2
1.8 Privacy and Data Protection	2
1.9 Compliance with Applicable Law	3
2.0 ENVIRONMENT, HEALTH, AND SAFETY	3
2.1 Occupational Safety.....	3
2.2 Emergency Preparedness	3
2.3 Hazardous Substances	4
2.4 Health and Safety Communication.....	4
2.5 Air Emissions.....	4
2.6 Energy Consumption and Greenhouse Gas Emissions	4
3.0 LABOR AND HUMAN RIGHTS.....	4
3.1 Child Labor	5
3.2 Freely Chosen Employment.....	5
3.3 Freedom of Association and Right to Collective Bargaining.....	5
3.4 Discrimination and Harassment	6
3.5 Working Hours.....	6
3.6 Compensation.....	6
3.7 Disciplinary Practices	6
4.0 MANAGEMENT SYSTEMS.....	7
4.1 Supplier Policy and Management System	7
4.2 Worker Feedback, Participation, and Grievance.....	7
4.3 Documentation and Audits.....	7
4.4 Supplier Responsibility	7
5.0 DOCUMENT HISTORY.....	8

HARMAN SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct (the "Code") applies to all suppliers (and their sub-suppliers) of goods or services to HARMAN International Industries, Incorporated and its affiliates (collectively, "HARMAN"). This Code is considered an integral part of HARMAN's business relationship with its suppliers and forms a part of any contract or agreement between HARMAN and its suppliers. All suppliers must meet the standards of conduct expressed in this Code. All suppliers are subject to audit by HARMAN to ensure compliance with these standards. Any failure to comply with this Code will constitute a breach of any contract or agreement between HARMAN and the supplier and may result in corrective action, up to and including termination, of contractor agreement.

1.0 RESPONSIBLE BUSINESS PRACTICES

1.1 Integrity

Suppliers should not offer any gift, gratuity, or any form of privilege to any HARMAN employee. Gifts, meals, or entertainment are permitted only if they are ordinary and reasonable, of limited value, consistent with accepted business practices and accepted ethical standards, and do not violate any law. HARMAN is subject to US law, including the Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act 2010 ("UK Bribery Act"), and all applicable laws in the countries in which we conduct business. HARMAN requires its suppliers to comply with the FCPA and the UK Bribery Act and encourages its suppliers to maintain an FCPA and UK Bribery Act compliance program. HARMAN also requires its suppliers to comply with all applicable laws in other countries concerning bribery, corruption, and related matters.

1.2 Conflicts of Interest

All suppliers of HARMAN must avoid personal and financial interests which could conflict with their responsibilities to HARMAN. All suppliers must immediately disclose to HARMAN any situation that could constitute an actual or potential conflict of interest. This includes a conflict between HARMAN's interests and the interests of the Supplier, such as a HARMAN employee, officer, director receiving professional, private, and/or significant financial advantages or other benefits in any of the supplier's businesses.

1.3 Fair Competition

All suppliers of HARMAN must operate their business in alignment with fair business, advertising, and competition, and in accordance with applicable anti-trust laws.

1.4 Disclosure of Information

All business dealings must be transparently performed and accurately reflected on the supplier's business books and records. Information regarding supplier labor, health and safety, environmental practices, business activities, structure, financial situation, and performance must be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

1.5 Intellectual Property

All suppliers of HARMAN must respect intellectual property rights. Transfer of technology and knowledge must be done in a manner that protects intellectual property rights. Customer and supplier information must be safeguarded against misuse, mishandling, counterfeit, theft, fraud, or improper disclosure in accordance with applicable law and HARMAN International contractual terms.

1.6 International Trade Controls and Sanctions

All suppliers of HARMAN must comply with export control regulations applicable to their business and provide accurate and truthful information about it to customs and other authorities when requested. All suppliers must ensure that neither they nor their sub-suppliers are involved in business with parties that are subject to relevant sanctions, denied parties list, or embargoed countries.

1.7 Protection of Identity and Non-retaliation

Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers¹ must be maintained, unless prohibited by law. All suppliers must have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

1.8 Privacy and Data Protection

All suppliers of HARMAN must comply with applicable privacy and data protection laws with respect to the collection, use, disclosure, retention, disposal, or other processing of personal information (as such term may be defined under applicable privacy and data protection laws). To the extent any and each supplier receives, or otherwise handles personal information from or on behalf of HARMAN, the supplier must comply with all of its contractual obligations it has with HARMAN with respect to such personal information. All suppliers must implement reasonable and appropriate administrative, technical, and physical safeguards to protect the confidentiality, integrity, and availability of such personal information and to prevent unauthorized access, use, or disclosure of such personal information.

¹ Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

1.9 Compliance with Applicable Law

All suppliers of HARMAN must comply with the applicable legal requirements and standards under the laws of each country in which the supplier operates. This includes, but is not limited to, the laws and regulations governing the following: environmental standards, health, safety, employment, child labor, forced labor, human trafficking, discrimination, freedom of association and collective bargaining, and human rights. Suppliers must not use forced labor or engage in or support human trafficking. All suppliers must ensure that their products comply with applicable legal requirements in each country (1) where the supplier's products are delivered to HARMAN or (2) where HARMAN has notified the supplier that the supplier's products will be sold.

2.0 ENVIRONMENT, HEALTH, AND SAFETY

All suppliers of HARMAN must comply with applicable environmental, health and safety standards. All suppliers must provide safe and healthy working conditions for their employees. Additionally, all suppliers must actively support HARMAN in minimizing potential adverse environmental, health and safety impact during the various phases of the life of the HARMAN products from development to disposition through manufacturing, disposition and usage.

2.1 Occupational Safety

Potential or actual worker exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards) must be identified, assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lock out/tag out), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers must be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women and nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, and include reasonable accommodations for nursing mothers.

2.2 Emergency Preparedness

Potential emergency situations and events must be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans should also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures must focus on minimizing harm to life, the environment, and property.

2.3 Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans or the environment must be identified, labeled, and managed, to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. All suppliers of HARMAN must comply with local laws and regulations prohibiting or controlling the use of particular chemicals and other materials.

2.4 Health and Safety Communication

All Suppliers of HARMAN must provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information must be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training must be provided to all workers prior to the beginning of work and regularly thereafter. Workers must be encouraged to raise any health and safety concerns without retaliation.

2.5 Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations must be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone-depleting substances must be effectively managed in accordance with the Montreal Protocol and applicable regulations. All suppliers of HARMAN must conduct routine monitoring of the performance of their air emission control systems.

2.6 Energy Consumption and Greenhouse Gas Emissions

Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions (GHGs) must be tracked, documented at the facility and/or corporate level. All suppliers of HARMAN must look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions. HARMAN encourages suppliers to commit to 100% renewable electricity for their operations and to report progress annually to CDP.

3.0 LABOR AND HUMAN RIGHTS

All suppliers of HARMAN must uphold the human rights of workers and treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. Workers must be legally entitled to work in the country in which they are employed, and must be granted the protections and rights granted to legal workers in that country.

3.1 Child Labor

HARMAN prohibits the use of child labor in its supply chain (including HARMAN's suppliers and their sub-suppliers). A "child" is any person under 15 years of age, or as defined by the International Labor Organization Conventions, national laws or any other applicable law or standard, depending upon which is the most stringent.

3.2 Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There must be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities including, if applicable, workers' dormitories or living quarters. As part of the hiring process, all workers must be provided with information in writing in their native language that contains a description of terms and conditions of employment.

Foreign migrant workers must receive the employment agreement prior to the worker departing from their permanent place of residence and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.

All work must be voluntary, and workers must be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. Employers, agents, and sub-agents' must not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents. Workers must not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees must be repaid to the worker.

3.3 Freedom of Association and Right to Collective Bargaining

All suppliers of HARMAN must respect the right for, and not interfere with, workers in forming, joining, organizing, representing, and administering trade unions of their choice and bargaining collectively with the supplier, to the extent of the law. All suppliers must ensure workers and representatives are not subjected to discrimination, harassment, intimidation, or retaliation for participating in unions.

3.4 Discrimination and Harassment

All suppliers of HARMAN must be committed to a workplace free of harassment and unlawful discrimination. Suppliers must not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity, gender expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers must be provided with reasonable accommodation for religious practices. In addition, workers or potential workers must not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way, in accordance with International Labor Organization No. 111 Discrimination (Employment and Occupation) Convention.

3.5 Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness. Working hours must not exceed the maximum set by local law. Further, a workweek must not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime by a worker must be voluntary. Workers must be allowed at least one day off every seven days.

3.6 Compensation

Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers must be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure must not be permitted. For each pay period, workers must be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor must be within the limits of the local law.

3.7 Disciplinary Practices

All suppliers of HARMAN must demonstrate respect at all times for each worker's mental, emotional and physical integrity in disciplinary and performance processes. Non-arbitrary and effective procedures must be used for giving written/formal warnings regarding an employee's performance and job security and for dispensing disciplinary procedures if required.

4.0 MANAGEMENT SYSTEMS

4.1 Supplier Policy and Management System

All suppliers of HARMAN must have a policy and management system to comply with these requirements. At a minimum, top supplier management must have a process in place to identify and periodically review the adequacy, suitability, and continuing effectiveness of the supplier's policies, procedures, and performance results in meeting the requirements of this Code and other applicable laws, regulations, and customer requirements. System amendments and improvements must be implemented where appropriate.

4.2 Worker Feedback, Participation, and Grievance

All suppliers of HARMAN must have ongoing processes, including an effective grievance mechanism, to assess workers' understanding of, and obtain feedback on, violations against practices and conditions covered by this Code and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

4.3 Documentation and Audits

All suppliers of HARMAN must provide additional documentation and evidence regarding the standards addressed in this Code as requested by HARMAN and must permit HARMAN or its representatives (including any third-party auditing organization engaged by HARMAN) to audit its books and records, facilities, and operations to verify compliance with this Code.

4.4 Supplier Responsibility

All suppliers of HARMAN must require, support, and monitor their suppliers and sub-supplier's compliance with this Code, including the requirements to provide additional information and certification and to permit audits by HARMAN and its representatives. HARMAN must have visibility to its entire supply chain regarding the standards addressed in this Code. Any violations of this Code within the supply chain may result in termination of the Supplier's business relationship with HARMAN.

5.0 DOCUMENT HISTORY

Version 1 – Released 2016

Version 2 – Released March 2021, with revisions to language associated with an inclusive, diverse, and respectful workplace.

Version 3 – Released February 24, 2023 with revisions to several sections that provide increased alignment to the RBA Code of Conduct.