

CSR Statement (Code of Conduct) of

Nidec GPM GmbH

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1. Business integrity

Nidec GPM GmbH is committed to conducting its business activities with integrity, fairness and transparency, based primarily on internationally recognised guidelines and in compliance with the applicable legal, regulatory, ethical and social requirements of the countries, regions, cities and other jurisdictions in which it does business. We also require this of our suppliers and customers

1) Prohibition of bribery

- Nidec GPM GmbH does not tolerate any form of bribery or corruption
 - Nidec GPM GmbH requires all directors, managers and employees to comply with the group-wide anti-bribery policy when giving or accepting cash, gifts, hospitality, meals, travel expenses, accommodation expenses and related costs, donations or other benefits directly or indirectly to or from public officials, customers and suppliers. The key elements of Nidec GPM GmbH's anti-corruption policy are summarised below
 - Offering cash, vouchers or other monetary benefits to public officials and customers is not permitted under any circumstances
 - The acceptance of cash, vouchers or other monetary benefits from suppliers is not permitted under any circumstances
 - Gifts, meals, hospitality, travel expenses, donations or other benefits offered to public officials and customers or accepted from suppliers are subject to careful review in accordance with strict internal standards to determine whether such benefits are within the scope of normal and appropriate business courtesy and necessary for the normal course of business
 - Strict compliance with internal guidelines is required when making decisions about the selection and hiring of representatives

2) Fair competition

- Nidec GPM GmbH does not engage in illegal or unethical business practices, including, but not limited to
 - All forms of extortion and embezzlement
 - Any activities that involve, utilise or favour anti-social forces
- Nidec GPM GmbH does not engage in unfair business practices, including but not limited to
 - Abuse of a superior negotiating position or imposition of unreasonable disadvantages on partners in the supply chain
 - Conspiracy or collusion with competitors or any other behaviour that impedes fair and free competition

3) Disclosure of information

- Nidec GPM GmbH will disclose material information about labour, health and safety, environmental practices, business activities, structure, financial condition and performance in accordance with applicable regulations and prevailing industry practices

4) Intellectual property rights

- Nidec GPM GmbH protects its own intellectual property rights while ensuring that its inventions do not infringe on the intellectual property rights of others

5) Information security

- Nidec GPM GmbH ensures the proper handling of confidential company data by adhering to appropriate procedures to protect its information resources from unauthorised access, misuse, manipulation, disclosure or transfer. The most important elements of Nidec GPM GmbH's information security management system include
 - Maintaining and improving a security framework to protect company information resources and thus prevent losses for Nidec GPM GmbH and its affiliated stakeholders
 - Managing and protecting customer/supplier data and employees' personal data
 - Compliance with data protection and information security laws and regulatory requirements when collecting, storing, processing, transferring and disclosing personal data

6) Whistleblowing system

- Nidec GPM GmbH has an internal reporting system (Nidec Global Compliance Hotline) that all directors, managers and employees (including permanent employees, part-time employees, temporary staff and fixed-term employees) to report and report suspected violations of laws, regulations or guidelines and rules of Nidec GPM GmbH that prohibit unethical practices such as accounting fraud, bribery and corruption, and violations of health and safety regulations
- The Global Compliance Hotline has been established in Japan, the United States, China, Europe and Southeast Asia to receive reports from whistleblowers. In all cases, the system ensures that whistleblowers can remain anonymous (where permitted by law) and are protected from retaliation

7) Product safety

- Nidec GPM GmbH attaches great importance to product safety in all areas of its business, including product planning, development, design, manufacturing, sales and customer service. In addition, Nidec GPM GmbH is committed to complying with all safety standards based on laws and regulations and constantly strives to exceed these standards to ensure continuous compliance
- Nidec GPM GmbH will promptly investigate any product safety issue, determine the cause(s) by tracing the production history, and notify affected customers

8) Quality management system

- Nidec GPM GmbH constantly strives to improve the quality of its products and services by establishing, maintaining and modifying an effective quality management system and a PDCA (Plan-Do-Check-Act) cycle

9) Responsible sourcing of minerals

- Minerals such as tantalum, tin, tungsten and gold, which are currently mined illegally in the Democratic Republic of Congo (DRC) and its neighbouring countries, have become a source of funding for armed anti-government militias and are therefore referred to as "conflict minerals". The scope of conflict minerals could be extended to other minerals or their derivatives in the future

Nidec GPM GmbH pursues a policy that ensures, to the extent possible, that the conflict minerals in the products it manufactures do not directly or indirectly contribute to the financing or support of armed groups that commit serious human rights violations in the DRC or its neighbouring countries. Nidec GPM GmbH will, where appropriate, work with its direct suppliers to trace the supply chain back to the smelters and refiners that process the minerals contained in Nidec GPM GmbH's products, primarily using the industry standard reporting template. The measures and results of Nidec GPM GmbH's investigations will be made available to affected customers upon request.

2. Respect for human rights and labour practices

In the global market, Nidec GPM GmbH comes into contact with different social, political, financial, legal and economic systems, as well as different cultures, traditions and languages in its business activities. It is therefore crucial for Nidec GPM GmbH to have a solid foundation in place to ensure that human rights are respected and that all people can develop their skills in the workplace. Nidec GPM GmbH addresses the increasing diversity of human rights issues by

committing to comply with existing international guidelines, including the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact, the United Nations Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work

1) Forced labour

- Nidec GPM GmbH employs people solely on the basis of their free will and never tolerates forced labour, debt bondage, slavery or human trafficking in its company or supply chain
- Nidec GPM GmbH does not retain, destroy, confiscate or deny its employees access to their identity or immigration documents, such as government-issued ID cards, passports or work permits

2) Child/youth labour

- Nidec GPM GmbH complies with all applicable local and international regulations for the prevention of child labour and the protection of young workers. Nidec GPM GmbH adheres to the minimum age limit set by national laws or by the International Labour Organisation (ILO), whichever is higher
- Nidec GPM GmbH will exercise reasonable care to prevent young workers under the age of 18 from performing hazardous work, night work or overtime

3) Discrimination and inhumane treatment

- Nidec GPM GmbH values a dynamic and diverse workforce and is committed to eliminating discrimination in job offers and hiring, ensuring equal opportunities and fair treatment in the workplace
- Nidec GPM GmbH is committed to creating an environment that is free from discrimination based on race, skin colour, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership or marital status in recruitment and employment, such as in wages, promotions, rewards and access to training
- Nidec GPM GmbH takes measures to ensure that there is no harsh or inhumane treatment, including physical, sexual, psychological or verbal harassment or abuse of employees, suppliers or vendors

4) Wages and social benefits

- Nidec GPM GmbH ensures that the remuneration paid to employees complies with all applicable wage laws, including those relating to minimum wages, overtime pay and statutory social benefits, and does not allow illegal, unjustified wage deductions as a disciplinary measure
- For each pay period, Nidec GPM GmbH provides each employee with a pay slip containing sufficient information to verify the correct remuneration for the work performed

5) Working hours and public holidays

- Nidec GPM GmbH complies with all applicable laws and regulations regarding overtime and maximum working hours and takes corrective action in situations where employees' working hours, including overtime, repeatedly exceed 60 hours per week
- Unless otherwise stipulated by applicable local law or works agreements, Nidec GPM GmbH grants all employees at least one day off per week or every seven days. This rest period is in addition to the annual leave granted under national legislation and practice

6) Right of association and collective bargaining

- Nidec GPM GmbH respects the right of all employees to form and join trade unions of their choice, to engage in collective bargaining and to participate in peaceful assemblies, and also respects the decision of employees to refrain from such activities
- Nidec GPM GmbH is committed to creating a working environment in which employees and their representatives can communicate openly and share ideas and concerns about working conditions and management practices with management without fear of discrimination, reprisals, intimidation or harassment

3. Harmony with the environment

Nidec GPM GmbH recognises that environmental responsibility is an integral part of manufacturing world-class products. In its production activities, Nidec GPM GmbH is committed to minimising negative impacts on the community, the environment and natural resources, while protecting public health and safety. Environmental compatibility not only enables a company to comply with new environmental regulations and market requirements, but also to market new environmentally conscious products and solutions in a timely manner.

1) Environmental management system

- Nidec GPM GmbH has established, maintains, manages and continuously improves an appropriate environmental management system in order to contribute to global environmental protection and reduce environmental impact.

2) Environmental protection measures and reduction of environmental impact

- Nidec GPM GmbH's primary goal is to reduce resource and energy consumption, greenhouse gas emissions (the main cause of climate change), other emissions into the atmosphere, water consumption (withdrawal), total waste and wastewater. Nidec GPM GmbH takes measures to prevent pollution at source, control pollution and promote recycling and reuse in accordance with local laws and other relevant laws and regulations.

Nidec GPM GmbH's approach to the effective use of resources includes

- Optimising resource use
- Restriction of the consumption of natural resources, including water, forests and metals
- Limiting the amount of packaging materials used
- Reducing use in production processes
- Reducing emissions and minimising waste generation in production processes
- Reuse of resources
- Simplification of reuse methods
- Production of durable products
- Recycling of resources
- Use of recycled materials
- Reusing parts
- Designing products that are easier to dismantle and recycle

3) Environmental permits and reports

- Nidec GPM GmbH obtains all necessary environmental permits, approvals and registrations, keeps them up to date and fulfils the associated operating and reporting obligations.

4) Environmental protection and reduction of resource consumption

- Nidec GPM GmbH will control sources of pollution, use pollution control equipment and implement process changes in production, maintenance and plant management. In addition, Nidec GPM GmbH is committed to conserving natural resources such as water, fossil fuels, minerals and forest products.

5) Hazardous substances

- Nidec GPM GmbH clearly identifies chemicals that have harmful effects on the human body and the environment by clearly labelling their containers and ensures that they are safely handled, transported, stored, used, recycled, reused and disposed of, in accordance with the regulations and laws applicable in Germany.

6) Solid waste

- Nidec GPM GmbH identifies solid waste (non-hazardous waste) and endeavours to dispose of, reduce and recycle it in accordance with the regulations and laws applicable in Germany.

7) Emissions into the atmosphere

- Nidec GPM GmbH takes measures to check the physical properties of emissions prior to disposal, including volatile organic chemicals, aerosols, corrosive substances, microparticles, ozone-depleting substances and calcined by-products generated during the production process, and conducts regular monitoring, management and disposal of these substances. At the same time, Nidec GPM GmbH works to monitor the functionality and effectiveness of the emission management system.

8) Material restrictions

- Nidec GPM GmbH complies with all applicable laws, regulations and customer requirements regarding the prohibition or restriction of certain substances in products and in manufacturing, including labelling for recycling and disposal.

9) Water management

- Nidec GPM GmbH makes every effort to improve a water management system that monitors water sources, water withdrawal and wastewater discharge, analyses their properties and records the results of monitoring and analysis in writing in order to reduce water consumption and wastewater discharge. Nidec GPM GmbH also takes appropriate measures to prevent pollutants from entering water bodies.

10) Energy consumption and greenhouse gas emissions

- Nidec GPM GmbH tracks its energy consumption and greenhouse gas emissions and promotes measures to reduce them through continuous improvements in energy efficiency.

11) Environmentally conscious design and life cycle assessment

- Nidec GPM GmbH assesses the environmental impact of products throughout their entire life cycle, from raw material extraction to manufacturing, distribution and disposal, and works to develop products with a lower environmental impact.

12) Preservation of biodiversity

- Nidec GPM GmbH takes biodiversity into account by protecting animals and plants that are threatened with extinction.

13) Disclosure of environmental information

- Nidec GPM GmbH regularly publishes its environmental management efforts and results in order to build good relationships with its stakeholders.

4. Health and safety at work

Nidec GPM GmbH is committed to ensuring health and safety in the workplace in order to protect its employees from hazards and risks associated with their work. Nidec GPM GmbH takes appropriate precautions to ensure that its employees are not assigned unsafe work, complying with government health and safety laws and regulations as well as its own standards and instructions based on the ILO guidelines for safety and health at work and the core elements of OHSAS 18001. At the same time, Nidec GPM GmbH attaches great importance to the continuous involvement and training of employees, who are essential for identifying and solving health and safety problems in the workplace.

1) Occupational health and safety management system

- Nidec GPM GmbH undertakes to draw up, maintain and improve written guidelines and procedures for controlling health and safety risks in the workplace.

2) Occupational safety

- Nidec GPM GmbH continuously assesses health and safety risks and prevents employee exposure to potential safety hazards (e.g. electrical and other energy sources, fire, vehicles and fall hazards) through appropriate design, engineering and administrative controls, preventive maintenance measures and safe work practices (including lockout/tagout), as well as through ongoing safety training. If hazards cannot be adequately controlled by these measures, employees are provided with appropriate, well-maintained personal protective equipment. In addition, Nidec GPM GmbH provides its employees with ongoing training on the risks associated with workplace hazards and encourages them to report safety concerns.

3) Emergency preparedness

- Nidec GPM GmbH constantly strives to identify and assess potential emergency situations and events in order to minimise damage to life, the environment and property by implementing emergency plans and response procedures, including Emergency reporting, employee notification and evacuation procedures, training and drills, appropriate fire alarm and extinguishing equipment, adequate escape routes and recovery plans.

4) Accidents at work and occupational diseases

- Nidec GPM GmbH ensures that procedures and systems are in place for the prevention, management, tracking and reporting of occupational accidents and diseases, including provisions to
 - encouraging employees to report incidents,
 - classifying and recording injuries and illnesses,
 - monitoring the health of employees and supporting them in maintaining and managing their health,
 - providing medical treatment where necessary,
 - investigating cases and implementing corrective measures to eliminate their causes, and
 - facilitating the return of employees to their workplace.

5) Physically demanding work

- Nidec GPM GmbH protects its employees from preventable injuries or illnesses resulting from physically demanding work by taking appropriate measures, such as providing regular breaks for employees, providing work aids and dividing work into smaller tasks. Physically demanding tasks can be characterised as follows:
 - manual material handling,
 - heavy or repetitive lifting,
 - prolonged standing, and
 - highly repetitive or force-intensive assembly work.

Nidec GPM GmbH also takes appropriate measures to protect pregnant women/breastfeeding mothers from excessively strenuous working conditions.

6) Occupational hygiene

- Nidec GPM GmbH identifies, assesses and controls the health risks associated with exposure to chemical, biological and physical agents and takes preventive measures, including protective equipment programmes, to protect workers from excessive exposure.

7) Machine safety

- Nidec GPM GmbH conducts risk assessments on machine safety and properly maintains physical guards, fail-safe/fail-safe designs, interlocks and barriers when machines pose a risk of injury to workers.

8) Hygiene, catering and accommodation

- Nidec GPM GmbH provides its employees with easy access to clean toilets, drinking water and hygienic facilities for preparing, storing and eating meals. Employee accommodation provided by Nidec GPM GmbH or an employment agency is kept clean and safe and is equipped with suitable emergency exits, hot water for bathing and showering, adequate heating and ventilation, and adequate personal space and access rights.

9) Health and safety communication

- Nidec GPM GmbH provides employees with appropriate training on health and safety in the workplace, in their native language where possible, and displays health and safety information in the facility

5. Harmony with society

Corporate social responsibility encompasses virtually every interaction a company has with society, and Nidec GPM GmbH is aware that its responsibility extends beyond satisfying the interests of its immediate external stakeholders to include consideration and support for the interests of the wider community () Nidec GPM GmbH also values the idea of achieving sustainable growth by aligning its business strategies with a number of internationally agreed universal goals aimed at solving social/environmental problems at a global and regional level

1) Relationships with the community

- Nidec GPM GmbH strives to build good and solid relationships with local communities that may be affected by its business activities through open and honest communication and by taking into account the views and concerns of the community in its work

2) Approach to addressing universal social and environmental challenges

- Nidec GPM GmbH supports the path to sustainability proposed in the United Nations Sustainable Development Goals (SDGs) These comprise 17 goals for addressing important global issues, including climate change, environmental degradation, poverty, energy and resource scarcity, and health problems Nidec GPM GmbH consciously strives to identify and prioritise new business opportunities within specific social/environmental issues in order to improve the economic and social conditions of the communities in which it operates

6. Framework for ensuring effectiveness

Nidec GPM GmbH has established and maintains a management system to translate the concept of this statement into actionable measures The management system is designed to ensure (a) compliance with applicable laws, regulations and customer requirements relating to Nidec GPM GmbH's business activities and products, (b) compliance with this statement, and (c) the identification and mitigation of operational risks related to the topics and guidelines contained in this statement Appropriate control procedures have been developed by adopting or referring to international standards such as ISO 14001, OHSAS 18001 or the Responsible Business Alliance (RBA) Code of Conduct

1) Company commitment

- Nidec GPM GmbH adheres to its policy statements on social and environmental responsibility, in which it reaffirms its commitment to compliance and continuous improvement Where possible, the policy statements are displayed in the local language at the facilities

2) Management responsibility and accountability

- Nidec GPM GmbH clearly identifies the managers and company representatives responsible for implementing the management systems and related programmes The management regularly reviews the status of the management system

3) Risk assessment/risk management

- Nidec GPM GmbH has developed a process to identify the risks associated with Nidec GPM GmbH's activities in relation to legal compliance, the environment, health and safety, labour practices and ethics In order to control the identified risks and ensure compliance with legal regulations, Nidec GPM GmbH also determines the relative significance of each risk and implements appropriate procedural and physical controls

4) Improvement objectives

- Nidec GPM GmbH has established written performance targets, specifications and implementation plans to improve its social and environmental performance and also conducts regular assessments of its performance in achieving these targets

5) Training

- Nidec GPM GmbH has organised training programmes for managers, employees and, in some cases, external visitors in order to implement its guidelines, procedures and improvement targets and thus comply with the applicable legal and regulatory requirements

6) Communication

- Nidec GPM GmbH has developed and maintains a process to provide its employees, suppliers and customers with clear and accurate information about its policies, practices, expectations and performance

7) Employee feedback and participation

- Nidec GPM GmbH has developed continuous processes to assess employee understanding of the practices and conditions covered in this statement, gather feedback and promote continuous improvement. In addition, an improvement and idea management system has been implemented to motivate employees to work on continuous improvements

8) Complaints

- Nidec GPM GmbH has a complaints procedure (Nidec Global Compliance Hotline) through which employees, suppliers, customers and visitors can submit their complaints on issues such as bribery, sexual harassment, bullying, workplace harassment, loss of information, antitrust, discrimination and other issues. The contact details are available on the intranet and posted on all whiteboards

9) Audits and assessments

- Nidec GPM GmbH conducts regular self-assessments (internal audits) to ensure compliance with legal and regulatory requirements, the content of this statement and the contractual requirements of customers with regard to social and environmental responsibility. Nidec GPM GmbH's internal self-assessments are occasionally supplemented by external assessments (audits by second or third parties) in order to leverage knowledge of industry best practices, either at the customer's request or on Nidec GPM GmbH's own initiative

10) Involvement of the supply chain

- Nidec GPM GmbH communicates the requirements of this statement to its most important direct suppliers and expects them to be extended to deeper levels of the supply chain
- An effective grievance mechanism is a key component of compliance with the Supply Chain Due Diligence Act (LkSG). It enables both internal and external stakeholders, such as employees, suppliers and affected persons, to report potential human rights and environmental violations in the supply chain quickly and easily. This is crucial for identifying risks at an early stage, remedying grievances and preventing negative impacts

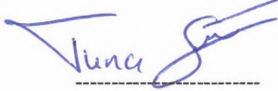
As a global leader in the automotive industry, Nidec GPM GmbH attaches the utmost importance to excellence, honesty and integrity, as well as compliance with all relevant laws. The trust of our customers, business partners and employees is our most valuable asset. To maintain this trust, we always act in accordance with the highest business and ethical standards and applicable legal requirements. At the same time, it helps the company to proactively fulfil its due diligence obligations, identify potential violations and respond appropriately. By integrating such a mechanism into our risk management, we can not only meet legal requirements but also make our supply chain sustainable and responsible. Reports must be made in good faith and based on information that is correct to the best of the reporter's knowledge and belief. Nidec GPM GmbH carefully and confidentially reviews each report to ensure that appropriate measures are taken to protect the company.

Nidec GPM GmbH's complaints procedure is open to all relevant stakeholders worldwide, including employees, suppliers, business partners and external interest groups such as NGOs and local residents. It offers the opportunity to report human rights or environmental risks and violations within one's own business area and along the supply chain. Accessibility is ensured through various reporting options so that anyone who is potentially affected or has knowledge of violations can file a complaint.

Nidec GPM GmbH



Holger Ehrhardt
Managing Director



Tuna Surucu
Managing Director



Andreas Gundlach
Authorised signatory

REFERENCES

This statement refers to the following standards

International labour standards of the ILO

<http://www.ilo.org/global/standards/lang--en/index.htm>

OECD Guidelines for Multinational Enterprises

<http://www.oecd.org/corporate/mne/>

ILO Code of Practice on Occupational Safety and

Health <http://www.ilo.org/safework/lang--en/index.htm>

ISO 45001

<https://www.iso.org/iso-45001-occupational-health-and-safety.html>

Universal Declaration of Human Rights [http://www.un.org/en/universal-](http://www.un.org/en/universal-declaration-human-rights/index.html)

[declaration-human-rights/index.html](http://www.un.org/en/universal-declaration-human-rights/index.html)

United Nations Global Compact <https://www.unglobalcompact.org/>

ISO 14001

<https://www.iso.org/iso-14001-environmental-management.html>

Responsible Business Alliance Code of Conduct (formerly EICC Code of Conduct)

<http://www.responsiblebusiness.org/standards/code-of-conduct/>

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-

Affected and High-Risk Areas <http://www.oecd.org/corporate/mne/mining.htm>

Knowledge platform for sustainable development

<https://sustainabledevelopment.un.org/sdgs>

TiSax

[https://www.tuvsud.com/de-de/wissenswert/newsletter/value-](https://www.tuvsud.com/de-de/wissenswert/newsletter/value-newsletter/3-2020/tisax-neuer-vda-isa-katalog)
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DIN EN ISO 5001 2018

[https://www.umweltbundesamt.de/energiemanagementsysteme-](https://www.umweltbundesamt.de/energiemanagementsysteme-iso-50001)
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Complaints

[http://intranet.nidec-](http://intranet.nidec-amec.com/merbelsrod/layouts/15/WopiFrame.aspx?sourcedoc=/merbelsrod/NIDEC_Informationen/Compliance_Beschwerden_Kontakt Daten/New%20Hotline%20Poster_Navex%20Germany_DE.pdf&action=default)
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[&action=default](http://intranet.nidec-amec.com/merbelsrod/layouts/15/WopiFrame.aspx?sourcedoc=/merbelsrod/NIDEC_Informationen/Compliance_Beschwerden_Kontakt Daten/New%20Hotline%20Poster_Navex%20Germany_DE.pdf&action=default)