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Supplier Code of Conduct to respect the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG):

Scope:

OPTIMAL Automotive GmbH, a subsidiary of Stahlgruber GmbH, together with its sister companies PV Automotive GmbH, Neimcke GmbH & Co. KG and Stahlgruber GmbH (Austria) (hereinafter jointly referred to as „STAHLGRUBER“) adopted the following Supplier Code. This Supplier Code supplements the global Supplier Code of Conduct of LKQ Corporation and is intended to ensure compliance with the requirements of the LkSG. When interpreting the requirements of the LkSG, this Supplier Code takes precedence over the regulations of the global Code of Conduct for Suppliers of LKQ Corporation.

Preamble:

STAHLGRUBER is fully aware of the responsibility it bears when procuring goods and services. In addition to our corporate principles providing that the products sold by us shall meet the highest quality standards and be in conformity with applicable laws and regulations, we set great store by acting in compliance with the standards specified in this Supplier Code of Conduct to respect human rights and protect the environment.

STAHLGRUBER reserves the right to perform a compliance due diligence and carefully monitors our suppliers' adherence to the requirements of this present Supplier Code of Conduct, both before engaging in a business relationship and any time during an existing business relationship.

STAHLGRUBER works towards committing our suppliers to respect human rights and protect the environment. We strive for making sure that even indirect suppliers adhere to our policy, and we are willing to take appropriate measures in this regard.

Part I – Human Rights

1. Ban on Child Labour

STAHLGRUBER condemns any kind of child labour within the meaning of the ILO Conventions¹ and advocates and stands up for effectively eliminating child labour.

We expect our suppliers not to employ children under the age at which compulsory schooling ends according to the laws applicable at the place of employment; irrespective of the foregoing, they must not employ workers under the age of 15 in principle.

¹ ILO (International Labour Organization) Conventions no. 138 & no. 182



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In particular, our suppliers are obliged to adhere to the ban on the worst forms of child labour for children under 18 years of age by all means. Above all, they must make sure not to employ children for any work, which by its nature or due to the circumstances in which such work is carried out, is likely to harm the health, safety, or morals of children.

2. Ban on Forced Labour

STAHLGRUBER does not tolerate the use of forced labour.

We expect our suppliers not to use any work or service that is required from an individual under threat of punishment and for which such individual has not made herself/himself available on her/his own free will, for example due to debt bondage or human trafficking.

This also includes the ban on all forms of slavery, or practices similar to slavery, serfdom, or other forms of domination or oppression in workplace environments, such as extreme economic or sexual exploitation and humiliation.

Therefore, we expect our suppliers to make sure that all employment relationships entered by them have been/will be made on their employees' free will and that any such employment contract can be terminated by observing a reasonable period of time.

3. Right to Occupational Health and Safety

STAHLGRUBER does not tolerate any breaches of industrial health and safety regulations.

We expect our suppliers to comply with the safety and health regulations applicable under the law at the place of employment in order to avoid the risk of industrial accidents or work-related health hazards. In particular, we expect our suppliers to

- ▶ arrange for adequate and sufficient safety standards regarding the provision and maintenance of the workplace, the workstation and any work equipment;
- ▶ provide their staff with appropriate protective measures to avoid exposure to chemical, physical or biological substances;
- ▶ implement suitable measures to prevent excessive physical and mental fatigue, in particular by way of mapping out suitable work plans that ensure a reasonable balance between working hours and rest times; and
- ▶ provide their employees with appropriate occupational health and safety trainings and instruct them accordingly.

Furthermore, we refer to the provisions set forth in the LKQ Corporation's Global Supplier Code of Conduct to ensure the maintenance of a fair and safe work place.



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4. Ban on Disregarding the Freedom of Association

STAHLGRUBER stands up for the freedom of association.

We expect our suppliers

- ▶ to give their employees the opportunity to freely form or join trade unions;
- ▶ not to use the formation, joining, or membership of a trade union as a reason for unjustified discrimination or retaliation against their employees; and
- ▶ not to prevent trade unions from operating freely and in accordance with the applicable local law, including the right to strike and to engage in collective bargaining.

Furthermore, we expect our suppliers – in accordance with the provisions set forth in the LKQ Corporation’s Global Supplier Code of Conduct – to enable their employees and/or their representatives to reach out to the company management and speak out openly about their ideas or raise concerns with regard to labor conditions and management practices without fear of suffering from discrimination, intimidation or harassment.

5. Promoting Equal Opportunities and Non-Discrimination

STAHLGRUBER has zero tolerance for any kind of discrimination at the place of work.

We expect our suppliers to actively implement the ban on unequal treatment in employment, for example on the grounds of national or ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief.

Also, we expect our suppliers to implement the principle of equal pay for work of equal value, regardless of the gender of their employees.

6. Wages and Benefits for Employees

STAHLGRUBER stands up for the payment of reasonable and fair wages.

We expect our suppliers to pay their employees at least the minimum wage determined by the applicable local law, enabling the workers and their respective families to make an adequate living.

7. Protection of the Environment and Natural Resources

STAHLGRUBER recognizes and acknowledges its responsibility to protect the environment.

We expect our suppliers to refrain from causing harmful changes to the soil, from polluting the water or the air, and from causing harmful noise emissions. Also, we expect them to refrain from contributing to excessive water consumption which

- ▶ significantly impairs the natural base for the preservation and production of food;
- ▶ denies an individual access to safe and clean drinking water;
- ▶ makes it difficult for an individual to access sanitary facilities or destroys them; or
- ▶ harms the health of an individual.



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8. Ban on Depriving Individuals of Essential Resources

STAHLGRUBER condemns any activity of unlawfully depriving individuals of essential resources.

We expect our suppliers not to engage in or benefit from the unlawful eviction of or the unlawful taking of land, forests, and waters from individuals when acquiring, developing or using land, forests, and waters, the use of which secures the livelihood of an individual.

9. Protection of Human Rights when Hiring Security Forces

STAHLGRUBER expects its suppliers to bind any security forces hired or used by them to the internationally recognized human rights.

We expect our suppliers to hire or use private or public security forces for the protection of their business projects only, if suppliers will instruct or monitor such forces to the effect that they will during their mission

- adhere to the ban on torture and cruel, inhumane, or humiliating treatment;
- cause no damage to limb or life; or
- not impair the right to organize and not disregard the freedom of association.

Part II – The Environment

STAHLGRUBER stands up for respecting the Minamata², Stockholm³ and Basel⁴ Conventions.

We expect our suppliers to observe the aforementioned Conventions as amended from time to time and, in particular, not to breach the following bans:

- the ban on manufacturing mercury-added products and the ban on using mercury and mercury compounds in manufacturing processes, and the ban on the treatment of mercury waste;
- the ban on the production and use of chemicals pursuant to the POP Convention, the ban on the non-environmentally sound handling, collecting, storing and disposing of waste of persistent organic pollutants (POPs);
- the ban on exporting hazardous waste and on importing hazardous waste and other waste.

Part III - Implementation

STAHLGRUBER expects its suppliers to comply with the standards stipulated in Part I and Part II of this present Supplier Code and communicate them up and down the supply chain.

Furthermore, STAHLGRUBER expects its suppliers to be able to verify any time compliance with the standards set forth in Part I and Part II therein.

Last but not least, STAHLGRUBER expects its suppliers to implement a grievance procedure that gives their employees the opportunity to raise concerns and report the breaching of any standards set forth in Part I and Part II of this Supplier Code of Conduct, find remedies to resolve matters of concern or refer them to STAHLGRUBER, and inform their employees about the option to use the “Speak Up” hotline of LKQ Corporation.



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The following options to raise a concern, even anonymously, are available:

- ▶ Telefon: 0800 182 1052 (Germany)
0800 070 603 (Austria)
- ▶ Online: www.lkqcorp.ethicspoint.com
- ▶ Postalisch: STAHLGRUBER GmbH, Gruber Strasse 65, D-85586 Poing

STAHLGRUBER warrants and assures that the persons in charge of handling and, to the extent necessary, investigating the complaints will act as an impartial and independent body and are not bound by any instructions. Also, STAHLGRUBER will make sure that the identity of the person raising a concern is kept confidential and that she or he will be effectively protected against discrimination or punishment.

STAHLGRUBER takes violations of this Supplier Code of Conduct seriously. If a supplier violates any of the requirements contained in this Supplier Code of Conduct STAHLGRUBER maintains its right to terminate the business relationship. In appropriate circumstances STAHLGRUBER may also refer an incident of wrongdoing to the relevant authorities. Suppliers should report known or suspected breaches against the Supplier Code of Conduct.

² <https://www.mercuryconvention.org/en>

³ <http://www.pops.int/>

⁴ <http://www.basel.int/>



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