

HARMAN International Supplier Code of Conduct

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HARMAN SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct (the "Code") applies to all suppliers (and their sub-suppliers) 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 of HARMAN, including their officers, directors, employees, representatives, and agents (collectively, "Suppliers") must meet the standards of conduct expressed in this Code and must conduct human rights and environmental due diligence in line with this Code and its standards through the establishment of an effective management system. 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 the agreement.

1 RESPONSIBLE BUSINESS PRACTICES

1.0 Integrity

Suppliers must uphold the highest standards of integrity in all business interactions. Suppliers may not offer any gift, gratuity, or any form of privilege to any HARMAN employee. Suppliers shall not engage in, endorse, or tolerate, directly or indirectly, any forms of corruption, including what are known as facilitation payments (payments to speed up the performance of routine tasks by officials). Suppliers also may not directly or indirectly offer or give anything of value to any government official or employee, political party official, political candidate, or commercial entity to influence their decisions or secure an improper advantage. 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. Suppliers must comply with the FCPA and the UK Bribery Act, and HARMAN encourages Suppliers to maintain an FCPA and UK Bribery Act compliance program. Suppliers must comply with all applicable laws in other countries concerning bribery, corruption, and related matters. Suppliers must have a zero-tolerance policy and due diligence processes in place to prohibit all forms of bribery, corruption, extortion and embezzlement in its dealings and in its supply chains.

1.1 Conflicts of Interest

Suppliers must avoid personal and financial interests which could conflict with their responsibilities to HARMAN. 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 Suppliers, 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.

1.2 Fair Competition

Suppliers must operate their business in alignment with fair business, advertising, and competition, and in accordance with applicable anti-trust laws.

1.3 Disclosure of Information

All business dealings must be transparently performed and accurately reflected on 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.

1.4 Intellectual Property

Suppliers 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.

1.5 International Trade Controls and Sanctions

Suppliers must comply with all applicable sanctions, trade embargoes, and export control regulations. These regulations may include, but are not limited to, any applicable dual-use export controls. Suppliers must ensure that they are not, and are not involved in business with, parties that are subject to relevant sanctions, denied parties list, or located in embargoed jurisdictions. Suppliers must maintain accurate and truthful information of related customs activities and provide the same to customs or other authorities when requested. Suppliers shall not perform any act which would cause HARMAN to be in violation of or exposed to adverse consequences under the applicable export control regulations, economic sanctions, embargoes, and other trade restrictions. Suppliers shall not supply to HARMAN any goods, software, technology, technical data, or services that are sourced from a restricted party or that have trans-shipped or transited through a country that is subject to sanctions.

1.6 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. Suppliers must have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

1.7 Privacy and Data Protection

Suppliers must comply with applicable information security, 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) and other sensitive data (such as HARMAN's intellectual property and private data). To the extent Suppliers receive or otherwise handle personal information from or on behalf of HARMAN, Suppliers must comply with all contractual obligations it has with HARMAN with respect to such personal information. Suppliers must implement reasonable and appropriate administrative, technical, and physical safeguards to protect the confidentiality, integrity, and availability of such information and to prevent unauthorized access, use, or disclosure of such information. Suppliers must comply with data privacy and security regulations for the use of Artificial Intelligence (AI) and comply with applicable laws and regulations in developments using AI. Suppliers are expected to follow international best practices for cybersecurity such as ISO 27000 or equivalent. In case information security has been violated, Suppliers have the obligation to inform HARMAN immediately.

1.8 Compliance with Applicable Law

Suppliers must comply with the applicable legal requirements and standards under the laws of each country in which (1) Suppliers operate, (2) where Suppliers' products are delivered to HARMAN, and (3) where HARMAN has notified Suppliers that Suppliers' products will be sold. Suppliers must adhere to internationally recognized standards such as the United Nations Guiding Principles on Business and Human Rights, the United Nations International Bill of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. This includes, but is not limited to, the laws and regulations governing the following: bribery and corruption, money laundering, environmental standards, health, safety, employment, child labor, forced labor, human trafficking, discrimination, freedom of association and collective bargaining, human rights, conflict minerals, exports, biodiversity, deforestation, animal welfare, imports (e.g., valuation, classification, duty and tariff treatment, and country-of-origin marking requirements), economic or trade sanctions, or boycott prohibitions. Suppliers must take the necessary steps to identify and rectify any cases or risks of money laundering and the funding or facilitation of any criminal activity arising as a result of its business

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.



operations and the business operations of its suppliers, as well as establish suitable preventive measures for this purpose. Suppliers must ensure documentation and information about their products will be available to HARMAN when needed to comply with applicable laws or regulations.

1.9 Truthful and Fair Dealings

Suppliers must comply with relevant labeling laws and regulations and be honest with HARMAN's customers. Suppliers must make sure all product labels and descriptions are clear, accurate, truthful, and not misleading. Suppliers must include all appropriate disclaimers, disclosures, and warranties, and support any claims made with adequate substantiation. Suppliers shall treat our customers equitably and provide excellent customer experiences to all regardless of individuals differences. Advertising, sales, and promotional materials should be fair, truthful and transparent. Suppliers should be alert for fraudulent and suspicious transactions, and follow trainings and policies designed to prevent product and services from being used to facilitate illicit activity.

2 ENVIRONMENT, HEALTH, AND SAFETY

Suppliers must comply with applicable environmental, health and safety standards, and provide safe and healthy working conditions for their employees. 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. All required environmental permits (e.g., discharge monitoring), approvals, and registrations shall be obtained, maintained, and kept current, and their operational and reporting requirements shall be followed.

2.0 Occupational Health and Safety

Suppliers must provide safe and healthy working conditions for their employees and non-employee workers which shall be maintained through ongoing, systematic monitoring of workers' health and working environments. Potential or actual worker exposure to health and safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, fall hazards, hazardous substances, excessive physical and mental stress) must be identified, assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance, healthy/safe work procedures (including lock out/tag out), and ongoing health and safety training. Worker exposure to chemical, biological, and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls (Elimination, Substitution, Engineering Controls, Administrative Controls, and Personal Protective Equipment).

Insofar as the product manufacture or the provision of services may have a significant impact on the health and safety of its employees, Suppliers will undertake to implement and operate a recognized and certified occupational health and safety management system (for example, in accordance with ISO 45001) and provide evidence of this by way of a corresponding certificate. 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 at no cost to the workers. 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.

2.1 Occupational Injury and Illness

Procedures and systems must be in place to prevent, manage, track and report occupational injury and illness including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate return of workers to work. Suppliers must allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.

2.2 Sanitation, Food and Housing

At a minimum, workers must have access to first-aid, fire exits, safety equipment, potable water, clean/operational toilet facilities, and sanitary food preparation, storage and eating facilities. If residential facilities are provided, they must be clean and safe with adequate personal space, entry and exit privileges, emergency egresses, heat and ventilation, water for bathing and showering, respect for workers' privacy, and satisfy all applicable legal requirements and this Code. Their access must not be restricted inappropriately. Suppliers will assign specific individuals with defined responsibilities for ensuring facilities have adequate fire prevention and extinguishing equipment in place, and that it is regularly inspected, tested, and maintained.

2.3 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. Suppliers must ensure an appropriate number of emergency exits, escape routes and emergency assembly points, all of which are marked with sufficient signage. In case of an accident, first aid and medical assistance must be provided. In the event of work-related health hazards, such as pandemics, Suppliers shall take all appropriate measures to protect their employees and the company.

2.4 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, reuse, and disposal. Suppliers must comply with the provisions of the following conventions: the Minamata Convention (on the use of mercury), the Stockholm Convention (on persistent organic pollutants), the Basel Convention (on the control of transboundary movements of hazardous wastes and their disposal), and all other local, national and international laws and regulations prohibiting or controlling the production, use, handling, and disposal of particular chemicals and other materials (e.g. European Regulation (EC) No. 1907/2006 (REACH)). Hazardous waste data shall be tracked and documented.

2.5 Physically Demanding Work and Machine Safeguarding

Suppliers shall identify, evaluate, control and reduce worker exposure to ergonomic risks, including but not limited to prolonged standing, sitting, improper working and/or lifting positions, repetitive movements, or physical load. Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers.

2.6 Health and Safety Communication

Suppliers 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. Protective occupational health and safety programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards. Workers must be encouraged to raise any health and safety concerns without retaliation. Suppliers that have employees performing work on HARMAN premises shall make sure that employees are informed about and comply with local HARMAN health and safety procedures. Health



information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Conditions posing an imminent risk to the health and safety of workers, and incidents involving loss of life, significant disruption to operations, significant injury, and significant loss of property should be reported to HARMAN and the appropriate governmental authority in accordance with local requirements.

2.7 Emission and Pollution

Emissions and discharges of pollutants and generation of waste must be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. Suppliers must support HARMAN's emissions reduction targets related to climate change, air pollution, and water pollution. Suppliers must implement environmental management systems (for example, in accordance with ISO 14001) and comply with all applicable environmental regulations and standards. Upon HARMAN's request, Suppliers shall provide data for a lifecycle assessment relating to orders placed by and supplied to HARMAN. Suppliers must disclose environmental information such as greenhouse gas emissions, energy consumption, water consumption, air emissions, wastewater, solid waste, as required by applicable law or upon request by HARMAN.

2.8 Energy Consumption and Greenhouse Gas Emissions

Energy consumption and all relevant Scopes 1, 2, and significant Scope 3 greenhouse gas emissions ("GHG") must be tracked, documented and publicly reported as required by applicable law. Suppliers shall establish and report against a science-based GHG reduction goal in alignment with Paris Agreement. Suppliers must look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

To reduce GHG emissions Suppliers must prioritize the principles of avoidance and reduction through establishing a robust energy management system, reducing energy consumption, and using energy efficient technologies, low-carbon materials, and renewable energy sources in own operation and supply chains. Suppliers should align their efforts with HARMAN's ambition for climate action and commit to material- and component-specific targets. Suppliers are encouraged to have their climate protection targets assessed using recognized scientific methods such as the Science Based Targets initiative (SBTi). Suppliers should extend these expectations to their own supply chain. Upon request, Suppliers shall disclose relevant GHG emissions and reduction progress to HARMAN, particularly in relation to its CO2 footprint at the product level and/or an allocation of Suppliers' emissions to HARMAN. HARMAN encourages Suppliers to commit to 100% renewable electricity for their operations and to report progress annually to CDP. Suppliers are encouraged to pursue certification for their energy

management system, such as ISO 50001.

2.9 Environmental Permits and Reporting

Suppliers must obtain, maintain and keep current all required environmental permits, licenses, registrations, and approvals, as well as any operational reporting requirements as identified in applicable laws, standards, ordinances, rules, codes, guidelines and regulations.

2.10 Air Emissions

Where applicable, Suppliers must adhere to all local laws and regulations related to air emissions. A list of any identified hazardous air emissions must be made available upon request. 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. Suppliers must conduct routine monitoring of the performance of their air emission control systems.

2.11 Biodiversity, Land Use, Deforestation and Animal Welfare

Suppliers must avoid contributing to or benefitting from illegal conversion of natural ecosystems, specifically illegal deforestation and the conversion of natural forests into usable areas (especially key biodiversity areas impacted by their operations) in accordance with international biodiversity regulations. Suppliers must conduct thorough due diligence to identify any potential risks of deforestation and natural ecosystem conversion within their supply chains. Suppliers of products with deforestation risk must provide HARMAN with all information necessary to demonstrate that due diligence was exercised and that the relevant products are deforestation-free and produced in accordance with the laws of the country of production. Suppliers must follow national and international rules regarding animal protection and animal testing, following the 3R principle regarding animal testing (reduction, refinement, replacement).

2.12 Soil Quality

Where appropriate, Suppliers must monitor and control their impact on soil quality to prevent soil erosion, nutrient degradation, subsidence and contamination.

2.13 Noise Emissions



Where appropriate, Suppliers should monitor and control the levels of industrial noise to avoid noise pollution.

2.14 Restricted Substances

Suppliers must adhere to all applicable laws, regulations, and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal. Suppliers must comply with all applicable product environmental laws including those regulating toxic materials, air emissions, wastewater discharge, waste treatment and disposal. No products are to be designed, developed, manufactured or sold without adherence to applicable product composition regulations in effect. Suppliers must identify and disclose to HARMAN all chemicals in products that are regulated by a government or other authority in the applicable jurisdiction where they are being used. Suppliers warrant to comply with applicable laws, including Toxic Substances Control Act (hereinafter "TSCA"), California Proposition 65, Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) and the Restriction on Hazardous Substances (RoHS), and will provide any information required by HARMAN to permit HARMAN to comply with these laws.

2.15 Water Management

Suppliers must implement a water management program that: documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. This includes tracking water usage at various stages of operations and identifying areas where water conservation efforts can be implemented. All wastewater must be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers must conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance. An inventory of all wastewater, including domestic wastewater and industrial wastewater must be made available upon request. Suppliers must consider the collection and reuse of water and rainwater in their production processes.

2.16 Circularity and Waste Management

Suppliers must increase the use of recycled and renewable materials where technically and economically possible. Suppliers must improve the recyclability of products through material selection and product design as approved, report the percentage of recycled content in their products, and make this information available to HARMAN upon request. We encourage Suppliers to take adequate measures throughout the product lifecycle to avoid waste, re-use resources, recycle, safely dispose of residual waste, chemicals, and wastewater, and eliminate/divert waste from landfills. Suppliers must implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste



(non-hazardous). Waste data must be tracked and documented.

3 LABOR AND HUMAN RIGHTS

Suppliers must uphold the human rights of workers and treat them with dignity and respect as expressed in the UN's International Bill of Human Rights, the principles concerning fundamental rights set out in the ILO's Declaration on Fundamental Principles and Rights at Work, and, at a minimum, the laws of the countries in which they operate. 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.

3.0 Prohibition of 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. Suppliers must provide substantiation of this verification mechanism upon request. Suppliers must have adequate policies, risk assessments and due diligence processes in place to prevent child labor throughout supply chains, including remediation plans addressing situations if child labor is detected at its business partners or subcontractors. Workers under the age of 18 (Young Workers) must not perform work that is likely to jeopardize their (physical or mental) health, safety or morals, including night shifts, hazardous work, and overtime. Suppliers must responsibly manage student workers by performing rigorous due diligence on educational partners, keeping appropriate student work records, and protecting student workers' rights. At all times, Suppliers must respect compulsory education laws. Any potential case of child labor must be immediately reported to HARMAN.

3.1 Prohibition of Forced Labor

Forced labor in any form, including but not limited to bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or trafficking of persons is not permitted by Suppliers or anywhere in the supply chain. 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 or 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, or in a language the worker can understand, that contains



a description of terms and conditions of employment. Suppliers must have adequate policies, risk assessments, and due diligence processes in place to prevent forced labor and modern slavery in their operations and supply chains, including remediation plans addressing situations if forced labor or modern slavery is detected at its business partners or subcontractors. Suppliers must not use forced labor or engage in or support human trafficking. This includes not supplying HARMAN with products that incorporate materials mined, produced, manufactured, loaded, or transported with forced labor.

Foreign migrant workers must receive the employment agreement prior to the worker departing from their permanent place of residence. 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 the worker's contract. Suppliers or contracted brokers may not mislead or defraud potential workers about the nature of the work. Suppliers must maintain documentation on all leaving workers. 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, or pay off a loan by working for an agreed-upon or unclear period of time for little or no salary with the work performed greatly exceeding the worth of the initial loan. If any such fees are found to have been paid by workers, such fees must be repaid to the worker. If it is necessary for Suppliers to use a labor broker, Suppliers will only use brokers that employ ethical recruitment practices, comply with applicable laws, and do not withhold identity documents. Supplier must comply with applicable laws such as the ILO Conventions No. 29 on Forced Labour and No. 105 on the Abolition of Forced Labor and the California Transparency in Supply Chains Act of 2010, and disclose information to HARMAN for HARMAN's compliance with law.

3.2 Freedom of Association and Right to Collective Bargaining

Suppliers must respect and not interfere with the rights of workers in forming, joining, organizing, representing, and administering trade unions of their choice, bargaining collectively, and engaging in peaceful assembly, to the extent in compliance with applicable law and ILO core conventions. Suppliers must ensure workers and representatives, as well as human rights and environment defenders, are not subjected to discrimination, harassment, intimidation, or retaliation for participating in unions or exercising their rights of freedom of expression, association, peaceful assembly and protest. Where local law restricts the right to freedom of association and collective bargaining, Suppliers should seek



alternative ways to best respect the principles of ILO Conventions No. 87 on Freedom of Association and No. 98 on the Right to Organize and Collective Bargaining. Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

3.3 Discrimination and Harassment

Suppliers 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, national or social origin, health status, physical or mental limitations, pregnancy or parenthood, religion or belief, political affiliation, union membership, covered veteran status, protected genetic information, marital status, or language in hiring and employment practices such as wages, promotions, rewards, and access to training, unless it is justified by the requirements of employment. Workers must be provided with reasonable accommodation for religious practices and disability as appropriate and necessary. 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. Suppliers should promote women's rights and avoid unfair treatment by providing equal opportunity in employment and committing to equal pay for equal work.

3.4 Working Hours

Working hours must be documented and communicated to workers, and must not exceed the maximum set by local law. 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. Where overtime is required, our Suppliers must clearly communicate such requirements. Suppliers must maintain reasonable working hour schedules for its employees to prevent quality and safety incidents, and to minimize strains on employees' physical and mental health. Suppliers will control working hours by assigning individuals with defined responsibility and accountability for comprehensive production and/or staffing planning and ensuring that contributing factors are controlled.

3.5 Compensation

Compensation paid to workers must comply with all applicable wage laws and applicable agreements,

including those relating to minimum wages, hours, overtime hours and legally mandated benefits and in any case shall be a living wage. In compliance with local laws, workers must be compensated for overtime at pay rates greater than regular hourly rates (or where permitted by law, agree in advance to time off in lieu of a higher hourly rate), and receive equal pay for equal work and qualification. Deductions from wages as a disciplinary measure are not 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. In the absence of local law, the wage rate for student workers, interns, and apprentices should be at least a substantially similar wage rate as other entry-level workers performing equal or similar tasks. Workers must be paid directly, in a timely fashion, and in recognized currency.

3.6 Disciplinary Practices

Suppliers must always demonstrate respect for each worker's mental, emotional, and physical integrity in disciplinary and performance processes, and ensure other serious human rights violations and abuses are prohibited in their own area of responsibility and along the supply chain. Suppliers will not engage in harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. 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. Suppliers must report all credible threats or concerns of workplace violence to HARMAN.

3.7 Security

Suppliers must not tolerate unlawful conduct of any kind on the part of security staff towards employees or third parties. Suppliers warrant that service providers delivering security services are contractually bound to respect human rights and undergo appropriate training wherever necessary. Suppliers must not contribute directly or indirectly to supporting private or public security forces that unlawfully exercise control over mining sites, transportation routes, and upstream stakeholders in the supply chain.

3.8 Conflict Minerals

Suppliers must comply with applicable laws and regulations regarding conflict minerals which currently include tin, tungsten, tantalum, and gold. Any conflict minerals contained in Suppliers' products must not directly or indirectly perpetuate human rights abuses. Suppliers must exercise due diligence on the source and chain of custody of these minerals and require the same from their supply chain. Suppliers



are required to design and implement reasonable processes to ensure transparency related to the content and materials comprising all products manufactured for HARMAN which may include gold, tantalum, tin, and tungsten and the ores from which they are derived. Suppliers are required to communicate, to the best of their knowledge, the country of origin and content of the products manufactured for HARMAN and to determine whether these products contain “conflict minerals” as defined by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Suppliers are required to assist HARMAN with its conflict minerals compliance by making a reasonable, good-faith effort to answer any questions and to provide all declarations in the form requested by HARMAN. Suppliers represent and warrant that, based on a good faith inquiry and except as otherwise separately disclosed in writing, its products do not contain any conflict minerals as defined in Section 1502 of the Dodd-Frank Wall Street Reform Consumer Protection Act and similar Laws or as designated by the U.S. Secretary of State. Upon HARMAN’s request, Suppliers must provide to HARMAN evidence of its due diligence supporting this representation and warranty.

Suppliers must adopt a policy and exercise due diligence on the source and chain of custody of minerals or raw materials of concern, such as tantalum, tin, tungsten, gold, mica and cobalt, in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework. Suppliers agree to conduct adequate due diligence to identify, prevent, minimize, or eliminate these risks, including making a reliable determination of the origin and source of the raw materials, and to disclose the information to HARMAN upon request. Suppliers are expected to exclude smelters or refiners for minerals of concern that do not have an adequate and audited due diligence process. Suppliers must inform HARMAN immediately of any breach that Suppliers becomes aware of.

4 COMMUNITIES

Suppliers must respect the human rights of local communities, including minorities and Indigenous people, in developments that affect them and the lands on which they live, with consideration for the presence of vulnerable groups. HARMAN expects Suppliers to avoid forced eviction and deprivation of land, forests and water in the acquisition, development or other use of the land, forests and waters. Suppliers must uphold the principles of free, prior, and informed consent of indigenous peoples prior to project or activities that may affect their lands, resources, and rights in line with ILO Convention No. 169.

5 MANAGEMENT SYSTEMS

5.0 Supplier Policy and Management System



Suppliers must have a policy and risk management system, endorsed by executive management, which aligns with HARMAN's sustainability goals, complies with this Code's requirements, and affirms their commitment to due diligence and continuous improvement. Suppliers must acknowledge their responsibility to implement a risk-based due diligence process to identify and assess actual or potential adverse human rights and environmental impacts from their own operations and value chain. Suppliers must take appropriate measures to prevent or adequately mitigate identified potential adverse impacts, end or minimize actual adverse impacts, and provide remediation where it has caused or jointly caused an actual adverse impact. Suppliers must provide a notification mechanism and complaints procedure and seek to conduct effective engagement with stakeholders in the due diligence process. Suppliers must have a process in place to identify and periodically review the adequacy, suitability, and continuing effectiveness of their policies, procedures, and performance results in meeting the requirements of this Code and other applicable laws, regulations, and customer requirements. Suppliers must disclose relevant information where required by applicable law or upon HARMAN's request. Suppliers must identify the top management responsible for implementing the management systems or associated programs. Suppliers must establish written performance objectives, targets, and implementation plans to improve their social, environmental, and health and safety performance, including a periodic assessment of Suppliers' performance in achieving those objectives.

5.1 Worker Feedback, Participation, and Grievance

Suppliers must have ongoing processes, including an effective grievance mechanism, to obtain feedback from workers, their representatives, and other stakeholders where relevant or necessary on operational practices and conditions covered by this Code and to foster continuous improvement. Suppliers will also have a process in place for subcontractors, the community associated with Suppliers' operations, and other stakeholders to raise concerns, anonymously or not, of misconduct to Suppliers without fear of retaliation. Workers and other stakeholders, including human rights and environment defenders, must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation. Suppliers will prohibit all forms of retaliation against those who raise concerns in good faith. Suppliers will also appropriately investigate reports and take corrective action, if needed.

5.2 Documentation and Audits

Suppliers must create and maintain documents and records to meet regulatory compliance and demonstrate compliance with this Code. If requested, Suppliers will complete questionnaires and 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. Suppliers must take any action to correct any non-compliance.



5.3 Supplier Responsibility

HARMAN regards compliance with this Code as a crucial aspect of its business relationships. HARMAN expects Suppliers to fully embrace the values outlined in this Code and to integrate them into their daily operations through effective and capable management. Suppliers must proactively identify and evaluate legal and other obligations and provide appropriate training to employees to ensure compliance with this Code. If a violation of this Code cannot be resolved immediately, HARMAN, together with Suppliers and/or relevant third parties, will develop and implement a corrective action plan. The objective is to eliminate the violation within a specific timeframe and minimize its impact. Suppliers must actively support HARMAN with the preparation and implementation of a plan to prevent, stop, or minimize the violation.

Failure to meet the expectations set forth in this Code may prompt HARMAN to take appropriate measures, including the potential suspension or termination of the supply relationship. It is imperative for Suppliers to recognize the significance of sustainability and align their practices accordingly to maintain a mutually beneficial and sustainable partnership with HARMAN. Suppliers must have a process to communicate these Code requirements through their supply chain and to require their suppliers to adopt management systems and practices for compliance with this Code, or requirements materially consistent with this Code. Suppliers must require, support, and monitor their suppliers and sub-supplier's compliance with this Code, including the requirements to complete questionnaires, 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. Upon request, Suppliers will provide evidence of efforts to cascade this Code, or requirements materially consistent with this Code, through their supply chains. Any violations of this Code within the supply chain may result in termination of the Supplier's business relationship with HARMAN. Subject to any restriction imposed by law, Suppliers will promptly inform HARMAN of any concern related to issues governed by this Code and collaborate with HARMAN in subsequent investigations. HARMAN policy prohibits retaliation against any person reporting such a concern. To report a concern, Suppliers can always speak directly to their HARMAN Global Purchasing and Supply Chain representative. In addition, the HARMAN Speakup Hotline (<https://harman.onetrustethics.com/>) allows employees, contractors, suppliers, and others to report concerns of misconduct affecting HARMAN. Individuals can file a report 24 hours a day, 7 days a week by phone, web, or email. Individuals filing reports on the HARMAN Speakup Hotline can remain anonymous, as permitted by law. Suppliers will communicate to their workers and suppliers the requirements of the Code and the access to HARMAN's Speakup Hotline.

5.4 Supply Chain Transparency

Suppliers must maintain transparency in their operations, providing relevant information to HARMAN about their environmental performance, responsible sourcing efforts, and supply chain practices.



Suppliers must have a process for communicating clear and accurate information about their policies, practices, expectations, and performance to workers, suppliers, and customers. Suppliers shall provide information to HARMAN to permit HARMAN to comply with all applicable laws, including but not limited to Corporate Sustainability Reporting Directive (CSRD), Corporate Sustainability Due Diligence Directive (CSDDD), Carbon Border Adjustment Mechanism (CBAM), EU Deforestation Regulation (EUDR) and EU Battery Regulation (EUBR), EPA Final Rule (40 CFR Part 705) on PFAS.

5.5 Due Diligence

Upon request, Suppliers must provide information on their established due diligence processes. This includes completing a self-assessment questionnaire provided by HARMAN and submitting relevant documents. Additionally, Suppliers must provide unsolicited information about identified risks and mitigating measures, and documentation of their due diligence measures upon request.

6 ADDITIONAL POLICIES

Suppliers must comply with all policies published on the Supply Chain page of HARMAN's website (<https://www.harman.com/supply-chain>). These policies may be periodically amended without prior notice.

7 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.

Version 4 – November 21, 2023, with revisions to several sections relating to trade compliance, human rights and due diligence, and enhanced alignment to the RBA Code of Conduct.

Version 5 – December 20, 2024, with enhancements to several Sustainability, Environmental, Social, and Governance topics.

