



GUIDING PRINCIPLES for SUSTAINABILITY

Spartan Light Metal Products believes that companies have social responsibilities and obligations to promote healthy and harmonious development between their enterprises, employees, society, and the environment. Spartan shall achieve its business goals through innovation, performance and transparency in a manner that is sustainable for both people and the environment. To ensure that our policies and practices support these beliefs, Spartan has adopted these ***Guiding Principles for Sustainability*** to direct activities of its leadership, employees, and business partners.

It is Spartan's expectation that each employee will fully understand and implement the principles prescribed within this document and appropriately escalate instances where these principles are not properly administered. Spartan also expects these principles to be extended throughout its supply chain. Spartan suppliers at all levels should strive toward attaining the same high standards in business integrity, social and environmental responsibility.

Guiding Principles for Sustainability is based on fundamental principles of social, environmental and governance responsibility, which are outlined in the AIAG Automotive Industry Guiding Principles to Enhance Sustainability Performance in the Supply Chain.

This ***Guiding Principles*** is intended to provide guidance to Spartan's employees and supply chain regarding Spartan's expectations for conducting business. To comply with this ***Guiding Principles***, Spartan and its suppliers must implement management systems - defined as a combination of policies, processes, functions, tools and internal controls - that help the organization to control its operations, reach objectives and ensure continuous improvement.

Spartan and its suppliers must always comply with applicable laws and regulations and aim to apply best industry practices. In situations where Spartan's ***Guiding Principles*** is more stringent than applicable laws and regulations, the ***Guiding Principles*** shall apply only to the extent permissible under applicable mandatory laws and regulations. Individual manufacturers may have their own standards, codes and policies in addition to this ***Guiding Principles***. However, those standards must meet or exceed those outlined in this ***Guiding Principles***.

Business Ethics

Spartan and its suppliers should uphold the highest standards of integrity and operate honestly and equitably throughout the supply chain. Both should implement management systems for business ethics, which include the following:

- **Anti-Corruption and Anti-Money Laundering:** Spartan and its suppliers should not participate in or endorse any corrupt practices in whatever form, including offering or accepting bribes, excessive gifts or hospitality or facilitation payments. Neither Spartan nor its suppliers should ever facilitate or support money laundering. Spartan and its suppliers should report any suspicious transactions and be alert for signs of money laundering.
- **Data Protection and Data Security:** Spartan and its suppliers should respect the privacy and civil liberties in respect of the collection, retention, use or dissemination, as well as any other processing of personal data.
- **Financial Responsibility/Accurate Records:** Spartan and its suppliers should perform their business dealings in a transparent manner and accurately reflect them in the companies' financial reports and filings. Spartan and its suppliers should confirm an adequate financial reporting system control is in place.
- **Conflicts of Interest:** Spartan and its suppliers should ensure that their employees avoid and disclose situations where their financial or other interests conflict with job responsibilities, or situations giving any appearance of impropriety.
- **Counterfeit Parts:** Spartan and its suppliers should minimize the risk of introducing counterfeit and/or diverted parts and materials into deliverable products and adhere to relevant technical regulations in the product design process.
- **Intellectual Property:** Spartan and its suppliers should respect valid intellectual property rights.
- **Fair Competition / Anti-Trust:** Spartan and its suppliers should not engage in activities that restrict free and fair trade with customers or suppliers. Spartan and its supplier must conduct business in accordance with all applicable anti-trust and anti-competition laws and regulations.
- **Export Controls, Trade, and Economic Sanctions:** Spartan and its suppliers should comply with applicable restrictions on the export or re-export of goods, software, services and technology, as well as with applicable restrictions on trade involving certain countries, regions, companies or entities and individuals.
- **Grievance Mechanism:** Spartan and its suppliers should establish an effective grievance mechanism that allows concerns related to business ethics, human rights, or any other topic to be raised anonymously, confidentially and without retaliation.

Environment

Spartan and its suppliers should develop, implement, and support a proactive approach to environmental responsibility through environmental protection practices, conserving natural resources and reducing overall environmental footprint of production, goods and services throughout their life cycle.

Spartan and its suppliers should implement an environmental management system that includes the following:

- **Responsible Stewardship:** Spartan and its suppliers will continually strive to protect the communities and environment that surround them. Supplier will also continually strive to conserve natural resources including water, fossil fuels, minerals, and virgin forest products by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means. Spartan and its suppliers should promote circularity and closed loop systems by supporting the use of sustainable, renewable natural resources while reducing emissions, pollution and waste.
- **Water Quality, Consumption & Management:** Spartan and its suppliers should minimize water consumption, effectively reuse and recycle water with responsible treatment of wastewater discharges and prevent potential impacts from flooding as a consequence of rainwater run-off, as required by and in accordance with applicable law.
- **Air Quality:** Spartan and its suppliers should routinely monitor and disclose, appropriately control, minimize, and to the extent possible, eliminate emissions contributing to air pollution, as required by and in accordance with applicable law. Spartan and its suppliers should assess cumulative impacts of pollution sources at their facilities and mitigate their pollution levels accordingly.
- **Responsible Chemical Management:** Spartan and its suppliers should identify, minimize or eliminate the use of restricted substances in manufacturing processes and finished products to ensure regulatory compliance. Companies should also be aware of any use of restricted substances in processes and finished products, and actively investigate suitable substitutes to maintain product and environmental stewardship.

Human Rights and Working Conditions

Spartan and its suppliers must respect the human rights of workers, local communities and other relevant stakeholders, and prevent and address adverse human rights impacts linked to their business activities.

Spartan and its suppliers should implement a management system for human rights and working conditions that includes the following:

- **Child Labor and Young Workers:** Spartan and its suppliers must observe the minimum employment age in their business activities and throughout their supply chain and shall ensure that child labor is not tolerated in any form.
- **Wages and Benefits:** Spartan and its suppliers must provide their workers with remuneration in accordance with applicable regulations and prevailing industry practices; such remuneration should be adequate to cover basic needs and enable a decent standard of living for the workers and their families, which includes respecting minimum wages, overtime compensation, medical leave and government mandated benefits.
- **Working Hours:** Spartan and its suppliers must comply with local laws and collective bargaining agreements (where applicable) regarding working hours.
- **Compulsory Labor:** Spartan and its suppliers must prohibit any forms of forced, bonded or compulsory labor, including human trafficking.
- **Freedom of Association and Collective Bargaining:** Spartan and its suppliers should allow workers to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment. Companies should respect worker rights to associate freely, to join or not join labor unions, bargain collectively, seek representation and join workers' councils.
- **Non-Discrimination and Harassment:** Spartan and its suppliers shall not tolerate or condone any form of discrimination or harassment in respect to employment and occupation. Both Spartan and its suppliers should provide equal employment opportunities regardless of worker or applicant characteristics such as age, gender, sexual orientation, gender identity, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union association, covered veteran status, genetic information or marital status.
- **Responsible Sourcing of Materials:** Spartan and its suppliers shall not knowingly provide products containing raw materials that contribute to human rights abuses, bribery, and ethics violations or negatively affect the environment. To support this effort, Spartan and its suppliers must conduct due diligence to understand the source or raw materials within its products. Spartan and its suppliers must also promote utilization of conflict-free smelters and refiners for procurement of materials and metals to ensure responsible and ethical sourcing.

Health and Safety

Spartan and its suppliers should provide workers a safe and healthy working environment that meets or exceeds applicable local laws and industry standards for safety and occupational health.

Spartan and its suppliers should implement a management system for a safe and healthy working environment that includes the following:

- **Workspace:** Spartan and its suppliers should provide a working environment that meets or exceeds local and national safety, occupational health, and fire safety legislation, in addition to encouraging remote workers to understand and apply best practices.
- **Contractors:** Spartan and its suppliers should properly manage the health and safety of contractors as part of their extended supply chain. Spartan and its suppliers should coordinate their procurement processes to identify hazards and to assess and control risks arising from the contractor's business activity with the supplier, and the company's business activity that impacts contractors' workers.