



SUPPLIER CODE OF CONDUCT

INTRODUCTION

This Truck Hero Supplier Code of Conduct applies to **all vendors that provide services, materials, components or finished products** to Truck Hero and its family of companies. Suppliers to Truck Hero must conduct themselves with **integrity at all times and obey the law in every aspect** of their business operations.

In addition, our suppliers' managers, leaders and members of our suppliers' workforces (at times, referred to here as "employees") are expected to **conduct themselves inside and outside the workplace in a manner that reflects positively** on both Truck Hero and its suppliers. The following principles are intended to specify certain, but not necessarily all, requirements that Truck Hero expects of its suppliers. **Failure to adhere to this Supplier Code of Conduct may result in immediate termination** of any agreement or arrangement with Truck Hero and its family of companies, in addition to any other remedies Truck Hero and its family of companies are entitled to under law or equity.

To ensure that the principles in the Truck Hero Supplier Code of Conduct are adopted in practice:

- Our **Terms and Conditions require compliance** with this Supplier Code of Conduct
- Suppliers must develop **documentation of their own** that demonstrate their commitment to adhere to the principles expressed in this Supplier Code of Conduct, and must **cascade that documentation to their subcontractors and sub-suppliers**, and all references to suppliers are meant to include our direct suppliers' own supply chain
- Suppliers are required to implement **mechanisms to identify, determine and manage risks** in all areas addressed by this Supplier Code of Conduct and with respect to all applicable legal requirements
- Suppliers must establish **appropriate training measures** to allow their managers and employees to gain an appropriate level of knowledge and understanding of the contents of this Supplier Code of Conduct, the applicable laws and regulations and generally recognized standards
- Suppliers must ensure that employees have a means to report concerns or potentially unlawful activities in the workplace, that such reports are treated on a confidential or need-to-know basis, and that investigations and corrective actions are undertaken when warranted
- Suppliers will be required, as a condition to providing services or goods to Truck Hero and its family of companies, to **certify that they and their subcontractors are carrying out** their actions accordingly
- Suppliers are required to **allocate appropriate resources** to execute on all of the above and below



SUPPLIER CODE OF CONDUCT **CONTINUED**

ETHICS

1. BUSINESS INTEGRITY

Suppliers are absolutely prohibited from practicing or tolerating any form of bribery, corruption, extortion or embezzlement. Suppliers will not offer or accept bribes or other unlawful incentives to/from their business partners.

2. ENTERTAINMENT AND GIFTS

While it may be customary to entertain customers and to exchange gifts, such exchanges may be interpreted as creating a conflict of interest. We discourage entertainment that could appear excessive or could appear to influence a business decision. Those working for Truck Hero and its family of companies may only accept gifts of nominal value of \$100 or less, whether or not the gift is of a promotional nature. We generally discourage exchange of such gifts, including free or reduced price services or products unless part of a company-wide authorized discount program. Members of our workforce can never provide or accept gifts of cash or cash equivalents, such as gift cards.

3. CONFLICTS OF INTEREST

Suppliers shall disclose any potential conflict of interest. Conflicts of interest may arise when an employee of a supplier (or someone close to that employee) has a personal or family relationship with an employee of ours who has the authority to make business decisions, or when an employee of ours has a business interest in a supplier's business (except for a nominal holding in a public company).

4. FAIR COMPETITION

Suppliers will conduct their business in line with fair competition and in accordance with all applicable anti-trust laws.

5. PRIVACY & INTELLECTUAL PROPERTY

Suppliers will safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.

6. IDENTIFICATION OF CONCERNS

Suppliers will provide means for their employees to report concerns or potentially unlawful activities in the workplace. Any report should be treated in a confidential manner. Suppliers will investigate such reports and take corrective action if needed.

7. CONFLICT MINERALS

Suppliers are expected to ensure that products supplied to Truck Hero do not contain metals derived from minerals or their derivatives originated from conflict regions that directly or indirectly finance or benefit armed groups.



SUPPLIER CODE OF CONDUCT **CONTINUED**

LABOR

1. CHILD LABOR

Our suppliers are prohibited from utilizing child labor. No person shall be employed at an age younger than 15 (or 14 where the governing law allows for such employment), or younger than the age for completing compulsory education, if the age in a supplier's country of operations is greater than 15.

2. FORCED LABOR, SLAVERY AND HUMAN TRAFFICKING

We do not tolerate slavery, servitude and forced or compulsory labor and human trafficking in our supply chain. All members of our suppliers' workforce must have voluntarily chosen to work for our suppliers. Suppliers will not make use of bonded, indentured or involuntary prison labor.

3. FAIR TREATMENT

Suppliers must treat all members of their workforce with respect and dignity. Suppliers shall provide their employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment. Furthermore, suppliers are expected not to unfairly terminate any employment contract or without clear evidence specify that the termination of an employment contract, in relation to the working performance of an employee, is permitted by law.

4. DIVERSITY AND INCLUSION

Equal treatment of all employees shall be a fundamental principle of the supplier's corporate policy. Typical discriminatory treatment takes into consideration – consciously or unconsciously – irrelevant characteristics of an employee such as race, national origin, gender, age, physical characteristics, social origin, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity, gender expression or any unlawful criterion under applicable law. Suppliers will ensure that their employees are not harassed in any way. Truck Hero encourages suppliers to provide an inclusive and supportive working environment and to exercise diversity when it comes to their employees as well as in their decisions to select subcontractors.

5. WORKING HOURS, WAGES AND BENEFITS

Working hours for suppliers' employees will not exceed the maximum set by the applicable national law. Compensation paid to employees will comply with applicable national wage laws and ensure an adequate standard of living. Unless otherwise provided by local laws, deductions from basic wages as a disciplinary measure will not be permitted (this does not exclude the entitlement of damages on a contractual or legal basis). Suppliers must provide their employees with fair and competitive compensation and benefits that provide an adequate standard of living for employees and their families. Supplier's employees will be paid in a timely manner. It is mandated that suppliers offer their employees ample training opportunities so that they may perform their jobs adequately and safely.

6. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Suppliers will be committed to an open and constructive dialogue with their employees and workers' representatives. In accordance with local laws, suppliers will respect the rights of their employees to associate freely, join labor unions, seek representation, join works councils and engage in collective bargaining. Suppliers shall not penalize members of their work force for participating in such collective activity, or conversely, for choosing not to engage in such activity. Suppliers will not disadvantage employees who act as workers' representatives.



SUPPLIER CODE OF CONDUCT **CONTINUED**

HEALTH, SAFETY, ENVIRONMENT, AND QUALITY

1. QUALITY REQUIREMENTS

Suppliers must meet consistently achieve generally recognized or contractually agreed quality requirements in order to provide goods and services that consistently meet Truck Hero's needs, perform as warranted and are safe for their intended use.

2. HEALTH, SAFETY, ENVIRONMENTAL AND QUALITY REGULATIONS

Suppliers are required to comply with all applicable quality, health, safety and environmental regulations. All required permits, licenses and registrations must be obtained, maintained and kept up-to-date by suppliers. Suppliers are required to fulfill their operational and reporting requirements to all oversight entities and government agencies.

3. PRODUCT SAFETY

Suppliers must provide material safety data sheets containing all necessary safety-relevant information for all hazardous substances utilize in suppliers' production or supply chain and those reports must be provided to Truck Hero and other parties as required by law.

4. SAFE AND HEALTHY WORK ENVIRONMENT

Suppliers must provide and maintain a safe and healthy work environment for its employees. A safe and healthy working environment includes as a minimum potable drinking water, adequate lighting, temperature, ventilation and sanitation and, if applicable, safe and healthy company living quarters.

5. OCCUPATIONAL HEALTH AND SAFETY

Suppliers must protect their employees from any chemical, biological and physical hazards and physically demanding tasks in the workplace as well as from risks associated with any infrastructures used by their employees. Suppliers are required to provide appropriate controls, safe work procedures, preventative maintenance and necessary technical protective measures to mitigate health and safety risks in the workplace. When hazards cannot be adequately controlled by these means, suppliers will provide employees with appropriate personal protective equipment. Safety information relating to hazardous materials – including compounds in intermediate materials – shall be available to educate, train and protect workers from hazards.

6. PROCESS SAFETY

Suppliers are required to have safety programs in place for managing and maintaining all their production processes in accordance with the applicable safety standards. Suppliers will address product-related issues and their potential impact during all stages of the production process. For hazardous installations suppliers must conduct specific risk analyses and implement measures that prevent the occurrence of incidents such as chemical releases and/or explosions.



SUPPLIER CODE OF CONDUCT **CONTINUED**

HEALTH, SAFETY, ENVIRONMENT, AND QUALITY CONTINUED

7. EMERGENCY PREPAREDNESS, RISK INFORMATION AND TRAINING

Suppliers will make available safety information on identified workplace risks and suppliers' employees will be correspondingly trained to ensure they are adequately protected. Suppliers will identify and assess likely and potential emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures. These obligations extend to any supplier living quarters.

8. WASTE AND EMISSIONS

Suppliers are required to have systems in place to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges. Any of these activities that have the potential to adversely impact human or environmental health must be appropriately managed, measured, controlled and handled prior to release of any substance into the environment. Suppliers are mandated to have systems in place to prevent or mitigate accidental spills and releases into the environment.

9. RESOURCE CONSERVATION AND CLIMATE PROTECTION

Suppliers are expected to use natural resources (e.g. water, sources of energy, raw materials) in an economical way. Even when not the subject of law or regulation, negative impacts on the environment and climates should be minimized or eliminated at their source or by practices such as the modification of production, maintenance and facility processes, material substitution, conservation, recycling and material reutilization. Suppliers will engage in the development and use of climate-friendly products and processes to reduce power consumption and greenhouse gas emissions to the extent commercially feasible.

10. SUPPLY CHAIN SECURITY

Suppliers must have good security practices across their supply chains. Suppliers are required to maintain processes and standards that are designed to assure the integrity of each shipment to Truck Hero from its origin through to its destination and all points in between. Suppliers are expected to implement all necessary and commercially accepted measures in their area of responsibility to ensure that Truck Hero products, their workable components or raw materials as well as the corresponding know-how do not end up in the hands of counterfeiters or third parties and do not leave the legal supply chain.