

Melexis Code of Conduct

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Introduction

As Melexis, we innovate with heart for the good of the planet and the good of the people. We empower engineers to turn their ideas into applications that support the best imaginable future; one that is safe, efficient and sustainable. This Code of Conduct defines Melexis commitments to sustainability and business ethics, in line with Melexis values and the UN Global Compact. It is intended to provide a clear reference for behavior during business activities.

All entities of the Melexis Group are collectively referred to as Melexis or We. The values and obligations set out in the Code of Conduct apply to all our employees, governance body members, agents, professional advisors and contractors (together referred to as “Melexians”). We expect all Melexians to carefully read this Code of Conduct and adhere to all values and obligations that are included. We also expect all our business partners to adhere to and promote similar values and obligations through the [Melexis Supplier Code of Conduct](#).

Our core values

This Code of Conduct should be read along with the Melexis values, which are the essence of Melexis identity. These values support our vision, shape our company’s culture and reflect what we deem important.

We care

For us, technology is about solving fundamental societal challenges. We are convinced it takes all kinds of people to solve these challenges, so we actively strive to build a diverse and inclusive team. We take nothing for granted, be it our people, our partners and customers, our planet or our resources. We attract and cultivate talent in an environment that values learning, continuous growth and team spirit and collaboration.

We are on the customer’s side

We root for our customers’ success. We do not stop at engineering innovations for our customers. We feel part of their team and are with them all the way. Understanding their perspective allows us to build future-proof innovations and offers us unbeatable industry insights.

We always have a plan

We became leaders in the industry because we are not daunted by challenges. We love coming up with new ways to create value, whether it is by removing obstacles or by exploring new and exciting opportunities. You can count on us to be collaborative, patient and self-driven.

We understand the value of money

We take pride in our track record as an industry leader in innovation, operational excellence, growth and results. We remain committed to the efficient ways of working that have brought us where we are today. As a result, we create lasting value for all stakeholders.

We enjoy the journey towards success

We celebrate our victories, but we experience daily that it is even more important to enjoy the journey itself. We get a real sense of achievement from working towards audacious goals with a team we can rely on.

Commitments in the workplace

Our workplace commitments aim to contribute to a company culture where each person feels valued, respected, and empowered. Our goal is to create a positive and productive atmosphere that encourages innovation, collaboration, and shared success. We firmly believe that a workplace built on trust, fairness, and mutual respect benefits everyone: Melexians, customers, suppliers, other partners, and the broader community.

Health and safety

We take responsibility for the physical and mental wellbeing of all people working on our sites or representing Melexis outside of the company.

We commit to maintaining safe and healthy working conditions on our sites, according to local Health & Safety policies, which include

- Risk assessments, preventive actions, emergency plans, inspections and audits,
- Actions to address stress and psychological wellbeing in the workplace, as described in the section “Inclusive, just and favorable working conditions”,
- Actions to prevent and control hazardous substance or noise exposure,
- Training of employees on health and safety risks and good working practices,
- Complaints procedure for employees to report on occupational health and safety incidents, risks, and concerns,
- Prohibition of the use of alcohol and drugs while working or attending business-related activities,
- Access to fully operational Water, Sanitation and Hygiene (WASH) facilities.

Inclusive, just and favorable work conditions

In line with our Inclusive Culture Policy, we recognize that Diversity, Equity, and Inclusion are cornerstones of innovation and business resilience, anchored in our "We care" value. Our vision is to cultivate a global, inclusive Melexis community where every individual is empowered to bring their full selves to work. We commit to:

- Focus intentionally on building an inclusive culture where every voice is heard and unconscious biases are actively addressed,
- Foster a safe workplace with a strict prohibition of discrimination, violence, and harassment based on any protected characteristic,

- Ensure equitable opportunity in all aspects of employment based solely on merit, qualifications, and abilities,
- The principle of equitable pay.

Use of computing and information resources

Melexis purchases, licenses and develops software and hardware computing resources to further its business activities and product development. Melexians are expected to use these tools within their licenses and terms of use. We do not condone the abuse of our information resources. More information on the use of Melexis computing and information resources can be found in our Information Security Policies, which are at all times available to Melexians.

Commitments in doing business

Our business commitments go beyond financial gain. They include a dedication to ethical practices, sustainable operations, and generating value for all stakeholders. By adhering to these principles, we ensure our business grows while contributing positively to the world. We are convinced that our business commitments foster trust, build lasting relationships, and are key for continued success.

Compliance with law

We undertake to comply with all applicable laws and regulations, including on export control, when conducting business. Our compliance also extends to industry codes and Melexis values. We will not aid in or tolerate a breach of law by any of our business partners.

Environmental sustainability

We recognize that environmental sustainability is fundamental to realise our mission and ensure long-term business resilience. We act according to our [Environmental Policy](#), which outlines the following commitments.

General principles of environmental sustainability:

- We prioritize prevention of negative impacts, such as pollution,
- We continuously improve the environmental management system to enhance environmental performance,
- We adhere to applicable environmental laws, regulations, and voluntary standards, and turn them into impactful environmental action,
- We foster a culture of environmental responsibility among all employees.

Climate change. We work on reducing our carbon footprint across Scope 1, 2, and 3, including transitioning away from fossil fuels.

Resource Management and Waste Reduction. We minimize waste generation; promote responsible resource management by minimizing consumption of energy, water, and auxiliaries; optimize the use of raw materials, and strive to increase their circularity.

Hazardous Substances and Pollution. We implement stringent controls for the safe handling, storage, use, and disposal of chemicals; continuously evaluate and reduce the use of hazardous substances; and ensure compliance with all applicable chemicals- and pollution-related regulations, including but not limited to RoHS and REACH.

Sustainable Supply Chain. We invest in supply chain due diligence through the implementation of ESG Procurement Policy, Supplier Code of Conduct, and ESG Supplier Engagement program, which cover all topics mentioned in this Code, complemented by topics material in the upstream value chain (such as responsible material management, air pollution, and water).

Human and labor rights

We respect human and labor rights in all our activities, as defined in [ILO International Labor Standards](#), [UN Universal Declaration of Human Rights](#), and [OECD Guidelines for Multinational Enterprises](#). Specifically, we do not tolerate, engage in or support the use of forced labor, compulsory labor, child labor, and human trafficking. We ensure labor rights of all people working for Melexis, including but not limited to the right to social dialogue through employee representatives and collective bargaining, the right to rest and reasonable working hours.

Product safety and consumer rights

Our products are integral parts of many critical systems in automobiles and industrial or commercial products. We therefore attach particular importance to constantly controlling and improving the quality of our products. Their proper functioning and reliable operation is the responsibility of all Melexians. We provide the necessary tools to allow Melexians to make products of consistently high quality and to report all quality deficits.

We respect consumer rights and provide accurate information about our products and services.

Financial and non-financial accounting and reporting

Diligent record-keeping protects our reputation and justifies the trust put in us by our stakeholders. We ensure that any data, information or records which are created, are true and fair. We recognize our obligation to the business, investors, clients and candidates to ensure that our reports on business performance are open, honest and accurate.

We comply with applicable laws and external accounting standards and ensure that the information we supply to auditors and stakeholders provides a true and fair view of our financial situation.

Confidential information and intellectual property

We take precautions to safeguard both our own confidential information and the confidential information of our customers, suppliers and partners. Confidential information as referred to in this Code of Conduct is any information other than public information that becomes known

to Melexians in connection with the performance of their work, and includes all information classified as 'restricted', 'confidential' and 'secret' in accordance with Melexis Data Classification Policy.

To that end, we expect Melexians to take precautions to guard any and all confidential information of Melexis and of our customers, suppliers and partners, from disclosure to competitors and other unauthorized third parties. This expectation of safeguarding confidential information extends throughout and after any employment period.

At the same time, we undertake to comply with the legal authority of local governments when presented with valid legal writs or orders and after appropriate consultation with our legal team.

Melexis intellectual property is central to our commercial success. Protecting our intellectual property rights, such as patents and brand names, as well as our technical knowhow is therefore a primary obligation of all Melexians. Similarly, Melexians must respect the intellectual property of Melexis customers, suppliers, any other partner and/or third party, including competitors and may only use it with their explicit, written consent or when otherwise legally permitted.

Privacy and data protection

Melexis is committed to respecting the fundamental right of privacy and attaches great importance to personal data protection. To that end, melexis processes personal data only in accordance with the applicable data protection and privacy laws.

This means we can only collect and use personal data if we have a legal basis to do so and for a specific legitimate purpose. At the same time, we cannot collect, process or retain more personal data than needed for the purpose, nor can we keep them any longer than needed.

More information is available in our Internal Privacy Policy and [External Privacy Policy](#).

Commitments to integrity

We are committed to acting with integrity in all our activities. This means being honest, transparent, and ethical in our dealings with colleagues, customers, suppliers, partners and any other third parties. We believe that integrity fosters trust, is a prerequisite to safeguard our reputation and is essential for long-term success.

Anti-bribery and anti-corruption

We do not engage in or condone bribery and corruption and we consider these practices to be directly opposed to the Melexis values. Instead, we want to compete and win over customers by virtue of our product quality and the value of our services.

Therefore, Melexis has a strict zero tolerance policy for bribes, kickbacks and any other form of benefits to obtain business. This applies to all Melexians, as well as all parties we engage with in the course of our business.

As a consequence, we do not allow the offering, promising or giving of anything of value (like money, gifts, hospitality or special treatment), either directly or indirectly through an intermediary, to anyone, including government officials and any other legal or natural person, to influence their decisions or to gain an unfair advantage. More guidance on the acceptance and giving of personal gifts is in the “Conflicts of interest and gifts”-section of this Code of Conduct.

Similarly, we will never accept any bribes, favors or improper benefits in exchange for our business. Any offers or suggestions by a third party to Melexis in this regard must be explicitly refused in writing to ensure that our refusal is clearly documented and to avoid any confusion or impression of acceptance. In addition, any such offers or suggestions should immediately be reported to compliance@melexis.com*.

To ensure these principles are respected, we have internal controls in place to prevent and detect any wrongdoing, like keeping clear records and having multiple people review important decisions. At the same time, we regularly train Melexians on this Code of Conduct and encourage them to speak up if they see anything suspicious.

* This mailbox is managed by the General Counsel and Compliance Counsel.

Conflicts of interest and gifts

We avoid conflicts of interest at all times and do not allow personal interests to have priority over the interests of Melexis.

Firstly, Melexians cannot offer or accept gifts or hospitality to or from Melexis stakeholders outside of the ordinary course of business, other than gifts of a modest nominal value or reasonable hospitality given in the ordinary course of business (e.g. at New Year's). More specifically, Melexians must not offer or accept any gifts or hospitality that could raise any concerns regarding their personal integrity or Melexis integrity and independence. When in doubt, Melexians shall obtain advice by sending an email to compliance@melexis.com. In any case, gifts with a nominal value exceeding EUR 100 cannot be accepted without consulting compliance@melexis.com. Any non-acceptable offer or suggestion regarding gifts or benefits in exchange for business must be explicitly refused in writing.

Secondly, Melexians must avoid any activity that leads to, or may lead to, a conflict of interest. Melexians cannot use their positions to obtain direct or indirect personal benefits. They shall exercise fair, objective and impartial judgment in all business dealings, placing the interests of Melexis over any personal interests in matters relating to the business.

In this regard, Melexians shall not have any personal relationship with a customer, supplier or competitor, in which their personal interest conflicts or might appear to conflict with that of Melexis. In case of such a personal relationship, management must be informed to avoid any conflict of interest. Likewise, Melexis employees are expected to devote their full-time duties and energy to Melexis. Any outside employment which interferes with their employment or competes with Melexis is prohibited.

Finally, within Melexis itself, any conflicts of interest due to personal relationships in the workplace should be handled in accordance with the Global Workplace Relationship Policy.

Insider trading

We have policies and procedures in place to prevent insider trading and to ensure proper handling of inside information.

Melexians who have access to inside information shall not profit from that information or position. Inside information is information that has not yet been made public and which, if it was made public, would likely have a significant impact on the price of the respective securities to which the information relates. Melexians must not use corporate assets for anything other than legitimate business or other authorized purposes. Any instances or suspicions of insider trading must be reported to compliance@melexis.com immediately.

Competition and antitrust

Melexians must not engage in any discussions with competitors that might be construed as to prevent fair and open competition, in particular price discussions. Transactions with related parties are conducted at arm's length.

Compliance with this Code of Conduct

Speak Up Policy

Melexis and its Melexians commit to doing business on a daily basis with respect for the commitments in this Code of Conduct. Despite this commitment, Melexians may one day observe behaviour that seems to violate the law, our values, this Code of Conduct or other Melexis policies. If Melexians observe or suspect such misconduct, or if it is very likely to take place, then a grievance mechanism is in place at Melexis. Melexians are encouraged to speak up and allow Melexis the opportunity to deal with the issue. The easiest way to do so is by using Melexis online [whistleblowing tool](#).

Melexians who speak up in good faith are protected and will not suffer any disadvantages for raising concerns. More information about our Speak Up procedure can be found in the [Speak Up Policy](#), which is at all times accessible to Melexians.

Reinforcement and consequences of non-respect of Code of Conduct

Any violation of this Code of Conduct is considered a serious matter and may cause disciplinary action. The specific consequences will depend on the nature and extent of the violation, as well as any relevant factors such as the employee's position and past behavior.

Melexis will properly investigate any alleged violations of this Code of Conduct and will take appropriate action based on the findings of the investigation.