



**Melexis**  
INSPIRED ENGINEERING

# Melexis Code of Conduct

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## Introduction

Combining a passion for technology with truly inspired engineering, Melexis designs, develops and delivers innovative micro-electronic solutions. We enable designers to turn ideas into applications that support the best imaginable future. Our advanced mixed-signal semiconductor sensor and actuator components address the challenges of integrating sensing, driving and communication into next-generation products and systems that improve safety, raise efficiency, support sustainability and enhance comfort.

We respect all of our stakeholders, both internally and externally. They deserve the utmost integrity, honesty and fairness in all their interactions with us. Our collective reputation as a corporation and as a collection of individuals representing the Melexis brand must meet the highest standards.

The following Code of Conduct is presented to achieve and maintain our goals of integrity, honesty and fairness. It also describes how Melexis aims to comply with relevant laws and regulations in all regions where we operate. It is meant 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 apply to all our employees, governance body members, agents, professional advisors and contractors (together referred to as “Colleagues”). We also expect all of our business partners to adhere to and promote similar values.*

Our Colleagues are encouraged to speak up if they experience, witness, or learn of harassment or discrimination in the workplace. Any report of harassment is investigated in a timely manner and followed up with due care and attention. Melexis also encourages everyone to speak up in case of concerns about unethical behavior. An internal Speak-up policy has been implemented to increase transparency and to enhance the reporting of any concerns regarding unethical behavior or incidents. Melexis does not tolerate any retaliation against any Colleague who raises a compliance concern in good faith. Equally, Melexis does not tolerate any abuse of the Melexis Speak-Up policy. As such, allegations made in bad faith and without any factual substance may result in disciplinary or other appropriate action.

## Our core values

This Code of Conduct should be read in conjunction 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 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 terms of 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 enduring value for all our stakeholders.

### **We enjoy the journey towards success**

We celebrate our victories, but we daily experience 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.

## **Our Commitments in the workplace**

By respecting and adhering to the Melexis values, we promote teamwork, sharing of knowledge, individual responsibility and strength through diversity.

We compensate our employees fairly and strive to provide them with an appropriate work-life balance. Our employees are offered the possibility to have flexible working hours and to work from home.

### **Safety and health**

We take responsibility for the physical and mental wellbeing of our Colleagues during their time at Melexis and outside of the company while representing Melexis.

We provide safe and healthy working conditions on our sites. Everyone is expected to contribute to the safety and health of the workplace by being alert and aware of the rules, policies and procedures, and by reporting any unsafe conditions. We provide appropriate resources to reach these goals and commit to continuously improve our safety and health performance. In addition, we organize regular health and safety trainings as well as exercises (e.g. evacuation, fire prevention and first aid).

Melexis is a drug-free workplace. We strictly prohibit the use of alcohol and drugs during work or while attending business-related activities.



## Equal opportunity, diversity and non-discrimination

We provide equal opportunity and encourage diversity at every level of employment. Everyone who works for Melexis or applies to work at Melexis shall be treated fairly and receive equal opportunities.

Any discrimination based on race, creed, color, nationality, ethnic origin (e.g. indigenous people), age, religion, gender, sexual orientation, marital status, or disability, and freedom of thought, conscience and religion, etc. is unlawful and will not be tolerated. Our Colleagues should respect each other.

## Harassment-free workplace

Everyone contributes to creating and maintaining an integer, honest and fair work environment, free from discrimination and harassment, where people are treated with dignity, decency and respect. Our environment should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. Our Colleagues should be able to work and learn in a safe and stimulating atmosphere.

## Computing and information resources

Melexis purchases, licenses and develops software and hardware computing resources to further its business activities and product development. We use these tools within their licenses and terms of use. We do not condone the abuse of our information resources. Any violations through these resources may result in disciplinary action.

### **Our Colleagues' obligations regarding computing and information resources.**

It is against Melexis policy to violate copyrights and licenses. All software and intellectual property must be utilized in a manner consistent with any licenses or terms of use. All company computing resources should be used only in a manner consistent with the business needs for which it was intended. Misuse and abuse of computer resources and network bandwidth is not acceptable. Colleagues who are issued laptop computers are expected to use and respect these resources as they would any other company equipment and property understanding fully that the asset is at all times property of the company along with all software and digital files stored thereon. Any content or use of an indecent, demeaning, discriminatory or unlawful nature will result in disciplinary action and, if in violation of statutes, will be reported to the appropriate authorities.

Melexis' company property includes, but is not limited to, computers, software, work equipment, mobile phones, business strategies, customer lists, financial data, personnel data, product cost data, product pricing, organization charts etc. At the end of the (employment) agreement, each Colleague shall return immediately all objects belonging to the Company, including those prescribed.

# Our commitments in doing business

## Compliance with law

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

## Environment and human rights

We aim to comply with all environmental laws and regulations. We are committed to being an environmentally responsible corporate citizen. We consider the effects of our activities on the environment and undertake to limit the burdens we place on the environment.

We recognize that human rights are crucial and universal. We respect those rights in all of our activities. Specifically, we do not tolerate, engage in or support the use of forced or child labor.

## Product safety

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 of our Colleagues. We provide the necessary tools to allow our Colleagues to make products of consistently high quality and to report all quality deficits.

## 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 as well as the confidential information of our customers, suppliers and partners.

We undertake to comply with the legal authority of local governments when presented with valid legal writs or orders and after appropriate consultation with Melexis' legal counsel.

We respect the intellectual property of our competitors and business partners and use it only with their explicit permission and/or where legally permitted.

### **Our Colleagues' obligations regarding confidential information and intellectual property**

Our Colleagues must take precautions to guard Melexis' confidential information from disclosure to competitors and other unauthorized third parties. Confidential information is any information other than general business knowledge and general work experience that becomes known to our Colleagues in connection with the performance of their work. This may include information and intellectual property of the company or its customers, suppliers and partners. This expectation of safeguarding company secrets and records extends throughout and after any employment period. Our Colleagues are expected, however, to comply with the legal authorities of the local government when presented with any writs or orders and after appropriate consultation with Melexis' legal counsel. Our Colleagues will treat confidential information provided by third parties with the proper care.

The company's intellectual property is at the core of our commercial success. Protecting our intellectual property rights, such as patents and brand names, as well as our technical know-how is therefore a primary obligation of all our Colleagues. Our Colleagues must respect the intellectual property of Melexis' competitors and may only use it with their explicit, written consent or when otherwise legally permitted.

## **Our integrity and reputation**

We greatly value our reputation. It is determined by our acts and affects not only our own success and trustworthiness, but also that of our business partners. For this reason, we undertake several commitments to maintain our business integrity.

We avoid conflicts of interest. We do not allow personal interests to have priority over the interests of Melexis. This includes the acceptance of gifts outside of the ordinary course of business and of gifts that would otherwise cause concerns about our integrity.

We do not engage in or condone bribery and corruption. We consider these practices to be directly opposed to our values. We want to compete and win over customers by virtue of our product quality and the value of our services. We support national and international efforts to combat corruption.

We have policies and procedures in place to prevent insider trading, to ensure proper handling of inside information and to comply with competition law.

Information on how these commitments specifically apply to our Colleagues can be found below ("*Our Colleagues' Integrity Obligations*").

## Our Colleagues' Integrity Obligations

### Bribery and corruption

Our Colleagues must at all times avoid every impression of corruption. They will not pay or offer to pay bribes or illicit payments to government officials, candidates, or other parties, in order to obtain or retain business or to influence decisions. Our Colleagues will not assist others in profiting from opportunities that are discovered through their affiliation with Melexis and which should normally be served by Melexis.

### Conflicts of interest and gifts

Our Colleagues must avoid any activity that leads to, or may lead to, a conflict of interest. They will not 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.

Conflicts of interest include, but are not limited to, acceptance and giving of personal gifts or hospitality to or from Melexis stakeholders, other than gifts of modest nominal value or reasonable hospitality given in the ordinary course of business (e.g. at New Year, religious celebrations, festivals, etc.).

Our Colleagues must not give or accept any gifts or entertainment that could raise any concerns regarding their personal integrity or Melexis' integrity and independence. When in doubt, our Colleagues are encouraged to consult their line manager to provide clarity and certainty. Any agreement or understanding regarding favours or benefits in exchange for gifts must be avoided. In any case, gifts with a nominal value exceeding EUR 100 may not be accepted without full disclosure to and prior clearance from that Colleague's line manager.

Our Colleagues 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 the company. In case of such a personal relationship, management must be informed to avoid any conflict of interest.

### Insider Trading

Our Colleagues 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. Our Colleagues 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 the Compliance Officer immediately.



### Competition and antitrust

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

## Privacy and Data protection

Melexis is committed to respecting data privacy and has developed principles that must be consistently applied when processing personal data. We have an important duty to respect this information, ensure that it is protected and handled responsibly and only used for the purposes for which it is provided. More information is available in the privacy policy on our website (<https://www.melexis.com/en/legal/privacy-policy>).

We gather and process the personal data of our Colleagues for purposes relating to the execution of their (employment) contract. The information collected will be processed to enable us to manage salaries, to fulfill statutory obligations and to carry out other tasks related to personnel management. Examples include processing for tax purposes, social security, group insurance, pension, etc.

We aim to adhere to all legal obligations when processing this personal data. Our Colleagues' personal data may be transferred within the Melexis group, both inside and outside the EU, but only when this is necessary.

### Our Colleagues' obligations related to privacy and data protection

Our Colleagues have an obligation to respect applicable privacy and data protection legislation while employed by Melexis. They will not process personal data unless a lawful basis is present. All personal data must be collected and processed only for specified legitimate purposes and only in so far as this is necessary. Our Colleagues will ensure that the data they collect is accurate and up-to-date, and that data is not retained longer than necessary. They will take actions to guarantee that personal data is adequately secured and that data subjects are able to exercise their rights.