



**Melexis**  
INNOVATION WITH HEART

# Melexis Code of Conduct

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## Introduction

As Melexis, we innovate to make our planet a better place. We care for our people and your people. We sense your needs and drive your future. We engineer globally with an inclusive mindset. Our promise is results. That's what we call: innovation with heart.

We empower engineers to turn their ideas into applications that support the best imaginable future; one that is safe, efficient and sustainable. We respect all 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 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 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 also expect all our business partners to adhere to and promote similar values.*

## 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 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.

## Our 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, partners, and the broader community.

### Workplace safety and health

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

We provide safe and healthy working conditions on our sites, including access to fully operational Water, Sanitation and Hygiene (WASH) facilities. Everyone is expected to contribute to the workplace safety and health by being alert and aware of rules, policies and procedures applicable at Melexis, and by reporting any unsafe conditions. We provide appropriate resources to reach these goals, including regular health and safety training such as evacuation, fire prevention and first aid exercises.

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

### Inclusive, just and favorable work conditions

We encourage diversity at every level of employment.

Everyone shall contribute to creating and maintaining an integer, inclusive 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 no intimidation, oppression and exploitation.

We recognize the universal right to work. Everyone who works for Melexis or applies to work at Melexis shall receive equal opportunities. Any discrimination based on race, 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.

Melexians should be able to work and learn in a safe and stimulating atmosphere. We compensate them fairly and strive to provide them with an appropriate work-life balance and flexibility.

### 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.

## Our 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

Melexis promotes environmental sustainability in both the application of its products and how they are produced. Our Environmental Management System considers environmental aspects both within and outside Melexis operational control, according to the lifecycle approach, including aspects like climate change and water. To ensure that, we establish a clear environmental governance model that considers all stakeholders. Thus, we act to minimize the environmental impact throughout the whole value chain, including actions like the “first time right” principle and maximization of the efficient use of resources such as water and energy.

We monitor our environmental performance and continuously search for ways to improve it. We ensure the validation of our environmental performance by complying with local and global environmental legislation and voluntary certification. In particular, we support industry-wide efforts to identify, reduce and eliminate the use of conflict minerals, and safe treatment of hazardous materials.

### Social sustainability

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, child labor, and human trafficking. We ensure labor rights of all people working for Melexis, including the right to 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 is any information other than general business knowledge and general work experience that becomes known to Melexians in connection with the performance of their work, and includes all classified information. This may also include information and intellectual property of the company or its customers, suppliers and partners.

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 Melexis' legal counsel.

The company's 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, distributors and 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 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 Melexians 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. Melexians' personal data may be transferred within the Melexis group, both inside and outside the EU, but only when this is necessary.

## Our 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 and any other third parties. We believe that integrity fosters trust, is a pre-requisite to safeguard our reputation and is essential for long-term success.

### Conflicts of interest and gifts

We avoid conflicts of interest at all times. 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.

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.).

Melexians 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.

Melexians 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, Melexians shall 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.

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 the company. 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.

### Bribery and corruption

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.

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. We do not allow the offering, promising or giving of anything of value (like money, gifts or special treatment) to anyone, including government officials and any other legal or natural person, to influence their decisions or gain an unfair advantage. Similarly, we will never accept any bribes or favors in exchange for our business or any other improper benefit.

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.

### 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 the Compliance Officer immediately.

### Competition and antitrust

Melexians 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.

## 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.