

Supplier Code of Business Conduct

Garrett is committed to integrity and compliance in everything we do. As part of that commitment, Garrett expects its suppliers to ensure that they provide their employees a safe working environment, that they treat their workers with dignity and respect, that they engage in environmentally sound and sustainable manufacturing processes, and that they comply with the law in all countries in which they conduct business. Suppliers are expected to foster a culture where employees and managers can communicate openly and raise concerns without fear of retaliation, intimidation, or harassment.

Garrett's Supplier Code of Conduct (the "Supplier Code") sets forth Garrett's commitment to integrity and compliance within its global supply chain. We expect all of our suppliers to adhere to the Supplier Code and to ensure these requirements are cascaded met within their supply chain. Garrett may visit (and/or have external monitors visit) supplier facilities, with or without notice, to assess compliance with the Supplier Code. Adherence to the requirements set forth in the Supplier Code will be considered in making sourcing decisions. Failure to comply with the Supplier Code may result in termination as a Garrett supplier and possible legal action.

I. Labor and Human Rights

1. Fair Treatment

Suppliers shall commit to a workplace free of harassment and unlawful discrimination. Examples of conduct that could be characterized as "harassment" include, without limitation, threatening or subjecting workers with harsh or inhumane treatment, sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse, and unreasonable restrictions on entering or exiting company-provided facilities.

2. No Involuntary Labor or Human Trafficking

Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or involuntary prison labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

As part of this commitment to prohibiting human trafficking, Suppliers may not engage in any of the following conduct:

1. Destroying, concealing, or confiscating identity or immigration documents;
2. Using fraudulent recruiting tactics; or
3. Charging employees unreasonable recruitment fees or providing inadequate housing based on local standards, laws and directives.

3. No Child Labor

Child labor is strictly prohibited. Suppliers shall not employ children. The minimum age for employment or work shall be 16 years of age, the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher. This Supplier Code does not prohibit participation in legitimate workplace apprenticeship programs.

4. Wages and Benefits

Suppliers shall pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition, workers shall be compensated for overtime hours at the rate required by applicable laws and regulations.

5. Fair Recruiting Practices

Suppliers shall follow ethical recruiting practices. In particular, Suppliers must not:

- Mislead or defraud potential workers about the nature of the work.
- Ask employees to pay recruitment fees.
- Confiscate, destroy, conceal, and/or deny access to employee passports and other government-issued identity documents

6. Subcontractor Compliance

Suppliers agree that any workers supplied by subcontractors to work at the Supplier's facilities will be treated in a manner consistent with the principles set forth in this Supplier Code.

7. Freedom of association

Suppliers shall respect employees' rights and their wish to be part of employee representative bodies including Unions, Works Councils and Employee Forums in accordance with local law and international conventions. Where local law sets restrictions on the right to freedom of association and collective bargaining, Supplier shall allow alternative forms of worker representation, association and bargaining.

II. Health and Safety

Suppliers shall comply will all applicable health, safety and environmental laws and regulations. Suppliers should address the following in their health and safety programs:

1. Occupational Safety

Suppliers shall commit to the safety and health of their employees, and shall ensure that required training of personnel has been completed prior to initiating any work activity. Suppliers should have or subscribe to a written safety and health program. Suppliers are responsible for addressing and controlling worker exposure to potential safety hazards in conformance with all applicable standards and/or regulations and by utilizing suitable means, e.g., design, engineering and administrative controls, preventative maintenance, training, work procedures, and appropriate personal protective equipment.

2. Emergency Preparedness

Suppliers shall have emergency plans and response procedures that implement all applicable laws and regulations regarding: emergency preparedness, reporting and notification; evacuation procedures, training and drills; appropriate hazard detection and suppression equipment; and adequate exit facilities from suppliers' sites.

3. Occupational Injury and Illness

Suppliers shall have procedures and systems to manage, track and report occupational injuries and illnesses, and exposure of workers to chemical, biological and physical agents. These procedures and systems shall implement all applicable laws and regulations, including, as applicable, provisions to (i) encourage worker reporting, (ii) classify and record injury and illness cases, (iii) investigate cases, and (iv) implement corrective actions.

4. Sanitation, Food and Housing

Suppliers shall provide workers with clean toilet facilities, access to potable water and if food preparation and storage facilities are provided these shall be sanitary. Worker dormitories provided by the Supplier or a third party agency shall be clean and safe and provide adequate emergency egress, adequate heat and ventilation, reasonable personal space, and reasonable entry and exit privileges.

III. Environmental Performance

Suppliers are expected to improve the environmental performance of products and services by setting targets and monitoring environmental key performance indicators. Impacts on the environment and the health of employees must be avoided or kept to a minimum in all activities throughout the entire lifecycle of the products and services.

Suppliers shall in particular make efforts to minimize air emissions that pose a risk to the environment and health, including greenhouse gas emissions. In order to improve the environmental key performance indicators for products and services, suppliers must provide for proactive management of the most important environmental indicators, including the reduction of greenhouse gas emissions along the entire supply chain. Further, Suppliers shall make efforts to run an Environmental Management System certified by a third-party to ISO 14001. Suppliers must, upon request, provide Garrett with information on total energy consumption in MWh and CO₂ emissions in metric tons (scope 1, 2 and 3).

1. Protecting Environment

Suppliers shall comply with all applicable health, safety and environmental laws and regulations when conducting business. By way of example, suppliers shall:

1. Obtain and keep current all required environmental permits and registrations;
2. Reduce, control and/or eliminate wastewater, waste and pollution at the source;
3. Reduce, control and/or eliminate air emissions of volatile chemicals, corrosives, particulates, aerosols and combustion products;
4. Conform to applicable labeling and warning requirements; and
5. Identify, manage, store, move and handle hazardous substances in accordance with law.

2. Responsible Sourcing

Supplier shall exercise adequate due diligence procedures with respect to sourcing, extraction and handling of tantalum, tin, tungsten, gold, hereinafter referred to as “3TG”, and cobalt and to make a reliable determination of the origin and source of such minerals. Supplier shall implement measures aimed at identifying risks – inter alia in relation to the direct or indirect financing of armed conflicts and serious violations of human rights, including child labor, forced labor and slavery – and taking appropriate measures to minimize such risks.

3. Resource Efficiency and Energy Consumption

Suppliers shall achieve continual environmental improvement in manufacturing operations by reducing emissions, increasing energy efficiency, and utilizing renewable energy. Further, suppliers shall use reusable, recycled and renewable materials including in packaging, and reduce substances of concern (including hazardous materials).

4. Emissions and Waste Management

Suppliers shall eliminate waste, divert waste from landfill to products, reduce single use plastic, and reduce freshwater usage and support safe and accessible drinking water in their manufacturing operations and communities.

Suppliers must utilize materials with reduced toxicity in their manufacturing processes. Suppliers shall improve environmental performance by setting targets and monitoring environmental performance indicators.

5. Hazardous Substances

Suppliers shall identify potentially hazardous substances in chemical products and articles used in its production and ensure that they are handled, transported, stored, recycled and disposed of safely. Safety information shall be available to educate, train, and protect suppliers’ employees from hazardous materials and employees shall have access to adequate personal protective equipment.

IV. Responsible Business Practices

1. Books and Records

Suppliers are expected to create and maintain accurate books and records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. When a record is no longer needed to conduct current business, records should still be retained based on applicable retention requirements.

2. Business Integrity

Suppliers shall at all times uphold the highest level of integrity in all business interactions and disclose details of its corporate structure when requested by Garrett.

Further, suppliers shall comply with the laws and regulations of all applicable jurisdictions, including all applicable anticorruption laws. Suppliers may not solicit, give or receive commercial bribes or unlawful kickbacks and must also be careful to avoid even the appearance of such improper conduct. Suppliers will conduct their businesses without engaging in corrupt practices and will not take advantage of anyone through unfair dealing practices. This means that suppliers should not misrepresent the quality, features or availability of their products or service. Suppliers also agree to maintain integrity, transparency and accuracy in corporate record keeping. Further, suppliers shall comply with all applicable laws combating money laundering and terrorist financing.

3. Conflict of Interest

Suppliers shall do business in an open and transparent way in order to demonstrate that they are an honest and reliable partner. Further, suppliers shall conduct business in a manner that avoids situations where private, financial or other external interests conflict with the job responsibilities of its employees. Any situation where a Garrett employee or professional under contract with Garrett may have a personal interest of any kind in the supplier's business or any kind of economic ties with the Supplier, must immediately be reported to Garrett through reporting channels (see section VI. Reporting Concerns).

4. Fair Competition

Suppliers shall respect and comply with all applicable fair trade, competition and anti-trust laws and regulations and shall not have any anti-competitive discussions or enter into any anti-competitive agreements, including illegal price-fixing, market sharing, customer allocation or other illegal restrictive practices, at any level of the production or distribution chain.

5. Protection of Intellectual Property

Suppliers shall respect Garrett's intellectual property rights and safeguard proprietary information. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights.

6. Substance Abuse

Suppliers shall have policies and procedures in place to ensure that employees do not conduct work while under the influence of alcohol, illegal drugs, or misused medications, whether prescription or non-prescription. In addition, suppliers will put in place policies and procedures that prohibit employees from using, possessing, transferring or selling illegal drugs or alcohol or misused medication (whether prescription or non-prescription) while at work or while on the job.

7. Quality

Suppliers shall take due care to ensure their product meets applicable quality standards. Suppliers shall put in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements.

Suppliers shall develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

8. Privacy and Information Security

Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers shall protect confidential and proprietary information, including confidential and proprietary information of others and personal information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronics security procedures.

Whenever a supplier is entrusted with personal information about individuals, supplier shall safeguard it and take appropriate steps to protect it from misuse. All applicable data privacy laws as well as the contractual

terms with Garrett shall be observed when collecting, storing, using, processing or sharing personal information about individuals.

Suppliers shall comply with applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

V. Management System

Suppliers shall adopt and implement a management system to comply with the principles set forth in this Supplier Code. Management Systems will vary from supplier to supplier based upon the size and scope of the business and risks. The management system will be designed to ensure (a) compliance with applicable laws, regulations and customer requirements; (b) conformance with this Supplier Code; (c) mitigation of risks, and (d) a process to track, measure and drive improvements in the management system.

The management system should contain at a minimum the following elements:

- Commitment and Management Accountability through policy statements affirming the supplier's commitment to compliance and identifying a company representative[s] responsible for ensuring implementation of the management systems.
- Risk Assessment and Risk Management process to identify risks associated with the supplier's operations. As regulations continue to change and emerge, the supplier's management system should include a process to monitor and track regulatory activity that may impact its business and that of its customers relating to, but not limited to, environmental, restricted material usage, conflict minerals and hazardous waste.
- Training Programs for training managers and workers to implement the supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.
- Standards, Audits and Assessments to ensure conformity to legal and regulatory requirements, the content of the Supplier Code and customer contractual requirements.
- Corrective Action Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

- Documentation and Records to ensure compliance with the principles of this Supplier Code.
- A Process to Communicate Supplier Code Requirements to Suppliers and monitor supplier compliance to the Supplier Code of Conduct.

VI. Reporting Concerns

If you become aware of a situation that may involve a violation of this Supplier Code, you have a responsibility to report it. Please note that failure to comply with this Supplier Code may result in termination as a Garrett supplier and possible legal action.

You may make a report using the Garrett Integrity Helpline:

- Calling 1-844-823-5677.
- From the following website: <http://garrettmotion.ethicspoint.com>
- Emailing: integrity.helpline@garrettmotion.com

Garrett will treat all reports confidentially to the extent possible, consistent with the law, internal policies and the Garrett's need to conduct a thorough investigation. All reports will be investigated promptly and thoroughly, consistent with applicable law and, upon the advice and approval of the Garrett Law Department, may be reported to the appropriate authorities.
