



SUPPLIER CODE OF CONDUCT

Tenneco seeks suppliers that are committed to conducting business in an ethical and honest manner, and in a way that promotes corporate social and environmental responsibility. This Code outlines our expectations and requirements which are more fully discussed in our Supplier Requirements Manual. Tenneco expects that Supplier cascades similar requirements through its own supply chain.

BUSINESS ETHICS AND INTEGRITY

Supplier shall:

- **Compliance with the Laws:** Conduct business in compliance with all applicable laws, rules, regulations and directives of the countries and locations in which they operate and its contract obligations with Tenneco.
- **Anti-Corruption:** Even if bribery is common in the region, not engage in, and have a zero-tolerance policy regarding corruption, misrepresentation, extortion, embezzlement, kickbacks, bribery and any other type of corrupt actions.
- **Conflicts of Interest:** Avoid conflicts of interest in work with Tenneco. Immediately disclose to Tenneco, using the Tenneco Hotline, any family or other close personal relationships with Tenneco employees.
- **Confidentiality, Intellectual Property and Counterfeit Parts:** Respect Tenneco's confidential information and intellectual property rights by safeguarding it against misuse, mishandling, counterfeit, theft, fraud or improper disclosure. Immediately notify Tenneco of any unauthorized use of Tenneco trade secrets, brands, trademarks, logos or confidential information. Minimize the risk of introducing counterfeit and/or diverted parts and materials into its products.
- **Data Privacy:** Put in place measures to respect privacy, to protect personal data against loss and unauthorized access or use, and to comply with relevant privacy and information security laws and regulations.
- **Financial Responsibility/Accurate Records:** Maintain up-to-date books and records, including financial records, to demonstrate compliance with laws and regulations. All business dealings will be transparently performed and accurately documented.
- **Fair Competition:** Compete fairly as required by the law even if others do not. Avoid discussions and agreements with others that harm competition, such as price-fixing, dividing up markets or customers, or other illegal practices, at any level of the production or distribution chain.
- **International Trade:** Comply with all international trade laws, national laws, regulations, and other controls which govern the transfer, access, export, re-export and import of products, services, and technology as well as embargoes, sanctions, and anti-boycott requirements by the United States and where you are located.
- **Product Quality and Safety:** Follow Tenneco's product quality and safety standards, including contract criteria.
- **Grievance Mechanism:** Implement appropriate grievance channels for its employees and third parties to raise concerns or complaints. Remediate violations promptly.

SOCIAL RESPONSIBILITY AND HUMAN RIGHTS

Supplier shall:

- **No Child Labor:** Verify and maintain documents that prove employees meet legal age requirements.
- **No Forced Labor/Modern Slavery:** Avoid facilitating or participating in human trafficking; avoid using forced, involuntary, or slave labor; or avoid purchasing materials or services from companies using forced, involuntary, or slave labor.
- **Lawful Employment:** Maintain proof of each employee's eligibility to work, such as visas and licenses.
- **No Harassment:** Prohibit harassment and encourage treating each other with respect.
- **No Discrimination:** Treat everyone with dignity and respect. Provide equal employment opportunities and conditions based on the ability to do the job, regardless of characteristics such as race, color, age, gender, gender identity, sexual orientation, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union association, veteran status, genetic information or marital status.
- **Wages and Benefits:** Provide wages and benefits that, at a minimum, comply with applicable laws and collective bargaining agreements, including minimum wages, overtime, breaks, leaves, and benefits.
- **Working Hours/Leave:** Always respect and comply with applicable laws and collective bargaining agreements, if applicable, on working and resting hours, including overtime working hours, as well as annual, sick and parental leave and any other applicable leave regulations.
- **Freedom of Association:** Respect employees' rights to lawfully form, join or not join labor unions, bargain collectively, seek representation and join worker's councils. Respect employees' open communication and sharing of ideas and concerns with management without fear of retaliation.
- **Health and Safety:** Provide employees a safe and healthy working environment that minimizes the incidence of work-related injuries and enhances the quality of products and services, the consistency of production, and worker retention and morale. This includes any housing and transportation provided by a Supplier to its employees.
- **Emergency Preparedness:** Maintain procedures to identify and to minimize the impact of potential emergency situations.
- **Preservation and Production of Food:** Avoid unlawful environmental pollution impairing the production of food or limiting access to clean drinking water or otherwise unlawfully harms the health of a person.
- **Unlawful Eviction:** Not to engage in any unlawful eviction or taking of land which secures the livelihood of a person.
- **Private or Public Security Forces:** Suppliers should not commission or use private or public security forces to protect the business project if, due to a lack of training or control on the part of the company, the deployment of the security forces may lead to violations of human rights.

ENVIRONMENTAL SUSTAINABILITY

Supplier shall:

- **Energy Use and Emissions:** Implement an energy reduction strategy that includes increasing its use of renewable energy to support Tenneco's objective to reduce greenhouse gas and emissions through the supply chain.
- **Water Quality and Consumption:** Reduce, reuse, and recycle water, including responsibly treating any wastewater discharge to protect the environment and improve overall water quality.
- **Air Quality:** Monitor, appropriately control, minimize and to the extent possible, eliminate its emissions contributing to air pollution.
- **Natural Resources Management and Waste Reduction:** Encourage and support the use of sustainable, renewable natural resources while reducing waste and increasing reuse and recycling.
- **Responsible Chemical Management:** Identify, minimize or eliminate the use of restricted substances in manufacturing processes and finished products to ensure regulatory compliance.
- **Permits and Reporting:** Obtain and maintain all required environmental permits and adhere to reporting requirements.
- **Soil Quality:** Suppliers should monitor and control their impact on soil quality to prevent soil erosion, nutrient degradation, subsidence and contamination.
- **Biodiversity, Land Use and Deforestation:** Suppliers should protect ecosystems, especially key biodiversity areas, impacted by their operations, and avoid illegal deforestation in accordance with international biodiversity regulations.

SUPPLY CHAIN MANAGEMENT

Supplier shall:

- **Due Diligence:** Use a due diligence process to select suppliers consistent with this Code, communicate this Code to them, and take steps to verify compliance.
- **Responsible Mineral Sourcing:** Follow the OECD and European Union Due Diligence Guidelines with respect to sourcing, extraction and handling of tantalum, tin, tungsten, gold, hereinafter referred to as "3TG", and additional minerals of concern to make a reliable determination of the origin and source of such minerals. Maintain a policy and process to ensure that any of these minerals contained in the products manufactured by the Supplier do not directly or indirectly finance or benefit groups that are perpetrators of human rights abuses or directly or indirectly contribute to human rights violations. Ensure that all smelters and refiners in its supply chain of 3TG and other regulated minerals of concern, take part and actively engage in third party audit programs to provide Tenneco any information on such smelters and refiners upon request.

COMPLIANCE WITH SUPPLIER CODE

- **Audits and assessments:** Supplier's compliance with this Code is a key indicator in the Tenneco supplier qualification and assessment process. Supplier must verify compliance with this Supplier Code by completing periodic questionnaires as requested from time to time. Tenneco reserves the right to conduct audits upon reasonable notice. Violation of this Code shall be a breach of supplier's other agreements with Tenneco. Tenneco reserves the right to modify this Code from time to time.
- **Reporting & No Retaliation:** Suppliers must report suspected or actual non-compliance with this Code to Tenneco. Supplier may use the Tenneco Ethics Hotline at 866-828-8388 or via tennecohotline.ethicspoint.com where anonymity is offered where allowed by law. Tenneco does not tolerate retaliation of any kind taken against individuals who honestly report potential or actual violations. When a potential violation has been reported, Tenneco will investigate it and respond accordingly.

REFERENCE DOCUMENTS

- Additional detail is provided in the following documents:
 - [Tenneco Code of Conduct](#)
 - [Supplier Requirements Manual](#)
 - [Basic Working Conditions and Human Rights Policy](#)
 - [Conflict Minerals Statement](#)
- Tenneco references the following human rights frameworks to inform and shape this code:
 - [The United Nations Universal Declaration of Human Rights](#)
 - [The United Nations Global Compact](#)
 - [The Organization for Economic Cooperation and Development \(OECD\) Guidelines for Multinational Enterprises](#)
 - The Global Sullivan Principles of Social Responsibility