



CONNECTED BY INTEGRITY: HARMAN INTERNATIONAL CODE OF CONDUCT





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A NOTE FROM MICHAEL MAUSER AND TAMIKA FRIMPONG

It is with great pride and anticipation that we have updated our global Code of Conduct ("Code"). This refreshed Code is grounded in HARMAN's fundamental values of *Integrity, Innovation, Inclusion, Teamwork, and Excellence*, which serve as our collective compass and should guide every decision and action we take in the pursuit of our shared vision of a sustainable culture of compliance. This Code is a living document that reflects our values and aspirations and provides all HARMAN employees, managers, directors, agents, and other third-party partners with a clear framework to navigate complex situations and make ethical decisions including, but not limited to, financial reporting, conflicts of interest, data privacy, intellectual property, and other important workplace interactions.

HARMAN's unwavering commitment to a global speak-up culture *and* a zero-tolerance retaliation policy represent the heart and soul of the Code. These commitments are not just words; they instead represent a mandate from our Board of Directors and Senior Leadership Committee ("SLC") that HARMAN consistently embody a work environment where every voice is heard, respected, and empowered. So, no matter how big or small a concern may seem, every voice at HARMAN matters, and through open and honest dialogue we can build an even stronger and more ethical company. We understand that speaking up can be challenging and sometimes requires a bit of bravery to step outside of one's comfort zone, voice unpopular concerns, or to question established practices. However, speaking up is both encouraged and expected. Preservation of a vibrant speak up culture is so important to HARMAN that we will not tolerate any form of retribution against those who raise good faith Code or other ethical or legal concerns. Violations of HARMAN's non-retaliation policy will be met with swift and decisive action.

As we embark on this important journey together, we invite each of you to embrace the spirit of the Code. Let us join forces to: (i) foster a culture of transparency where speaking up is the norm, not the exception, (ii) celebrate innovation while upholding the highest standards of integrity, (iii) champion inclusion and teamwork, by recognizing that our collective strength lies in our diversity, and (iv) strive for excellence in everything we do while constantly setting a high bar for ourselves and inspire others to follow.

Thank you for being an important part of our HARMAN community.



Michael Mauser
President & CEO



Tamika A. Frimpong
Chief Legal & Compliance Officer



OUR PURPOSE, VISION, MISSION AND VALUES

Our Purpose and Vision are our North Star, guiding us all to make sustainable and ethical decisions in all circumstances. Our Mission and Values also represent the glue that binds us together.

Our Purpose

Amplifying life experiences.

Our Vision

Offer the most compelling consumer experiences everywhere.

Our Mission

As a global community, we create unparalleled value through technology and design centered around people.

Our Values

Our values are the fundamental beliefs that we hold true. We must be united in purpose and in the principles that guide our actions and everyday decisions. Each of us is accountable for upholding our values in how we engage with each other, our customers and our communities.





HARMAN
PREMIUM ENTRY AUDIO

OUR CODE OF CONDUCT: CONNECTED BY INTEGRITY

Our Code of Conduct

Purpose of the Code

Our Code shows us how to live our values through actions and behaviors. It aligns those values with our policies to ensure that we do what is right and comply with all applicable laws. Following our Code sets each of us on the path to behaving lawfully and with integrity. This is how we sustain our strong culture of ethics and compliance at HARMAN.

How to Use the Code

We encourage you to use our Code as a practical guide: to identify potential wrong doing or business or compliance risks, make ethical decisions, and do the right thing. We urge you to read it and to come back to it when you have questions or concerns, or need more information about a particular topic.

The best place to start is the Table of Contents. From there, you can click on any of the headings to find the topic you are looking for.

The Code is divided into eight sections. The first two sections cover general information about:

- Our Purpose, Vision, Mission and Values
- Our Code of Conduct

The next five sections cover specific ethics and compliance risk topics aligned with our Values:

- Integrity
- Innovation
- Diversity & Inclusion
- Teamwork & Respect
- Excellence

The final section, Staying Connected, offers further resources and guidance, including contact information for speaking up.

To Whom Does Our Code Apply?

Our Code of Conduct applies to all employees, regardless of level, function or location. We also expect contractors, consultants, vendors, agents and distributors to act consistently with our Code.

What Happens If We Don't Comply?

Violating the Code will result in disciplinary action, including, where appropriate, termination of employment. Some Code violations could lead to civil or criminal sanctions, as well as financial penalties and/or reputational harm. We should always be cautious and report any behavior or situation that does not uphold our values and Code.

Our Responsibilities

Everyone's Responsibilities

The following responsibilities and expectations apply equally to all employees:

- Comply with applicable laws, rules, regulations and the policies outlined in this Code.
- Seek guidance when we are unsure about any decision or situation.
- Report any suspected violation of this Code, the law or other policies and procedures. See [Speaking Up and Seeking Help](#) for more information.
- Certify that we have read and understood these policies and are committed to upholding HARMAN's high levels of ethics and compliance. You can find the full text for the policies referenced throughout the Code on the [HARMAN Hub](#) or at the links included in the final section of this Code, [Staying Connected](#).
- Identify risks that could impact HARMAN's ability to meet business objectives and inform the appropriate risk owner per the [HARMS Enterprise Risk Management](#) process.
- Cooperate with any investigations of potential misconduct.
- Never retaliate against anyone who participates in an investigation.

Special Responsibilities of Managers

Managers have an additional responsibility to help employees understand our Code and policies. Managers are also expected to:

- Lead by example and model the highest ethical standards.
- Communicate clearly and often with employees about how they can support our values.
- Treat all employees fairly.
- Make sure employees complete training and understand the Code.
- Make sure that employees are comfortable reporting any violations or concerns by cultivating HARMAN's zero tolerance retaliation policy.
- Personally report any Code or other policy violations in a timely manner.

Officers and Directors

HARMAN's Senior Leadership Committee ("SLC") and officers are accountable to HARMAN's board of directors (the "Board") for following and advocating that others follow the Code and principles governing their professional and ethical conduct. HARMAN's SLC also serves as the bridge between employees and the Board, and is responsible for designing and implementing policies. Finally, the SLC must keep the Board apprised of compliance-related concerns and provide the support necessary to address any concerns.

Senior Leadership Committee and Senior Management

HARMAN's SLC is primarily responsible for setting the tone at the top. Led by the Chief Legal & Compliance Officer, the SLC ensures that they are:

- Overseeing the drafting of, and any amendment to, this Code of Conduct.
- Determining that policies are clear and understandable.
- Overseeing the implementation of this Code.
- Overseeing any inquiries and investigations into alleged violations of this Code.

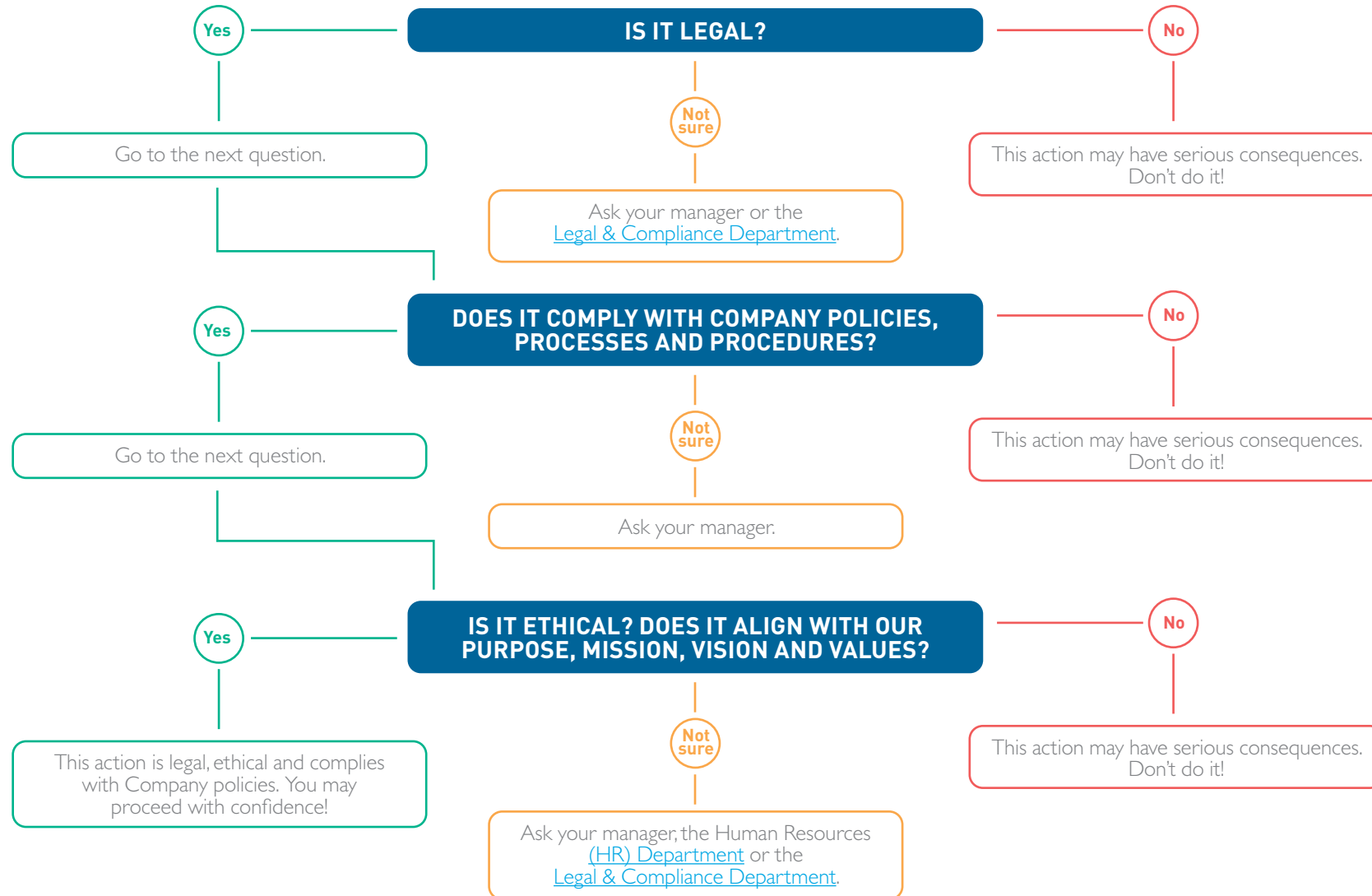
The Chief Legal & Compliance Officer, together with the SLC as appropriate, will also ensure that employees are:

- Conducting business ethically and following the Code.
- Trained in ethical business practices on a regular basis.



Making Ethical Decisions

Each decision we make has an impact on our Company, customers and the communities we serve. We must carefully consider every action to ensure it is consistent with our Code and shared values. We should ask these questions to help us make ethical decisions:





INTEGRITY

Speaking Up and Seeking Help

Each of us is accountable for upholding HARMAN's values and following our Code. Part of that responsibility includes speaking up about suspected violations. When we see or suspect a violation of this Code, Company policies or the law, we must report it as soon as possible.

To help us voice concerns, HARMAN offers a number of reporting options:

- [Speak Up Hotline](#)
- Local Management
- Local HARMAN Legal or HR Professionals

The HARMAN Legal and HR teams are dedicated to ensuring internal and external stakeholders feel confident and comfortable reporting concerns. The

[Speak Up Hotline](#) is available to all:

- Employees
- Consumers
- Business partners
- Other third-party stakeholders

For questions or to raise any concerns you may have, please feel free to connect with us:

- HARMAN Legal & Compliance Department: Compliance@harman.com
- HARMAN HR Department: +1 203-328-3971 | HRCorporate@harman.com
- [Speak Up and Anti-Retaliation Policy](#)

What Happens When I Report an Issue?

The information you provide is sent to authorized employees at HARMAN for review. All reports will be kept confidential to the fullest extent possible; however, we may report matters to the appropriate authorities as necessary or proper. All reports will be handled promptly and discreetly. If warranted, a fair and thorough investigation will be conducted. If a violation is substantiated, HARMAN will take appropriate corrective and/or disciplinary action. Once investigations are completed, where possible, reporters will be notified about the investigation completion, but not specific details.

Making Connections: Open-Door Policy

At HARMAN, we believe that the best ideas come from people who understand our products and our markets. We are also committed to creating a workplace where all employees feel comfortable asking about things they do not know or understand and making suggestions to improve the organization.

If you have an idea that may benefit the Company, including product ideas or ways to do things better or more cost effectively, share them with your manager. You are also encouraged to discuss any job-related concerns with your manager. If you do not feel comfortable doing so, or believe your issue remains unresolved, you may take the issue up with successive levels of management or the HR Department.

HARMAN Does Not Tolerate Retaliation

HARMAN prohibits retaliation against an employee, officer or director who, in good faith, reports a suspected violation or cooperates with an investigation. Retaliation is itself a violation of our Code and can result in immediate disciplinary action, up to and including termination. (See Speak Up and Anti-Retaliation Policy contained within this Code).

Making Connections: What Is Retaliation?

Retaliation is when an employer or employee takes adverse action against an employee or coworker for making a report in good faith. Examples include:

- Demotion, termination or relocation
- Reducing pay or benefits
- Changing hours or job duties
- Withholding a promotion or pay raise
- Exclusion from meetings or staff activities
- Harassment and microaggressions

Learn More

[Speak Up and Anti-Retaliation Policy](#)

[Open Door Policy](#)

Preventing Bribery and Corruption

Our Commitment

At HARMAN, we do business with integrity everywhere we work. We follow the law and never offer or accept improper payments of any kind.

Why It Matters

As a global Company, we obey not just U.S. laws and regulations, but also the laws of all countries where we operate. These include the many laws that prohibit improper business practices—such as offering bribes, kickbacks or payoffs.

Bribery undermines the rule of law and harms economic and social development in our communities. Even the appearance of a bribe could put our reputation at risk. At HARMAN, we simply don't do it.

How We Prevent Bribery and Corruption

- Follow HARMAN's Anti-Bribery and Anti-Corruption Policy and any local anti-corruption regulations.
- Know the laws and regulations that govern the places where we do business.
- Keep detailed, accurate records of all payments and expenses.
- Never use HARMAN funds or assets to do anything unlawful, improper or unethical.
- Remember that much stricter laws apply when doing business with governments. Offering or giving an improper gift or payment directly to a government official, or indirectly to the government official's close associate, could be interpreted as a bribe.

The line between a permissible expenditure and an improper one is not always clear. If you are ever in doubt, contact the [Legal & Compliance Department](#).

Making Connections: What Is a Bribe?

What is a bribe, facilitating payment, kickback or payoff? All of these are improper payments (of money or anything of value) offered or made in order to influence a decision in favor of HARMAN or for an individual's personal gain.

Connecting the Dots: Q&A

Q: My team is in the process of securing approval to test a new Advanced Driver Assistance System in one of the countries where we do business. I've spent a lot of time with one government official, who has been quite friendly and cooperative. She hinted that she'd love to go to the big football match if I could get the tickets. I really like working with her. Would it be okay if I took her to the event?

A: No. There are laws that forbid offering anything of value to a government official in exchange for favorable treatment. HARMAN's [Anti-Bribery and Anti-Corruption Policy](#) prohibits this type of activity. If you have any questions or concerns, contact the [Legal & Compliance Department](#).

Learn More

[Anti-Bribery and Anti-Corruption Policy](#)

[Foreign Corrupt Practices Act Compliance Policy](#)

[Speak Up and Anti-Retaliation Policy](#)

Conducting International Business with Integrity

Our Commitment

To grow and succeed in markets worldwide, we comply with all export trade laws and regulations enforced by every country where we do business.

Why It Matters

HARMAN does business all over the world. We are constantly forging new relationships with new partners and expanding into new markets. To continue growing and succeeding in this way, we must follow export trade laws and regulations set by the U.S. and all other countries where we do business.

If we fail to comply, we could be subject to heavy fines, loss of export privileges or even criminal prosecution.

How We Conduct Business with Integrity

- Keep your knowledge current regarding international laws and regulations.
- Know and follow the [Export Compliance Policy](#).
- Participate in periodic training about the laws and regulations that govern our exports.
- Don't attempt to navigate challenging export situations alone. Contact the [Legal & Compliance Department](#) for guidance.

Learn More

[Export Compliance Policy](#)

[Trade Compliance Policy](#)

Competing Honestly and Fairly

Our Commitment

At HARMAN, we always strive to succeed, but we seek business advantages only through lawful means. We must never act in ways that could be interpreted as violating antitrust law.

Why It Matters

Customers come to HARMAN—and stay with us—because they trust us to connect their lives with superior quality, safety and value. But we must always connect with integrity, never through unfair competition. We don't engage in any conduct that could be seen as a violation of antitrust laws.

How We Compete Honestly and Fairly

- Ensure that you have a legitimate reason before communicating with any HARMAN competitor or other third-party stakeholder.
- Don't enter into agreements with competitors, customers, suppliers, or other third-party stakeholders that could improperly influence HARMAN's or another firm's sales, marketing, manufacturing, or compensation.
- Ask the [Legal & Compliance Department](#) for advice before engaging in an activity that puts you in direct contact with competitors, including trade association meetings and events.

Making Connections: What Are Acceptable Reasons to Communicate with a Competitor?

A variety of legitimate activities could put us in direct communication with a competitor.

A few examples include:

- Association or industry events
- Joint venture discussions
- Benchmarking projects

The key is to limit communication to the scope of that activity, to ensure that the purpose of such communication is documented and understood, and to confer with the [Legal & Compliance Department](#) before the meeting or communication. We must never venture into topics that could violate antitrust laws. Subjects to avoid include:

- Pricing
- Production costs
- Manufacturing plans

Connecting the Dots: Q&A

Q: I recently attended a trade show and saw several competitors having what appeared to be a friendly conversation in the lounge. I walked over to see if I could join in. I overheard what appeared to be a discussion about pricing strategy. I immediately excused myself and left the lounge. Was that the right thing to do?

A: Yes. Removing yourself from the discussion reduces the risk that someone might think you were trying to fix prices or engage in other illegal activities with competitors. By excusing yourself verbally, you made it clear to the attendees that you were not interested in being a part of that conversation. This would be important if the incident were ever to be investigated. Report the incident to the [Legal & Compliance Department](#) as soon as possible.

Learn More

[Antitrust Compliance Policy](#)

Avoiding Conflicts of Interest

Our Commitment

We all must act in the best interest of HARMAN and our stakeholders.

Why It Matters

By disclosing potential conflicts of interest, we build HARMAN's corporate brand and reputation by doing what is right without compromise.

If you inform the [Legal & Compliance Department](#) or the [HR Department](#) of a conflict of interest, HARMAN will review the situation to evaluate what additional steps may be required. These range from granting a waiver to monitoring and other steps to remediate the situation.



Making Connections: What Is a Conflict of Interest?

A conflict situation can arise when an employee, officer or director:

- Takes actions or has interests that may make it difficult, or even appear to make it difficult, to work objectively and effectively.
- Receives improper personal benefits as a result of their position at HARMAN. This applies to family members as well.

Many conflicts of interest situations are obvious, but others are not. They can include the following:

- Corporate opportunities
- Competition and fair dealing
- Business entertainment and gifts

Making Connections: What Is a Corporate Opportunity?

A corporate opportunity is any business opportunity that may benefit a corporation such as:

- Investment
- Potential joint venture
- Intellectual property

How We Avoid Conflicts of Interest

- Promptly share corporate opportunities with HARMAN leadership.
- Don't personally take opportunities that you discover through your work with HARMAN.
- Do not own, invest in, or work for our competitors, customers, suppliers, or other third-party stakeholders while also working as an employee of HARMAN.
- Notify your supervisor and the [Legal & Compliance Department](#) if you own or invest in any firm where HARMAN may do business. Small investments in publicly traded companies, such as through a mutual fund, do not represent a conflict of interest.
- Don't withhold information about any substantial ownership interest, board seat or other potential conflict you may have.
- Contact the [Legal & Compliance Department](#) if you have questions about corporate opportunities.
- [Disclose potential conflicts of interest](#) to your supervisor and the [Legal & Compliance Department](#).
- Promptly disclose familial or close personal relationships in direct reporting lines and/or before weighing in on hiring, termination or other actions that impact employment, compensation or benefits.

Connecting the Dots: Q&A

Q: I hold equity in a startup technology company and spend some time providing advice to the company. Do I need to disclose my activities?

A: Yes. You should disclose your activities so the Company can determine whether any actual or potential conflict exists. It's important that we're all making objective, sound decisions that put our Company's interests first.

Q: I work in the HR Department. My friend just started a company that provides human resources services to businesses. My friend offered me a part-time job that I could work during my off hours. I could use the extra money. Can I accept this position?

A: Secondary employment can be considered a conflict of interest, especially when you are performing the same type of work for another company. As an employee, you have access to Company systems, customer information, Company and department policies and procedures and other sensitive information. We want to be certain that our Company information is protected. You should disclose the potential conflict of interest to the [Legal & Compliance Department](#) using the [Conflicts of Interest Disclosure Tool](#) or by contacting them directly. The Legal & Compliance Department will review the situation and determine the best course of action.

Q: My brother works for a vendor that we're evaluating to provide IT services. I am part of the team in charge of selecting the vendor. What should I do?

A: This situation could create a conflict. It may be necessary for you to remove yourself from the selection process. You should disclose it to your manager or supervisor immediately and disclose the potential conflict using the [Conflicts of Interest Disclosure Tool](#). The [Legal & Compliance Department](#) will determine next steps.

Learn More

[Conflicts of Interest Policy](#)
[Conflicts of Interest Disclosure Tool](#)
[Employment of Related Persons](#)
[Related Party Transactions Policy](#)

Giving and Receiving Gifts and Entertainment Responsibly

Our Commitment

We are fair and objective in our relationships with third parties. That means we must always exchange gifts and entertainment responsibly and in moderation.

Why It Matters

We are all expected to conduct business fairly and honestly. We must be very careful when exchanging gifts with customers, vendors, suppliers or government officials. Offering a gift could be seen as an attempt to influence a business decision. It might even be in violation of the recipient's policies. Also, accepting a gift may make us become or seem less objective.

This doesn't mean we can't express gratitude to customers and suppliers. To build comradery with third parties, we can offer gifts and entertainment within acceptable limits, as outlined in HARMAN policies.

How We Give and Receive Gifts Responsibly

- Give gifts and entertainment within the acceptable limits outlined in HARMAN policies.
- Only offer or accept gifts or entertainment if they are in compliance with law, nominal in value and consistent with customary business practices.
- Don't offer or accept significant gifts or entertainment.

- Never offer or accept a gift of cash from a third party.
- Promptly report and secure approval for expenses.
- Document expenses for gifts and entertainment through the Travel and Expense (T&E) system. If your expense does not comply with policy, HARMAN may not reimburse you
- Disclose, as necessary any gifts or entertainment given or received using the [Gifts and Entertainment Disclosure Tool](#).
- Use good judgment, refer to the applicable policies and [Gifts and Entertainment Disclosure Tool](#), and ask your supervisor or the [Legal & Compliance Department](#) for help when deciding if it's okay to accept or give a gift.

Making Connections: How Do I Know If a Gift Is “Nominal” or “Significant”?

You can determine if a gift is significant based on knowledge of local cultural norms and good judgment in context. Any gift, regardless of value, is significant if offered or received to “smooth the way” or further a deal. Contact your supervisor or the [Legal & Compliance Department](#) if you are ever in doubt.

Learn More

[Gifts and Entertainment Disclosure Tool](#)

[HARMAN's Global Travel Policy](#) (sections 11, 14 and 15)

[China Gift Policy](#)

[Anti-Bribery and Anti-Corruption Policy](#)

[Conflicts of Interest Policy](#)

[Corporate Giving Guidelines](#)

[Third Party Gifts, Travel and Entertainment Policy](#)

Data Privacy and Data Security

Our Commitment

HARMAN is committed to the appropriate handling of personal data, including appropriate data security.

Why It Matters

Compliance with data privacy laws is an important part of HARMAN's global business strategy, including data obtained from or related to HARMAN employees, applicants for employment at HARMAN, customers, potential customers, suppliers or contractors. Compliance with HARMAN's data security policies is important in order to protect data from misuse, loss, disclosure, alteration or unauthorized access.

How We Appropriately Address Data Privacy and Data Security

- Follow this Code, HARMAN's IT Security policies and privacy laws/regulations.
- Use both physical measures (such as locking file drawers) and technological measures (such as using strong passwords) to keep information secure.
- In the event that data is sent to the wrong recipient, or accessed by a third party without authorization, please immediately contact Privacy@harman.com.
- Never collect, analyze or share personal data without getting the appropriate review and approval. Check with Privacy@harman.com to ensure that HARMAN has provided the necessary notice and obtained the required consent for the data.
- Don't leave anyone's personal data unprotected—physically or technologically.
- Be conscious of whether it is permissible for HARMAN to use data. Contact Privacy@harman.com if you aren't sure.
- Contact Privacy@harman.com for guidance and support on any data privacy

and data security related questions. HARMAN has a Data Protection Committee which makes policy decisions about data privacy and data security at HARMAN. The Committee is comprised of senior representatives from key corporate functions, our divisions and business units. Matters raised through Privacy@harman.com will be elevated to the Data Protection Committee as necessary.

Connecting the Dots: Q&A

Q: I'm a customer support representative. I collect and store personal information about our customers. A colleague who works in marketing asked if I could share our customers' names and email addresses with her. She wants to solicit their donations for a charity she supports. It's for a good cause. Can I share this information with her?

A: No, you must not share this information. Customers have the right to understand how the data we collect about them is being used. Unless customers have agreed to having their data used for such a purpose, we must not do it. If you have any questions, contact Privacy@harman.com.

Learn More

[Technology – Email and Internet Usage Policy](#)

[HARMAN International Privacy Notices](#)

[Data Protection Committee](#)

[Data Privacy Webpage](#)

[DigITal Policies](#)

[Privacy Policy](#)

[HARMAN Privacy Principles & Governance Policy](#)

Respecting Our Financial Assets

Maintaining Accurate Financial Records and Accounts

Our Commitment

We keep complete and accurate financial statements and records, no matter what results we are reporting. We follow procedures and cooperate with auditors to ensure our financial reports are clear and accurate.

Why It Matters

At HARMAN, we make every effort to ensure our financial statements and records are complete and accurate. We follow procedures and internal controls to ensure timely, accurate and understandable financial information. When working with auditors, we cooperate with honesty and respect.

How We Respect Our Financial Assets

- Follow HARMAN's procedures for financial reporting as well as our [Service of Process Policy](#) and [Records Management Policy](#).
- Respond promptly and cooperatively to auditor requests.
- Consult with the [Legal & Compliance Department](#) before providing any information to an auditor.
- Never try to fraudulently influence, coerce, manipulate or mislead an auditor.
- Contact a supervisor or the [Legal & Compliance Department](#) if you have questions about accounting matters.

Learn More

[Finance and Accounting Policies and Manuals](#)

[Records Management Policy](#)

[Service of Process Policy](#)

Combatting Money Laundering and Terrorist Financing

Our Commitment

Our commitment to integrity extends beyond our Company to the global community. We take care of our funds and uphold the law by doing everything we can to prevent illegal activity.

Why It Matters

Money laundering is a process criminals and terrorists use to make criminal funds seem legitimate by hiding their true origins. Illegal funds are moved through legitimate businesses, like HARMAN, and may be used to fund illegal terrorist activities. That's why it is so important to stay alert for signs of suspicious activity. We must protect our finances carefully.

How We Combat Money Laundering and Terrorist Financing

- Pay close attention when working with customers and third parties, especially if the transaction involves cash payments.
- Know who's behind every transaction and only conduct business with reputable third parties.
- Follow internal controls to prevent the theft, misuse and misappropriation of financial assets.
- Report real or suspected fraud or the misuse of HARMAN financial assets.
- Comply with the laws and regulations related to money laundering and funding criminal activities.
- Contact the [Legal & Compliance Department](#) if you have questions or concerns.

Making Connections: What Are Red Flags of Money Laundering and Terrorist Financing?

- Withholding basic or complete information
- Providing false information
- Financial transactions that do not add up
- Unusual payments in cash followed by request for refund in a different form of payment
- Unusual requests about where to direct payments
- Fund transfers to or from countries unrelated to the transaction
- Asking for a payment to be broken into small amounts to avoid reporting thresholds

Learn More

[Anti-Bribery and Anti-Corruption Policy](#)

Working with the Government

Our Commitment

When communicating with the government about public policy, we express HARMAN's interests with integrity.

Why It Matters

Some employees are authorized to communicate with the government or other public bodies on behalf of HARMAN to shape public policy or secure new business. If this is part of our job, we must communicate truthfully and transparently. We uphold our values of ethics and integrity at every opportunity.

How We Work with the Government

- Make sure your statements are factually correct and never misleading.
- Make it known that you are communicating on behalf of, and for the benefit of, HARMAN.
- Speak accurately and clearly when shaping public policy if this is part of your job responsibilities.
- Check with [Government Affairs & Communication](#) before offering any public statement on behalf of HARMAN.

Learn More

[Foreign Corrupt Practices Act Compliance Policy](#)
[Government Affairs & Communication](#)

Political Activities

Our Commitment

We encourage participation in the political process, which can make a positive difference in our lives and communities. We connect with integrity by keeping our political actions separate from our work at HARMAN.

Why It Matters

Outside of work, we may make political contributions on our own. However, we cannot use HARMAN's name, brands or resources to support any political activities.

How We Participate in Political Activities

- Never use HARMAN's name, brands or resources to support any governmental entity, political party or political candidate unless you have received appropriate internal approvals.
- Feel free to support causes you care about, but use your own resources to do so, and do not reference your affiliation with HARMAN.

Making Connections: What May Be Considered a HARMAN Resource?

Examples include, but are not limited to:

- Funds
- Meeting space/facilities
- Products
- Catering
- Photocopiers
- Company brands
- Company-issued email addresses

Learn More

[Anti-Bribery and Anti-Corruption Policy](#)

[Sponsorships Policy](#)

[Political Activities Policy](#)





INNOVATION

Building a Sustainable Future

Our Commitment

We believe that our commitment to being a purpose-driven organization will help our Company, customers and communities thrive for years to come.

Why It Matters

Our world is changing, and a number of emerging trends—from climate change and the depletion of natural resources to racial, gender and economic inequity—reinforce the need for sustainability and accountability. HARMAN's sustainability vision is simple and clear: to be a best-in-class employer and provider of technology solutions that are beneficial to the long-term well-being of the people and communities we serve.

Through our “One HARMAN” approach, we thrive sustainably by growing our business in a responsible way while having a positive societal impact and creating a more just and equitable world. At HARMAN, we are aware that we are all linked globally. For that reason, we have established sustainability goals around three key areas: the environment, our people and the communities in which we live and work.

How We Build a Sustainable Future

- Follow all applicable environmental laws and Company policies.
- Comply with annual legal compliance evaluations and audits at our global manufacturing sites.
- Report any spills, leaks or accidental discharges or emissions.

- Follow procedures for waste management and recycling.
- Take practical steps each day to reduce our consumption of water, fuel and electricity. These might include turning off lights, setting thermostats and not idling engines.
- Follow our environmental sustainability goals, including our Scope 1, 2, and 3 admissions reductions ambitions, by 2023, 2040, and beyond.
- Reimagine our product and packaging design standards to include significant use of recycled plastics, papers, inks and other sustainable materials.

Making Connections: HARMAN's Environmental, Social and Governance (ESG) Committee

The **ESG Committee** comprises senior leadership and oversees Harman's sustainability vision, mission, strategy, capital allocation and progress. We also have regular meetings with cross-functional teams to align, implement and integrate sustainability practices into our business strategy, including reporting, decarbonization and other initiatives.

Learn More

[HARMAN Sustainability](#)

[Conflict Minerals Policy](#)

[Supply Chain Corporate Social Responsibility & Sustainability Policy](#)

Protecting Our Information Assets

Our business runs on information about processes, products, people and more. Just think: How much valuable information do you use, share, receive and store each day? Whether we're accessing or managing information, HARMAN depends on us to do so responsibly.

Information Security

Our Commitment

We have an obligation to protect the information of the Company and our customers, suppliers and partners, including business, technical and other proprietary information.

Why It Matters

Through our work, we are privy to certain non-public information and may have access to advanced technologies. It is our responsibility to protect this information. We must protect all of our assets—both tangible and intellectual—and use them only for legitimate business purposes.

How We Protect Our Information Assets

- Don't leave Company documents unattended.
- Be mindful of HARMAN's intellectual property rights, including copyrights, trademarks and trade secrets.
- Immediately report any suspected incident of fraud, theft or similar improper conduct.

Learn More

[Third Party Due Diligence Policy](#)
[HARMAN's Intellectual Property](#)

Confidential and Proprietary Information

Our Commitment

We protect confidential information relating to the Company, our employees and customers as well as confidential information received from suppliers and partners.

Why It Matters

At HARMAN, we are serious about protecting confidentiality. HARMAN depends on us to promptly report suspected violations of this Code. We know this can feel risky. HARMAN is committed to protecting confidentiality to the extent possible under law.

For internal investigations or to monitor performance and compliance with HARMAN policies, sometimes we do need to monitor, search or review information contained in HARMAN's technology resources (such as voicemail, email and computer files). We may take these actions at any time, with or without notice, and only as permitted by law.

We protect the privacy of all personally identifiable information. If you have access to director, customer, supplier or contractor information, keep it confidential and secure.

How We Protect Confidential and Proprietary Information

- Protect confidential information shared with HARMAN.
- Never disclose confidential information unless it is necessary for business reasons or legally required.
- Promptly report suspected violations of this Code, knowing that HARMAN will protect your confidentiality.
- Don't reproduce licensed software (except for backup and security purposes) or other copyrighted material without authorization. Doing so may violate intellectual property law and lead to serious legal consequences.
- Respect the intellectual property rights of other companies, including their right to keep information confidential.

Making Connections: What Counts as Confidential Information?

- Any proprietary information such as:
 - Trade secrets
 - Business strategies
 - Financial performance
 - Marketing plans
 - Forecasts
 - Designs
 - Databases
 - Employee information
- Any other nonpublic information that might be of use to competitors or harmful to us or our customers if disclosed
- Information that others have entrusted to us on a confidential basis

Learn More

[Technology – Email and Internet Usage Policy](#)
[HARMAN International Privacy Notices](#)

Securing Our Physical Assets

Our Commitment

We protect our innovations, facilities and each other by securing our physical assets.

Why It Matters

We all have a duty to safeguard and properly use HARMAN property. Theft, carelessness and waste have a direct impact on our profitability. They also make it harder for us to satisfy customer needs and find solutions. That's why it is so important to protect our assets.

How We Secure Our Physical Assets

- Do all you can to protect HARMAN's property from theft, careless treatment and waste.
- Tell your manager if you suspect theft, fraud or any other improper use of assets.
- Wear your Company-issued identification badge or have it in your possession at all times while on Company premises.
- Register all visitors such as vendors, employees or relatives of employees at the reception desk so they may receive a visitor identification badge. The badge must be visible at all times while on Company premises.
- Don't allow unidentified or unknown individuals to enter Company premises.
- Don't allow visitors to roam HARMAN offices without an authorized employee.
- Don't allow personal visitors in manufacturing areas.
- Don't take photographs of HARMAN facilities or property without authorization.

Making Connections: What Should I Do If I See Someone Who Might Be an Unauthorized Visitor?

If you witness any situation that could be a security issue, immediately notify your supervisor, the [HR Department](#) or Security.

Learn More

[Health and Safety Management](#)
[Confidential Information Policy](#)



DIVERSITY & INCLUSION

Embracing Diversity and Inclusion

Our Commitment

We strive to create a workforce that reflects our increasingly diverse marketplace. We attract, develop and promote our people based on merit and fair treatment.

Why It Matters

We believe in celebrating all dimensions of diversity through a culture that is global-minded, respectful and inclusive. Our diverse experiences help us harness ideas to develop creative, innovative and connected solutions.

How We Embrace Diversity and Inclusion

- Share information and seek input from all of your team members.
- Treat others with courtesy and respect.
- Use inclusive language and eliminate offensive terminology.
- Promote equal employment opportunities to all employees and applicants.
- Make employment-related decisions based on merit, qualifications and job-related performance.
- Comply with laws regarding employment of immigrants and non-citizens.
- Provide reasonable accommodation to those who have protected disabilities, as required by law.

Making Connections: What Is Equal Employment Opportunity?

Equal employment opportunity means giving each candidate equal consideration for employment. We cannot make decisions based on a person's protected characteristics, such as:

- Race
- Color
- Ethnicity or national origin
- Gender or gender identity
- Sexual orientation
- Marital or family status
- Veteran status
- Disability
- Age
- Religion
- Any other protected status

Learn More

[Diversity, Equity & Inclusion Policy](#)

Preventing Harassment and Discrimination

Our Commitment

At HARMAN, we believe everyone has the right to work in a safe, inclusive and respectful environment. We do not tolerate discrimination or harassment of any kind.

Why It Matters

Our Harassment-Free Workplace Policy applies to everyone who works or does business with HARMAN. It also applies to professional meetings, seminars and other off-site work functions.

We will promptly investigate any allegations of harassment, discrimination and/or retaliation. HARMAN will not retaliate or tolerate retaliation against anyone for filing a complaint.

How We Prevent Harassment and Discrimination

- Follow HARMAN's [Harassment-Free Workplace Policy](#).
- Treat others fairly and with respect.
- Refuse to accept any excuses for discrimination or harassment—there are no excuses for this type of behavior.
- Speak up when we experience or observe sexual harassment, or any other harassing or discriminatory conduct.
- Report this behavior to your supervisor, the [HR Department](#) or the [Legal & Compliance Department](#).

Making Connections: What Is Harassment?

Harassment is any verbal, written or physical conduct that denigrates or shows hostility or aversion toward someone because of any characteristic protected by law. It can take many forms.

Sexual harassment is unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature. Examples include:

- Leering, gesturing or displaying objects or pictures that are sexually suggestive or explicit.
- Making sexually suggestive insults, jokes or comments.
- Making unwanted physical contact.
- Granting, denying or threatening to deny employment opportunities or benefits based on gender or refusal to submit to sexual advances.

Connecting the Dots: Q&A

- Q: Does the Company's policy mean we can't have fun and joke around at work?
- A: Of course not. Friendly relationships and having fun at work are encouraged. However, we need to be mindful that jokes or teasing may be perceived by others as offensive, inappropriate, harassing, discriminatory or retaliatory. We are expected to show respect, professionalism and reasonable judgment in our communications with, and conduct toward, all people in the workplace. Remember that "just kidding" will not be a defense.

Learn More

[Harassment-Free Workplace Policy](#)

Contributing to Our Communities

Our Commitment

We believe that giving back to our communities enriches us all. It is an important part of our sustainability story.

Why It Matters

Throughout our history, we at HARMAN have dedicated ourselves to enhancing the communities where we live and work. Whether through volunteerism, financial support or gifts in kind, we fulfill our purpose and vision for everyone in the community—amplifying life experiences and offering the most compelling consumer experiences everywhere.

Our philanthropy is centered on our global cause initiative, HARMAN Inspired. The mission is to empower the next generation to realize their possibilities through the power of music, technology and service. We must follow [Corporate Giving Guidelines](#) and obtain all necessary approvals if helping with donations at the local level.

How We Contribute to Our Communities

- Conduct thorough due diligence on any nonprofit requesting donations for any assets from HARMAN.
- Obtain legal verification that the nonprofit is a verified 501(c)(3) by the IRS or the foreign equivalent.
- Request permission from the budget holder before agreeing to any donation.
- Don't use HARMAN assets to benefit a personal cause or effort. These might include a marathon, personal fundraiser or kind gesture to another employee.
- Obtain approval from your manager before volunteering on Company time.
- Don't solicit HARMAN employees without approval from your local HR lead.

Making Connections: Can I Use My Employee Discount to Purchase Products for Donation?

Yes. Corporate discounts can be used for charitable contributions as long as you have conducted due diligence on the eligible organization. There must also be reasonable belief that the product will not be used in a manner other than to benefit the organization.

Learn More

[Corporate Giving Guidelines](#)

[Charitable Contributions Checklist](#)

[Charitable Contributions Policy](#)

[HARMAN Inspired](#)





TEAMWORK & RESPECT

Keeping Workplaces Safe, Healthy and Secure

Our Commitment

No matter what we do or where we work, employee health and safety is our top priority.

Why It Matters

HARMAN employees perform a wide range of functions in various locations. We must all follow safe work practices to ensure our own safety as well as the safety of others.

It is just as important to take care of each other through our environment, health, safety and security (EHSS) management systems as it is in our physical workplaces. We adopt best practices internally and from industry and client engagements to continually improve our performance.

We must report any potential safety hazards or misuse of our management systems to a supervisor or the [HR Department](#). Failure to follow Company safety practices can result in disciplinary action.

How We Keep Workplaces Safe, Healthy and Secure

- Know and follow all health and safety policies and procedures that apply to your job function and location.
- Know what to do in case of a workplace injury or emergency.
- Come to work free from the influence of any substance that could impair performance or create an unsafe working environment.

- Never engage in violence or threats of violence, or bring a weapon, firearm or explosive into a work location.
- Immediately report any workplace injury, illness, unsafe condition or potential hazard.

Making Connections: Emergency Action Plan

Each HARMAN site has a unique Emergency Action Plan in the event of a fire or other disaster. Familiarize yourself with the location of exits, fire extinguishers and first-aid kits on each floor. Regularly review your site's Emergency Action Plan.

Learn More

[Drug and Alcohol Free Workplace Policy](#)

[Occupational Health, Safety, Environmental and Energy Policy](#)

[Speak Up and Anti-Retaliation Policy](#)

[Energy and Environmental Management](#)

[Health and Safety Management](#)

[Corporate Social Responsibility](#)



Respecting Human Rights

Our Commitment

We are committed to respecting internationally recognized human rights as expressed in the United Nations' International Bill of Human Rights, the principles in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and, at a minimum, the laws of the countries in which HARMAN operates.

Why It Matters

At HARMAN, we recognize that our activities and business operations may have human rights impacts on our employees, the stakeholders with whom we interact and the communities in which we operate. Respect for human rights plays a vital role in the sustainable development of our organization. We take seriously any efforts to eradicate slavery and human trafficking. We can do so using our Human Rights Policy and the Supplier Code of Conduct.

How We Respect Human Rights

- Provide training on human rights to our employees.
- Assess potential human rights impact of our activities and provide access to remediation.
- Report suspected human rights violations.
- Ensure our suppliers are committed to fair labor and sustainable sourcing practices.
- Engage with internal and external stakeholders on business and human rights topics.

Learn More

[Supplier Code of Conduct](#)

[Human Rights Policy](#)

[Conflict Minerals Policy](#)

[Supply Chain Corporate Social Responsibility & Sustainability Policy](#)

Working with Suppliers and Other Third Parties

Our Commitment

We deal fairly and ethically with suppliers and other third parties. Across all relationships, we follow this Code, and we hold others accountable for acting with integrity as well.

Why It Matters

We cultivate relationships built on mutual respect and integrity. When dealing with third parties, we always act with professionalism and respect for their people, business, products and information.

We expect third parties to act consistently with our Code. If we hire or work with third parties, we must ensure that they know and meet our standards.

How We Work with Suppliers and Third Parties

- Treat third parties according to the high ethical standards described in the Code.
- Discuss our ethical standards with third parties who support you. Be sure they know and do what's expected.
- Perform due diligence to ensure the third party's behavior aligns with this Code before having HARMAN enter into a new relationship.
- Never take unfair advantage of anyone through manipulation, concealment or any other unfair practice.
- Don't take or dishonestly use competitively sensitive information from or about a third party.
- Don't offer improper inducements to a third party.
- Consult with the [Legal & Compliance Department](#) when entering into or navigating a sensitive contractual relationship with a third party.

Making Connections: Third Parties and Improper Inducements

What is a third party?

- A contractor, consultant, vendor, agency, distributor or other non-employee who works with HARMAN
- Customers, competitors or suppliers of HARMAN

What is an improper inducement?

Persuading or attempting to persuade someone to do something through illegal or unethical means, such as bribery.

Learn More

[Supplier Code of Conduct](#)

[Anti-Bribery and Anti-Corruption Policy](#)

[Supply Chain Corporate Social Responsibility & Sustainability Policy](#)

[HARMAN Free and Open Source Software Supplier Policy](#)





EXCELLENCE

Records Management

Our Commitment

We maintain complete and accurate records throughout our business and comply with the legal requirements that apply to us.

Why It Matters

We maintain accurate records to honestly reflect our business and transactions. Accurate records are also integral to equipping management with data that supports sound decision-making.

How We Manage Our Records with Integrity

- Keep complete, accurate records of all business transactions in conformance with applicable laws and our document retention policies.
- Never leave any fund, asset, charge or obligation unrecorded, or “off the books.”
- Never compromise the integrity of our financial statements, internal controls or books and records.
- Never destroy company records that are subject to a records hold or are relevant to a pending or anticipated legal proceeding or government investigation.

Learn More

[Records Management Policy](#)

[Service of Process Policy](#)

Providing Safe and High-Quality Products

Our Commitment

To us, excellence means focusing relentlessly on cost-leadership, execution and quality. We fulfill customer needs by developing and delivering safe and high-quality products.

Why It Matters

The products we create at HARMAN touch the lives of countless people each day. Our impact spans across the globe, so it is critical that we prioritize safety and quality in all of our innovations. We protect our communities by doing what is right without compromise.

How We Provide Safe and High-Quality Products

- Follow all safety protocols, processes, rules and regulations.
- Choose suppliers who meet our standards for integrity and excellence.
- Ensure our products are produced in an environment that prioritizes quality and consumer safety.
- Immediately report any quality and safety issue or concern.

Learn More

[Product Performance Advisory Work Instructions](#)

Safeguarding Our Reputation

When speaking about HARMAN, we share messages that are accurate, timely and authorized for release. If we are communicating on HARMAN's behalf, we must represent the Company with honesty and integrity.

External Communications

Our Commitment

We follow our policies and the law when communicating with outside authorities and lawyers.

Why It Matters

The [Legal & Compliance Department](#) supervises our contact with governmental, regulatory and administrative authorities, as well as outside lawyers. This includes communications about subpoenas, investigations, inquiries and other requests for information.

For other types of communications, we may be able to speak to authorities directly. But don't guess. We should always involve the [Legal & Compliance Department](#) before talking with authorities.

How We Communicate with Integrity

- Promptly notify the [Legal & Compliance Department](#) if you are contacted by a governmental, regulatory or administrative authority or an outside lawyer.
- Never initiate contact with an authority or outside lawyer without first consulting the [Legal & Compliance Department](#).

All employees have a right to voice concerns about possible legal violations under fair employment practices law. Employees are always free to speak up and exercise their rights.

Making Connections: Communicating with Attorneys

Throughout this Code, you'll find a lot of encouragement to contact the [Legal & Compliance Department](#) for guidance. When you seek legal advice from our attorneys, those communications are generally "privileged". These communications will only be disclosed to regulators or others outside the Company on a need-to-know basis, as determined by HARMAN attorneys.

Our attorneys must act in the best interests of the Company. They don't act as personal representatives or lawyers for employees, officers or directors.

Learn More

[Service of Process Policy](#)



Social Media

Our Commitment

When communicating with the public about HARMAN on social media, we must use good judgment and common sense.

Why It Matters

Every day, people engage in discussions about HARMAN and our brands in thousands of online conversations. As a technology Company, HARMAN encourages us to follow and engage with Company brands on social platforms. But we must take care to do so responsibly and with integrity.

HARMAN respects our right to use social media as a form of self-expression. However, we should be aware that our personal use is still subject to certain Company policies. We also value social media channels as a way for authorized spokespeople to discuss Company business. Authorized spokespeople are media relations professionals who have been trained to speak on behalf of the Company.

How We Use Social Media with Integrity

- If you mention the Company, our brands or products on social media platforms or any product review site, then you must clearly indicate your affiliation with HARMAN. This is a legal requirement. For example, you can begin your message with the phrase, “My employer, HARMAN, ...” or include an appropriate hashtag, such as #MyEmployer or #HarmanEmployee.
- Refer to our [Social Media Guidelines](#) before speaking about HARMAN through any social media channel.
- Obtain authorization from the [Corporate Communications](#) team before speaking on behalf of HARMAN on social media.
- Watch for good and bad PR, even if you’re not an official spokesperson. Share what you see with the [Corporate Communications](#) team.
- Don’t respond to negative posts unless you’re an official spokesperson.

- Never disclose nonpublic or confidential information.
- Don’t post if you have any doubt about the accuracy of your information.
- Remember that the Internet is permanent. Once information is online, it is a part of permanent record—even if you remove/delete it later or attempt to make it anonymous.
- Contact the [Corporate Communications](#) team if you are a thought leader or subject-matter expert interested in representing the Company on social media.

Making Connections: How Should I Indicate on Social Media That I Am a HARMAN Employee?

You can begin your message with the phrase, “My employer, HARMAN, ...” In a tweet, you can include an appropriate hashtag, such as #MyEmployer or #HarmanEmployee.

Connecting the Dots: Q&A

Q: I’m quite active on social media. I have a personal account and a professional account. I follow business news and developments in our industry. Recently, I came across what appear to be false rumors about HARMAN, questioning the quality of our products and services. I want to set the record straight by citing my experience and position within the Company. May I do this?

A: [Not unless you are an official spokesperson for HARMAN. It’s admirable that you want to defend our reputation online. You should report this situation to the \[Corporate Communications\]\(#\) team. The Corporate Communications team will know how best to respond.](#)

Learn More

[Social Media Guidelines](#)

[Corporate Communications](#)



Ethics & Compliance at HARMAN

Our Code of Conduct is the cornerstone of our Ethics and Compliance (E&C) Program. Our E&C Program is designed to help our company maintain a culture of ethics and compliance throughout the organization. We do this through our Code of Conduct, policies, communications, training, risk assessment, reporting and investigations. You can get in touch with our team via email at Compliance@harman.com.

Policies & Other Resources

- [Anti-Bribery and Anti-Corruption Policy](#)
- [Antitrust Compliance Policy](#)
- [Charitable Contributions Checklist](#)
- [Charitable Contributions Policy](#)
- [China Gift Policy](#)
- [Confidential Information Policy](#)
- [Conflict Minerals Policy](#)
- [Conflicts of Interest Disclosure Tool](#)
- [Conflicts of Interest Policy](#)
- [Corporate Communications](#)
- [Corporate Giving Guidelines](#)
- [Corporate Social Responsibility](#)
- [Data Privacy Webpage](#)
- [Data Protection Committee](#)
- [Digital Policies](#)
- [Diversity, Equity & Inclusion Policy](#)
- [Drug and Alcohol Free Workplace Policy](#)
- [Employment of Related Persons](#)
- [Energy and Environmental Management](#)
- [Export Compliance Policy](#)
- [Finance and Accounting Policies and Manuals](#)
- [Foreign Corrupt Practices Act Compliance Policy](#)
- [Gifts and Entertainment Disclosure Tool](#)
- [Government Affairs & Communication](#)
- [Harassment Free Workplace Policy](#)
- [HARMAN Free and Open Source Software Supplier Policy](#)
- [HARMAN Hub](#)
- [HARMAN Inspired](#)
- [HARMAN International Privacy Notices](#)
- [HARMAN Privacy Principles & Governance Policy](#)
- [HARMAN Sustainability](#)
- [HARMAN's Global Travel Policy](#) (sections 11, 14 and 15)
- [HARMAN's Intellectual Property](#)
- [HARMS Enterprise Risk Management Process](#)
- [Health and Safety Management](#)
- [Human Rights Policy](#)
- [Occupational Health, Safety, Environmental and Energy Policy](#)
- [Open Door Policy](#)
- [Political Activities Policy](#)
- [Privacy Policy](#)
- [Privacy Team](#)
- [Product Performance Advisory Work Instructions](#)
- [Records Management Policy](#)
- [Related Party Transactions Policy](#)
- [Service of Process Policy](#)
- [Social Media Guidelines](#)
- [Speak Up and Anti-Retaliation Policy](#)
- [Speak Up Hotline](#)
- [Sponsorships Policy](#)
- [Supplier Code of Conduct](#)
- [Supply Chain Corporate Social Responsibility & Sustainability Policy](#)
- [Technology – Email and Internet Usage Policy](#)
- [Third Party Due Diligence Policy](#)
- [Third Party Gifts, Travel and Entertainment Policy](#)
- [Trade Compliance Policy](#)



Code of Conduct Acknowledgement Form

By signing below, I acknowledge and certify that I have read the Code of Conduct set forth above and agree to comply fully with its terms and conditions at all times during my service with HARMAN International Industries, Incorporated or any of its affiliates.

Signature: _____

Name: _____

Date: _____

