

Code of Business Conduct & Ethics

OUR STANDARD OF BEHAVIOR AND EXPECTATIONS

GENTHERM



A message from Bill Presley, President & CEO

Gentherm's success is built on a foundation of integrity, respect, and accountability. Our Code of Conduct and Ethics is an important part of who we are as a company where we are committed to operating with the highest level of ethics and integrity.

Our Code of Conduct serves as a guiding framework, ensuring that our actions reflect our core values and commitment to ethical business practices. This Code demonstrates our commitment as an organization and emphasizes the key principles that guide us to always act with integrity and do the right thing.

To safeguard our reputation and contribute to Gentherm's ongoing success, it is important for all of us to take the time to review, understand, and live the values of our Code of Conduct. Every employee is encouraged to review our Code of Conduct to understand the contents and how they affect us. Complying with all laws is critical, along with our teams acting in accordance with their spirit and intent as well. By following our Code of Conduct we can conduct our business in a way we can all be proud of.

This document provides clear expectations for how we interact with colleagues, customers, partners, and the communities we serve. It is not just a set of rules but a reflection of who we are as a company. Each of us has a responsibility to read and comply with the Code.



Bill Presley, President & CEO



01

WE ARE COMMITTED TO OUR CODE OF CONDUCT

This Code sets forth the standards of behavior we expect from our employees, our business partners, and all other individuals we conduct business with. We designed this Code because conducting business ethically and with integrity is foundational to our success and delivering on our mission. You will be accountable and responsible for your actions and decisions. At Gentherm, we live our values and our beliefs every day by doing what is right for our customers, our employees, our communities and all stakeholders.

This Code applies to every individual at Gentherm Incorporated (collectively, including any affiliate or subsidiary under Gentherm control, as applicable, "Gentherm" or the "Company,") at all levels, including employees and directors of Gentherm regarding their Gentherm-related activities. No matter our job title, we are all leaders when it comes to ethics and integrity, and we must meet the commitments called for by this Code. Further, we expect our employees to hold all contractors, customers, vendors, suppliers, distributors, and any other individuals or organizations who do business with or on behalf of Gentherm ("Business Partners") to high ethical standards. As members of a team, being accountable and responsible means that each one of us must do our part, including:

- **Read and Understand this Code:** Look to this Code for guidance and direction. Use it to help make decisions and guide your actions. Employees should also read and understand the related supporting policies referenced throughout this Code.
- **Understand Applicable Laws and Regulations:** As a global company, there are many complex laws and regulations that apply to our business, and these can change over time in significant ways. Ask questions about the laws and regulations that might apply to your areas of the business.
- **Act Ethically and With Integrity:** Always make decisions that align with the ethics and principles we have established in this Code and other policies. Every decision you make is an opportunity to reinforce our beliefs and to ensure that we do business the right way, every time.
- **Cooperate Appropriately:** Whether it is part of an internal process, a customer audit, a government investigation, or any other inquiry process, be sure to cooperate as appropriate and do not provide knowingly and maliciously false information.
- **Ask Questions and Share Concerns:** This Code cannot address every concern or question that may arise. Therefore, having the courage to ask questions and raise concerns is an essential part of an ethical culture.

Within Gentherm, we also place additional standards of behavior on our leaders and supervisors, including:

- **Model Good Behavior:** Always work to set a good example for your team. Live the values and principles outlined here and demonstrate your commitment via your actions.
- **Listen to Employees and Offer Guidance:** Listen to any concerns or questions by persons who come to you for help or guidance, and provide direct feedback or follow-up with other leaders and supervisors. A question that is obvious to one person may not be as clear to someone else.
- **Build a Positive and Ethical Culture:** Expect your team to read this Code, and talk with them about the contents. Share with them what it means to operate with integrity.
- **Stand Against Retaliation:** As a leader, you must never permit retaliation of any kind against people who ask questions, raise concerns, or speak-up about issues.
- **Speak-Up and Ask Questions:** Speak-up when an issue needs to be raised and never tolerate behavior that goes against our principles.

HELPFUL TIPS

When a situation arises that presents a decision involving an uncertain question of ethics, start your analysis by asking yourself a few questions:

- Does my planned decision "feel" like the correct step?
- Is my decision aligned with this Code and our policies?
- Is this decision the right one for Gentherm, our customers, and our other stakeholders?
- If my supervisor or my team knew about this decision, would they agree with it?
- Am I willing to take responsibility for this decision if asked about it?

- If you answered "Yes" to the questions above, you probably are on the right track.
- If you hesitated or answered "Maybe", consider talking with your supervisor or an HR representative for guidance.
- If you answered "No" to any of these questions, your decision may not align with this Code. Seek support from your supervisor or other appropriate resources.

Watch out for instances where individuals are not following this Code or where they dismiss any guidance from their supervisors. Phrases that may indicate this behavior include:

- "We need to do whatever it takes to get the job done."
- "That's how business is done there."
- "It's not a big deal – nobody will know or care."
- "We've always done it this way."
- "It's just a one-time thing – don't worry about it."
- "I know somebody at another company – they do the same thing."

These or similar phrases indicate ideas that may not align with this Code. If so, stop and think about what you should do next, including reaching out to your supervisor, HR representative or a member of management for more help and support.

As you consider your actions, remember that adherence to our Code is not optional. Failure to comply with this Code may, subject to applicable law, result in disciplinary action up to and including termination of employment.

WHAT WOULD YOU DO?

Question: When talking about this Code in a team meeting, one of your co-workers says "I never read those things, they are all the same and who really cares anyways." What would you do?

Answer: While many pieces of this Code are common sense, it is important to read this Code to help understand Gentherm's commitment to the topic, how to deal with issues and questions, and to reinforce our position on ethics and integrity. The business world is a complex environment, and what is expected of us is always changing, so it's important to understand Gentherm's expectations on how you should navigate those complexities. If you encounter an employee who dismisses the Code as unimportant, encourage them to read the document or speak to your supervisor about how to deal with the issue.



02

WE ARE COMMITTED TO LISTENING & ADDRESSING ISSUES

An essential part of Gentherm's ethics and integrity is based on taking action when you see things that do not align with this Code, other policies, or applicable laws. We need every member of the Gentherm team to be a part of building and preserving our culture, including speaking up when you are aware of, or suspect, any misconduct.

REPORTING VIOLATIONS OR SUSPECTED VIOLATIONS OF THIS CODE

A number of different methods are available to report issues or concerns:

- Talk to your Supervisor: Employees may report a concern directly to their supervisor. The supervisor will help address the issue or provide guidance on other available resources.
- Report It to Other Internal Resources: If you are not comfortable reporting the issue to your supervisor directly, you may reach out to other Gentherm departments such as Human Resources, Gentherm's Legal and Compliance Department ("Legal and Compliance Department") and other members of local leadership and management, or you can leverage internal processes such as the Annual Conflict of Interest and Ethics Assessment survey to report issues.
- Report Via Internal Email: You may also report issues directly by sending an email to the Legal and Compliance Department mailbox: Compliance@gentherm.com.
- Report Via the Ethics Hotline: Gentherm maintains an external, anonymous hotline ("Ethics Hotline") where individuals can report issues via Internet or telephone. Those services are provided in multiple languages and are available toll-free 24 hours per day, seven days a week from any location. For contact information, including online reporting and local phone numbers click here.



WHAT IS THE BEST METHOD FOR REPORTING MY CONCERNS?

Different issues may be best resolved in different ways. Some examples include:

Example 1: My coworker is often rude to me and always says offensive things. We really do not get along, and I feel he behaves inappropriately.

- *This seems to be a local, interpersonal issue and could be a situation that is best handled by talking to your supervisor.*

Example 2: My site manager routinely says things that disparage women, implies that men are better workers, and promotes only men. I'm hesitant to talk to anyone here about it.

- *This is a serious allegation – you should reach out to the global HR leadership team and report this behavior.*

Example 3: A fellow employee at my location said some terrible things about a former employee as well as a few active employees. I don't feel comfortable reporting it to our local HR team, who can I reach out to?

- *In this case, you can speak to other local leaders, the global HR leadership team or other senior leaders. They can provide you with guidance or suggest another path to address this issue.*

Example 4: I suspect that our local team has been accepting bribes from a vendor to route business to their company. I have a few emails where the vendor mentions "payments received" and similar messages that seem inconsistent with the rest of the transaction. Who can I reach out to?

- *This type of issue should be reported to the Gentherm Ethics Hotline. Available both via phone and online, you can report your concern anonymously and ensure that it will receive the right attention and investigation.*

REPORT PROCESS

Gentherm takes seriously every issue raised in good faith. Each such matter will be investigated as necessary, and Gentherm will take prompt remedial action if appropriate. You must not conduct your own investigation, and instead you must cooperate in good faith with the Company's efforts to investigate. Items reported via the Ethics Hotline are reviewed with the Legal and Compliance Department, an investigation plan is developed and implemented if necessary, and details of each case, including the eventual outcome, may be reported to senior leadership as part of our documentation processes.

Investigations will be conducted confidentially to the extent possible. Disclosure of some reported information may be required in order to investigate and adequately respond to a concern or to litigate or defend a claim. Further, we may be required to disclose information related to a violation or suspected violation to law enforcement and/or regulatory authorities. Anonymous reports will be accepted, as set forth above, however, we encourage self-identification by the reporting individual—anonymous reports may limit our ability to thoroughly investigate the matter and follow-up with you regarding our findings. If you choose to remain anonymous, please provide as much specific information as possible so that we can investigate and address your concerns adequately.



RETALIATION IS NEVER TOLERATED

Gentherm is committed to a culture where employees feel comfortable voicing concerns and raising issues. Retaliation is prohibited against anyone for raising questions or concerns or reporting actual or suspected violations in good-faith, participating in or cooperating with an investigation or refusing to participate in any violation of applicable law. Anyone who engages in retaliation will be subject to disciplinary action.

Retaliation can take many forms and present itself in different ways. Any punitive actions taken against an employee for good-faith reporting is considered retaliation and is strictly forbidden.

FALSE REPORTING

Reports of potential misconduct are taken seriously by the Company. Before reporting a concern, please be certain that your report is done in good faith. Making a false report in bad faith is inconsistent with the work environment of fairness and ethical behavior that Gentherm aims to provide. Any employee who intentionally or knowingly makes false or misleading allegations is in violation of this Code and will be subject to disciplinary action.





03

WE ARE COMMITTED TO COMPLIANCE

COMPLIANCE WITH LAWS AND REGULATIONS

Our reputation and business success depend on our knowledge of and compliance with all applicable laws and regulations. We each have an obligation to comply with all of the laws and regulations applicable to the Company, and to raise any concerns, when appropriate, about such compliance by Business Partners in the context of our relationships with them. We expect you to read and understand Company policies and procedures, attend training sessions and ask questions if you are uncertain about any applicable laws and regulations, and where this Code or other policies differ from applicable laws or regulations, you must always follow the higher standard.

COMPLIANCE WITH CONTRACTUAL OBLIGATIONS

In addition to government-mandated laws and regulations, Gentherm is subject to the contractual rights of our Business Partners and other third parties. Lawsuits and claims for damages can cause considerable harm to the Company, both monetarily and to our reputation. Therefore, we expect good-faith efforts to comply with the contractual legal obligations that the Company has made unless a deviation is approved by appropriate leaders.

COMPLIANCE WITH FOREIGN LAWS

As a United States ("U.S.") corporation, Gentherm's activities will ultimately be subject to U.S. laws even if they occur in a foreign country. Additionally, we must also adhere to applicable laws and regulations in the country and locality in which our operations are located or where we are doing business. In some cases, the local customs of the country where you work may be in conflict with U.S. laws or the standards set forth in this Code. Where there appears to be a conflict between local laws and U.S. laws or this Code, the Legal and Compliance Department must be consulted before proceeding.



WHAT WOULD YOU DO?

Question: You work in a Gentherm site outside of the United States. Recently, your sales team started negotiating with a non-U.S. company. You mentioned to your boss that you think the U.S. has laws prohibiting trade with this foreign country. Your supervisor said not to worry about it because our country doesn't have those laws, it is a small transaction, and nobody will even notice. What would you do?

Answer: Your instincts are correct. All Gentherm business units, regardless of their physical location or where they are doing business, need to follow U.S. laws around exports, sanctions, and embargoes. Talk to your supervisor again, remind him of our obligations and the guidelines established in this Code. If that doesn't work, reach out to local HR department for guidance. If you still have concerns, contact the Legal and Compliance Department or the Ethics Hotline.

COMPLIANCE WITH INVESTIGATIONS AND AUDITS

Consistent with our efforts to maintain a strong ethical foundation and a culture of integrity, Gentherm is committed to cooperating with any required internal or external investigation or audit process. As part of this commitment, we require all employees to make a good-faith effort to cooperate with and support all investigations or audits and to ensure that anyone acting under our direction also cooperates with such auditors. This includes behaving in a transparent manner, providing complete and thorough information, refraining from providing knowingly and maliciously false information, and working to support the investigation or audit process to the extent possible. Additionally, you must not discuss ongoing investigations with anyone, inside or outside of the Company, until you get permission from the Legal and Compliance Department (unless you are communicating with a government agency).

Employees do not have an obligation to report participation in activities protected by the U.S. National Labor Relations Act ("NLRA"), and nothing in this Code is meant to limit or discourage employees from engaging in protected activity or exercising their rights under the NLRA. In addition, for investigations related to alleged violations of the NLRA, a non-managerial employee's participation, while encouraged by Gentherm, is voluntary.

In addition to this guidance, always be sure to report any inquiries or requests for information to appropriate personnel. Requests from customers or vendors must be reported to your supervisor or other local personnel, while requests from Government Agencies should also be promptly communicated to the Gentherm Legal and Compliance Department.





04

WE ARE COMMITTED TO EMPLOYEE ENGAGEMENT AND INCLUSION

This Code lays out basic principles of how we expect people to treat one another. At Gentherm, we are committed to building a culture where every employee and person we interact with is treated with respect and dignity. By fostering an environment where diversity, engagement, inclusion and belonging are championed, we can help drive the success of the Company and deliver on our mission statement.



WORKING ENVIRONMENT, ANTI-DISCRIMINATION AND ANTI-HARASSMENT

Gentherm is committed to a providing a safe, productive and open working environment. We have a workforce with diverse backgrounds, differences, ideas, skills and experience. Coupled with a positive work environment free from unlawful discrimination and harassment, this inspires excellence in our employees and enhances relationships with our customers.

We will not tolerate unlawful discrimination or harassment in the workplace, whether by a supervisor, manager or other employee, contractor, customer, supplier or other person, including sexual harassment or harassment based on any legally protected category. This includes unwelcome sexual advances or comments, or any other visual, verbal or physical conduct of a sexual nature. Be mindful to maintain professional communication with others without any offensive messages, derogatory remarks or inappropriate jokes. And always keep in mind that our expectations for appropriate behavior extend beyond just our buildings to include any Gentherm event, work function, business travel, or other activity directly related to Gentherm.

At Gentherm, diversity, equity, inclusion and belonging are core parts of our corporate culture, and we believe that embracing diversity inspires innovation. We seek to build an inclusive culture where we value our differences and create a sense of belonging for all to positively impact the lives of our employees, customers and communities. We are committed to providing equal employment



opportunities to all applicants and current employees. Individuals will be evaluated in accordance with their qualifications and work performance and will not be discriminated against based on prohibited personal characteristics such as race, ethnicity, color, religion, sex, national origin, ancestry, age, disability, family status, pregnancy, veteran status, gender identity, sexual orientation or any other status protected by applicable law. We also provide reasonable accommodations for employees with disabilities, absent an undue hardship, so that they may have the opportunity to perform the essential functions of their role and otherwise participate fully in employment.

We value workforce diversity. To learn more about Gentherm's commitment to diversity, read about ONE (Our Network of Engagement) efforts here. If you are subjected to or observe behavior that violates this Code, you should report it immediately using the methods outlined in the handbook and/or using the reporting avenues set forth in this Code. Supervisors who become aware of unlawful discrimination or harassment concerns must report the issue. As with other good faith concerns, no retaliation will be permitted against employees who submit a report.

HUMAN RIGHTS

Gentherm respects human rights for all people, at all levels of our supply chain, in every location where we operate or do business. This includes downstream to our customers, upstream through our supply chain, and to any other relevant stakeholders. Human rights are a fundamental right that must be respected and honored at all times. Consistent with this commitment, Gentherm does not tolerate human trafficking, forced labor or child labor and will not tolerate it by any of our Business Partners. Gentherm also works to ensure that we fully align with regulations regarding working hours, wages, and benefits. We will comply with applicable laws related to employment and employment criteria. Gentherm's Global Human Rights policy expands on these topics, and is available on our website here.

WORKPLACE VIOLENCE

In keeping with our commitment to employee safety, Gentherm will not tolerate threats of violence of any kind, whether explicit or implicit, stalking, acts of violence or any other conduct that results in harm to people or property. We take all reports of threatening behavior or violence seriously, and we will investigate such matters and take appropriate action. To report cases of such behavior contact the Ethics Hotline or email the Legal and Compliance Department. In cases of an emergency, contact local human resources, on-site security, or local authorities.

SUBSTANCE USE

Working under the influence of drugs or alcohol can create a safety hazard and affect your judgment. Because of this, Gentherm prohibits employees from working under the influence of such substances, consistent with applicable laws. We expect employees to be fit for duty to help ensure a safe working environment. Keep in mind that certain medications prescribed to you by a doctor can also affect your ability to do your job safely. Check with your doctor about any impact your prescription medications might have on your ability to perform your job safely, and communicate any concerns to your supervisor or local HR.



05

WE ARE COMMITTED TO PERFORMANCE AND ACCOUNTABILITY

A culture of ethics and integrity is developed when people are committed to doing the right thing and acting in a manner that aligns with predetermined values and principles. Accountability also is at the core of an ethical culture. While this Code and our other policies provide guidance, it is up to each of you to make the right decisions, to ask questions and to speak-up when necessary to ensure we live our values.

CONFLICTS OF INTEREST

Conflicts of interest occur when personal interests or activities interfere with your ability to act objectively. At Gentherm, we seek to avoid conflicts of interest or even the appearance of conflicts of interest. Although this Code does not describe every situation or instance that may present a potential conflict of interest, here are a few instances to consider:

- **Personal Relationships:** Supervising a friend, family member or someone with whom you have a romantic or close personal relationship.
- **Financial Interest:** Investing in a company that does business with Gentherm or competes with Gentherm in anyway.
- **Business Opportunities:** Using information you learned because of your work or activities with Gentherm for yourself, including by competing with Gentherm.
- **Family Members:** Allowing a member of your family to receive improper benefits or gains, based on your position, knowledge, or activities associated with Gentherm.
- Relationships with Government Officials: Based on specific laws and regulations, employees who have personal relationships with government officials should be sure to notify their supervisor and HR of the situation.

Gentherm also expects employees to be focused on their commitment to Gentherm as their primary form of employment. While employees are permitted to hold other employment, that employment must be reported to local Human Resources and must not present a potential or actual conflict of interest. Outside employment also must not interfere with an employee's ability to fulfill their obligations to Gentherm.



Conflicts of interest may not always be clear or easy to identify. If you have a question, you should consult with your supervisor or email the Legal and Compliance Department.

HELPFUL TIPS

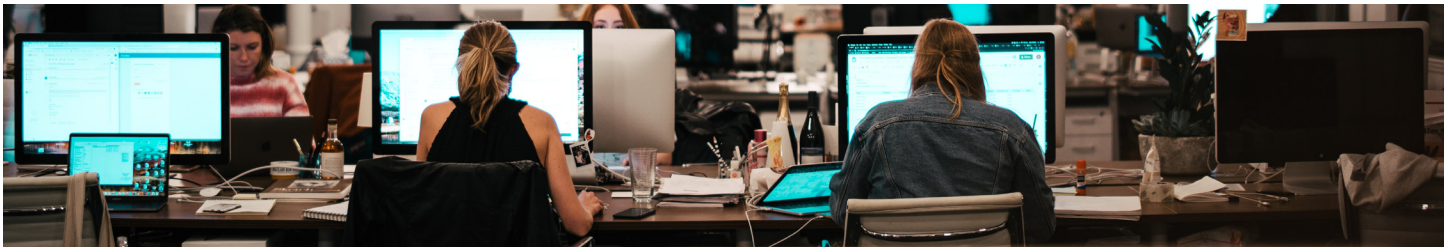
In order to help identify when you have a potential conflict of interest, ask yourself these questions.

- Does this interfere with my ability to do my job for Gentherm?
- Am I using Company resources, information, or relationships for my own or someone else's benefit?
- Could it appear to someone else that a conflict of interest exists?
- Does my decision or my actions compete with Gentherm or Gentherm's interests?
- Is any part of this decision influenced by my personal relationships or any personal gain?

If you answered "yes" to any of these questions, you may have a conflict of interest, and you are encouraged to talk with your supervisor for more guidance.

The following are examples of some common situations that may lead to conflicts of interest:

- Conducting Gentherm business with a family member, significant other or close friend. We must generally avoid situations where we mix personal relationships and business, as this could create a conflict between doing what is right for a friend, relative, or significant other and what is right for Gentherm. This includes making a business decision that would directly affect anyone we have a personal relationship with, such as hiring them as an employee or vendor, buying goods or services from them on Gentherm's behalf, or providing them with an unfair business advantage. Favoring a family member, significant other or close friend by hiring or conducting business with them because of their relationship to you can be considered a type of conflict of interest known as nepotism and presents unique challenges. Always be transparent, and let your supervisor or Human Resources know if this type of situation arises or could potentially arise.
- Establishing or having any sort of reporting relationship with a family member, relative, or close, personal friend. If such a person directly or indirectly reports to you or vice versa, your relationship may present a conflict that you must report to your local HR team.
- Conducting Gentherm business with a former Gentherm employee. Sometimes Gentherm employees leave our Company and work with companies that conduct business with Gentherm. Business dealings with these individuals can give rise to conflicts of interest, especially if their company, or Gentherm, seeks or receives an unfair business advantage. It is important to disclose any business dealings with former Gentherm employees to avoid a potential conflict of interest.
- Outside employment. We may not accept outside employment that negatively impacts or interferes with our responsibilities at Gentherm, such as working for a competitor or starting a business that competes or does business with Gentherm.
- Investing in other companies. Avoiding significant interests in companies that are competitors, suppliers, or customers of Gentherm helps us steer clear of conflicts of interest. However, it is usually acceptable to have immaterial investments in publicly traded companies.
- Serving on a board of directors. If you are asked to serve on the board of directors of a charitable, educational, or nonprofit organization, or trade association, speak to your manager or supervisor before agreeing, in order to make sure the situation does not create a conflict of interest. You must also get management approval before accepting a position as a director or officer of any outside organization.



WHAT WOULD YOU DO?

Question: Your Gentherm location is looking for a landscaping company to perform work. Your brother owns a company that is interested in submitting a bid. Is that allowed? Is that a conflict of interest? What would you do?

Answer: A Conflict of interest can be tricky and not always easy to identify or address. In this case, your brother's company is free to bid on the project and be considered just like any other company. The potential conflict comes down to (1) your involvement in selecting or influencing the winning bid, and (2) your transparency and appropriate reporting of your relation to the owner of such company.

If you are not involved in or do not have the ability to influence the Company's purchasing process or decisions, you probably do not have a conflict of interest. The more removed you are from influencing that process, the better.

However, if you have potential concerns, you should report the relationship to the Purchasing Team or your supervisor. Being transparent helps to minimize the appearance of a conflict of interest. The Purchasing Team together with the Legal and Compliance Department, will analyze such information.



INSIDER TRADING

It is generally unlawful for any person to buy or sell any stock or security of any publicly traded company while in possession of material non-public information about such company. "Material" means information that investors would find valuable in making decisions about whether to buy, sell or hold a security.

Gentherm is a publicly traded company. Gentherm maintains a Securities Trading Policy that generally prohibits Gentherm employees and directors, including members of their families or those that reside with them or others whose securities transactions are under their influence and control, from:

- Buying, selling or otherwise transacting directly or indirectly in Gentherm securities at any time while in possession of material non-public information about Gentherm;
- Engaging in any action to take advantage of, or pass on to other persons outside Gentherm, material non-public information of the Company, or recommending to such persons whether to transact in Gentherm securities; and
- Disclosing any material non-public information to any person outside of Gentherm, including family members, unless that disclosure is for a business purpose and protected by a confidentiality agreement for the benefit of the Company, or is otherwise approved in writing by Gentherm's General Counsel.

Other third parties with access to material non-public information of the Company may be subject to similar prohibitions.

Members of Gentherm's Board of Directors, officers and persons reporting to the CEO or CFO, as well as other employees designated as insiders, may transact in Gentherm securities only within designated open trading windows after receiving pre-clearance to so act.

In addition, persons subject to the Securities Trading Policy may not hedge or pledge or engage in any derivative or short-term transactions in the Company's securities.

If you do not know if you are an insider, please contact Gentherm's Legal and Compliance Department for clarification. For further information regarding Gentherm's Securities Trading Policy, see our website here.

WHAT WOULD YOU DO?

Question: At a family dinner, your brother asks about Gentherm financial and business performance and if he should buy stock in the Company. He is thinking about buying a small number of shares. You recently learned at work about a major business win that has not yet been announced to the public. What would you do?

Answer: Insider trading does not just cover your personal trading activity, it also involves "tipping" or telling others about material non-public information. Any use of inside information is illegal, including regardless of the size of the transaction. You must tell your brother that you are not permitted to discuss the Company matters he raised.

GIFTS AND GRATUITIES

Gentherm recognizes that exchanging small gifts and simple gratuities is a normal part of business and can be an important part of building professional relationships. However, employees must take care not to be influenced by Business Partners in a manner detrimental to the Company or in violation of law. Further, employees and other Company representatives must not offer gifts or other items of value to Business Partners as a regular practice, and may be prohibited from providing or accepting such items to certain persons or above certain monetary values. It may not always be clear what gifts are or are not appropriate. Please consult a member of the Legal and Compliance Department if you have questions in this regard.

The use of Company resources for gifts or gratuities to develop or enhance business relationships generally is subject to a standard of reasonableness and regular review. Any such gifts or gratuities must never be in cash, must generally be infrequent and must follow all guidelines established by the applicable work location policies. In many cases, gifts must be approved in advance by senior leadership.

Any items that are of significant value must be returned immediately and reported to your supervisor or a member of the Legal and Compliance Department. If immediate return is not practical, the item must be given to the Company for charitable disposition or such other disposition as the Company, in its sole discretion, believes appropriate.

When engaging in business entertainment on behalf of the Company, use common sense and moderation. Entertainment and gift giving must never be based on reciprocal action. Any business entertainment provided to or accepted from anyone doing business with the Company must be limited to entertainment that is infrequent, modest, culturally appropriate and intended to serve legitimate business goals. If your plans seem lavish or the attendees include any government officials, review your plans with the Legal and Compliance Department.

In addition to the guidance described here, there are also special restrictions related to offering gifts or donations to government officials or governmental agencies. For more guidance, refer to Gentherm's Gift Policies, available interally to Gentherm employees.

Note, it may not always be obvious who is a government official. If you are considering a gift or donation to someone you think may be indirectly associated with a government, you must consult a member of the Legal and Compliance Department.

WHAT WOULD YOU DO?

Question: A vendor invites you out to dinner to discuss its new products and other customary business updates. As the dinner ends, the vendor gives you an envelope which you later open to find a "thank you" gift card with a small balance. What would you do?

Answer: The dinner meeting and discussion appears to have been appropriate and in-line with policy; however, the gift, regardless of the amount, is not appropriate and violates this Code. You must immediately reach out to your supervisor and the Gentherm Legal and Compliance Department. Gentherm will need to review this vendor and their actions and determine appropriate next steps related to the business partnership.



06

WE ARE COMMITTED TO A GLOBAL MINDSET

As a global company, having a global mindset regarding how to align our values and business practices wherever we operate and do business is essential to building an ethical culture.

ANTI-CORRUPTION AND ANTI-BRIBERY

Gentherm has a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all our business dealings and relationships. Our company is subject to U.S. and non-U.S. laws that prohibit bribery or acting to suggest that a bribe would be accepted or offered to facilitate business, notwithstanding any local practices or customs that other businesses may use. Providing anything of value to any person who could be viewed as a government official is prohibited in any setting, and further, you must never engage a third-party whom you reasonably believe may attempt to offer a bribe in connection with Company business. Gentherm's Business Partners are held to this same standard, subject to limited gifts and gratuities in accordance with our policies. Gentherm's Anti-Bribery policy expands on this stance and is available on our website here.

If you intend to provide any gift, donation or business entertainment to a government official in any country, it must be in strict compliance with both the Company's Global Travel, Gifts & Entertainment, & Expense Reporting Policy and applicable anti-corruption laws and you must obtain pre-approval from Gentherm's Legal and Compliance Department. Additional information, including appropriate gift levels, approval processes, and more is available as part of Gentherm's internal policy – the Global Travel, Gifts & Entertainment, & Expense Reporting Policy.



WHAT WOULD YOU DO?

Question: Your immediate supervisor is the plant manager. Your site recently applied for a building permit, but it was denied by the local government. After the denial, your supervisor has you deliver a series of packages to the city planning office. Suddenly a few weeks later, the building permit is approved. What would you do?

Answer: This appears to be a potential case of bribery, and a potential violation of FCPA (Foreign Corrupt Practices Act) laws based on the involvement of government officials. You should report this issue to the Legal and Compliance Department or the Ethics Hotline, including as many details as you can. The Gentherm Legal and Compliance Department will receive the case and investigate the matter.

TRADE RESTRICTIONS AND EXPORT CONTROL LAWS

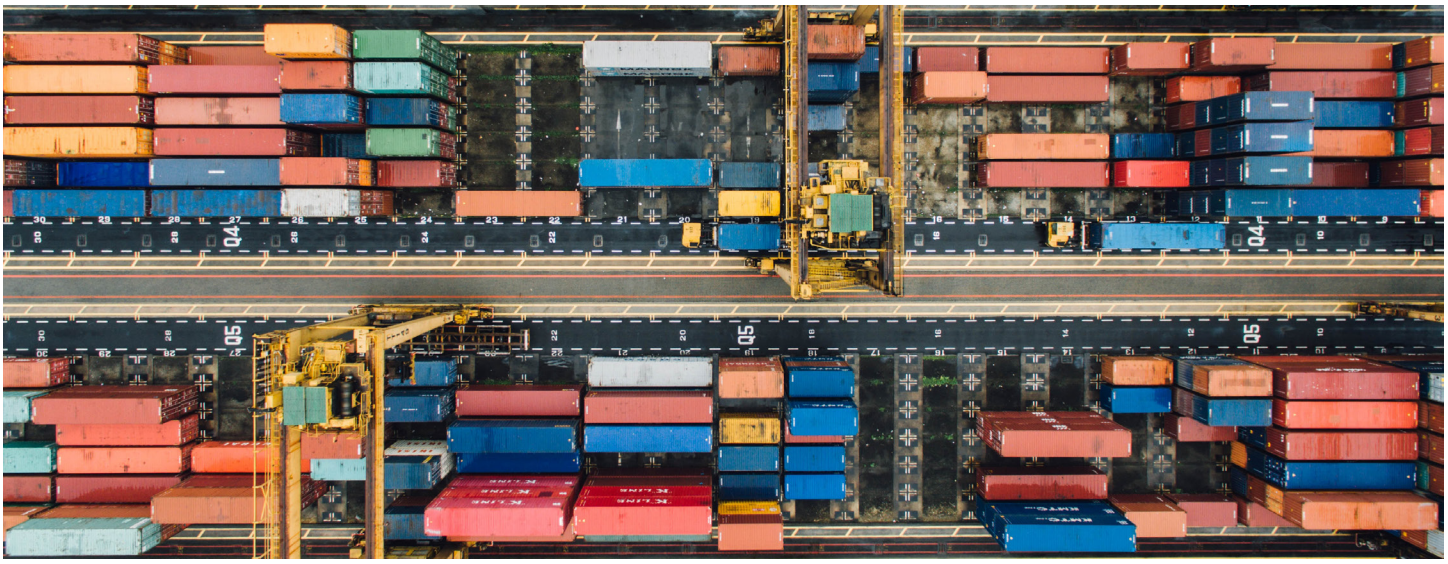
An "export" occurs when a product, service, technology, or piece of information is shipped or made available to a person in or from another country. An export may be as simple as sharing technology, technical information or software code in any form, including verbally, to a foreign person. The U.S. and other countries have laws restricting exports of goods, services and other dealings with certain countries, entities and individuals. These restrictions apply to:

- Exports to prohibited countries and persons;
- Investments in and other dealings with sanctioned countries or with designated individuals; and
- Export of high-tech or "military grade" technologies.

Before engaging in any exporting activity, you must verify the controls applicable to the goods, technology or software, and the eligibility of both the location of delivery and the recipient given the applicable controls. The Company must also obtain all applicable licenses and permits and pay required duties that may be assessed by either country.

The list of prohibited countries and export restrictions always is subject to change and requires regular review. Therefore, if you are involved in international trade activities you must contact the Legal and Compliance Department to verify whether there have been changes that affect what is permissible and how to appropriately clear products for export. Similarly, if you receive unusual requests or commitment demands from Business Partners, it is always best to contact the Legal and Compliance Department to review the request before agreeing to anything on behalf of the Company.

Remember, as a U.S. company, Gentherm must operate in compliance with U.S. laws, even at locations outside of the U.S. This includes activities related to trade restrictions and exports, but also applies to other regulatory and compliance topics that may arise. For additional information or questions related to trade restrictions and export control laws, contact the Legal and Compliance Department.



WHAT WOULD YOU DO?

Question: A potential customer you are not familiar with reaches out to inquire about purchasing a large volume of products. You do a little research and find out that the potential customer is a shop based in a region known for buying these products and re-exporting the products to embargoed or sanctioned nations. Your potential customer is not blacklisted and is in a country with no sanctions, so it seems like it might be fine to proceed with the sale. What would you do?

Answer: Compliance with export sanctions is not limited to where you sell your products, but also understanding risk of re-export, or known plans to ship products to places that do not align with U.S. law. If you know, or have a reasonable suspicion that the products will be re-exported to a sanctioned or embargoed location, you are obligated to speak up. Reach out to a member of the Legal and Compliance Department for more information before you engage further with the potential customer.

COUNTERFEIT PARTS

We make great effort to ensure the parts that we buy and use are genuine and legitimate. Counterfeit parts are not made in accordance with Gentherm standards and can lead to part failure or broader system breakdown in the products we manufacture. Failures caused by counterfeit parts can greatly harm Gentherm's reputation and our customer's brands. When acquiring parts, make sure to inspect the packaging, compare prices to ensure they are comparable to other parts on the market and purchase from source known to be reputable. If you suspect that parts that Gentherm has purchased or is using are counterfeit or if you have information regarding possible counterfeit activities, talk to your supervisor or reach out to the Legal and Compliance Department.

ANTITRUST AND FAIR COMPETITION

Our business is subject to U.S. federal antitrust and competition laws and the competition laws of the other countries in which Gentherm operates. While Gentherm strives to compete vigorously, we must always comply with antitrust and competition laws.

Antitrust and competition laws are designed to protect consumers and competitors against unfair business practices and to promote fair competition. These laws, among other things: prohibit or restrict activities with competitors related to fixing, coordinating or controlling prices (including any terms affecting prices) or output; allocating or dividing customers, territories or markets; and agreeing with a competitor to boycott another business.

To ensure compliance, you must not communicate with competitors concerning activities that could be deemed to restrict competition, fix or control pricing or output, or otherwise coordinate market actions. This includes participating in trade associations that exchange sensitive pricing, output or sales data in a way that could be viewed as anticompetitive. Employees must notify the Company's General Counsel if a competitor or trade association engages in activities around the margins of these topics. You may gather market intelligence in a legal and ethical manner, but you must not reach out to competitors directly.

Antitrust risks also may arise in the Company's dealings with Business Partners. Imposing restrictions on the resale of Company products, "tying" the purchase of a second product to the sale of a product, or charging different prices to different customers under conditions which may harm competition are all possible violations of the antitrust and competition laws.

For additional information or questions related to antitrust and fair competition issues, contact the Legal and Compliance Department.

ANTI-MONEY LAUNDERING

Money laundering is a process which converts money or property gained from illegal activities into money that appears legally earned. Gentherm will not allow any organizations or individuals to use our company to launder money or engage in any activity that facilitates money laundering or helps fund terrorist activities or other criminal acts. Use good judgment and pay close attention when working with Business Partners, especially if the transaction involves cash payments, excessive upfront amounts, payments to offshore or third-party accounts, or if a Business Partner refuses to give required identifying information or has a name similar to a party on a prohibited or sanctioned list. Always know who's behind every transaction and only conduct business with reputable third parties engaged in legitimate business activities. Take action to prevent the use of our operations for these purposes by reporting any suspicious activity to the Legal and Compliance Department or the Ethics Hotline.



ENVIRONMENTAL LAWS AND SUSTAINABILITY

We are committed to protecting the environment in which we live and work, including taking appropriate steps to reduce our environmental footprint. We also must satisfy applicable environmental legal requirements in the U.S. and other countries where we operate. You must comply with federal, state, provincial and local environmental laws and regulations at your work site, as well as follow the Company's Environmental Health and Safety policy and other environmental standards and initiatives.

POLITICAL DONATIONS AND CONTRIBUTIONS

Gentherm forbids the contributions of money, goods, services, or anything of value to any government official on behalf of the Company. Gentherm also forbids the contributions of money, goods, services, or anything of value to any candidate for political office, political office holder, or political party officials on behalf of the Company unless it is approved by the Board in advance. You may engage in political activities on a personal individual basis; however, in doing so, you must use your own resources and not any Gentherm funds or resources, avoid speaking on behalf of the Company, and ensure that all engagement in political activities complies with applicable laws and regulations. Any interaction or support that may appear to have political implications on behalf of the Company must be reported to the Legal and Compliance Department prior to engagement, and the Board will have discretion as to whether to approve such reported activities.

WHO IS A GOVERNMENT OFFICAL?

Government officials include any employees of government-owned or controlled companies, traditional officials such as legislators, judges, ministers, governors and regulators, and members of public organizations.



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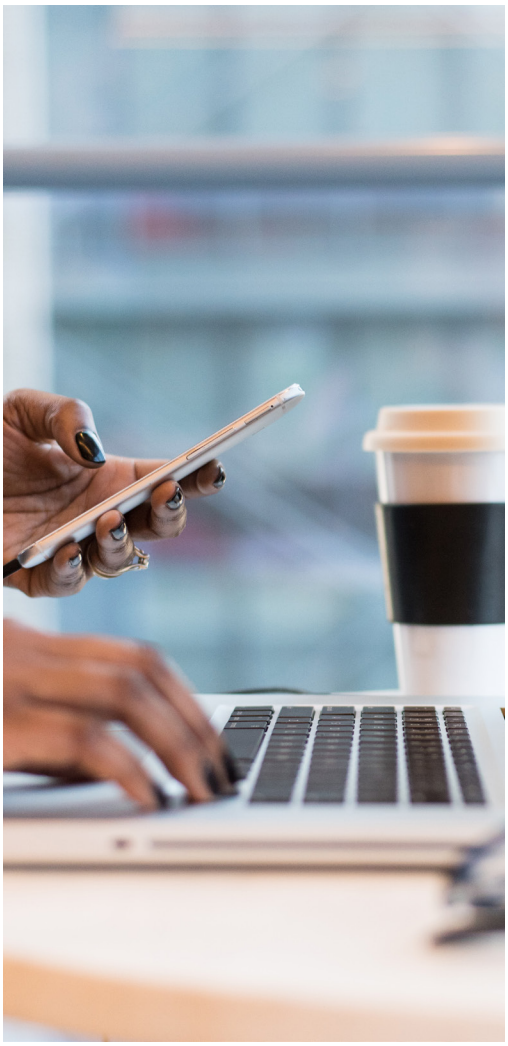
WE ARE COMMITTED TO CUSTOMER FOCUS

We operate in many ways to protect the interests of our internal and external stakeholders, including in the protection of private data, Company information, and much more.

DATA PROTECTION AND PRIVACY

At Gentherm it is critical to maintain the security, privacy and integrity of personal and non-public corporate information that the Company holds or has access to. We recognize that improper handling of such information could harm our employees, Business Partners and other third parties from whom we collect personal information, as well as disadvantaging Gentherm in our business operations. Data protection and privacy is a rapidly changing area of law, and many countries around the world have laws governing the collection, use, storage, disclosure, and international transfer of personal information. Under such laws, personal information generally includes information that identifies, or reasonably could be used to identify, an individual, including name, address, contact information (including email address and telephone number), biometric information, financial information (such as bank account or payment card information), health or medical information, photographs, personal profiles, and government issued identification numbers.

We are committed to complying with all applicable data protection and privacy laws (GDPR, etc.). Our goal is to implement reasonable and appropriate data protection and privacy practices that meet the expectations of our employees and Business Partners, and comply with our legal obligations. As a Company employee, you have a responsibility to comply with our privacy and data security requirements. You must carefully protect all personal information you acquire or have access to by virtue of your employment with the Company. This includes personal information about Company employees, Business Partners and other third parties with whom the Company does business. Please note, however, that this obligation does not restrict you from providing information about coworker names, contact information, your wages, or your working conditions in connection with activities covered by the NLRA. For more information on data protection and data privacy, contact your local Human Resources team, the Legal and Compliance Department, or supporting policies here.



WHAT WOULD YOU DO?

Question: You get an email from an outside company asking for contact information about a person that used to work on your team. You have that person's personal email and phone number. What would you do?

Answer: At Gentherm, protecting private and confidential information is not something that ends when someone leaves our team. You should inform the outside company that you cannot share that information. If the person claims to have a legal right, such as representing a government agency, or any sort of legal proceeding, reach out Human Resources or the Legal and Compliance Department for more guidance.

PROTECTION AND PROPER USE OF CORPORATE ASSETS; CORPORATE OPPORTUNITIES

Our business depends on our protection and proper use of the assets we develop and maintain. Anything you create within the scope of your employment with Gentherm is considered Gentherm intellectual property. You must follow Gentherm's established procedures and practices to protect the value of all the Company's assets, including physical assets, intangible assets such as intellectual property and confidential information. You must be careful to respect the intellectual property rights of others. For example, you may not introduce, copy, reproduce, transmit or otherwise use protected material (e.g., material covered by third-party intellectual property or your own intellectual property) in the performance of your job duties or onto Gentherm's devices or computer systems, such as works-of-authorship, writings, artwork, music, videos, photographs, movie clips, inventions, know-how, trade secrets, software and the like unless Gentherm has an express license for such activity.

At all times, even after leaving Gentherm's employment, you must continue to protect confidential information (whether Gentherm's or another party's) and not use or disclose it without Gentherm's express written authorization. Furthermore, you must not request or encourage anyone to use or disclose privileged or confidential information or introduce privileged or confidential information into Gentherm or place such information on Gentherm's systems or devices unless they are authorized to do so by the owner of that information and, to the extent that you become aware of any disclosure in violation of this prohibition, you should raise the issue with your supervisor or reach out to the Legal and Compliance Department. As set forth above, this obligation does not restrict you from providing information about coworker names, contact information, your wages, or your working conditions in connection with activities covered by the NLRA.

Theft, carelessness and waste have a direct impact on our financial and operational performance. While Gentherm respects employee privacy, you should not assume that your desk, cubicle, or use of computer devices or telephone equipment is private or confidential. Subject to local laws and under the guidance of the Legal and Compliance Department, Gentherm may search and review both incoming and outgoing communications on the Company's electronic and network resources, as well as all Company device information, including any password-protected communications.

Additionally, you are prohibited from personally taking actual or potential opportunities that properly belong to the Company or are discovered in the course of your employment or directorship with the Company without first obtaining the Company's consent. You must also not use corporate property, information (including but not limited to customer lists and customer information and other confidential or proprietary information) or position for personal gain or to compete or to prepare to compete with the Company.

We encourage all of our employees to become involved in your communities and to give back. However, you must never use the Company's resources or Company time to support a charity without permission from your supervisor or other appropriate personnel.

CONFIDENTIAL AND PROPRIETARY INFORMATION

Confidential and proprietary information includes all nonpublic information, including third-party information entrusted to the Company. Please note that, consistent with the NLRA, confidential and proprietary information does not include information related to your wages, coworker names and contact information, and your working conditions. Our confidential and proprietary information might be of use to competitors or harmful to the Company if disclosed. Confidential and proprietary information is a key asset of our Company. Always maintain the confidentiality of confidential or proprietary information entrusted to you by the Company or shared with Gentherm by our Business Partners, except when disclosure is expressly authorized by contract or is required or permitted by law, in each case as determined and communicated to you by Gentherm's General Counsel. Unauthorized disclosure of any confidential or proprietary information is prohibited and could result in legal liability to you and the Company.

Take appropriate precautions to safeguard confidential information and to ensure that it is not communicated within the Company except to employees who have a need to know such information to perform their duties. Appropriate precautions include not discussing or reviewing confidential information in public places or where other people are present.

Do not seek, use, accept, or upload to any Company electronic resource any competitor's trade secrets or confidential information unless disclosure is covered by an appropriate confidentiality agreement approved by Gentherm's General Counsel. In addition, third parties from the media, market analysts or investors may ask you for information concerning the Company. Do not share confidential or proprietary information with anyone outside of the Company unless you are authorized to do so and, if necessary, an appropriate confidentiality agreement is in place as determined by Gentherm's General Counsel. All responses to inquiries on behalf of the Company must be made only by the Company's authorized spokespersons.

ACCURACY OF BOOKS AND RECORDS AND PUBLIC REPORTS

The accuracy of our books, records and public reports is essential to Gentherm's ability to meet legal and regulatory obligations. Our records are the basis of our earnings statements, financial reports and other disclosures and also guide our business decision-making and strategic planning. Gentherm must provide full, fair, accurate, timely and understandable disclosures in reports and the documents filed with, or submitted to, the U.S. Securities and Exchange Commission ("SEC") and in other public communications. We require all employees to correctly report all business transactions and maintain accurate records. To ensure that the Company maintains accurate records, if applicable, you must:

- Record all assets, liabilities, revenues, expenses and business transactions completely, accurately, in the proper period and in a timely manner;
- Ensure that records and accounts conform to generally accepted accounting principles and our internal controls system;
- Never set up secret or unrecorded cash funds or other assets or liabilities; and
- Use appropriate and accurate wording and avoid exaggeration when creating records.

In addition, you must not knowingly make a false or misleading statement to an accountant in connection with any audit, review or examination of the Company's financial statements or in connection with the preparation or filing of any document or report with the SEC.

If you suspect that any of the Company's books, records or public reports is inaccurate, you should discuss the matter with your supervisor, a member of the Gentherm Accounting or Internal Audit Team, or a member of the Legal and Compliance Department. You can also contact the Ethics Hotline, click here.

WHAT WOULD YOU DO?

Question: One of your co-workers mentions that they found a minor error in last quarter's accounting records, but they did not notice it until after the information was finalized and submitted. Your co-worker says it's not a big deal since it was a pretty small amount and they made a correction at the beginning of this quarter so nobody will ever notice. What would you do?

Answer: As a publicly traded company, we have a legal obligation to accurately report our financial data. If errors are detected, even after the data is made public, there is a rigorous process for determining appropriate next steps. You should reach out to your supervisor or Gentherm's Chief Accounting Officer for more support.



RESPONSIBLE COMMUNICATIONS

All communications about Gentherm from our employees and directors reflect on the Company's reputation and brand. All responses to inquiries on behalf of the Company must be made only by the Company's authorized spokespersons, and you must identify opinions as your own unless you are authorized to speak on the Company's behalf.

Your online activity, even outside of work, could be detrimental to the Company. You must be mindful to not post illegal content or anything that could reasonably make others feel bullied, threatened, unlawfully harassed or unlawfully discriminated against. Gentherm's Social Media Policy (available internally to employees) expands on this topic and is available to all Gentherm employees.

Gentherm is committed to ensuring the timely, consistent and accurate dissemination of information in SEC filings and other stakeholder communications in alignment with applicable regulations and best practices. We have established procedures governing the release and use of material nonpublic information, as well as the authorized persons that are permitted to speak on behalf of the Company regarding such matters. For more information on our disclosure procedures, refer to our Fair Disclosure policy (here).

INTEGRITY IN MARKETING AND SALES

Our high-quality products and services, combined with our values and integrity, give us a competitive advantage in the marketplace—we do not disparage others in order to succeed. Where statements about competitive products or services are allowed by local law, be sure that any claims you make comparing competitors' products or to our products are properly substantiated through appropriate testing and verified by the appropriate people. Never unfairly criticize our competitors or seek to discredit their products in an improper manner.

In addition, we must use only legal, honest means to gather information about our competitors. Never conceal your identity as a Gentherm employee to collect competitive information or force or coerce anyone else to disclose such information. In the event you are offered competitive information that you feel should not be disclosed, refuse to accept the information and notify your supervisor or contact the Legal and Compliance Department.

RECORDS MANAGEMENT

In the course of our business, the Company produces and receives many documents. The Company is committed to comply with all applicable laws and regulations relating to the preservation of records. The Company's policy is to identify, maintain, safeguard and destroy or retain, as applicable, all records in the Company's possession on a systematic and regular basis.

An individual who learns of a subpoena, a pending or contemplated legal proceeding, demand or government investigation must immediately contact Gentherm's General Counsel. The individual must retain and preserve all records that may be responsive to the subpoena or that relate to the demand, legal proceeding or investigation until he or she is advised by Gentherm's General Counsel on how to proceed. The individual must not destroy, and to the contrary, must retain and preserve all relevant records, such as emails and voicemail messages. Destruction of such records, even if inadvertent, could seriously damage the Company. Any questions regarding whether a particular record pertains to a pending or contemplated dispute, demand, investigation or legal proceeding or may be responsive to a subpoena or questions regarding how to preserve particular types of records should be directed to a member of the Legal and Compliance Department.



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WE ARE COMMITTED TO DOING THE RIGHT THING IN THE RIGHT WAY

We appreciate the commitment of every person that has reviewed this Code and is committed to ensuring that we conduct our business with the highest levels of ethics and integrity. With the principles and guidelines established in this Code, we look to each of you to help build and maintain a culture of doing things the right way.





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POLICY LINKS AND HELPFUL RESOURCES

- **Global Human Rights Policy –** https://gentherm.gcs-web.com/policies-reports
- **Gentherm Ethics Hotline –** www.gentherm.ethicspoint.com
- **Environmental Health and Safety Policy –** https://gentherm.gcs-web.com/policies-reports
- **Global Data Privacy Policy –** https://gentherm.com/wp-content/uploads/Privacy-Policy.pdf
- **Gentherm Corporate Governance Policy & Reports –** https://ir.gentherm.com/corporate-governance/documents-charters
- **Gentherm Related Persons Transaction Policy –** https://gentherm.gcs-web.com/policies-reports
- **Securities Trading Policy –** https://gentherm.gcs-web.com/policies-reports
- **Anti-Bribery Policy –** https://gentherm.gcs-web.com/policies-reports
- **Gentherm Sustainability –** www.gentherm.com/en/esg
- **Gentherm Fair Disclosure Policy –** https://gentherm.gcs-web.com/policies-reports

Note: If you need assistance locating internal employee policies, please contact:

- **Social Media Policy –** Marketing & Communications Team
- **Global Travel, Gifts & Entertainment and Expense Reporting Policy –** Human Resources or Compliance
- **All Other Internal Policies –** Contact your Supervisor or a member of the Human Resources Team

Appendix

WAIVER OF CODE OF CONDUCT AND ETHICS

Any waiver of this Code for an executive officer or director of the Company may only be made by the Board or a committee designated by the Board, and any waiver of this Code for such persons will be disclosed to the public as required by applicable laws and regulations. Only Gentherm's Chief Executive Officer and General Counsel may waive provisions of this Code for other employees of the Company. If you believe that an exception to any of the policies contained in this Code is appropriate in your case, you must contact Gentherm's General Counsel to request a waiver.

FAILURE TO COMPLY WITH THIS CODE

Failure to comply with this Code will, subject to applicable law, result in disciplinary action up to and including termination of employment. Certain violations of this Code may require the Company to refer the matter to law enforcement authorities for investigation or prosecution. Any supervisor or member of management who directs, approves or ignores any conduct in violation of this Code, or who has knowledge of such conduct and does not immediately report it, also will be subject to disciplinary action as permitted by applicable law.

APPLICABILITY TO CERTAIN PERSONS

For purposes of clarity for applicable U.S. securities laws, this Code expressly applies to the Company's Chief Executive Officer, principal financial officer, controller, principal accounting officer and other persons performing similar functions.

OTHER COMPANY GUIDELINES

This Code is intended solely to describe certain principles and policies of the Company. This Code is not a complete list of Company policies and guidelines. You are expected to know and comply with all Company policies and guidelines related to your job, and violation of any Company policies and guidelines may result in discipline, up to and including termination of employment or service.

NO RIGHTS CREATED

This Code is not intended to guarantee or promise employment or create any other obligations to or rights for any employee, client, supplier, competitor, shareholder or any other person or entity, or create a cause of action in favor of any third party.

CHANGES TO THIS CODE

The Company has the right to amend, alter, or terminate this Code at any time for any reason. The most current version of this Code can be found on the Company's Intranet, as well as the Company's website.

As Adopted: June 2026