

TAWESCO AUTOMOTIVE s.r.o. (jointly referred to as „TWSA“) is a producer and supplier of the parts for automotive industry with long-term tradition. The customers include the majority of the passenger and heavy vehicles producers.

### Basic Principles of our Business activities

For a successful company rich in tradition like TWSA, acting in compliance with the law is a matter of course. To safeguard and deep trust in the company's and the group's management among shareholders, employees, customers and suppliers, as well as among the public, we are committed to responsible corporate governance. We are committed to our corporate mission in conducting our business with integrity and ethical standards. This basic principle is the foundation of our activities and an essential factor when it comes to securing our company's long-term, sustainable success for the future.

We also expect our TWSA business partners to have this basic understanding, which we defined in our Code of Conduct for Business Partners.

The TWSA Code of Conduct for Business Partners goes beyond more compliance with laws and regulations. We consider it an indispensable condition for the selection and appraisal of our collaboration with our business partners that they: act in conformity with the law and observe ethical standards and take this into account in selecting their business partners.

Any statutory national, supranational or international laws and regulations remain in force where applicable and take precedence over this Business Partner Code of Conduct wherever they set higher standards in individual cases. In case of lower standards, the Business Partner Code of Conduct shall take precedence.

### 1. Behaving with Integrity in all Business activities

#### Prohibition of Corruption and Bribery

Corruption is prohibited by international conventions (e.g., the principles of the UN Global Compact and the UN Conventions against Corruption) and national laws.

TWSA does not tolerate any form of bribery or business practices that may rise an impression that there is any impermissible taking of influence or manipulation among both. TWSA own employees as well as our Business Partners.

TWSA expects that our Business Partners refrain from offering any advantages whatsoever to the third parties and receive neither any direct nor indirect advantages for themselves from others. Likewise, they shall not promise any advantages constituting an illegal action pursuant to the applicable anti-corruption laws.

TWSA additionally expects that our Business Partners do not tolerate any form of illegal gratuities whatsoever, particularly in business contact with official dignitaries and authorities at home and abroad. They shall likewise ensure the integrity of their employees' conduct and procedures.

#### Invitations and Gifts

In the handling of gratuities, for example in the form of gifts or invitations, the Business Partner shall pay close attention generally and particularly, as concerns its activity for TWSA, to avoiding any appearance of impropriety or incorrectness. TWSA expects that its Business Partners do not abuse invitations and gifts for the purpose of taking influence. Invitations and gifts to TWSA employees or persons associated with them shall be granted only if the reason and value is appropriate, i.e., if they are of low value and if they can be considered as an expression of locally generally accepted business practice. In the same way, Business Partners shall not solicit any inappropriate advantages from TWSA employees.

### **Fair Competition**

TWSA expects our Business Partners act fairly in competition and observe the applicable legal regulations of anti-trust and competition law. Business Partners shall neither participate in any agreements with competitor contrary to anti-trust regulations nor take advantage of any possibly existing market-controlling position.

### **Money Laundering**

TWSA expects our Business Partners observe the relevant legal requirements for the prevention of money laundering. They do not get involved in money-laundering actions and they support the international fight against money laundering.

### **Conflicts of Interest**

TWSA expects that our Business Partners make their decisions regarding business with TWSA exclusively on the basis of objective considerations. Conflicts of interest with private or family matters or otherwise with economic or other activities, as well as those of associated persons or entities or other related persons or organizations shall be avoided from the outset.

### **Counterfeit parts**

The Business Partner will fulfill the requirement for companies to develop, implement and maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products. Business partners are also expected to establish effective processes to detect counterfeit parts and materials and, if detected, quarantine.

### **Export Controls and Economic Sanctions**

The Business partner is expected to comply with applicable restrictions on the export or re-export of goods, software, services and technology, as well as with applicable restrictions on trade involving certain countries, regions, companies or entities and individuals.

## **2. In the Interest of Employees**

TWSA expect from our Business Partners that they observe the fundamental employee rights of the respectively applicable national legal system. In addition, TWSA expect the recognition of the "Universal Charter of Human Rights" of the United Nations, the principles of the UN Global Compact and the core work standards of the International Labor Organization (ILO), in consideration of the country-specific laws applicable at the different sites.

### **Child Labor**

TWSA does not use child labor. We expect from our Business Partners do not use of any kind of child labor.

### **Harassment and Non-discrimination**

TWSA expects our Business Partners treat their employees fairly and that they prevent discrimination in the hiring of employees. As well as in promotions or in continued education measures. We expect from each Business Partner that they do not discriminate against anyone by reason of their gender, skin color, age, citizenship, religious affiliation, social origin, disability or sexual orientation.

### **Modern Slavery**

TWSA does not tolerate any kind of modern slavery or forced labor or human trafficking and expect the same from our Business Partners.

### **Freedom of Association**

TWSA expects that our Business Partners respect the freedom of association as well as the right to form interest

groups. Thus, they shall grant the right to their employees under national laws and regulations to represent their interests.

#### **Compensation and Working Hours**

TWSA expects that its Business Partners observe the respectively applicable legislation on working hours. It is furthermore expected that the employees of our Business Partners receive compensation that is consistent with the respectively applicable national laws.

#### **Private or public security forces**

TWSA expects that its Business Partners should commission or use private or public security forces to protect the business project if, due to a lack of training or control on the part of the company, the deployment of the security forces may lead to violations of human rights.

#### **Health and Safety**

TWSA expects that our Business Partners observe the respectively applicable legislation on health protection and work safety. Business Partners shall support the protection of their employees' safety and health through appropriate measures, such as preventive and consistent work protection as well as a safe and healthy work environment.

### **3.Environmental Performance**

#### **Energy consumption and Resources Efficiency**

The Business Partner shall monitor, track and document its consumption of natural resources such as water and raw materials, as well as sources of energy in order to be able to identify aspects that Business partner can control and can influence fostering opportunities for improvement and minimized consumption.

#### **Waste Management and Emissions**

The Business Partner shall monitor, track and document its emissions to air, water and soil from its facilities and transports as well as the wastewater and solid waste generated by its operations in order to be able to identify aspects that Business partner can control and influence fostering opportunities for improvement and minimized emission.

#### **Hazardous Substances**

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

#### **Land, forest and water rights and forced eviction**

The Business Partner commit to the avoidance of forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.

#### **Animal Welfare**

With respect to animal welfare, we require compliance with all legal requirements and, as applicable, we expect our Business Partner to implement industry-best policies and practices related to the ethical treatment of animals. Commits to a belief in the humane treatment of animals, including freedom from thirst and hunger, freedom from discomfort, pain, injury and disease, freedom to express normal behavior, and freedom from fear and distress.

### **Decarbonisation**

The Business Partner undertake to contribute to the reduce of GHG emissions from a company's value chain.

### **Noise emissions**

The Business Partner is required to support the noise reduction in their production area.

TWSA expect our Business Partners to comply with the applicable environmental laws, regulations and standards.

## **4. Confidential Handling of Information**

In order to protect confidential and personal information, data and plans, the Business Partners shall store these securely and protect them against access by third parties.

TWSA expect our Business Partners observe all relevant legal regulations on data privacy. And that they gather, process and use personal data only on the conditions of the applicable data protection regulations.

Business Partner may use information exclusively for authorized purposes and in an appropriate way and manner. All Business Partners of TWSA undertake not to pass on any confidential data and business secrets to third parties without authorization and not to use these on their own for their own purposes.

## **5. Compliance and Implementation of Standards described**

TWSA calls on select Business Partners to carry out a self-assessment based on a supplier survey. TWSA will verify the compliance and implementation of the standards described herein within the scope of a risk-based review in order to detect any compliance or integrity risks ("Business Partner Compliance Due Diligence").

In case of non-compliance with the standards described herein TWSA reserves the right to review the business relationship with each Business Partner. In doing so, TWSA will adhere to the principle of appropriateness, so that TWSA will review carefully which consequences are appropriate, suitable and required in each individual case. This may lead to an immediate termination of the business relationship as well as to claims being brought for damage compensation.

### **Supplier Relations**

TWSA's Business Partners expect their subcontractors and suppliers to comply with the principles and requirements described herein and take this into account when selecting suppliers. The TWSA Code of Conduct for Business Partners can be used as a basis and may be communicated to third parties.

### **Management Systems**

TWSA recommend the implementation of appropriate management systems or equivalent processes to ensure compliance with the principles listed herein, e.g., by using a certified management system.

## **6. Reporting of Violations**

Despite the commitment to act honestly and ethically, every company is exposed to the risk that various situations may not proceed appropriately or that unlawful or unethical acts may be committed, either knowingly or unknowingly. To ensure that TWSA is able to respond to misconduct in a timely and appropriate manner, the attention and willingness to cooperate of everyone needed.

Our whistleblower system provides everyone with a way to inform us about misconduct within TWSA or in

connection with TWSA.

If you have concrete, well-founded evidence of a severe infringement or breach of rules within TWSA or any non-compliance in connection with TWSA, you can use your contact person to report these. We also accept anonymous tips.

**Business Partner Confirmation**

We, the undersigned, hereby confirm that

- we have received the TWSA Code of Conduct for Business Partners and we acknowledge and accept it;
- we know all the relevant laws and regulations of the countries in which our company operates;
- we conduct our business based on ethical principles, applicable laws, and social responsibility; and
- we take into account all standards described in the TWSA Code of Conduct for Business Partners when it comes to selecting our business partners.

Company's full name

Stamp/ Seal of the company

First and last name

Title

Signature

Commercial Register, place

Commercial Register No. or VAT ID

Place, date

This document must be signed by an authorized representative of the Business Partner and be returned to the requesting person from Tawesco Automotive company.