

Culimeta Automotive Neunkirchen GmbH

Code of Conduct for Business Partners

1. Preamble

Culimeta Automotive Neunkirchen GmbH (hereinafter referred to also as “Culimeta”) aspires to be a modern, forward-looking company that is firmly committed to providing excellent services. As an international company, Culimeta is responsible for creating and maintaining a corporate culture in which the relevant statutory provisions and regulations as well as ethical principles are respected to the greatest possible extent. To ensure this, Culimeta always acts in compliance with the laws applicable in the different countries and locations and in recognition of the different cultures. In addition to complying with legal requirements, it is also the responsibility of Culimeta to adhere to fundamental ethical and social principles, and Culimeta expects the same from all business partners with which it cooperates.

This Code of Conduct for Business Partners defines the minimum requirements with which Culimeta complies and that Culimeta also expects its business partners and suppliers to comply with.

2. Human rights and fair working conditions

The business partners undertake, as a basis of this business relationship, to respect the human rights, personal dignity, privacy and rights of each individual. This includes, in particular, the following areas:

2.1. Modern slavery and child labour

You will ensure that all forms of forced labour, including but not limited to involuntary prison labour, victims of slavery or human trafficking, and child labour, are rejected.

2.2. Discrimination and harassment

You must not tolerate discrimination against employees or discrimination in recruiting and hiring employees on grounds of legally protected characteristics including but not limited to gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation or sexual

orientation. This also includes any other characteristics protected by local laws, such as pregnancy/ parenthood or belonging to a national minority.

You must not tolerate harassment, inequality, discrimination, violence, retaliation or any other disrespectful behaviour.

You will promote an inclusive workplace as well as equal treatment, equal opportunities and diversity among employees.

2.3. Occupational health and safety

You will provide your employees with a safe and healthy workplace that complies with the applicable laws and regulations.

You will ensure that all employees are sufficiently aware of health and safety and environmental requirements by implementing appropriate training programmes.

2.4. Working hours

You are expected to ensure that working hours, including overtime, do not exceed applicable legal requirements.

2.5. Wages and social benefits

We expect our business partners' employees to receive remuneration that is always in line with, or exceeds, the applicable national laws in each case and the legally valid and guaranteed minimum income, including social benefits, and that this is undertaken irrespective of differences in gender.

2.6. Freedom of association and collective bargaining

You will respect your employees' right to freedom of association, and especially the right to form and join workers' representative bodies and trade unions. You will treat your employees with neutrality regardless of their affiliation or non-affiliation to a workers' representative body or trade union, and you will not punish the exercise of the right to freedom of association with reprisals. You will also recognise the right of your employees to bargain collectively and the right of trade unions to operate freely within the law of the place of employment, especially the right to bargain collectively and the right to strike.

2.7. Reprisals

You will allow your employees to raise concerns to the management without fear of reprisal.

2.8. Use of security personnel

You will ensure that the security personnel you employ do not commit human rights or labour rights violations.

2.9. Rights of minorities and indigenous peoples

You will act in accordance with the "United Nations Declaration on the Rights of Indigenous Peoples", and in particular respect and promote applicable land, resource and water rights.

2.10. Forced eviction

You will observe the prohibition of unlawful eviction from land, forests and water bodies.

3. Environmental management

You will conduct your business in an environmentally sustainable way, including compliance with all applicable environmental laws and regulations.

3.1. Resources, avoidance of environmental damage

In the course of your business activities, you will take adequate and appropriate measures to use resources, such as raw materials, water and energy, efficiently and sparingly and to avoid, or at least reduce, damage to health and the environment through waste or harmful and excessive air pollution, greenhouse gas and noise emissions, soil degradation and water pollution. You will be transparent about your greenhouse gas emissions. In the course of your business activities, you will also seek to take suitable and appropriate measures to promote the reuse (recycling) and sustainable management of resources and the reduction of greenhouse gas emissions by setting reduction targets (decarbonisation) and using renewable energy.

3.2. Water consumption and quality, air quality, soil quality

You will use water carefully and minimise water abstraction, especially in areas of water scarcity. You will comply with applicable laws and regulations governing waste water, air and soil quality.

3.3. Waste, chemicals

You will ensure that any substances you use, especially chemicals, are labelled in accordance with applicable regulations and are handled, reused, recycled or disposed of appropriately. In

addition, hazardous substances must be transported and stored safely. Where possible, you will endeavour to reduce waste and to recycle materials. You will adhere to the prohibitions on the non-environmental handling, collection, storage and disposal of associated waste.

3.4. Animal welfare, deforestation, biodiversity

You will help protect natural ecosystems, natural forests, wildlife, biodiversity and species diversity by striving to avoid deforestation and to consider animal welfare in the course of your business activities.

4. Business ethics

You are expected to conduct your business in an ethical manner and to comply with all applicable laws and regulations, including but not limited to

4.1. Anti-corruption and anti-bribery laws

You must not tolerate any form of bribery or business practices that could create the impression of improper influence or the exertion of improper influence. This applies regardless of alleged local custom. You must not tolerate the direct or indirect acceptance, offering or granting of tangible or intangible benefits (in the form of gifts, invitations or other benefits) to or from Culimeta, public officials or third parties if such benefits are intended to exert improper influence on business processes or to speed up or facilitate an official procedure (facilitation payments), or if they create such an impression. Especially when dealing with public officials and authorities, Culimeta expects its business partners' employees to follow the law, and to act with integrity.

4.2. Competition and anti-trust

The business partner will comply with antitrust law and other applicable competition laws and regulations. Above all, Culimeta will not tolerate:

- Anti-competitive contracts, agreements or arrangements with actual or potential competitors, in particular but not limited to agreements intended to fix prices and premiums; limit the number or quality of products or services provided; manipulate tenders; allocate customers; or share markets.
- Abuse of a dominant position on a particular market; or

- Vertical restrictions or contracts (with suppliers or customers) with the intention or effect that free and fair competition is prevented or restricted, contrary to applicable laws.

4.3. Money laundering

Business partners shall only maintain business relationships with partners if they are convinced of their partners' integrity. They are expected to ensure that applicable anti-money laundering legal requirements are not violated.

4.4. Protection of third-party intellectual property rights (e.g. copyright, trademark rights, design rights, patent rights)

The business partner will respect the intellectual property of others and will comply with the applicable laws and regulations relating to intellectual property.

4.5. Conflict of interests

In dealing with partners, the business partner must make decisions solely on the basis of objective information and may not allow itself to be influenced by personal interests. The business partner must disclose potential or actual conflicts of interest and identify an appropriate response.

4.6. Financial responsibility

The business partner will shoulder its financial responsibility by keeping accurate accounts and statements.

4.7. Trade and export laws

The business partner will adhere to international trade regulations and export control regulations, including any applicable economic embargoes.

4.8. Product integrity

The business partner is obliged to ensure the safety and conformity of its products. To this end, the statutory regulations applicable in the respective countries and regions with regard to product integrity must be complied with; in addition, the product must provide the safety that the general public is entitled to expect. In particular, products may not pose a risk to human health or the environment. Technical requirements for manufacture, assembly and use must be

observed and, in particular, counterfeit parts (counterfeit products) or material from unauthorised sources may not be used.

4.9. Confidentiality, intellectual property and data protection provisions

You are expected to protect and respect the intellectual property and confidential information of Culimeta and of third parties, and to ensure that the intellectual property and confidential information of Culimeta and all third parties is only used if expressly permitted under applicable agreements.

Personal data may only be collected, processed, disclosed or stored for a legitimate business purpose. You are expected to ensure that proper agreements have been made, taking into account applicable legislation, before collecting or processing these data, or before disclosing them to third parties.

5. Supply Chain

In order to adhere to the principles of this Code of Conduct as best as possible along the entire supply chain, the business partner undertakes to do its best to oblige its suppliers and service providers, which it uses to fulfill its performance obligations, to comply with the principles of this Code of Conduct and to also urge them to pass on the principles are passed on to their suppliers and service providers.

6. Reporting of potential violations (“whistleblowing”)

Culimeta expects its business partners to report to the mailbox sustainability@culimeta.de any criminal offences or legal or ethical violations that could have an impact on Culimeta. Culimeta will not tolerate retaliation against anyone who makes a good faith report of a potential violation, and expects the same of its business partners.

7. Cooperation with Culimeta

The relationship between Culimeta and its business partners is built on trust and cooperation. Culimeta reserves the right to conduct business partner reviews in order to minimise potential compliance and ethical risks. In the event of suspected non-compliance with the aforementioned requirements, we reserve the right to request information on the relevant circumstances without delay. Culimeta further reserves the right to terminate individual or all contractual relationships with business partners for exceptional reasons and without notice if this Code of Conduct for



Business Partners and the requirements thereof are not complied with vis-à-vis Culimeta or third parties, where appropriate after setting a reasonable deadline to rectify or remedy the violation.

We would like to thank our business partners in advance for their cooperation in adhering to these principles, making an active contribution to ensuring the basis for the sustained future success of our companies and our mutual cooperation.