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SEG AUTOMOTIVE SUPPLIER CODE OF CONDUCT

Introduction

SEG Automotive is one of the leading global suppliers of technology and services. The assumption of responsibility towards society and future generations is an established SEG Automotive commitment. We want our products to spark enthusiasm, improve quality of life and help conserve natural resources. At the same time, sustainability in our activity is a central element of our self-conception and corporate strategy. Our suppliers contribute significantly to our success and our future goal is therefore to develop our products and services together with them in a sustainable and successful way. In this regard, we consider the common understanding for ethical and sustainable activity as the basis for business success.

Purpose

This Code specifies the minimum standards of behavior SEG Automotive requires from all Suppliers, in the areas of Business Ethics, Human Rights and Working Conditions, Healthy and Safety, Environmental Performance including Responsible Sourcing of Raw Materials. The requirements identified in the Code are based on the principles of the SEG Automotive Code of Conduct, as well as on international conventions and standards such as the United Nations Global Compact, the OECD Guidelines for Multi-national Enterprises, the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. The purpose of the Code is to clearly communicate the requirements and expectations of SEG Automotive to the global supply chain. It is available to view and can be downloaded from <https://www.seg-automotive.com/purchasing/purchasing-documents/>.

Scope

The Supplier Code of Conduct is an integral part of the agreement between Supplier and the SEG Automotive Group of Companies and is mandated through the SEG Automotive General Conditions of Purchase.

Supplier, Business Partners and third parties engaged for the performance of Supplier's duties towards SEG Automotive are required to adhere and comply with the principles set out in this document.

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The term “Employee” used throughout this Supplier Code of Conduct covers everyone working for or on behalf of a Supplier, including, but not limited to full and part-time employees, consultants, contractors, trainees, temporary workers, migrant workers, senior management, and board of directors.

The Supplier Code of Conduct applies to all suppliers that deliver goods and/or services to any entity of the SEG Automotive Group of Companies, including their parent, subsidiary, or affiliate entities as well as their respective employees, agents, and any other third party engaged for the performance of supplier’s duties towards SEG Automotive, hereinafter individually and collectively referred to as “Supplier”.

Suppliers are expected to align these principles with their own suppliers to ensure consistency throughout the supply chain. This may involve establishing supply chain management processes that integrate the requirements of this Code.

In addition to our Supplier Code of Conduct, SEG conducts periodic Due Diligence and Risk Assessments process to evaluate its Strategic Suppliers. This entails a comprehensive evaluation of various risk factors, including but not limited to production capacity, quality, environmental impact, and financial. This continuous oversight ensures the resilience and stability of our business and enables us to make informed decisions that align with our ethical and business standards.

To stay in compliance with evolving automotive industry standards, SEG also engages in regular communication to update its suppliers on pertinent regulatory changes, including but not limited to e.g. carbon footprint, etc.

1. BUSINESS ETHICS

SEG Automotive requires its Suppliers to uphold the highest standards of integrity and strict legality, as well as always operate honestly and equitably throughout their operations and business interactions.

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We believe that earning business fairly and in compliance with all applicable legal and regulatory requirements, as well as in accordance with industry standards and best practices, is essential to building trust with customers and other business partners.

Therefore, our Suppliers shall adhere to the following when conducting business:

Anti-Bribery and Corruption

Supplier shall not engage in, endorse nor tolerate any form of bribery or corruption, directly or indirectly. Supplier shall not offer nor accept any form of improper benefit to or from a third party, private or public, with the purpose of obtaining or retaining business or any form of preferential treatment. Such benefits may comprise not only cash but also job opportunities, favors, travel, facilitation payments, promises to pay debts or unlawful gifts, entertainment, and hospitality.

Anti-Money Laundering and Terrorism Financing

Supplier shall prevent Money Laundering as well as Terrorist Financing activities and enforce effective internal controls to combat such activities, covering, among other aspects, the performance of a risk assessment on overall activities, including individual counterparty due diligence, as well as cooperation with the competent authorities when required.

Financial responsibility is crucial to SEG. SEG analyses credit and financial reports considering the supplier's political, macroeconomic and commercial environment.

Conflicts of Interest

Supplier shall conduct business in an open and transparent way to demonstrate that they are an honest and trustworthy partner and avoid situations where financial, personal or other external interests conflict with the employee's job responsibilities. Any situation in which a SEG Automotive employee or professional under contract with SEG Automotive may have a personal interest of any kind in the Supplier's business or any kind of economic ties with the Supplier, must be immediately reported to SEG Automotive through ordinary reporting channels.

Fair Competition and Antitrust

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Supplier shall ensure adherence to all applicable fair trade, competition, and anti-trust laws and regulations and shall refrain from engaging in any anti-competitive discussions or entering into any anti-competitive agreements, including illegal price-fixing, market sharing, customer allocation or other illegal restrictive practices, at any level of the production or distribution chain.

Trade Laws and Economic Sanctions

Supplier shall comply with all relevant export control legislations when exporting goods or technology and shall plan for and obtain all necessary authorizations and permits to ensure timely and compliant deliveries of their products.

Supplier shall respect national and international sanctions involving certain countries, regions, entities, and individuals, and adopts procedures for screening business partners, as well as their beneficial owners, in view of applicable government lists of restricted parties.

Confidentiality and Intellectual Property Rights

Supplier shall respect the confidential information and intellectual property rights of SEG Automotive, by safeguarding against misuse, mishandling, misappropriation, counterfeit, theft, fraud, or improper disclosure in accordance with applicable law and contractual terms.

Data Privacy and Security

Supplier shall, whenever entrusted with personal information about individuals, safeguard it and take appropriate steps to protect it from misuse. All applicable data privacy laws as well as the contractual terms with the SEG Automotive shall be observed when collecting, storing, using, processing, or sharing personal information about individuals.

The Data Privacy Information for Suppliers is available to view and can be downloaded from <https://www.seg-automotive.com/purchasing/purchasing-documents/>

Product Quality & Safety / Counterfeit parts

Supplier shall ensure that their products meet all relevant legal, regulatory, and contractual requirements and are consistent with all other internationally recognized standards. Supplier shall eliminate the risk of introducing counterfeit parts and materials into deliverable products, which, if detected, shall

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be excluded from the delivered product, with subsequent notification to SEG Automotive and law enforcement as appropriate.

2. HUMAN RIGHTS AND WORKING CONDITIONS

SEG Automotive strongly believes that employees are a company’s most valuable asset and that respect for human rights forms the basis of any successful business.

Suppliers shall therefore respect all internationally recognized human rights and treat all people with dignity. Suppliers shall be especially aware of and respect the rights of indigenous people, vulnerable groups, including, but not limited to migrant workers, women, children and disabled people, as well as local communities in connection with the Supplier’s activities and operations.

We expect our Suppliers to exercise human rights due diligence to identify, prevent, mitigate, and account for negative human rights impacts of their own operations and supply chain, with a focus on where they present the greatest risk of harm to people and appropriate to the size and circumstances of the company.

Modern Slavery and Human Trafficking

SEG Automotive does not tolerate any form of forced or unlawful compulsory labour, modern slavery and human trafficking and respects the principle of freely chosen employment. Consequently, Supplier, including their recruitment agencies, shall not engage in or tolerate restrictions of movement, excessive recruitment fees, confiscation of identity documents and/or passports, withholding of wages, abusive working conditions, debt bondage, violence or any other kind of exploitation or abuse.

Child Labour and Young Workers

SEG Automotive does not accept any kind of child labour and Supplier shall prevent all forms of it. The minimum working age is the age of completion of compulsory school, but never less than 15 years. Young Employees within the age of 15 – 18 years shall not be exposed to work that is likely to harm their physical or mental health, safety, or morals.

Non-Discrimination

Supplier shall treat everyone with dignity and respect and provide equal employment opportunities and conditions based on the individual’s ability to do the job, as well as based on their hard work, talent, and engagement with the company, regardless of Employee or job applicant characteristics including, but

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not limited to race, colour, gender, sexual orientation, gender identity and gender expression, sex, ethnicity or national origin, disability, religion and ideology, age, pregnancy (including pregnancy, childbirth or related medical conditions), genetic information, military or marital status, political affiliation, union membership, etc.

Supplier shall not tolerate humiliating or physical punishment or allow any Employee to be subject to verbal, psychological, physical, sexual harassment or abuse.

Wages and Benefits

Supplier shall always pay and provide its Employees' wages and benefits that, as a minimum, comply with applicable laws and collective bargaining agreements. Supplier shall provide its Employees with information about their employment terms and conditions, including benefits, in a format and language they can easily understand, such as a written employment contract and a timely wage statement. Deduction from wages shall be permitted only if and to the extent prescribed by applicable law, regulations, or collective bargaining agreements.

Working Hours

Supplier shall abide to all applicable regulations and collective bargaining agreements governing working and resting hours, including overtime, annual, sick, and parental leave, as well as maximum consecutive days of work.

Freedom of Association

Supplier shall respect freedom of association and the rights of Employees to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of employees to refrain from such activities. Employees shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, intimidation, or retaliation.

Where local law sets restrictions on the right to freedom of association and collective bargaining, Supplier shall allow alternative forms of worker representation, association, and bargaining.

3. HEALTH AND SAFETY

Supplier shall provide Employees with a safe and healthy working environment that mitigates work-related injuries and enhances not only the quality of products and services, but also the consistency of

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production. This applies to Supplier’s production facilities but also to any company that provides accommodations such as dormitories, transportation for its Employees, etc.

Supplier shall ensure that potential Employee exposure to safety hazards such as machinery, equipment or substances, or other chemical, biological or physical agents, are duly identified, assessed, and controlled through proper design and/or preventative maintenance and safe work procedures. When hazards cannot be adequately controlled by these means, Employees shall be provided with appropriate personal protective equipment including access to first-aid supplies. Safety information shall be made available to Employees to educate, train, and protect them.

Supplier shall have adequate emergency preparedness procedures in place to identify and assess potential emergency situations. Emergency plans, fire safety and response procedures shall be implemented, including Employee notification and evacuation procedures, Employee training and evacuation drills. Fire safety procedures shall, when available, be periodically reviewed and approved by local authorities.

Employees shall have ready access to potable water, clean toilets facilities, hygienic food preparation and eating facilities, adequate lighting-heat-ventilation and acceptable levels of noise and dust pollution (when applicable).

4. ENVIRONMENT PROTECTION

Suppliers shall minimize their negative environmental impacts by conserving natural resources and continuously striving at lowering the environmental footprint of their production, products, and services throughout their life cycle. Life cycle stages include raw materials acquisition, design, production, transportation/delivery, use, end-of-life treatment, and final disposal. Suppliers are expected to handle environmental violations and complaints systematically and communicate them to affected Employees and external stakeholders, including SEG Automotive, if relevant.

Resources Efficiency

Supplier shall monitor, trace, and record its consumption of natural resources such as water, raw materials, sources of energy, etc., to identify aspects that Supplier can control and influence to promote opportunities for improvement and minimized consumption. Consumption shall be monitored, traced, and recorded both on-site and at the corporate level and provided to SEG Automotive upon request.

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Emissions and Waste Management

Supplier shall monitor, trace, and record its emissions to air, water, and soil from its facilities and transportation, as well as the wastewater and solid waste generated by its operations, to identify aspects that Supplier can control and influence to promote opportunities for improvement and minimized emission. All output shall be monitored, traced, and recorded both on-site and at the corporate level and be provided to SEG Automotive upon request.

Waste Management

Supplier shall monitor, trace, and record the composition of their packaging material which becomes waste at SEG Automotive, to facilitate steps towards circular economy, for example by using non-complex materials and/or materials for which there are locally established recycling markets available. Supplier shall, also, ensure that no waste is illegally discarded and shall take measures to eliminate and minimize waste production through material improvement, substitution, reuse, and recycling.

Commitment to a low carbon future and to the use of renewable energy sources

Supplier shall be committed to decarbonization practices, by switching to low carbon energy sources, using renewable sources based on green electricity and so contributing to a successful transition to a low carbon future.

Biodiversity

The supplier shall contribute to protecting and preserving conservation of natural ecosystems practices, through its business activities. By avoiding illegal deforestation, such as conversion of natural forests into usable areas, choosing responsibly produced wood products or promoting animal welfare.

Hazardous Substances

Supplier shall identify potentially hazardous substances in chemical products and articles used in their 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 they shall, whenever necessary, be provided with adequate personal protective equipment. Substances included in products or services delivered to SEG Automotive shall meet all requirements set out in the quality standards issued by SEG Automotive, including any updates thereof. A 100% dec-

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laration of all substances used in the delivered products, reported via the International Material Data System (IMDS) or any other corresponding tool, as advised by SEG Automotive, is required.

Responsible Sourcing of Raw Material and Minerals

Supplier shall respect all internationally recognized human rights and conduct responsible supply chain management of any materials critical to the industries in which the SEG Automotive operates, and in particular of those from conflict affected and high-risk areas.

Supplier shall conduct adequate due diligence following the OECD Due Diligence Guidelines with respect to the sourcing, extraction and handling of tantalum, tin, tungsten, gold, hereinafter referred to as “3TG”, and cobalt and to make a reliable determination of the origin and source of such minerals. Supplier shall have a policy and process in place to ensure that any such minerals contained in the products manufactured by the Supplier do not directly or indirectly finance or benefit armed groups that are perpetrators of human rights abuses or in any other way directly or indirectly contribute to human rights violations.

Supplier shall ensure that all smelters and refiners in its 3TG and cobalt supply chain participate and actively engage in third party audit programs and provide any information in this regard upon request by SEG Automotive.

Speaking Up - Non-Retaliation

SEG Automotive strongly encourages all Suppliers and Third Parties to speak up about anything that concerns us, reporting potential or known wrongdoings, whether a violation of any of this Code or other unethical or unlawful conduct involving our organisation. When there is a reason to believe that misconduct may have occurred (if you see, learn, or suspect this), speak up.

No retaliation against anyone who speaks up will be tolerated. SEG Automotive prohibits threats or acts of retaliation for (i) reporting in good faith potential wrongdoing or inappropriate behavior, (ii) refusing to act in violation of the Business Conduct Guidelines, or (iii) cooperating with an investigation.

All concerns can be raised via the Compliance email address (compliance@seg-automotive.com) or the Whistleblowing platform (<https://report.whistleb.com/seg-automotive>), which is available 24/7 and operated by a third party, allowing anonymous and confidential reporting. Both channels are open to all Supplier, business partners and third parties.

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Suppliers shall communicate to their personnel the process by which they are able to raise any such concerns.

SEG’s Automotive Compliance department follows-up on the processing of tip-offs until the case has been closed. In doing so, the Compliance Department strives to maintain the highest level of confidentiality and fairness in dealing with both whistleblowers and those affected by an allegation. Impartiality and Proportionality shall guide the examination of each case, to determine individually what consequences are suitable, necessary, and appropriate.

Supplier Commitment

Supplier shall abide by all aspects of the SEG Supplier Code of Conduct.

As well as making their employees aware of the SEG Supplier Code of Conduct, Supplier shall also pass on this Code of Conduct to third parties who have undertaken to fulfill their contractual obligations to SEG Automotive, take the principles of this Code into consideration when selecting such third parties and endeavor to ensure compliance with this Code by such third parties.

SEG Automotive is entitled to verify the Supplier's compliance with the principles of this Code of Conduct by means of an audit. To this end, SEG Automotive shall coordinate the scope, schedule and location with the Supplier.

SEG Automotive considers that compliance with the requirements set forth herein is essential to its business relationships and therefore reserves the right to take appropriate legal action if the Supplier fails to comply with these requirements, including, but not limited to, suspension of RFQs, termination of contracts, or any other measure as may be necessary.

The ultimate decision rests with SEG Automotive as to whether it is willing to waive such consequences and instead to take alternative action if the Supplier can credibly assure and prove SEG Automotive that it has implemented immediate countermeasures to prevent comparable violations in the future.

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Supplier Commitment Form

SEG Automotive requests that all Suppliers who receive the SEG Automotive Supplier Code of Conduct submit the **Supplier Commitment Form** signed by a legal representative (FORM 1).

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