

Code of Conduct

Principles of corporate responsibility

We are committed to a value-oriented and a societal responsibility as part of our corporate activities (usually referred to internationally as "CSR "1) and see sustainability as an integral part of our business processes. This binding code of conduct (hereinafter referred to as the "Code of Conduct" or "CoC") serves as a guide to what this means, particularly with regard to legality, working conditions, social and environmental compatibility, transparency, trusting cooperation and dialog.

The contents of this CoC are an expression of our values, as defined and set out in our corporate policy. The CoC is designed as a voluntary commitment.

1 Basic understanding of socially responsible corporate governance

This CoC is based on a shared basic understanding of socially responsible corporate governance. This means that we assume responsibility by considering the economic, technological, social and environmental consequences of our business decisions and actions and, where necessary, striking an appropriate balance between interests. We voluntarily contribute to the well-being and sustainable development of global society at the locations where we operate within the scope of our respective possibilities and scope of action. We are complying with laws and regulations and are guided by generally accepted ethical values and principles, in particular integrity and honesty and respect for human dignity.

2 Scope of application

- This CoC applies to Supfina Grieshaber GmbH & Co. KG.
- We undertake to demand and promote compliance with the contents of this CoC by our suppliers and in the wider value chain within the scope of our respective possibilities and scope of action.

3 Cornerstones of socially responsible corporate governance

We actively work to ensure that the values and principles set out below are observed and complied with in the long term.

3.1 Compliance with the law

We are complying with the applicable laws and other legal provisions of the countries in which we operate. In countries with a weak institutional framework, we carefully examine which good corporate practice from our own home country should be applied to support responsible corporate governance.

3.2 Integrity and principles of corporate governance

- We base our actions on generally accepted ethical values and principles, in particular –integrity, integrity, respect for human dignity, openness and non-discrimination of –religion, ideology, gender and ethnic origin.
- We reject corruption and bribery in accordance with the relevant UN convention. We promote transparency, ethical conduct and responsible management and control within the company in an appropriate manner.

- We are complying with the laws and regulations of antitrust and competition law, pursue recognized business practices and fair competition. We do not enter into agreements with competitors to set binding prices, agree on offers or divide up markets (sectors, products, territories, customers).
- We are complying with all export control and customs regulations that apply in the respective countries. All employees involved in the import and export of goods, services or technologies are obliged to comply with the applicable economic sanctions, export control and import laws and regulations.
- We are complying with all legally applicable regulations on conflict materials and expect that our suppliers can also ensure transparency about their supply chain up to the smelter for affected products upon request.

3.3 Communication

- We communicate openly and in a dialog-oriented manner about the requirements of this CoC and its implementation to employees, customers, suppliers and other interest and stakeholder groups.
- All documents and records are prepared in accordance with our obligations, are not unfairly altered or destroyed, are stored appropriately and are protected from access by third parties.
- All legal regulations on data protection are complied with and personal data is only collected, processed and used in accordance with the applicable data protection regulations.
- Trade secrets and business information of our partners are treated sensitively and confidentially.

3.4 Human rights and working conditions

We respect internationally recognized human rights and strive to take into account the rights of vulnerable groups in particular.

In the following sections, we describe the key issues for Supfina Grieshaber GmbH & Co. KG. on human rights and working conditions. In defining the human rights risks, we are guided by the fact sheet of the Federal Office of Economics and Export Control (BAFA), among other things).

- Privacy
We respect the personal dignity, privacy and personal rights of every individual.
- Health and safety
Protecting and promoting the health of our employees is a top priority for us. In accordance with the relevant ILO conventions, we are convinced that by creating an effective culture of prevention, these causes can be eliminated and occupational accidents, injuries and illnesses prevented.
- Harassment
Protection of employees from corporal punishment and from physical, sexual, psychological or verbal harassment and abuse
- Freedom of expression
Protection and granting of the right to freedom of opinion and expression
- Rights of local communities
We respect the rights of local communities and indigenous peoples who may be affected by the business activities at our locations and take into account the local impact of our business activities. Where local legal systems are deficient, we are guided by the recognized minimum standards with regard to illegality.

- Human rights protection when deploying security forces
We reject any use of excessive force, torture and the violation of freedom of association and freedom of association by private or state security forces to protect business activities.
- Child labor
The prohibition of child labor, i.e. the employment of persons under the age of 15, unless local legislation sets higher age limits and exceptions are permitted.
- Modern slavery
We have a zero-tolerance approach to modern slavery and do not use any form of forced labor. All work must be on a voluntary basis. Employees are free to resign or terminate their employment with reasonable notice, provided they comply with local legal requirements.
- Forced labor
We do not tolerate any form of forced or compulsory labor. We are strictly opposed to forced or compulsory labor as defined by the relevant ILO core labor standards and all forms of slavery, in particular modern forms of slavery and human trafficking.
- Remuneration
The labor standards with regard to remuneration, in particular with regard to the level of remuneration in accordance with the applicable laws and regulations.
- Working hours
Within the framework of the applicable law, we ensure that safe and healthy working conditions prevail, that work breaks, an appropriate limitation of working hours and regular paid vacations are guaranteed and that the applicable international standards on working hours, but at least the relevant ILO conventions at the place of employment, are complied with.
- Employee rights
Respect for the right of employees to freedom of association, freedom of assembly and collective bargaining, insofar as this is legally permissible and possible in the respective country.
- Inclusive culture
Inclusion and diversity are crucial to the global success of Supfina Grieshaber GmbH & Co. KG. Recognizing the personal and cultural experiences of our employees strengthens our innovation and development as a company and as a community of colleagues. We want to be sure that everyone feels valued and supported to reach their potential.
- Non-discrimination
Recruitment, access to training and promotion are based solely on employees' skills, performance and behavior. No one may be deprived because of their ethnic origin, nationality, gender, religion or ideology, age or physical constitution.

3.5 Ecological responsibility

We strive not only for excellence in crafting and manufacturing our products, but also in our efforts to protect the environment. We strive for an exemplary environmental and energy balance

and energy balance, meet the increasing demands of consumers and the current and future ecological challenges.

Our aim is to develop products that are particularly environmentally friendly and energy-efficient in their respective market segment.

The measures for environmentally friendly and energy-efficient design encompass the entire product range of Supfina Grieshaber GmbH & Co. KG. and take into account the entire product life cycle, from production through to disposal and recycling.

We design all stages of production to be as environmentally friendly and energy-optimized as possible, to minimize our environmental impact and energy consumption.

We respect the laws and guidelines on land, forest and water rights.

3.6 Cooperation with employee representatives

We stand by our social responsibility. We work together with all employees, employee representatives and trade unions in a spirit of respect and trust. In doing so

We strive for a fair balance between the economic interests of the company and the interests of our employees. Even in the event of disputes our goal remains to jointly create and maintain a viable basis for constructive cooperation.

3.7 Volunteering

Volunteering holds society together. As a company that takes its responsibility towards the community, we welcome and support the voluntary work of our employees. It does not matter whether it is political-democratic, social or social-charitable activities.

3.8 Conflicts of interest

Supfina expects its employees to be loyal to the company.

All employees must avoid situations in which their personal or financial interests conflict with those of Supfina. For this reason, it is particularly forbidden to take an interest in competitors, suppliers or customers or to enter into business relationships with them in a private context if this could lead to a conflict of interest. Supfina's interests must not be impaired by conflict situations.

Such conflicts of interest can arise in many situations: For example, no employee may accept benefits - in any form whatsoever - that could reasonably be expected to influence Supfina's business decisions or transactions. Invitations must remain within the limits of customary business hospitality. Employees should not personally gain direct and/or indirect advantages through access to confidential information due to their position at Supfina. All employees have a duty to promote the legitimate interests of Supfina much far as possible. Any competitive situation with the company must be avoided.

Any actual or potential conflict of interest must be reported and discussed with the respective manager.

3.9 Consumer interests

Where consumer interests are affected, we comply with consumer protection regulations and appropriate sales, marketing and information practices. Particular attention is paid to vulnerable groups (e.g. young people).

3.10 Counterfeiting and intellectual property

The market success of our products is inextricably linked to their quality. This places high demands on all employees in terms of creativity, diligence, tidiness and precision. We do not tolerate deliberate or negligent behavior that results in a reduction in our quality.

For this reason, the use of plagiarized or counterfeit materials is prohibited. By sourcing our raw materials from official and certified suppliers, we minimize the likelihood of counterfeit materials and plagiarism being introduced into our products.

If counterfeit or pirated materials are detected, they will be isolated immediately and the original parts manufacturer and/or any law enforcement authorities will be notified.

We also respect intellectual property, such as inventions, literary and artistic works, designs and symbols, names and images used in trade and will not use or publish these without authorization. This applies in particular to intellectual property that is protected by patents, copyrights or trademarks.

3.11 Confidentiality / data protection

Data protection and confidentiality are observed.

With regard to the protection of private information, the reasonable expectations of suppliers, customers, consumers and employees are met. When collecting, storing, processing, transmitting and disclosing personal information, the laws on data protection and information security and the official regulations are observed.

3.12 Anti-corruption policy

Any form of direct or indirect bribery or acceptance of advantages, whether by accepting or making payments, gifts or benefits of any kind beyond the legally permissible scope and customary level, is prohibited.

3.13 Ethics escalation policy (whistleblowing policy)

Violations of this "Code of Conduct - Principles of Corporate Responsibility" and other violations of applicable law or common decency must be reported immediately to the line manager.

If circumstances or facts preclude a report to the line manager, a report can be made personally or anonymously to the employee representatives and / or the HR department; the respective mailbox can also be used anonymously for this purpose.

We undertake to review all information and reports received in accordance with this "Code of Conduct - Principles of Corporate Responsibility" and to take appropriate action if necessary

4 Implementation and enforcement

We make every appropriate and reasonable effort to continuously implement and apply the principles and values described in this CoC. Contractual partners will be informed of the key measures upon request and within the framework of reciprocity, so that it is clear how compliance is ensured. There is no entitlement to the disclosure of trade and business secrets, competition-related or otherwise sensitive information.

Wolfach, January 2025



Florian Berger
Managing Director

Appendix Code of Conduct

Explanation of terms / references:

- CSR = Corporate Social Responsibility
- United Nations Convention against Corruption of 2003, in force since 2005
- Universal Declaration of Human Rights, UN Resolution 217 A (III) of 1948
- ILO = International Labor Organization = Internat. Labor Organization (specialized agency of the UN)
- ILO Convention No. 138 of 1973 and ILO Convention No. 182 of 1999
- ILO Convention No. 29 of 1930 and ILO Convention No. 105 of 1957
- ILO Convention No. 100 of 1951
- ILO Convention No. 87 of 1948 and ILO Convention No. 98 of 1949
- ILO Convention No. 111 of 1958
- The 27 principles of the "Rio Declaration on Environment and Development" of 1992 as a result of the United Nations Conference on Environment and Development in Rio de Janeiro
- Global Automotive Sustainability Practical Guidance
- Federal Office of Economics and Export Control (BAFA)