# Code of Conduct (CoC)

***Gender note**: For better readability, the masculine form is used for personal names and personal nouns in this document. In the interests of equal treatment, the corresponding terms apply to all genders. The abbreviated form of language does not imply any valuation.*

## General principles

The Aspöck Group (=Aspöck) has been putting light on the road for more than 45 years and is therefore Europe´s leading manufacturer for pre-fabricated lighting systems for all types of towed vehicles. From the concept, right up to a product ready for assembly, Aspöck develops solutions concerning lighting for truck trailers, trailers, agricultural machines, automotive, motorcycles and caravans. With its experience, Aspöck offers the global automotive industry individual and innovative solutions for new types of LED lighting, but also for cable and connector systems.

Aspöck wants to ensure that **its actions and the actions of its business partners** are **ethically correct**, **socially acceptable** and **ecologically sustainable.** To meet these requirements, it has formulated the following Code of Conduct, which contains **generally applicable guiding principles for** all **business activities of** the **Aspöck Group** and **its business partners.** The Code of Conduct is **binding for all employees**. It reflects Aspöck's values and thus provides all employees with orientation for their actions and decisions.

## Implementation

It must be ensured in an appropriate manner that the employees are aware of the Code of Conduct and observe it. In case of uncertainties, ambiguities or doubts regarding its application, employees shall contact the responsible persons in the company.
Employees are encouraged to report **ethical concerns and violations of the Code of Conduct** through the respective reporting channels of the **whistleblower system.** It must be ensured that whistleblowers are protected and do **not suffer any disadvantages or reprisals.** Likewise, whistleblower reports are treated confidentially and thoroughly investigated in order to initiate appropriate measures for correction and improvement.

## Expectations/consequences of violations

Aspöck expects that the Code of Conduct is complied with by its business partners and all employees, and that its business partners pass on and implement these or similar requirements in the supply chain. If the following principles are not complied with and this **non-compliance** becomes manifest, this entitles the company to issue a reprimand and, if the identified violation is not remedied, to **terminate the business relationship** with the respective **business partner for cause** or to **terminate the employment relationship** with the respective **employee**.

*In the following principles of the Code of Conduct, the word sequence "WE" covers the Aspöck Group **and** its business partners.*

# I. Ethical principles

We are committed to **acting lawfully** as well as with **integrity in our business dealings**. This includes the following topics in particular:

### 1. Compliance with the law

We are committed to **lawful behaviour**. We operate based on ethical principles and follow existing **legal rules, official regulations, guidelines, standards and practices in all business transactions**. Where local laws and regulations are less restrictive in individual countries, our actions will be guided by the principles set out in this Code of Conduct. However, if there are stricter legal regulations in individual countries than those set out in this Code of Conduct, the stricter regulations will always be followed. In case of doubt, lawful action always takes precedence.
We obtain any necessary permits and present them to Aspöck (business partner) upon request.
To comply with all applicable requirements, we have **appropriate management systems and processes** in place, such as work instructions, training and regular monitoring. We review these regularly and continuously improve them.

### 2. Objective decision making

We employ comprehensible principles when making decisions and ensure appropriate documentation to make these decisions comprehensible to others. We adhere to the **"four-eyes principle"** for every decision unless this is expressly regulated otherwise in individual cases.

### 3. Prohibition of corruption

We refrain from any form of **corruption**, **extortion** and/or **embezzlement**. We pursue a **zero-tolerance policy in** this regard and ensure that our employees do not grant, offer or accept any improper payments or benefits to or from third parties.

### 4. Procurement and avoidance of conflicts of interest

We select our business partners according to objective criteria and avoid any conflict of interest during the selection process. Furthermore, we make all decisions exclusively on the basis of **objective criteria** and are **not** guided by **personal interests.** We ensure that any potential conflicts of interest are made **transparent** immediately and reported to the respective supervisor.

### 5. Prohibition of money laundering and terrorist financing

We comply with the relevant **legal provisions** on the **prevention of money laundering** and **terrorist financing.** We do not engage in money laundering activities, nor do we tolerate actions that could (even indirectly) support money laundering or terrorist financing.

### 6. Financial responsibility and disclosure of information

We conduct all business transactions transparently and are committed to complying with all legal provisions relating to the **disclosure of financial information.**
Furthermore, we undertake to disclose information regarding **occupational health and safety measures** and **environmental practices (sustainability reporting)**, provided that the disclosure of such information does not violate existing laws or contractual agreements.

## 7. Compliance with tax law requirements

We ensure that **taxes and duties** are always declared and paid in the **prescribed amount** and **on time.** We are aware of our social responsibility and are expressly committed to complying with the statutory provisions to **combat tax avoidance** as well as all other national and international tax law requirements.

## 8. Compliance with export and import laws

We agree to comply with all applicable regulations for the **export and import** of **goods**, **services** and **information**. **Trade restrictions**, **embargoes** and **other restrictions** are respected. We ensure that we ourselves, our beneficial owners, and all of our agents and other subcontractors used by us are **not** on any applicable **sanctions list** as a **sanctioned entity** and/or **person**.

## 9. Compliance with applicable antitrust and competition law provisions

We behave **fairly** in competition. We conduct our business in compliance with applicable antitrust laws and regulations and ensure that neither our services nor our goods infringe the property rights of business partners and/or third parties. Specifically, **not tolerated are unfair agreements on prices and offers**, the **abuse of a dominant market position through price discrimination** and **other conduct** that could **improperly influence** or **restrict competition.**

## 10. Protection of (intellectual) property/trade secrets

We undertake to **protect intellectual property** of any kind, to keep **confidential information secret** and at the same time ensure that **unauthorized third parties** do not gain access to this knowledge. We respect the **intellectual property of** our **competitors, customers, and other business partners**, comply with all requirements and conditions for their use and observe **all confidentiality obligations** arising from contract and law. The obligation to maintain confidentiality, which must be strictly observed, must also be adhered to **after the termination of the cooperation** with us.
We develop and implement effective methods and processes to detect **counterfeit parts and materials** and prevent them from being used in our products.
With regard to **tangible assets,** we use the **provided tools** and **technical equipment** exclusively for **operational purposes**. We treat these provided items with the same **care as we** would treat our **own property**. Any **use for private purposes** must be expressly approved by the respective competent authorities.

## 11. Data protection

We treat all personal data of employees, customers, suppliers and other data subjects fairly, lawfully and in accordance with applicable data protection regulations. We take all suitable and appropriate technical and organizational measures at our disposal to **secure personal related data**, **to protect information**, to **prevent unauthorized access,** as well as **changes** or **loss of** this **data**. The interests of data subjects in **maintaining the confidentiality of** their data must not be compromised in any way.

## 12. IT Security

We operate an **information security management system** that ensures that all information is processed in a secure manner. We implement effective mechanisms and processes to continuously monitor and improve this information security management system. Our protection goals focus on ensuring the **confidentiality**, **integrity** and **availability of information**. To achieve these goals, we have guidelines in place that regulate the handling of information. We

protect ourselves against **cyber security** threats through targeted measures such as training our employees and using appropriate technologies. All employees are encouraged to comply with the existing IT regulations.

### 13. Use of artificial intelligence (AI)

When we use or develop AI, we do in a **responsible, fair, transparent and controlled way**. In addition, we comply with all **applicable national and international laws and regulations**. We respect **ethical standards**. When AI is used, an appropriate set of rules for it must be created.

## II. Social principles/working conditions

We adhere to internationally recognized human rights standards (**United Nations declarations**, **OECD Guidelines** and the **National Action Plan**) and are committed to fulfilling our **social responsibility** towards our **employees** and **society.** In this context, we would like to emphasize in particular our respect for the following aspects:

### 1. Prohibition of forced labor and modern slavery/use of security forces

We undertake not to practice any form of forced labor, modern slavery or such comparable work. No employee may be forced to work, either directly or indirectly, by force and/or intimidation. All work must be **voluntary** and **without threat of punishment**. Employees must be able to terminate work or employment at any time.

We also ensure that **private or public security personnel** employed or engaged by us comply with all applicable laws and regulations and **respect human rights**. Security forces must **not use force against employees.** They must not be engaged or used if they treat or injure people in an inhumane or degrading manner.

### 2. Prohibition of child labor/rights of young employees

We commit ourselves not to use child labor in any phase of production. We comply with the **minimum age for employment** in accordance with **international guidelines (ILO).** According to this, the minimum age for eligibility for employment must not be below the age at which compulsory schooling ends according to the law of the place of employment and in any case **not below 15 years**. If a national law provides for stricter standards with regard to child labor, precedence must be given to it.
The **rights of young employees under the age of 18** may not be used for work that is harmful to their health, safety or morals. Special protective regulations must be observed.

### 3. Humane treatment

We ensure that **human dignity is respected** and that cooperation is characterized by **decency**, **mutual respect, fairness** and **trust**. Dignity is inviolable and must not be violated under any circumstances. Personal insults, sexual harassment, sexual abuse, punishment or other forms of physical or psychological coercion will not be tolerated.

### 4. Non-discrimination, diversity, equality and inclusion

We are committed to **equal opportunities** and **equal treatment** of our employees. No one shall be **discriminated against**, **support discrimination,** or **tolerate discrimination** on the basis of

race, ethnic origin, color, national origin, religion, gender, age, marital status, pregnancy, disability, sexual orientation, gender identity, religious or political beliefs, union membership, other personal characteristics, or status protected by applicable laws. We are committed to creating an environment free of harassment. We are committed to promoting **diversity, equality** and **inclusion (DEI)** in the workplace and to ensuring that the existing diversity of our society is also reflected in the working environment, that this is valued and understood as an enrichment.

### 5. Ethical recruitment and equal treatment in the employment relationship

We ensure that **recruitment** of employees is based on **ethical** and **fair practices.** The selection, hiring and promotion of employees shall be based on qualifications and skills. Requirements relating to personal characteristics (e.g. gender and age) are only applied if they are absolutely necessary for a position, and the reason for this is stated.

We guarantee all employees **equal treatment** with regard to **all conditions** associated with the **employment relationship.**
These include in particular:

- **Terms of contract**
- **Access to education and training**
- **Career Planning**
- **Reward**

### 6. Women's rights

We treat **women fairly** and **equally** in all matters. This particularly applies to **recruitment**, **promotion, working conditions**, **remuneration** and **social benefits**. We condemn any distinction, exclusion or restriction based on gender that has the effect of impairing or frustrating women's recognition, enjoyment or exercise of human rights and fundamental freedoms.

### 7. Minority rights

We respect and protect the rights of minorities (**e.g., indigenous peoples**) and consider the impact of our business activities on the human rights of these groups.

### 8. Preservation of the natural basis of life and protection of basic human needs

We undertake **not to unlawfully deprive land, forests or waters**, whose use secures the **livelihood of people.** Harmful soil changes, water and air pollution, noise emissions and excessive water consumption have to be avoided if they harm people's health, significantly impair the natural basis for the production of food or prevent people's access to safe drinking water or sanitary facilities.

### 9. Fair wage, social benefits and working hours

We are committed to pursuing a **fair compensation policy** that complies with all national laws on remuneration and ensures an adequate standard of living. We respect the right of employees to **fair compensation** and **adequate benefits**. Wages and salaries for services rendered are paid **regularly**, **on time** and in **full.** Unlawful withholding is prohibited. Wage deductions as a punitive measure are not permitted and **discrimination in pay is prohibited**. We are expressly

committed to upholding the **right to equal pay for equal work.** Employees must receive clear, detailed and regularly written information about the composition of their pay.
Furthermore, we comply with the respective applicable laws and regulations on the **limitation of working hours** and the **granting of rest periods**, **breaks** and **vacations.**
We ensure access to **clean sanitary facilities, drinking water, hygienic beak and food areas**. Any accommodation provided is clean, safe, and adequately equipped (emergency exits, hot water, heating/ventilation, sufficient personal space).

### 10. Health and safety at the workplace

We comply with applicable regulations regarding health and safety at the workplace. We provide a **safe and healthy working environment** to maintain the safety and health of employees, protect third parties, and prevent accidents, injuries, and work-related illnesses.
We actively work to **identify** and **remedy safety deficiencies** in order to improve workplace conditions in a way that ensures and protects health and safety. This is ensured in particular by setting up and applying appropriate occupational safety systems, including **systematic fire protection** management.
All employees receive **regular, verifiable training on applicable security systems** and must comply with relevant security guidelines. They can raise security concerns via secure, anonymous channels, free from fear of reprisals.
When identifying and assessing hazards, consideration is given to **employees who are** particularly at **risk** or **in need of protection**, as well as the suitability of employees in terms of constitution, physical strength, age and qualifications. Employees in need of protection, such as **pregnant women** and **people with disabilities** receive **special protection**.
We take preventive measures against **physical and mental strain**. We avoid physically demanding activities, such as heavy or frequent lifting and prolonged standing, whenever technically possible.

### 11. Freedom of association and collective bargaining

We are committed to respecting the applicable laws and regulations for the protection of employees and to guaranteeing them the active exercise of their rights.
In particular, we respect the **right to freedom of association** and **collective bargaining**. Employee representatives may not be discriminated against. The employment contract may not be terminated in retaliation for exercising employee rights, raising grievances, participating in union activities or reporting suspected violations of the law.

## III. Ecological principles

We are committed to fulfilling our **responsibility towards the environment.**
With the following aspects, we would like to sustainably ensure that we can continue to operate successfully in an **economically sound environment** in the future and maintain a **healthy working and living environment** for our employees.

### 1. Environmental protection

We ensure compliance with applicable **environmental laws**, **regulations** and **standards.** The aim is to introduce and apply an environmental management system that meets the requirements of **ISO 14001**, the **EMAS Regulation (EC) No. 1221/2009** or a comparable national standard and includes an audit or certification system. With regard to environmental protection, we take

initiatives to promote increased **environmental responsibility**, encourage the **development** and **dissemination of environmentally friendly technologies** in terms of environmental protection, ensure a high level of environmental protection in all phases of production, and take measures to avoid the consequences of negative effects on the environment. For instance, systems are to be established to prevent or at least minimize unintended releases or emissions into the environment.

We do not manufacture products containing **mercury**, do **not use mercury** or **mercury compounds** in manufacturing processes and prohibit the illegal treatment of mercury waste (**Minamata Convention**).
We ensure that no chemicals (persistent organic pollutants) are produced or used in accordance with the **Stockholm Convention**.

We ensure compliance with the Basel Convention's prohibitions on the import and export of hazardous waste.

We instruct our employees on how to actively **avoid environmental risks.** Employees are required to comply with the existing set of regulations on environmental protection.

**2. Sustainable resource management**

We are committed to using natural resources responsibly and contribute to a **mindful consumption of energy, water and fuels.** We reduce environmental pollution in the air, on land and in water, use **renewable energies** and **energy-efficient processes that conserve resources.**

**3. Water quality, consumption and management**

We undertake to reduce the impairment of water quality to the indispensable minimum. We use **water resources responsibly** and **protect water quality**. We take steps to minimize water use and implement **efficient water management practices.** Water sources shall not be excessively polluted or contaminated.

**4. Climate protection/management of emissions/decarbonization**

We recognize the urgent need for action to combat climate change and are committed to promoting climate protection. We take appropriate measures to minimize emissions that are hazardous to health and the environment. **Emissions from operations (air and noise emissions),** as well as **greenhouse gas emissions,** are to be **typed prior to release**, regularly **monitored**, **reviewed,** and **treated** and **minimized** as necessary. Legal restrictions (e.g. noise restrictions) have to be observed.
To reduce greenhouse gas emissions throughout the **supply chain**, we set **ambitious targets to reduce our own greenhouse gas emissions** and take action (including training) to achieve these targets.
We aim to become carbon neutral in the long term. We also encourage and support our own business partners to **reduce** their **greenhouse gas emissions** and implement more sustainable practices.
Upon request, we shall provide information (including data on material usage) from our business partners for a life cycle assessment (cradle-to-gate) with regard to the goods or parts of the goods in accordance with DIN EN ISO 14040, DIN EN ISO 14044.

### 5. Species conservation, land use and deforestation

We ensure that business practices do not harm endangered species and ecosystems. We use **land and soil responsibly**, avoiding **deforestation** as well.

### 6. Waste and recycling

We ensure that in the development, production and use phase of products, as well as other activities, **waste prevention**, **reuse, recycling** and **environmentally safe disposal of waste** are taken into account. We promote the reuse of materials and implement **effective recycling programs**, where possible, to maximize the proportion of recyclable materials and minimize the environmental impact of waste. We focus on **sustainable procurement** and **circular economy practices**.

### 7. Product safety

We ensure that all applicable **product safety regulations** and **specifications** are complied with. This also includes the legal requirements regarding **safety**, **labeling** and **packaging of products**, as well as the use of hazardous substances and materials.
We are committed to proactively educating ourselves about the **environmental and safety aspects** of our products.

### 8. Conflict Minerals

The term "conflict materials" is used here to refer to raw materials that originate from politically unstable areas of the world and whose extraction or trade promotes forced labor and other human rights violations, leads to corruption or money laundering, or serves to finance armed groups. These include the classic conflict minerals (**tin, tantalum, tungsten, gold**) as well as—in accordance with recognized industry standards—the extended conflict minerals (**cobalt, mica, copper, graphite, lithium, and nickel**).

We take due diligence measures to avoid the use of conflict materials in our products in order to prevent **human rights abuses**, **corruption**, and **funding of armed groups** or the like.
If products manufactured and/or supplied by the business partners contain conflict materials, this must be reported to us immediately and without being requested. Furthermore, due **diligence processes** are to be established in the **supply chain** to identify the sources of these minerals and to support efforts to prevent the use of conflict materials.

### 9. Hazardous substances and the import of chemical substances

We ensure that **chemicals** or **other materials that pose** a **hazard** when released into the environment are identified and handled in a manner that ensures **safe handling as well** as **transportation, storage**, **use or reuse**, and **disposal.** Where possible, we replace them with healthier and more environmentally friendly alternatives.

We are committed to complying with the **RoHS Directive** by ensuring that the products we supply do not contain any substances whose placing on the market is prohibited under the RoHS Directive. The following substances are affected by the RoHS Directive: **Lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls, polybrominated diphenyl ethers.**

We undertake to comply with the **REACH Regulation** by verifiably registering these substances in a central database of the **REACH authority** (=**Registration, Evaluation, Authorization and**

**Chemicals**) when manufacturing or importing chemical substances into the European Economic Area in quantities of more than one tonne per year. At the request of our business partners, we must provide information about this.

## IV. Declaration of the business partner

With his signature, the business partner declares to have received, read and understood the Code of Conduct.
The Business Partner undertakes to act responsibly and to comply with the ethical and legal principles set out in this Code.
The business partner communicates these in an understandable manner to its employees as well as in particular to third parties who indirectly affect ASPÖCK's contractual relationship and implements appropriate measures to ensure compliance with the requirements.

_____
Business partner

_____
Name of the signatory

_____
Function

_____
Place, date

_____
Signature

## V. Document release - Approval

See footer or SharePoint.