

OMBUDSMEN

MUBEA CODE OF CONDUCT

GLOBAL

Hermann Josef Schulze Osthoff
Warth & Klein Grant Thornton AG
Head of division audit & assurance
Johannstraße 39, 40476 Düsseldorf, Germany

Office: +49 211 9524 8545
E-mail: hermannjosef.schulzeosthoff@wkg.com

Dr. Christian Schleifenbaum
Attorney at law and notary public
Schleifenbaum & Adler PartG mbB,
Hindenburgstr. 1, 57072 Siegen, Germany

Office: +49 271 23270 52
E-mail: christian.schleifenbaum@schleifenbaum-adler.de

Stefan Lemmen
Chief Financial Officer
Mubea Group
P.O. Box 360, 57427 Attendorn, Germany

Office: +49 2722 62 9517
E-mail: stefan.lemmen@mubea.com

Dr. Sascha Grimm, LL.M.
Head of Legal
Mubea Group
P.O. Box 360, 57427 Attendorn, Germany

Office: +49 2722 62 8993
E-mail: sascha.grimm@mubea.com

NORTH AMERICA

Jamie Moore
Head of Human Resources
8200 Dixie Highway, Florence, KY 41042

Office: (859) 746-5315-7114
E-mail: jamie.moore@mubea.com

SOUTH AMERICA

Luiz Lopes
Chief Financial Officer
Av. Eurico Amborge Santos, 2400
BRA Taubate SP-CEP 12042-010

Office: +55 12 3627 ext. 5053
E-mail: luiz.lopes@mubea.com

ASIA

Jing Chen
HR Manager China
5 Changzhou Road, 215400 Taicang,
Jiangsu, P.R. China

Office: +86 512 5395 0900 ext. 7988
E-mail: jing.chen@mubea.com

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Mubea
www.mubea.com



English

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CODE OF CONDUCT

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02

As a family-owned business for more than 100 years, the Mubea Group is recognized for our continuity among stockholders and our strong entrepreneurial spirit. We have the clear goal of strengthening and further expanding the position of the Mubea Group as a leading company in the automotive supply industry. We must adequately counter the associated risks in our entrepreneurial activities.

Our future success is determined by our business strategies, the lawful and responsible actions of our stockholders as well as our corporate management including our executives, and in particular the actions of every single employee. This aspiration is not limited to our home market in Germany, but extends to all global markets where we are either represented by our subsidiaries or otherwise economically active.

The Mubea Group is fully aware of its role in society and its responsibility towards customers and business partners as well as stockholders and employees. Our company is, therefore, committed to clear principles. We expect the same commitment from our business partners.

Our shared values are integrity, the commitment to succeed, cooperation, and responsibility. They represent an integral part of our corporate culture. These values form the basis for a cooperative and productive working environment as well as for the continued successful development of the Mubea Group. They guide us in our cooperation with each other and are the basis of our daily activities.

The Mubea Code of Conduct represents the summary of principles and the balance of our business strategies with internal and external guidelines. In particular, these guidelines include laws, regulations, agreements, and other voluntary commitments. The Code of Conduct also serves the purpose to encourage each employee to assume personal responsibility and to provide the employee with the necessary orientation. Furthermore, it specifies the objectives and principles for the entrepreneurial actions of the Mubea Group.

The principles stipulated in the Mubea Code of Conduct also reflect our understanding of values. Since many individual organizational units make up the Mubea Group, these standards must be uniform and are applied across all organizations.

Compliance with the principles described in the Mubea Code of Conduct protects the Mubea Group as well as each employee from avoidable risks, and reinforces our positive image with customers and business partners.

Attendorn/Germany, July 2023



Dr.-Ing. Thomas Muhr, CEO/General Partner

We put all our trust in the lawful and responsible actions of our employees.

The Mubea Code of Conduct summarizes the most important rules of conduct. As an employee of one of the companies of the Mubea Group, you need to familiarize yourself with them. They will provide you with the necessary orientation and are a reliable source for proper conduct in your working environment.

Some of the principles laid down in the Mubea Code of Conduct may already be covered by specific regulations. More detailed explanations on the key aspects of the Mubea Code of Conduct can be prepared or may already exist in part. In this respect, the Mubea Code of Conduct plays a comprehensive and explanatory role and does not replace these specific regulations. If stricter requirements are stipulated in these regulations, they shall be given priority. The Mubea Code of Conduct shall also serve as a guideline for our business partners on how to balance business goals with internal and external regulations. For any purchasing decision Mubea has to take, we will also consider whether such business partner ensures compliance with this Mubea Code of Conduct or its own code of conduct which needs to be at least equivalent to Mubea's.

The Mubea Code of Conduct applies to all employees of a company in the Mubea Group on a uniform basis regardless of whether the company has its place of business in Germany

or abroad. Foreign subsidiaries and their employees must take special national conditions into account when implementing the Mubea Code of Conduct.

The Mubea Code of Conduct is the basis for all additional operational regulations and it can consider special conditions of the particular market or country. It covers the professional interests of the company.

Mubea is committed to doing its utmost to ensure compliance with equivalent conduct requirements for companies not belonging to the Mubea Group, where Mubea has a share.

The Executive Board of Muhr und Bender KG may provide generally applicable instructions to further clarify the principles stipulated in the Mubea Code of Conduct. This Mubea Code of Conduct shall in no case establish any title or claim of a third party against Mubea, its employees or representatives. The legal relationship to third parties is governed exclusively by the contracts concluded with Mubea and the governing law.

If a masculine term is listed in the following, it only serves better readability. The term "employee" also includes - if not explicitly stated otherwise - managers and other executives.

Laws and Legislation, Competition, Corruption

We comply with laws and legislation at all times and act in accordance with the respective national legal provisions in all business matters.

We adhere to the principles of fair and free competition and respect the competition and antitrust laws in all countries where the Mubea Group has a place of business.

We do not tolerate any corruption in the form of unlawful privileges. We do not accept any unduly granted benefits and reject any sort of bribe.

Ethical Conduct, Fairness towards Business Partners

We abide by the internationally recognized principles on the prohibition of discrimination against individuals.

Our business partners are treated in a fair manner and are selected according to comprehensible criteria. Suppliers found to be in violation of the Mubea Code of Conduct will not be commissioned.

Working Environment, Social Standards

We respect the right to freedom of association and collective bargaining.

At the least, the respective national regulations shall be taken into account with respect to pay, working hours, and social security benefits. We ensure health and safety in the workplace.

We are fully committed to Mubea within the context of our employment relationship. Potential conflicts of interest are communicated. For secondary employment, supervisory or management positions approval by Mubea is required.

Mubea will not tolerate any type of harassment or violence in the workplace. Specifically forbidden is harassment based on race, color, religion, gender, national origin, age or disability. Sexual harassment as well as any type of physical force against our employees will not be tolerated.

Environment and Safety

Our products meet the environmental standards of our market segment. In the process of production, natural resources will be consumed in an efficient and economic manner.

The resources and work equipment made available to us are not used for anything else besides the intended business purposes, unless special arrangements allow the personal usage.

In order to protect the data of the Mubea Group as well as the data of our business partners, our IT systems should only be used in line with the corresponding IT specifications. We maintain secrecy concerning all confidential matters.

Compliance with Laws

We conduct all business activities in compliance with the applicable laws, legal provisions, and contractual obligations, both domestically and abroad.

As an internationally active group of companies, we observe all tax law regulations domestically and abroad. The same applies to all applicable foreign trade and customs, export control and sanctions regulations. All companies comply with the respective provisions on proper financial reporting.

Competition

We adhere to the principles of fair and free competition and respect the relevant competition and antitrust laws in all countries where the Mubea Group has a place of business.

Hidden agreements with competitors regarding sales pricing, customers, supply areas etc. are not allowed. This is to be distinguished from alliances with competitors in other fields, e.g. the development of new products for which the overall positive economic impact potentially outweighs the restraints on competition. Whether such alliances are acceptable shall be assessed on a case-by-case basis.

Bribery and Granting of Advantages

We do not tolerate any corruption in the form of unlawful privileges of any kind.

No benefits may be granted to authorities and public officials even if they are only of little economic value. The authorities must preserve their independence. This does not affect an

appropriate catering during meetings and conferences to the extent permitted under the relevant laws.

Personal gifts, invitations, benefits, or other advantages as “contributions in the course of maintaining the business relationship” may be presented to public enterprises, or companies that are wholly or partially owned by the state, as well as other business partners within the private sector, provided this does not violate any criminal laws and other regulations or the value is not too high.

Benefits must be transparent since this could otherwise create an impression of bribery or granting of advantages. Especially prohibited are monetary gifts or equivalent benefits to employees or representatives of domestic or foreign enterprises, as well as to any persons closely associated with them, in return for the granting of benefits. Gifts are always shipped to the business address - we do not send gifts to private addresses.

Bribery and Acceptance of Benefits

We do not accept any unduly granted benefits and reject any manner of bribe.

As employees of the Mubea Group, we are permitted to accept personal favors, such as gifts (however, in no case money) or invitations for the purpose of maintaining the business relationship with our suppliers and service providers, but only if these favors are appropriate within the scope and the situation. In any situation of doubt, we will check with our superior.

Ethical Conduct

We comply with the prohibition of discrimination stipulated in the European Convention on Human Rights and the EU Charter of Fundamental Rights. This means, in particular, that we do not discriminate against any employee on the basis of gender, ethnic and social origin, sexual orientation, culture, religion, nationality, political views, age, or state of health. Individuals with the same professional and personal qualifications must be treated equally with regard to recruitment, conditions of employment, further training, and personnel development. The work performed by employees is compensated accordingly depending on the place of employment and the individual tasks. We pay the minimum wage established by applicable law.

We reject all forms of child, forced and compulsory labor, as well as forms of modern slavery and human trafficking. Country-specific regulations for minimum age for employment are respected.

We are committed to gender equality and to the inclusion and rights of minorities and indigenous people.

Fairness towards Business Partners

We treat our business partners with fairness. Our goal is to have our company continuously valued by our business partners based on its integrity.

The selection of our suppliers and service providers is made on the basis of fair and comprehensible criteria.

Suppliers who violate the principles of our Supplier Code established for suppliers will not be considered.

Freedom of Association, Collective Bargaining

We respect the right to freedom of association and collective bargaining. In doing so, we also abide by the specific national legal frameworks. Employees must be able to communicate openly with management about working conditions without fearing negative consequences.

Compensation, Social Standards, Safety in the Workplace

Compensation is calculated by observing minimum wages and overtime regulations in accordance with the respective national laws. The same applies to working hours and social security benefits. Employment agreements are developed on a voluntary basis. Employees have the right to terminate the employment agreement subject to the observance of a reasonable period of notice. We ensure that health and safety at work are guaranteed, at least within the framework of the applicable national regulations.

Avoiding Conflicts of Interest

We do not engage in work for third parties during our working hours. Secondary employment of any kind must be disclosed to the management staff of the respective company of the Mubea Group. The same applies if an employee operates a company or holds shares in a company engaged in whole or in part in competition or in a business relationship with a company of the Mubea Group.

Prior to accepting a secondary employment, supervisory or management position in another organization, consent must be obtained from the management staff of the respective company of the Mubea Group.

We also obtain such an approval in the event that a contract is placed with companies in which we hold shares, or one of our relatives, or another person closely associated with us.

We do not give preference to business partners out of personal interest.

Environment-friendly Production and Products

We take a proactive approach to environmental concerns within the scope of production and avoid negative impacts on the environment to the extent possible by using appropriate production processes. We do not cause harmful soil changes, water pollution, air pollution and harmful noise emission. We do not tolerate eviction and land confiscations. The main focus is on energy savings and emission reduction. Mubea products must fulfill the environmental standards of our market segment. We comply with the environment-related prohibitions of the German Supply Chain Sourcing Obligations Act.

Use of Company Resources

We make careful and appropriate use of the resources of the Mubea Group. Mubea provides its employees with various resources and work equipment in order to carry out the respective tasks. The use of company resources for personal purposes is generally prohibited, unless explicitly granted, for example, through a collective bargaining agreement, company agreement, or employment agreement. We do not utilize the resources of the Mubea Group for any unintended purposes.

Data Protection and IT Security, Secrecy and Industrial Property Rights, Security Services

The business activity of the Mubea Group depends to a great extent on the availability and performance of the IT systems. Therefore, the security and integrity of all data is fundamental to us. We protect the sensitive data of our customers and other business partners, as well as any information about

business transactions, from any form of unauthorized access. The use of Mubea IT systems or IT equipment specifically for any unlawful, fraudulent, malicious or harassing activity is prohibited. Mubea permits only occasional and insignificant private use of the business Internet connection and the computers made available in relation to business use.

We handle IT systems solely in harmony with the specifications outlined by the IT department under consideration of data protection provisions.

We maintain secrecy with respect to all confidential matters, documents, and information – particularly all items in regard to intellectual properties, business and trade secrets as well as technical details of products and processes – both for the duration of the employment agreement as well as upon termination thereof, and do not disclose any such information to any third parties, unless we are obliged to disclosure by law or court or administrative order. In this case, third parties also include our relatives or individuals closely associated with us. We respect industrial property rights of third parties and make certain that we do not use counterfeits in our products.

To protect our company, we do not use security services that do not respect human rights.

COMPLIANCE WITH PRINCIPLES

REPORTS OF VIOLATIONS

Each employee is responsible to comply with and actively support the principles stipulated in the Mubea Code of Conduct. Should you have any doubts, please contact your supervisor first. The supervisor is responsible for knowing, understanding and complying with this Mubea Code of Conduct by their members of staff. The employee's point of contact is the management staff of the respective Mubea company.

Conduct that is not in line with the Mubea Code of Conduct must be immediately corrected and might result in legal consequences for individual employees according to labor, civil, and criminal law.

We are fully aware that violations against the Mubea Code of Conduct can also result in serious implications for the affected company of the Mubea Group. Infringements of competition and antitrust laws as well as of anti-corruption legislation, in particular, can put the existence of our company at risk. Consequently, misconduct in these areas will not be tolerated under any circumstances.

Reports of violations contrary to the Mubea Code of Conduct can be made in various ways:

- Should you observe the misconduct of an employee please try to clarify the situation at a workmate level first by addressing the employee and making them aware of their misconduct and its potential consequences.
- However, you can also contact your internal ombudsman at any time. Internal ombudsmen are either your supervisor or the CFO of the respective Mubea company. Your report will be treated confidentially and you will not have to fear any retaliation.
- In the event of doubt or concern that your report is not being handled confidentially, please contact the external ombudsman appointed for this specific purpose or the specially designated internal ombudsmen. The external ombudsman is the Group auditor of the Mubea Group, Warth & Klein Grant Thornton AG. The auditor will receive your information confidentially by telephone, regular mail, or e-mail in German or English. If you become aware of conduct that you believe to be non-compliant with the Mubea Code of Conduct, you can report it to compliance@mubea.com at any time.
- We also offer the option to submit notifications related to risks or the violation of human rights and the environment in accordance with the German Supply Chain Due Diligence Act via an electronic notification system on our website under the link: <https://mubea.integrityline.com>.