

SUPPLIER CODE OF CONDUCT

PREAMBLE

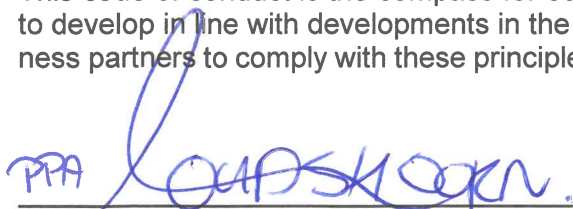
Dear business partners and suppliers,

Treating people, the environment and resources responsibly is a cornerstone of our identity. As the market and technology leader in towbars, we are heavily involved in global supply chains. We therefore see it as our duty to assume economic, ecological and social responsibility along these supply chains.

Respect for human and environmental rights is a fundamental part of ethical and sustainable corporate governance. Our aim is to ensure that these rights are respected in all our group companies, and also by our partners and suppliers.

Our values guide us in this: integrity, innovation, responsibility and respect. They are deeply rooted in our corporate culture and influence how we pursue our goals and meet challenges. We are convinced that long-term success is only possible if we act ethically and always keep the well-being of all stakeholders in mind.

This code of conduct is the compass for our daily activities. It is a living document that will continue to develop in line with developments in the industry, in society and in our company. We ask all business partners to comply with these principles as basis for a sustainable and successful partnership.



Mark Oudshoorn
Vice President Procurement
ACPS Automotive

ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

Environmental Management System

You identify all relevant environmental regulations and their impact on your organization. In addition, you undertake to comply with these regulations in a verifiable, continuous and sustainable manner. You shall strive to develop further your environmental management systems in accordance with the requirements of ISO 14001 in the currently valid version. ACPS Automotive expects you to demonstrate compliance.

Efficient Use of Resources

You use energy-efficient and environmentally friendly technologies, and reduce waste, as well as emissions into the atmosphere, water and soil. You constantly aim to reduce your impact on biodiversity, climate change and water scarcity. Resources are used efficiently.

Hazardous substances

You take appropriate measures to avoid or minimize the use of substances and materials that are harmful to the environment or health. This is ensured by responsible management of hazardous substances and chemicals. You comply with the requirements of international conventions and other legal instruments relating to the production, use, handling and disposal of certain substances, such as the European chemicals regulation 'REACH' or the Extended and Conflict Minerals Reporting Templates (EMRT/CMRT).

You will inform ACPS Automotive upon request about the use of substances in production and operation that are subject to legal provisions or restrictions, and to provide written descriptions of the procedures for handling these substances. We also expect you to stay informed about future legislation that applies to your business and to prepare for its timely implementation.

Decarbonisation / Reduction of CO2 Emissions

You take binding measures to reduce your direct and indirect CO2 and equivalent emissions, including those of your upstream value chains. These measures include, for example, the use of green electricity and the use of secondary or biomaterials. We expect you to create transparency about your own emissions and your upstream supply chains, e.g. through life cycle assessments (LCA), and to set corresponding reduction targets.

ACPS Automotive prefers suppliers that are committed to actively contributing to the reduction of greenhouse gas emissions, consistently reducing their energy consumption, reducing their carbon intensity and investing in new technologies and offset programs.

Conflict Minerals

ACPS Automotive is committed to using only raw materials which extraction, production, transport, trade, processing and export do not directly or indirectly contribute to human rights abuses, health and safety issues, environmental pollution or other violations. We expect you to implement effective

ACPS AUTOMOTIVE

due diligence processes in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We also expect you to exclude smelters or refiners of these raw materials that do not have an adequate and effective due diligence process in place.

Upon request, you will provide us with information on your supply chain for critical raw materials, including information on the origin of the material.

Animal Welfare

In case you process animal products you implemented standards and best practices for animal welfare compliance throughout the supply chain. In any event, you comply with all national and international regulations on animal welfare and animal testing, such as the German Animal Welfare Act or the European Union's Directive 2010/63 (Animal Testing Directive).

SOCIAL AND HUMAN RIGHTS

Prohibition of Child Labour, Forced Labour and Other Forms of Modern Slavery

We do not tolerate any form of child labour, forced labour or modern slavery – neither in our own company nor along our supply chain. You comply with the applicable laws and international standards for the protection of human rights, in particular the conventions of the International Labour Organization (ILO). This includes ensuring that all employment relationships are freely chosen and that children below the legal minimum age are neither employed nor exploited. You have implemented appropriate control mechanisms to detect, prevent and promptly remedy violations.

ACPS Automotive is committed to a respectful, fair and inclusive working environment, both within the company and in its dealings with business partners. Any form of discrimination, harassment, intimidation or disadvantage will not be tolerated. This applies regardless of gender, age, religion, ethnic origin, social background, disability, sexual orientation, marital status, political opinion or any other characteristic protected by law.

All employees are treated with dignity and respect and are treated equally in all areas - from recruitment, remuneration, access to training and promotion to termination and retirement. We embrace diversity, we welcome teams from different cultures, nationalities and backgrounds, and we specifically promote gender equality within the company.

You ensure ethical recruitment practices. Employment must be transparent, fair and voluntary. Exploitation through misleading promises, unreasonable contract terms or financial dependency is not permitted. The protection of the personal rights and privacy of all employees is a matter of course for ACPS Automotive and is expected from all our suppliers. Equal opportunity in all aspects of our activities is the foundation of our corporate culture.

Rights of Minorities, Local Communities and Indigenous Peoples

You ensure that the rights of minorities, local communities and indigenous peoples who may be affected by activities at your sites are respected. In particular, you take appropriate measures to

ACPS AUTOMOTIVE

avoid potentially harmful impacts on the health, safety and livelihoods of minorities, local communities and indigenous peoples.

ACPS Automotive pursues a zero-tolerance policy regarding land grabbing and expects the same from you. In addition, you implement remediation measures for areas that have been illegally appropriated in the past. You ensure inclusiveness and cultural appropriateness in all activities and communications with local communities.

Remuneration and Working Hours

We expect you to comply with all applicable labour laws on compensation and working hours. Wages, salaries and benefits must be at least the minimum required by law or collective agreements and are paid in a transparent manner. Similarly, overtime is only permitted within the legal framework and is fairly remunerated or compensated by adequate time off. Rest periods and days off are respected to protect the health and well-being of your employees. Fair and appropriate remuneration and regular working hours are fundamental to a responsible and sustainable working environment.

Freedom of Association and Collective Bargaining

ACPS Automotive recognizes the right of all employees to organize freely, to join trade unions or employee representative bodies and to conduct collective negotiations. You equally respect these rights and do not obstruct or impose sanctions on the exercise of freedom of association or participation in collective negotiations. Employees are not disadvantaged or discriminated for deciding to organize or to collectively represent their interests.

You inform your employees about freedom of association in accordance with the ILO Convention and train your managers accordingly. Constructive dialogue between employers and employee representatives is an essential part of fair and stable labour relations.

Compliance with Occupational Health and Safety Regulations

ACPS Automotive is committed to the highest standards of occupational health and safety and expects the same from you. All applicable legal and industry-specific regulations for occupational health and safety must be strictly adhered to. You ensure a safe, healthy and hygienic working environment in which risks are systematically identified, assessed and minimized. This includes suitable protective measures, regular training and access to clean drinking water, sanitary facilities and medical care. The physical and psychological well-being of all employees is of utmost importance.

Use of Public and Private Security Forces

Security forces, whether public or private, must always act in accordance with applicable laws and respect human rights. We expect you to ensure that security services are used solely to maintain law and order and to act with respect for the dignity of all people. Assault, intimidation or disproportionate use of force are strictly prohibited. Security officers must receive appropriate training, particularly in conflict management and human rights protection.

GOVERNANCE

Compliance with Applicable Law

Compliance with all applicable laws and regulations is a matter of course for ACPS Automotive. We expect the same from you as our business partner. This is the only way to ensure a trusting and long-term business relationship. You are aware of the laws, regulations, guidelines and policies relevant to your respective activities. Stricter regulations than those described in this Code of Conduct may exist in individual countries, business areas or markets. In such cases, the stricter regulations are to be applied at your own responsibility.

Financial Integrity

We expect your full financial integrity. That means you are conducting your business, record keeping, and financial reporting properly. Business transactions and investments, your assets and liabilities, are recorded and documented in accordance with legal requirements. Documents relevant to financial accounting are correct and do not contain misleading entries. Any form of balance sheet manipulation is prohibited. Financial integrity also means minimizing risks related to money laundering, terrorist financing, fraud and other unethical or illegal activities and ensuring that no business relationships are maintained with sanctioned individuals or organizations.

Corruption and Criminal Acts in Business Transactions

Corruption is a criminal offense with severe consequences. We uphold a zero-tolerance policy, particularly regarding bribery of public officials. You and your employees must not offer, promise, or provide any personal benefits, including payments, loans, or repeated small gifts, to civil servants or government employees to gain business advantages. Likewise, you do not give or accept gifts, payments, invitations, or services intended to improperly influence business relationships or compromise professional independence, neither towards us, nor along your supply chain. Exceptions apply only to customary business hospitality and courtesies.

Competition Law

You protect and promote fair competition and comply with all applicable antitrust and unfair competition laws. No agreements, business practices or behaviors that could restrict competition, such as market allocations or price fixing, are exercised.

Compliance with Foreign Trade Laws

National and international laws regulate the import, export and domestic trade of goods, technologies and services and the handling of certain products, as well as capital and payment transactions. You take appropriate measures to ensure that transactions with third parties do not violate applicable economic embargoes or regulations on trade, import and export controls or on combating terrorist financing.

ACPS AUTOMOTIVE

Data Protection and Information Security

When collecting, storing, processing or transferring personal data of employees, customers or other third parties, you take care of and observe strict confidentiality. You remain in compliance with all applicable laws and rules (e.g. the EU General Data Protection Regulation).

In the context of information security, you use the information made available to you exclusively to fulfil your tasks within the framework of the services for ACPS Automotive and protect them from internal and external misuse. Therefore, you implemented technical and organizational state-of-the-art measures.

Trade Secrets and Intellectual Property

You oblige your employees to protect business and company secrets. It is forbidden to pass on confidential information and confidential documents to third parties without authorization or to make them otherwise accessible unless corresponding permission has been granted, or the information is in the public domain. Any document or information pertaining to ACPS Automotive's intellectual property, such as drawings or specifications, may only be disclosed to a third party, if this is necessary for the performance of the contract with ACPS Automotive, and if the disclosure was previously agreed by ACPS Automotive in writing.

Counterfeit Products

You develop, implement and maintain effective methods and processes to detect and minimize the risk of counterfeit parts and materials getting introduced into the supply chain. If counterfeit parts are detected, you quarantine them and notify the recipient(s) of the counterfeit products.

Conflicts of Interest

Any actions and decisions shall be made independently of irrelevant and extraneous considerations and personal interests. You avoid and minimize the appearance of conflicts of interest, disclose potential or actual conflicts of interest and respond appropriately to them.

Whistleblower Rule

You establish clear rules for dealing with suspicions of misconduct or serious offenses in business operations. Whistleblowers and individuals who are subject of reported wrongdoing are protected from any form of bullying, harassment, or disciplinary action, if the disclosure is made in good faith and not with malicious intent or for personal gain. You also ensure, that individuals who report issues are treated fairly and with respect. Any actions and investigation reports, etc. in this regard must be kept strictly confidential.

COMPLIANCE ALONG THE SUPPLY CHAIN

For ACPS Automotive, the commitment of its suppliers to fulfil their social and ecological responsibility is an indispensable prerequisite for any business relationship. You therefore comply with the minimum standards set out in this Supplier Code of Conduct throughout the entire business relationship. These principles are clearly communicated to your employees working for ACPS Automotive activities and their compliance is to be actively promoted. Since the standards apply along the entire value chain, we also expect you to inform your subcontractors and consultants, about the contents of this Supplier Code of Conduct and ensure that it is implemented.

Compliance with this Supplier Code of Conduct is a basic requirement for our business relationship with you. You will report any suspicion of a violation immediately and cooperate in its investigation. Depending on the severity of the violation, we reserve the right to take appropriate measures – from demanding the immediate cessation of the violation to claiming compensation for damages to the extraordinary termination of the business relationship.

Information about alleged or observed violations, in particular illegal business practices, can be reported via an independent and confidential whistleblower portal. This ensures anonymous dialogue with the ACPS Automotive compliance department through website or country-specific hotlines:

<https://www.safecall.co.uk/report/>

Germany, Netherlands, Spain	0 0800 7233 2255
Hungary	0680 99 30 52
UK	0800 915 1571
USA	1 866 901 3295
Mexico	800 1231758
China	4008 833 405

Other country-specific numbers, see: <https://www.safecall.co.uk/de/file-a-report/telephone-numbers/>

Alternatively, the compliance officer is also available as a point of contact at ACPS Automotive at **compliance@acps-automotive.com**

OTHER PROVISIONS

Audits

ACPS Automotive is entitled to verify your compliance with these requirements through audits – on-site or remote, conducted by us or a third party. You will grant unrestricted access to all relevant information, premises, systems, and records, upon prior notice. We may document our findings through images, video/audio recordings, and copies, while respecting your legitimate interests and confidentiality obligations. You will actively support us, particularly by providing all necessary information and access to relevant personnel.

ACPS AUTOMOTIVE

Obligations to Cooperate

You are obliged to register on the following supplier portals and to keep your data up to date:

- the JAGGAER supplier portal
- the NQC supply chain compliance management platform

You undertake to comply with all relevant international, European and national regulations on climate, the environment and human rights along your supply chain. These include, but are not limited to, the Carbon Border Adjustment Mechanism (CBAM) and the Corporate Sustainability Reporting Directive (CSRD). Any resulting obligations, such as obligations to cooperate and/or report, must be fulfilled.

Breach of Contract

If you violate key requirements or warranties of this Supplier Code of Conduct, we may:

- declare all unpaid amounts forfeited and demand repayment of ineligible amounts,
- suspend payments until appropriate corrective actions are taken,
- retain your goods or services,
- claim compensation, indemnification, and reimbursement of penalties or sanctions,
- terminate the contract or business relationship without notice and without liability for resulting losses or claims.

Rejection of Non-Compliant Goods/Supplies

In the event of serious adverse impacts on human rights or the environment (e.g., forced or child labor), we may reject the affected goods or supplies as non-compliant.

Suspension or Termination Due to Adverse Impacts

In case of significant adverse impacts on human rights or the environment, we may suspend or, as a last resort, immediately terminate the business relationship if:

- the impact is classified as serious,
- the agreed corrective measures prove ineffective after the set timeframe, and
- no milder remedies are available or promising.

Termination is also justified if you refuse cooperation or fail to properly implement the corrective action plan.

ACPS AUTOMOTIVE

CONFIRMATION OF COMPLIANCE

The undersigned supplier hereby confirms that he has understood and acts in accordance with the requirements set out in the present Code of Conduct.

Date, company stamp, supplier's signature