

# GUIDELINE COMPLIANCE



TURNING IDEAS INTO EXCITEMENT

## Contact – Compliance / Ansprechpartner – Compliance

Eissmann Group Automotive has established a Compliance Committee. Its task is to monitor the implementation and enforcement of the Code of Conduct. The Compliance Committee is composed of the managing directors (Group CEO, Group CFO) of Eissmann Automotive Deutschland GmbH as well as the heads of HR, Quality, Legal, the data protection officer and the financial auditor. In addition, one designated expert from each country is involved for Central-Eastern Europe and North America. If a Chief Compliance Officer has been appointed, he chairs the committee; otherwise the Group CEO chairs the committee. Further experts may be appointed and consulted. In the case of violations in individual companies, the respective managing director or a designated company compliance officer participates in the Compliance Committee. If members of the Compliance Committee are affected, they do not participate on their own behalf. In the individual companies, either a managing director or a designated company compliance officer is the contact person and is entrusted with implementing the Code of Conduct. All employees can contact their Company Compliance Officer or the Chief Compliance Officer (HQ) or the Legal department in compliance matters, or the members of the Compliance Committee. In addition, contact details and a software-based whistleblower system can be found on the intranet and our homepage under "Compliance". The whistleblower system also allows anonymous reports. Such reports are subject to the statutory protection provisions for whistleblowers. Employees who report violations of the Code of Conduct or corresponding suspected cases to the Eissmann compliance team will not suffer any disadvantages as a result.

Source: Code of Conduct Clause 11

<https://eissmann.sharepoint.com/sites/Compliances/SitePages/de/Home.aspx>

<https://eissmann.integrityline.com/frontpage>

## Working conditions / remuneration and working hours

/ Arbeitsbedingungen/ Vergütung und Arbeitszeiten

Remuneration is based on the applicable laws and, where applicable, existing, binding collective agreements and is supplemented by the relevant, national minimum wage laws.

Employees are informed clearly, in detail and regularly about the composition of their remuneration.

We comply with applicable laws and (international) labor standards regarding maximum permissible working hours and ensure that

- the working hours, including overtime, do not exceed the respective maximum limits permitted by law;
- the weekly working time, including overtime, does not exceed 60 hours, even in exceptional cases, in the absence of such provisions;
- employees have at least one full day off per calendar week.

Source: Code of Conduct Item 5

## Soil quality / Bodenqualität

We comply with local laws and international guidelines to ensure soil quality. If higher regulations (e.g.: requirements in a water protection area) exist, we take these into account in our processes.

Source: *Guideline Compliance*

## Compliance / Policy Statement / Compliance / Grundsatzerklärung

The Eissmann Group Automotive is committed to the rule of law and to an economic order based on competition. Compliance with the law and ethically correct conduct are part of our self-image. Our company has therefore taken organizational measures to meet these requirements. Our compliance organization is based on our Code of Conduct. We continuously conduct training on relevant compliance topics for our employees. Our role as a credible and trustworthy partner for our customers, suppliers and employees as well as society is both our aspiration and incentive. To affirm our self-image, we have committed ourselves to applying the current version of the ZVEI-VDMA Code of Conduct.

Source: [www.eissmann.com/compliance](http://www.eissmann.com/compliance)

## Conflict Minerals Reporting

We do not source or process any conflict minerals, conflict resources, conflict raw materials such as: Tin, Tantalum, Tungsten - incl. their ores, concentrates, gold, diamonds, oil, precious woods, drug raw materials, natural rubber, cotton or cocoa. We do not accept any violations of human rights or international law. We do not purchase any mineral resources, raw materials or other goods that are cultivated or extracted in conflict regions. We also require all relevant suppliers to comply with these Conflict Minerals regulations as part of our terms and conditions of purchase.

Source: *Code of Conduct Clause 8*

## Data protection and information security / Datenschutz und Informationssicherheit

Global electronic information exchange is crucial for employee effectiveness and overall business success. However, the advantages of electronic communication are associated with risks for data privacy and security. Business documents and data carriers must therefore always be protected from access by third parties.

When using the Internet, it must be ensured that under no circumstances information is retrieved and passed on that incites racial hatred, glorification of violence or other criminal acts or that has offensive content.

When handling operational information, we expect appropriate care to be taken (see the ISMS Declaration IT Group Guideline in the IMS). Confidentiality must be maintained with regard to internal matters that are not officially disclosed to the public.

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This also applies to inventions and other know-how. These elements are the cornerstone for sustainable success and guarantee the future of Eissmann Group Automotive. For this reason, employees may not pass on new findings or company secrets to third parties in any form.

This also applies after termination of the employment relationship. Personal gain for oneself or others through the use of internal company knowledge is not permitted. The same applies to the unauthorized disclosure of such knowledge.

*Source: Code of Conduct 3.4*

## Decarbonization / Dekarbonisierung

Eissmann Group Automotive regards climate change as a serious threat to the environment and society. Therefore, Eissmann is also aware of its corporate responsibility to combat climate change.

We have taken various measures to accelerate decarbonization at Eissmann Group Automotive. For example, our sites are certified according to an environmental management system. We also record the energy consumption of our companies and use emission factors to calculate our greenhouse gas emissions (Scope 1, Scope 2). We make this data available to interested parties in our Sustainability Report. By increasing energy efficiency and using renewable energies, we aim to continuously reduce our CO<sub>2</sub> emissions and achieve our decarbonization targets.

*Source: Code of Conduct section 7, Sustainability Report*

## Discrimination / Promotion of Diversity, Equal Opportunities

/ Diskriminierung / Förderung von Vielfalt und Diversität, Chancengleichheit

We promote equal opportunities and do not tolerate discrimination. We treat all people equally, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

*Source: Code of Conduct section 6.4*

## Compliance with principles of management and working conditions

Einhaltung von Grundsätzen der Führung und Arbeitsbedingungen

The management guidelines of Eissmann Group Automotive apply without restriction. Due to their function as role models, we require our managers not only to communicate the rules of the management guidelines and the Code of Conduct in the required form, but also to exemplify them themselves and demand them from their employees. Our managers are the first point of contact for their employees in all matters relating to these Leadership Principles and the Code of Conduct.

Within the framework of the culture of trust cultivated at Eissmann Group Automotive, managers are responsible for ensuring that no violations of these regulations occur in their respective areas.

*Source: Code of Conduct, Management Guidelines*

## Compliance with Code of Conduct / notices and violations

/ Einhaltung Code of Conduct / Hinweise und Verstöße

We provide our employees and business partners with access to a protected mechanism to confidentially report possible violations of the principles of this Code of Conduct.

If you have a tip, please contact the following person/office directly or anonymously.

Name of the contact / the job

Contact information (e-mail address, phone number)

Dr. Frank Straile, Christian Mehrer; Compliance Management

compliance@eissmann.com, +49 7125 9373 2000, [www.eissmann.com/compliance](http://www.eissmann.com/compliance)

Source: Code of Conduct section 11.2, Whistleblowing Policy

## Remuneration / Entlohnung

Remuneration is based on the applicable laws and, where applicable, existing, binding collective agreements and is supplemented by the relevant, national minimum wage laws. Employees are informed clearly, in detail and regularly about the composition of their remuneration.

We comply with applicable laws and (international) labor standards regarding maximum permissible working hours and ensure that

- The working hours, including overtime, do not exceed the respective maximum limits permitted by law
- The weekly working time, including overtime, does not exceed 60 hours, even in exceptional cases, in the absence of such provisions
- Employees have at least one full day off per calendar week.

Source: Code of Conduct Item 5

## Ethical recruitment / Ethische Rekrutierung

We promote equal opportunities and do not tolerate discrimination. We treat all people equally, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

Source: Code of Conduct section 6.4

## Professional and personal development / Fachliche und persönliche Entwicklung

People grow with their tasks. "If necessary and in the context of quality needs, we set individualized development goals with our employees for personal and professional growth."

Together with our employees, we agree on and document the training measures tailored to the company's needs and actively monitor the success of their implementation.

Source: Leadership Guideline

# Guideline Compliance

## Women's rights and equal treatment of all people

/ Frauenrechte und Gleichbehandlung aller Menschen

We promote equal opportunities and do not tolerate discrimination. We treat all people equally, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

Our actions are in compliance with the relevant legal regulations. We are guided by ethical values and principles, in particular integrity and probity as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the core labor standards of the International Labor Organizations (ILO), as well as the United Nations Guiding Principles on Business and Human Rights.

*Source: Code of Conduct Clause 6.4, Item 1, Reference to ILO Standards*

## Hazardous substances and chemicals / Gefahrstoffe und Chemikalien

All relevant hazardous substances and chemicals must go through an approval process and are listed in a register. Hazardous substances are stored in authorized rooms. The up-to-dateness of the safety data sheets and the corresponding operating instructions are verified in a regular cycle.

*Source: Integrated Management System*

## Risk assessment / Gefährdungsbeurteilung

Our risk assessment describes the process of systematically identifying and evaluating all relevant hazards to which our employees are exposed in the course of their work. This is supplemented by the derivation and implementation of all measures required to protect safety and health, which are subsequently reviewed with regard to their effectiveness. Our aim is to identify hazards at work at an early stage and counteract them preventively, i.e. before health impairments or accidents occur. The procedure is described in our Integrated Management System and is regularly verified by third parties.

*Source: Integrated Management System, Code of Conduct paragraph 4*

## Business conduct and business relationships

/ Geschäftsverhalten und Geschäftsbeziehungen

Our Code of Conduct contains rules for dealing with our business partners.

*Source: Code of Conduct Integrity and Compliance, item 3*

## Global Compact - UN/OECD/ILO

Our actions are in compliance with the relevant legal regulations. We are guided by ethical values and principles, in particular integrity and probity as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the core labor standards of the International Labour Organization (ILO), as well as the United Nations Guiding Principles on Business and Human Rights.

This Code of Conduct sets out the basic principles of our actions, which we actively require our employees worldwide to observe. The contents apply in all of our company's subsidiaries and business units.

*Source: Code of Conduct Item 1*

## Global Reporting Initiative (GRI)

We currently report sustainability aspects in accordance with the German Sustainability Code, which is based on the GRI. The GRI standards thus already support us in the preparation of the sustainability report and provide an interested public with comparable decision-making and orientation aids. The specification of specific key figures and indicators on economic, ecological and social aspects of our activities, products and services increases the comparability of the reports. They thus complement operational sustainability management and controlling. By the time we report in accordance with the EU CSR Directive in 2026 at the latest, we will have integrated the GRI standards even further into our reporting.

*Source: GRI - Home (globalreporting.org)*

## Integrity / Integrität

We have taken appropriate compliance measures to ensure that the following topics are adequately covered. Compliance stands for observance of statutory requirements, regulatory standards, voluntary commitments and internal policies. For "integrity" this relates above all to the prohibition of corruption, the requirement of fair competition, appropriate money laundering prevention, the protection of information and intellectual property, data protection, export controls and the avoidance of conflicts of interest.

*Source: Code of Conduct Item 3*

## Avoid conflicts of interest / Interessenkonflikten vermeiden

We avoid internal and external conflicts of interest that could illegitimately influence business relationships. If this is not successful, we disclose these conflicts.

*Source: Code of Conduct section 3.7 and Conflicts of Interest Policy Doc #002-02*

## International Material Data System / Internationales Material Daten System

In the IMDS material data, the material and chemical compositions of components, semi-finished products and materials are declared by us and all suppliers. Our main use of the IMDS material data is to secure and prove legal substance regulations for complete vehicles and their spare parts. Our goal is to comply with national and international legislation to which we are subject through standards and legal regulations, especially in the environmental field. For the IMDS, we assign all materials to a classification according to VDA 231-106.

*Source: Integrated Management System*

## Child labor / Prohibition of child labor / Kinderarbeit / Verbot von Kinderarbeit

We do not tolerate child labor. We do not hire employees who do not have a minimum age of 15 years and ask for proof of age. In countries that fall under the developing country exception under ILO Convention No. 138, the minimum age may be reduced to 14. We do not hire employees for hazardous work who cannot demonstrate a minimum age of 18 years in accordance with ILO Convention No. 182.

*Source: Code of Conduct 6.1*

## Communication / Kommunikation

We adhere to our communication rules and communicate in a recipient-oriented, clear, factual and well-structured manner. We hold regular meetings with employees for mutual information and coordination of activities and processes. We provide timely and comprehensive information about relevant developments, overarching issues, and organizational and personnel changes that affect the work of our employees.

*Source: integrated management system (F2 01 interested parties).*

## Corruption / Korruption

Principles relating to corruption and extortion gifts, payments, services

Eissmann Group Automotive observes the rules of fair competition and the free market. Eissmann Group Automotive therefore refrains from any order that can be obtained by violating the relevant laws.

It is therefore prohibited to enter into formal or informal agreements with competitors which have as their object or effect an unlawful restraint of competition. The same applies to tacit, deliberately concerted practices. Eissmann Group Automotive does not tolerate any form of corruption or bribery. All business activities must be based on honest and responsible thinking and acting.

All agreements or ancillary agreements that relate to a direct or indirect granting of benefits in favor of individual persons or organizations in connection with the procurement, awarding, approval, delivery, processing or payment of orders are therefore prohibited. Management and employees may not offer, promise, demand, grant or accept gifts, payments or services in business transactions. Exceptions are occasional gifts of low value < € 35. Any offer of gifts or benefits exceeding this amount must be rejected and, if necessary, returned.



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The supervisor must always be informed. Invitations to events require the prior approval of the local management. If the managing directors of the subsidiaries are invited to events, they require the approval of the Eissmann Group Automotive management in advance. Invitations to business meals within the usual scope (€ 50 per person) are generally permitted.

*Source: Guideline Compliance*

## Noise emissions / Lärmemissionen

We act in accordance with applicable laws and are guided by international standards to minimize negative impacts, such as noise emissions, on the environment and to continuously improve our activities for environmental and climate protection.

*Source: Guideline Compliance*

## Suppliers - Sustainability / Lieferanten – Nachhaltigkeit / Sustainability

We expect our suppliers to comply with the principles of this Code of Conduct or to apply equivalent codes of conduct. We also encourage them to enforce the contents of this Code of Conduct in their supply chains.

We reserve the right to check the application of this Code of Conduct at our suppliers systematically and on an ad hoc basis. This can take place, for example, in the form of questionnaires, assessments, supplier platforms or audits. If there are still doubts regarding compliance with this Code of Conduct, the supplier will be requested to take appropriate countermeasures and report the matter to the responsible contact in our company. If necessary, the cooperation will be terminated.

The sustainability regulations define the standards and requirements of Eissmann Group Automotive for its suppliers:

The observance of internationally recognized human and employee rights, the outlawing of child labor and forced labor, the observance and promotion of ethical business conduct, and compliance with legal standards and environmental guidelines as well as precautionary environmental protection. The sustainability provisions are based on internationally recognized principles of the United Nations Global Compact (<http://www.unglobalcompact.org>) and the applicable minimum standards of the UN's International Labor Organization (<http://www.ilo.org>).

*Source: Code of Conduct section 9, Sustainability and environmental protection regulations for suppliers*

## Management System: Social Accountability SA8000

/ Managementsystem: Social Accountability SA8000

We are successively using this international standard with the aim of improving working conditions for our employees, workers and temporary workers, thus ensuring social and labor standards well above the minimum requirement.

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Social audits are carried out annually in the Group as part of the internal system audits. Based on the internationally targeted SA 8000 standard, the following points are verified: Child and Forced Labor, Health and Safety, Right to Collective Bargaining and Trade Unions, Discrimination, Disciplinary Measures, Compensation and Management Systems.

*Source: Self-Assessment (Doc 419) SA 8000, FO 05 Social Audits*

## Management system: Information security according to ISO 27001

/ Managementsystem: Informationssicherheit nach ISO 27001

We specify the requirements for establishing, implementing, maintaining, and continuously improving in our documented information security management system, taking into account the context. In addition, we assess and address information security risks in accordance with our industry-standard requirements. We ensure protection of all values / assets in our value chain through appropriate security mechanisms.

*Source: ISO 27001 (matrix certificate) Bureau Veritas Certification,*

## Management system: TISAX Assessment Level 3, prototype protection

/ Managementsystem: TISAX Assessment Level 3, Prototypenschutz

Through our TISAX Assessment Level 3 labels, we have created a cross-company testing and exchange procedure for information security and prototype protection that is regularly verified by third parties. We are concerned with the protection of our data, its integrity and availability in the manufacturing process.

*Source: TISAX Assessment Level 3- Labels*

## Management system: Quality according to ISO 9001 and IATF 16949

/ Managementsystem: Qualität nach ISO 9001 und IATF 16949

Our goal is to use these quality standards to effectively improve system, process and product quality in order to continuously increase customer satisfaction, identify errors and risks in the production process and supply chain, eliminate their causes and verify the effectiveness of the corrective and preventive measures taken. The focus is not on the detection, but explicitly on the prevention of errors. Our claim is to fulfill all customer-specific requirements that automotive manufacturers additionally place on us.

*Source: IATF 16949 Certificate Bureau Veritas Certification*

## Management system: Environment according to ISO 14001

/ Managementsystem: Umwelt nach ISO 14001

We place an emphasis on a continuous improvement process as a means of achieving each of the defined goals related to our environmental performance.

This process is based on the PDCA method (Plan-Do-Check-Act).

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We have defined a corporate environmental policy, environmental goals and an environmental program, and implemented a corresponding management system. This helps us to achieve our goals, e.g. reduction of waste, waste water and emissions.

*Source: ISO 14001 (matrix certificate) Bureau Veritas Certification*

## Management system: Occupational health and safety according to ISO 45001

/ Managementsystem: Arbeits- und Gesundheitsschutz nach ISO 45001

We safeguard the health of our employees by taking appropriate health and occupational safety measures (e.g.: implementing a company health and occupational safety management system) that adequately cover the following topics:

- Compliance with applicable laws and orientation towards international standards in terms of health and occupational safety;
- appropriate workplace design, safety regulations and provision of suitable personal protective equipment;
- Implement preventive controls, emergency response, an accident reporting system, and other appropriate continuous improvement measures;
- Enabling access to drinking water in sufficient quantity as well as access to clean sanitary facilities for employees. We ensure that all our employees are instructed accordingly.

*Source: Code of Conduct Item 4*

## Human Trafficking / Menschenhandel

We categorically reject any form of human trafficking.

*Source: Guideline Compliance, Code of Conduct Item 6*

## Minimum wage / Mindestlohn

Remuneration is based on the applicable laws and, where applicable, existing, binding collective agreements and is supplemented by the relevant, national minimum wage laws. Employees are informed clearly, in detail and regularly about the composition of their remuneration.

*Source: Code of Conduct Item 5*

## Sustainability reporting / Nachhaltigkeitsreporting

We already prepare a non-financial statement on a voluntary basis in a separate sustainability report in accordance with the German Sustainability Code, which is based on the GRI. In addition to a description of the business model, this Corporate Social Responsibility (CSR) Report includes the following aspects:

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- Environmental concerns (e.g. greenhouse gas emissions)
- Employee issues (e.g. working conditions, gender equality)
- Social issues (at the municipal or regional level)
- Respect for human rights (avoidance of human rights violations) and
- Anti-corruption (what tools are used).

By 2026 at the latest, we will integrate the sustainability report into the management report of the annual financial statements in accordance with the EU CSR Directive and have it audited and certified by the auditor together with the financial reporting.

Source: German Sustainability Code ([www.deutscher-nachhaltigkeitskodex.de](http://www.deutscher-nachhaltigkeitskodex.de)); Sustainability Report (based on DNK)

## Zero defect quality policy / Null-Fehler Qualitätspolitik

Through continuous improvement based on quality methods, we pursue a clear zero-defect strategy.

Source: Integrated Management System

## Ecological responsibility / Ökologische Verantwortung

As a company, we consider taking ecological responsibility to be part of our commitment to sustainability, and this is of great importance to us.

On the basis of existing environmental and occupational safety guidelines, we work consistently on the further development of the environmentally friendly use of resources. In our actions, we comply with applicable laws and follow international standards to ensure soil, air and water quality at our sites. The manufacture of our products requires the use of valuable resources. We take the associated responsibility to conserve, reuse and recycle raw materials and thus protect the environment very seriously. After all, what makes ecological sense is often also economically useful and therefore also adds value for our customers. Our manufacturing processes are certified. Throughout the Group, we rely on integrated management systems that help us to operate in a way that conserves resources. For example, all manufacturing sites are certified to the environmental management standard. We regularly carry out extensive energy audits at our European plants.

Source: Matrix certificate ISO 14001 Bureau Veritas Certification; Code of Conduct, Sustainability Report

## Patents, industrial property rights / protection of information and intellectual property / Patente, gewerbliche Schutzrechte / Schutz von Informationen und geistigem Eigentum

We protect confidential information and respect intellectual property, technology and know-how transfers shall be made in such a way as to protect intellectual property rights and customer information, trade secrets and non-public information. We comply with applicable trade secret laws and treat confidential information of our business partners accordingly.

Source: Code of Conduct section 3.4

## Selection of persons / promotion of diversity and diversity, equal opportunities

/ Personenauswahl / Förderung von Vielfalt und Diversität, Chancengleichheit

We promote equal opportunities and do not tolerate discrimination. We treat all people equally, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

*Source: Code of Conduct section 6.4*

## REACH - Registration, Evaluation, Authorization and Restriction of Chemicals

As a manufacturer of vehicle interiors, Eissmann Group Automotive is a so-called "downstream user" in the sense of REACH. Obligations due to the production and placing on the market of substances/chemicals for pre-registration or registration (ECHA) are not applicable for us.

Our products are articles and therefore not to be defined as substances or preparations (according to Article 3 Definitions).

Furthermore, no substance is released from the articles under normal and reasonably foreseeable conditions of use. Thus, Eissmann Group Automotive is neither subject to the obligation to register nor to the obligation to prepare safety data sheets. In order to guarantee our customers a continuous supply of reliable and safe products, we use our purchasing conditions to ensure that our suppliers meet all requirements with regard to chemical substances and materials.

*Source: Declaration of Conformity REACH and RoHS*

## Rights of minorities and indigenous peoples / Rechte von Minderheiten und indigenen Völkern

We promote equal opportunities and do not tolerate discrimination. We treat all people equally, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

Our actions are in compliance with the relevant legal regulations. We are guided by ethical values and principles, in particular integrity and probity as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the core labor standards of the International Labor Organizations (ILO), as well as the United Nations Guiding Principles on Business and Human Rights.

*Source: Code of Conduct, Clause 6.4, Paragraph 1, Reference to ILO Standards*

## Legislation – compliance / Rechtsvorschriften - Einhaltung

Compliance with the applicable laws and other legal provisions of the countries in which we operate is a matter of course for us. If local laws and regulations are less restrictive, our actions are guided by the principles of our Code of Conduct. In cases where there is a direct conflict between mandatory local law and the principles contained in our Code of Conduct, local law takes precedence.

We comply with applicable laws. In addition, we ensure compliance with legal requirements for specific tasks by maintaining a legal directory (Health, Safety and Environmental, Information Security, Data Protection). We verify this directory in our Group in each case in an annual compliance audit.

*Source: Integrated Management System, Legal Directory, FO 06 ff, Code of Conduct item 2.*

## Risk Management / Risikomanagement

We ensure that risky products/processes and all types of corporate risks are structured, recorded, evaluated, assigned measures and tracked through to realization.

*Source: Integrated Management System*

## RoHS - Restriction of Hazardous Substances

To our current knowledge, our products delivered to you do not contain any substances, according to the RoHS-2 Directive 2011/65/EU of the European Parliament and of the Council of January 3, 2013 and the RoHS3 Directive 2015/863 of June 4, 2015 on the restriction of the use of hazardous substances in electrical and electronic equipment.

Substances subject to restrictions in accordance with Article 4(1) and the maximum permissible concentrations in homogeneous materials in percent by weight:

- lead (Pb) (0.1%), -mercury (Hg) (0.1%), -cadmium (Cd) (0.01%), -six-valent chromium (Cr VI) (0.1%),
- Polybrominated biphenyls (PBB) (0.1%), -Polybrominated diphenyl ethers (PBDE) (0.1%),
- di(2-ethylhexyl) phthalate (DEHP) (0.1%), -butylbenzyl phthalate (BBP) (0.1%),
- dibutyl phthalate (DBP) (0.1%), -diisobutyl phthalate (DIBP) (0.1%)

*Source: Declaration of Conformity REACH and RoHS*

## Training - Compliance relevant training / Schulungen - Compliance relevante Schulungen

Our employees are regularly instructed on compliance topics (e.g.: via workshops, e-learning).

*Source: Guideline Compliance*

## Social responsibility / Soziale Verantwortung

As a company, we consider assuming social responsibility to be part of our commitment to sustainability, and this is of great importance to us.

We act in accordance with applicable laws as well as existing collective agreements, if any, and are guided by international standards on topics such as health, occupational safety, remuneration and working hours. We have an operational health and labor management system and regularly conduct SA 8000 as an internal audit.

We also respect and support compliance with internationally recognized human rights and

- respect the personal dignity, privacy and personal rights of each individual
- protect and grant the right to freedom of opinion and expression
- do not tolerate unacceptable treatment of employees, such as physical and psychological hardship, sexual and personal harassment or discrimination.

Source: Code of Conduct Clause 6

## Accident recording system / Unfallerfassungssystem

Our goals for all sites are "zero accidents". We record and analyze: accident-free days, type of accident, classification between occupational or commuting accidents, days absent. TOP analyses (technical, organizational, personal) are carried out for all accidents. If accidents are assessed as system-relevant, corrective measures are rolled out and implemented throughout the Group. In addition, independent accident prevention measures are implemented worldwide.

Source: Integrated Management System

## Corporate sustainability / Unternehmerische Nachhaltigkeit

For us, corporate sustainability means pursuing economic, ecological and social goals in equal measure and thereby creating lasting value for all our stakeholders. As a globally active company, we are aware of our responsibility towards employees, business partners, society and the environment. We therefore not only comply with legal and regulatory requirements, but also take measures on our own initiative that create sustainable value for society and our environment.

Through a sustainability report, which is accessible to all our stakeholders, we communicate relevant topics of corporate sustainability at Eissmann Group Automotive.

Source: German Sustainability Code ([www.deutscher-nachhaltigkeitskodex.de](http://www.deutscher-nachhaltigkeitskodex.de)); Sustainability Report (based on DNK)

## Freedom of association / collective bargaining / Vereinigungsfreiheit / Kollektivverhandlungen

We respect the right of employees to freedom of association, freedom of assembly, and collective and wage bargaining to the extent that this is legally permissible and possible in the respective country in which we operate. If this is not permissible, we seek appropriate compromises for our employees.

Source: Code of Conduct section 6.3

## Assets - Protection / Vermögenswerte - Schutz

Eissmann Group Automotive requires its employees to protect the companies' tangible and intangible assets. These assets include real estate, vehicles, operating equipment and inventories, securities and cash, office equipment and supplies, information systems and software, as well as patents, trademark rights and know-how. All facilities and equipment may only be used for official business unless private use is expressly permitted.

Source: Guideline Compliance

## Cooperation with business partners / Zusammenarbeit mit Geschäftspartnern

In dealing with our business partners, a high level of professionalism, correctness, honesty, transparency (see item 3.4 Data protection and information security) and integrity are at the heart of all communication and contractual relationships.

Source: Code of Conduct Item 3

## Forced labor / Zwangsarbeit

Forced labor, modern slave labor or comparable measures that deprive people of their freedom are prohibited. All work must be voluntary and it must be possible to terminate the employment relationship.

Source: Code of Conduct section 6.2

Bad Urach, March 24<sup>th</sup>, 2023



VP Global Director Legal &  
Chief Compliance Officer  
Eissmann Group Automotive



Head of Group System Management  
Eissmann Group Automotive