

# AUTOFORM GROUP SUPPLIER CODE OF CONDUCT

## I. Introduction

At AutoForm, we are committed to conducting business in an ethical, legal, environmentally, and socially responsible and sustainable manner. We expect a similar conduct from our Suppliers, who should continuously strive to improve the sustainability of their operations and products.

AutoForm's Supplier Code of Conduct (the "Code") sets out the requirements expected from the suppliers, service providers and vendors ("Suppliers") regarding compliance with laws and regulations, business integrity, social and working conditions, child labor, and the environment. Our goal is to work with Suppliers to ensure full compliance with these requirements as they, in turn, apply them to their own employees, agents, subcontractors, and suppliers with whom they work within the delivery of goods and services to AutoForm. All business partners will obey all applicable laws and regulations, and in cases where either the Code or the applicable laws are stricter, the higher of the two shall apply.

## II. Compliance with Applicable Laws and Regulations

Suppliers must be aware of and comply at all times with the applicable international, domestic and local legislation, including the International Labor Organization (the "ILO") and the United Nations' Universal Declaration of Human Rights, industry standards, and all other relevant statutory requirements whichever requirements impose the highest standards of conduct.

### A. Doing business with integrity

Suppliers shall conduct their business in accordance with the highest ethical standards. Suppliers must comply with all applicable laws and regulations concerning corruption, bribery, fraud, and unfair and prohibited business practices.

### B. Social and working conditions

Suppliers shall recognize and be committed to upholding the human rights of their employees and treat them with dignity and respect as understood by the international community. Our Suppliers shall respect the following standards:

- **Freely Chosen Employment:** the use of forced, bonded, or indentured labor or involuntary prison labor is strictly prohibited.
- **Child Labor Avoidance:** Suppliers must not, under any circumstances, use child labor as defined by ILO and United Nations Convention and/or national law, whichever is more stringent.
- **Compensation:** Suppliers must comply with all applicable laws, regulations, and industry standards concerning wages and benefits. Wages and benefits paid for a standard working week shall meet at least legal or industry minimum standards and always be sufficient to meet the basic need of workers and their families. Deductions from wages as a disciplinary measure shall not be permitted; unless authorized by applicable law.
- **Working hours:** Suppliers shall comply with all applicable laws, regulations, and industry standards on working hours. Unless applicable laws, regulations, or industry standards are more restrictive, the maximum working hours in a week should not, on a regular basis, exceed 48 hours and the maximum allowable overtime hours in a week should not exceed 12 hours. Overtime should be on a voluntary basis. Employees shall be provided with at least one day off every 7-day period.
- **Non-Discrimination:** Suppliers shall strictly adhere to all applicable laws and regulations prohibiting discrimination in hiring and employment on the grounds of race, religion, age, nationality, color, gender, sexual orientation physical ability, health condition, political opinion, creed or other basis prohibited by law.
- **Freedom of Association and Collective Bargaining:** Suppliers have to respect the rights of employees to form and join trade unions and bargain collectively.

- **Health and Safety:** Suppliers shall provide their employees with a safe and healthy workplace in compliance with all applicable laws, regulations, and industry standards. Harassment of any employee is prohibited.
- **Working conditions:** Suppliers shall provide their employees with adequate working facilities; fire safety, personal protection equipment, access to emergency medical care, and adequate lighting and ventilation.

### C. Data Protection and Privacy

Suppliers must handle all personal data in accordance with relevant privacy laws and data protection regulations, including the EU General Data Protection Regulation (GDPR) and other applicable global standards. Suppliers must:

- Implement security measures to protect data from unauthorized access, loss, or misuse
- Ensure transparency regarding the collection, use and processing of personal data
- Facilitate data subject rights, such as access, correction, and deletion of personal data

### III. Environment

Suppliers recognize that environmental responsibility is integral to producing high quality products and that they should adhere to environmentally responsible practices that protect natural resources and reduce the environmental impact of their operations. This includes:

- Compliance with local and international environmental laws, regulations and industry standards
- Reducing emissions, waste, water and energy consumption
- Promoting the use of sustainable materials and products where possible
- Encouraging the development and use of environmentally friendly technologies
- Taking measures to minimize the ecological impact of manufacturing, packaging, and transportation

Further, Suppliers shall comply with any additional environmental requirements specific to the products or service being provided to AutoForm as called for in the design and product specifications and contract documents. Suppliers must implement and maintain effective environmental policies to meet these requirements.

Any breach or potential breach of these terms must be communicated to AutoForm. In addition, suppliers must ensure that any animal derived products supplied to AutoForm are from animals that have been treated ethically in the production process.

### IV. Ethical Sourcing and Supply Chain Transparency

Suppliers must ensure that their sourcing practices do not contribute to human rights abuses, environmental harm, or illegal activity. This includes:

- Not using materials sourced from conflict zones or areas where such materials fund violence, human rights violations, or other illegal activities
- Undertaking due diligence to ensure the ethical sourcing of minerals, including compliance with relevant international standards

Upon request, Suppliers must disclose any sub-suppliers, subcontractors, and other third parties involved in the manufacturing or provision of products or services, to ensure full transparency and traceability of the supply chain.

### V. Communication and Implementation

Suppliers must effectively communicate to all their employees the content of this Code and undertake actions necessary and appropriate to assure their implementation.

## **VI. Supplier and Subcontractor Management**

Suppliers have to establish a documented system to ensure that all of their agents, subcontractors, and suppliers comply with requirements of this Code.

## **VII. Monitoring/Record Keeping/Continuous Improvement**

Suppliers shall maintain documentation appropriate to demonstrate adherence to the Code, both for their own operations as well as those of their agents, subcontractors, and suppliers. Suppliers shall provide access to such documentation and other information demonstrating adherence to this Code upon request.

AutoForm expects its suppliers to actively work towards continuous improvement in all areas of the Code, including environmental performance, labor rights, and business practices. Suppliers should set goals for improvement and actively work to meet them.

## **VIII. Internal Assessment and Potential Impacts on Business Relationship to AutoForm and Its Companies**

Suppliers must conduct regular internal assessments to assure their compliance with the Code. AutoForm reserves the right to conduct (or have its designee conduct) inspections of Supplier and their facilities to verify compliance with the Code. In addition to any other contractual rights of AutoForm, Suppliers' failure to adhere to the Code may result in AutoForm ceasing to do business with offending Suppliers.

## **IX. Suppliers' Certification of Compliance**

By its acceptance of any purchase order from AutoForm, the Supplier thereby acknowledges and certifies its compliance with the principles and requirements of the Code.

## **X. Development of the Code**

AutoForm will review this Code on a regular basis and will introduce revisions where necessary or appropriate. AutoForm will notify its Suppliers of any important changes.

**ADOPTED: May, 1<sup>st</sup>, 2025**