



CODE OF CONDUCT FOR SUPPLIER

This is a document of APL Automobil-Prüftechnik Landau GmbH

For better readability, this document avoids simultaneous use of the masculine, feminine and diverse forms of speech when referring to persons and using personal nouns. In the interests of equal treatment, the relevant terms generally apply to all genders.

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Foreword

For more than three decades, APL Automobil-Prüftechnik Landau GmbH (hereinafter referred to as "APL GmbH"), headquartered in Landau, has been developing the drive systems of the future in close cooperation with customers from the automotive, aviation and petroleum industries as a reliable development partner with the vision of shaping the mobility of tomorrow through innovative technologies and sustainable solutions. APL GmbH is aware of its resulting responsibility to ensure the highest standards of integrity, sustainability and social responsibility

We are committed to working with our Suppliers and partners to promote a sustainable and ethical supply chain. This includes respecting human rights, ensuring fair working conditions, protecting the environment and promoting business ethics.

Our Suppliers play a crucial role in achieving these goals. We therefore expect them to share our values and actively contribute to the implementation of these standards. By complying with this Supplier Code of Conduct, our Suppliers are helping to shape a responsible and sustainable future for the automotive, aviation and petroleum industries.

This Supplier Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Children's Rights and Business Principles, the United Nations Guiding Principles on Business and Human Rights, the International Labor Standards of the International Labor Organization and the United Nations Global Compact. This Supplier Code of Conduct defines the minimum requirements that you as a Supplier must observe and fulfill. We expect you as our business partner to also address these requirements accordingly with your downstream subcontractors.

The original version of this Supplier Code of Conduct was prepared in the German language. In the event of conflicts of interpretation between different language versions of this Supplier Code of Conduct, the German version shall prevail.

1 Requirements for our Suppliers

1.1 Social responsibility

The perception of social responsibility towards employees and society is of central importance to APL GmbH. We also expect our Suppliers to comply with their social responsibility. In particular, the Supplier must ensure that the following minimum requirements are met.

1.2 Exclusion of forced labor and slavery

APL GmbH does not tolerate any form of forced or compulsory labor. The Supplier must ensure that the prohibition of forced labor, slavery or comparable work is observed. All work must be voluntary. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment.

1.3 Ban on child labor

APL GmbH does not tolerate any form of child labor. The Supplier must ensure that the ban on child labor is consistently observed in its own business and by its subcontractors. The Supplier is requested to observe the recommendations of the ILO conventions on the minimum age for the employment of children. According to this, the age must not be less than the age at which compulsory schooling ends, and in any case not less than 15 years. In addition, the rights of young workers must be protected and safeguarded by special protective regulations.

1.4 Right to fair pay and working hours

The Supplier must ensure that the remuneration for regular working hours and overtime corresponds to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. It must also be ensured that wage deductions are not used as a sanction and that employees are granted all legally prescribed benefits.

The Supplier must ensure that the working hours of its employees comply with the applicable laws or industry standards. Overtime is only permitted if it is worked on a voluntary basis and the statutory limits are not exceeded.

1.5 Freedom of association

The Supplier respects the right of employees to freely organize or join trade unions. The formation of a trade union, joining a trade union or membership in a trade union may not be used as a reason for unjustified discrimination or retaliation. Similarly, the right of trade unions to operate freely and in accordance with the laws of the place of employment, including the right to strike and the right to collective bargaining, must be respected.

1.6 Protection against discrimination and harassment

Any form of discrimination or unequal treatment of employees is prohibited, unless it is justified by the requirements of the job. This applies in particular to discrimination based on national or ethnic origin, social background, state of health, disability, sexual orientation, age, gender, political views, religion or ideology. In particular, unequal pay for work of equal value is considered unequal treatment. The personal dignity, privacy and personal rights of each individual must be respected.

Any form of brutal and inhumane treatment or threat of such treatment, including but not limited to sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or insult of employees, is unacceptable.

1.7 Health and safety in the workplace

It is the Supplier's responsibility to ensure a safe and healthy working environment. Suitable occupational safety systems must be set up and the necessary precautions taken against accidents and damage to health that may occur in connection with the work. Accidents due to excessive physical or mental fatigue must be avoided by taking appropriate measures. The Supplier shall ensure that employees are regularly informed and trained on the applicable health and safety standards.

1.8 Deployment of security forces

The Supplier shall refrain from commissioning or deploying private or public security forces if, due to a lack of instruction or control on the part of the Supplier, there is a risk that the deployment of the security forces may violate the prohibition of torture and cruel, inhuman or degrading treatment, injure life or limb or impair the freedom of association and freedom of association.

1.9 Rights of local communities

Applicable national and international land, water and resource rights must be respected. In particular, the rights of indigenous peoples and local communities throughout the supply chain must be respected, promoted and protected in accordance with the United Nations Declaration on the Rights of Indigenous Peoples.

The Supplier undertakes not to participate in land grabbing. The Supplier shall also observe the prohibition of unlawful forced eviction from land, forests and waters if it acquires, cultivates or otherwise uses land, forests and waters that serve as a basis of life for people.

1.10 Ethical recruiting

Recruitment of workers must be conducted in accordance with international labor standards, in a fair and transparent manner and with respect for human rights. Misleading or deceiving potential workers about the nature of the work, confiscating, destroying, concealing and/or denying access to workers' passports and other government-issued identification documents is not permitted. Workers shall be provided with a written employment contract in a language they understand at the

start of their employment, which sets out their rights and obligations truthfully and clearly.

1.11 Diversity and women's rights

Suppliers are encouraged to develop and promote an inclusive culture at all levels of their workforce, where diversity is valued and celebrated and everyone is able to contribute and reach their full potential.

In particular, the rights of women to political, economic and social equality within the meaning of the Convention on the Elimination of All Forms of Discrimination against Women must be respected.

1.12 Animal welfare

The applicable laws on animal protection and animal welfare (e.g. Animal Welfare Act; Regulation (EC) 1069/2009) must be complied with. This obligation applies in particular to Suppliers who produce, process and/or use animal (by-)products. In this context, affected Suppliers are also required to respect the five freedoms defined by the World Organization for Animal Health (WOAH) as guiding principles for animal welfare in the Terrestrial Animal Health Code. These five freedoms include: Freedom from hunger, thirst and malnutrition; freedom from fear and stress; freedom from physical and heat-related discomfort; freedom from pain, injury and disease; and freedom to express normal behavioral patterns.

2 Ecological responsibility

APL GmbH is committed to environmental protection. With this in mind, we also expect our Suppliers to implement and continuously improve sustainable practices in their business processes and supply chains.

This includes compliance with all relevant environmental laws and regulations and the reduction of environmental pollution. The Supplier is expected not to cause harmful soil changes, water or air pollution, harmful noise emissions or excessive water consumption that significantly impair the natural basis for the preservation and production of food, deny people access to clean drinking water, make access to sanitary facilities difficult or impossible or harm people's health.

2.1 Decarbonization and sustainable resource management

Our Suppliers are encouraged to take measures to reduce their CO₂ emissions. This includes the implementation of strategies and technologies that contribute to the reduction of greenhouse gas emissions. Suppliers should continuously look for ways to improve their environmental performance and energy efficiency and promote sustainable practices, particularly through the use of renewable energy.

The use and consumption of natural resources and the generation of waste of all kinds must be reduced or avoided whenever possible. This can be done either directly at the point of origin or through processes and measures such as changing production,

maintenance or operating procedures, using alternative materials, saving, recycling or reusing materials.

2.2 Handling waste and hazardous substances

The Supplier shall take a systematic approach to the identification, handling, reduction and responsible disposal or recycling of waste. Chemicals or other materials that pose a risk if released into the environment shall be identified and handled in a manner that ensures the safety and protection of the environment during handling, transportation, storage, use, recycling or reuse and disposal.

Mercury, mercury compounds and mercury waste must be treated in accordance with the prohibitions of the Minamata Convention on Mercury of October 10, 2013 (Federal Law Gazette 2017 II p. 610, 611) (Minamata Convention) as amended.

The ban on the production and use of persistent organic pollutants and the ban on the environmentally unsound handling, collection, storage and disposal of waste in accordance with the provisions of the Stockholm Convention of May 23, 2001 on Persistent Organic Pollutants (Federal Law Gazette 2002 II p. 803, 804) (POPs Convention), as amended, must be observed.

The prohibitions on the import and export of hazardous and other waste in the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of March 22, 1989 (Federal Law Gazette 1994 II p. 2703, 2704) (Basel Convention), as amended, must be observed.

2.3 Biodiversity, land use and deforestation

The preservation and protection of natural ecosystems are crucial to our environmental responsibility. We expect our Suppliers to protect natural ecosystems and not to contribute to the alteration, deforestation or degradation of natural forests and other natural ecosystems.

2.4 Dealing with conflict minerals

The requirements of the Conflict Minerals Regulation (Regulation (EU) 2017/821) in accordance with Annex II of the OECD Guidelines with regard to the supply of tin, tantalum, tungsten and gold must be observed. In particular, it must be avoided that:

- it is contributed to the financing of conflicts; when extracting, transporting and trading minerals, any serious human rights abuses (such as the widespread occurrence of sexual violence), war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide are tolerated, profited from, participated in or supported;
- the direct or indirect support of non-state armed groups is assumed (including the procurement of minerals from, the making of payments to and the logistical support or provision of equipment to non-state armed groups); goods have been procured directly or indirectly from non-state armed groups;

- money laundering occurs in connection with minerals; and
- offering bribes in connection with the supply of minerals, concealing the origin of conflict minerals or making misrepresentations about taxes, royalties or license fees paid and, if necessary, surrendering such royalties to governments.

The traceability of the supply of the conflict minerals tin, tantalum, tungsten and gold must be ensured. All material information about the relevant circumstances in the supply chain must be passed on, such as the country from which the minerals originate, the quantity imported and the time of extraction, the name and address of the sub-Supplier and, in the case of minerals originating from conflict and high-risk areas, the mine from which the minerals originate, the place where the minerals are brought together, traded and processed, as well as the taxes, duties and fees paid by the Supplier.

Suppliers of metals must provide information on the name and address of the smelters and refiners in the supply chain and, where applicable, third-party audit reports, records of test reports or certificates of conformity.

2.5 Energy-related performance

Our company has been certified in accordance with DIN EN ISO 9001:2015 for many years. It should be noted that energy-related performance is one of the evaluation criteria for the procurement of energy-using products, facilities and services that have or may have an impact on significant energy uses (SEUs). Suppliers are therefore encouraged to continuously monitor and improve their own energy-related processes.

2.6 Certified management system

In order to comply with the requirements and regulations listed in this Supplier Code of Conduct, our Suppliers are particularly recommended to implement and provide evidence of a certified management system (e.g. DIN EN ISO 9001:2015; DIN EN ISO 14001; DIN EN ISO 50001; Regulation (EC) 1221/2009).

3 Ethical business conduct

APL GmbH stands for responsible, lawful and ethical conduct. We place high demands on both our employees and our Suppliers. It is expected that all national and international laws, standards and official directives are complied with.

We expect our Suppliers to set up a responsible office for compliance and to establish a code of conduct or a guideline on corporate ethics.

3.1 Fair competition

The principles of fair business conduct, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be complied with, which in particular prohibit agreements and other activities that influence prices or conditions when dealing with competitors

3.2 Confidentiality/data protection

The Supplier shall meet the reasonable expectations of APL GmbH, Suppliers, customers, consumers and employees regarding the protection of private information. The collection, storage, processing, transmission and disclosure of personal information shall comply with applicable data protection laws and information security regulations.

3.3 Financial responsibility

All applicable statutory accounting, recording, disclosure and publicity obligations must be fulfilled. In particular, the books and records must be kept in accordance with applicable law and in accordance with generally accepted accounting principles. All business transactions in a commercial enterprise must be recorded and documented in accordance with the legal requirements.

3.4 Intellectual property and plagiarism

Suppliers must comply with all applicable laws on the protection of intellectual property rights and trade secrets and take appropriate measures to avoid infringing the intellectual property or trade secrets of third parties. Appropriate training must be completed by all employees at the start of their respective activities and must be repeated annually thereafter.

3.5 Insider trading

Suppliers and their employees may not use information received or otherwise made available to them in the course of their business relationship if doing so would violate the insider trading prohibition of Art. 14 of the EU Market Abuse Regulation. According to this regulation, transactions involving the purchase or sale of financial instruments are prohibited in particular if insider information relating to the financial instruments to be purchased or sold is used (Art. 8 of the EU Market Abuse Regulation). The prohibition also applies if the transactions in question take the form of canceling or amending an order in relation to a financial instrument to which the information relates. The unauthorized disclosure or dissemination of inside information is also prohibited (Art. 10 of the EU Market Abuse Regulation). Training on the ban on insider trading must be completed by all employees at the start of their respective activities and must be repeated annually thereafter.

3.6 Prohibition of bribery/benefits

The highest standards of integrity must be applied in all business activities. The Supplier is obliged to pursue a zero-tolerance policy with regard to all forms of bribery, corruption, money laundering, extortion and embezzlement. Procedures for monitoring and enforcing standards shall be implemented to ensure compliance with anti-corruption laws.

Effective measures must be implemented to prevent employees from demanding, accepting, making or promising material or immaterial benefits, such as cash, vouchers, loans or customer contacts, in order to influence decisions or gain other

advantages. This applies in particular where public officials, candidates for public office and political parties are concerned.

3.7 Conflicts of interest

Conflicts of interest must be avoided as they can compromise the integrity of the business relationship. In particular, it must be ensured that situations are avoided in which personal or financial interests come into conflict with professional duties and objective decision-making could be influenced as a result. If a potential conflict of interest arises, it must be disclosed immediately so that appropriate measures can be taken to eliminate or manage it.

3.8 Taxes

It must be ensured that all applicable tax laws and regulations are complied with. Suppliers must take all appropriate measures to avoid tax evasion or other violations of tax regulations. This includes, in particular, the establishment of effective control measures, such as approval processes. Internal investigations must be initiated in the event of concrete suspicions of misconduct.

3.9 Whistleblower protection

The applicable statutory provisions for the protection of whistleblowers must be observed. This includes, in particular, compliance with the provisions of the German Whistleblower Protection Act (Hinweisgeberschutzgesetz), insofar as this is applicable. Within the framework of the statutory provisions, the prohibition of reprisals and the duty of confidentiality must also be observed in particular.

3.10 Gifts/promotional gifts

In any business relationship, Suppliers must ensure that the offering or receiving of gifts or business courtesies (such as invitations) is permissible under applicable laws and regulations and that such exchanges do not violate the rules and standards of the recipient's organization and are consistent with market practice and custom. Gifts and business courtesies in favor of public officials are not permitted.

Cash gifts or cash equivalents may neither be offered nor accepted. Employees and contributors must refuse all gifts that could give the appearance of improperly influencing the Supplier's business decisions.

3.11 Export control and trade restrictions

Suppliers shall take appropriate measures to ensure compliance with all import and export laws, directives and regulations applicable to their business activities, including their products, particularly sanctions and embargoes. This is achieved - without prejudice to mandatory legal requirements - by means of an appropriate internal compliance system that includes written programs, controls and regular training of all employees involved in export or import.

In particular, trading with or providing services to sanctioned persons, companies or associations is prohibited. Suppliers are required to implement internal filters that can

check their business partners for sanctions list entries - either automatically or, where effective, individually. These systems must be monitored, updated and expanded as necessary.

3.12 Product compliance and quality

Appropriate methods and processes shall be installed to exclude the risk of delivery of counterfeit parts and materials. If such parts and/or materials are nevertheless discovered or suspected, the Supplier must notify the recipient immediately.

All applicable regulations on product safety and quality (including environmental impact assessments) and all other product-related legal requirements must be complied with. All products and/or services must also comply with the respective contractual product safety and quality standards resulting from the quality management requirements.

Appropriate quality assurance processes, product compliance and recall management systems must be implemented in order to identify product defects and to be able to immediately initiate and implement any necessary corrective measures to eliminate and minimize risks.

3.13 Risk management

We expect our Suppliers to implement an appropriate and effective management system for corporate due diligence for people and the environment in their organization and with their direct Suppliers. This includes, for example, contractual agreements, a Supplier guideline for sustainable procurement and audits.

4 Implementation of the requirements

4.1 Obligation to comply

The Supplier undertakes to act responsibly and to comply with the requirements set out in this Supplier Code of Conduct. This includes the obligation to communicate the content of this Supplier Code of Conduct to employees, agents and subcontractors and to take all necessary measures to implement the requirements, including training.

Furthermore, the Supplier undertakes to appropriately address the requirements set out in this Supplier Code of Conduct in the supply chain and to obligate its respective business partners accordingly and ensure compliance with them.

4.2 Verification measures

Compliance with the requirements listed in this Supplier Code of Conduct shall be checked regularly. The Supplier agrees that APL GmbH may verify compliance with the requirements on site. APL GmbH is entitled to carry out on-site inspections and audits at the Supplier's premises in order to verify compliance with the requirements set out in this Supplier Code of Conduct if necessary. In doing so, APL GmbH shall take into account the legitimate interests of the Supplier and, in particular, protect the Supplier's trade and business secrets.

4.3 Dealing with violations

In order to safeguard supply chains with increased risks, the Supplier must inform APL GmbH promptly of any violations and risks identified and the measures taken.

If APL GmbH discovers a violation of this Supplier Code of Conduct, APL GmbH may take appropriate corrective and remedial measures in cooperation with the Supplier.