

## **Code of Ethical Conduct for Fischer Automotive Sp. z o.o. Sp.k (FA1)**

FA1's goal is to operate its long-term business in an ethical and responsible manner by continuously improving its processes and products and services, while taking into account its sustainability goals. FA1 operates according to the following values: trust, respect for others, openness and honesty.

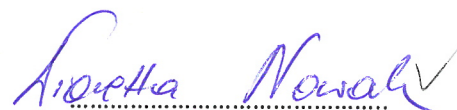
FA1 is committed to sustainable development and high standards of business ethics and integrity. FA1 believes in the link between sustainability, high ethical business standards, and financial performance. FA1 Code of Ethical Conduct compiles and describes the ethical principles that form the basis for conducting business. Key operating principles are further described in separate local policies and instructions. The Code applies to all FA1 employees.

FA1 requires that all of its suppliers, subcontractors and business partners act responsibly and in accordance with the principles outlined in this Code or have improvement goals related to this. FA1 expects all its suppliers to commit to the FA1 Supplier Code of Conduct, which includes requirements similar to those contained in this Code.

### ***A few words from the CEO of FA1...***

The cornerstone of FA1 is how we act and behave toward ourselves, our customers and business partners. This Code of Ethical Conduct describes how to operate "according to FA1 standards," and is a common tool for us to conduct business consistently and sustainably. It is intended to help all of us make decisions and act responsibly towards individuals, society as a whole, and the environment. Compliance with the Code is the responsibility of all FA1 employees.

Therefore, it is important to read this document carefully and examine our daily tasks in its light. When we all act in accordance with the Code, it will be the foundation of our company's culture, which is a key factor in determining our competitiveness, now and in the years to come.



*Wioletta Nowak*  
CEO

## 1. BUSINESS INTEGRITY

### ➤ COMPLIANCE

FA1 complies with applicable legal requirements, including local regulations. In addition to applicable regulations, FA1 adheres to its internal policies, regulations and procedures. FA1 is building an ethical and strong compliance culture. Regardless of the position, no person in FA1 has the right to commit or permit illegal activities.

#### WHAT DOES IT MEAN IN PRACTICE?

- *Monitor legal and regulatory developments in your area of responsibility and share your knowledge with others in FA1.*
- *Require suppliers, customers, consultants and other business partners to comply with legal regulations and act responsibly.*
- *Never allow illegal activities.*
- *Immediately report any illegal or suspicious activity using appropriate communication channels.*

### ➤ FAIR COMPETITION

FA1 does not tolerate acts of unfair competition to gain business advantages. FA1 conducts its business and competes in accordance with applicable antitrust and competition protection laws and rules, as well as internal policies. No employee has the right to participate in illegal activities that restrict competition.

#### WHAT DOES IT MEAN IN PRACTICE?

- *Avoid any unnecessary contact with representatives of FA1 competitors. Any contact with competitors should have a clear and legitimate purpose, with contact being made only with the approval of the FA1 management.*
- *If a competitor initiates a discussion of market-related issues, stop the conversation and contact FA1 management.*
- *Avoid any arrangements with competitors on prices, market sharing, collusive bidding, production volumes, discounts or similar terms.*
- *Do not share commercial information such as price levels, costs, production volumes or discounts or other confidential market information with competitors.*
- *Do not publicly disclose prices or share sensitive business information with outside parties.*
- *Before meetings of any trade association, make sure that a proper agenda has been developed, and pay attention to whether the agenda is followed. After the meeting, the minutes should clearly reflect the agenda and discussions during the meeting.*
- *Seek legal advice from a law firm or an outside expert before agreeing any arrangements with competitors or entering into a long-term exclusive agreement with a supplier or customer.*

## 2. COUNTERING CORRUPTION, BRIBERY AND CONFLICT OF INTEREST

FA1 takes a zero-tolerance approach to all forms of bribery and corruption, whether committed by FA1 employees, public officials or third parties acting for or on behalf of the company. FA1 employees are not allowed to make any improper payments or other arrangements that could influence or corrupt the recipient. Inappropriate payments or arrangements may include bribes, gifts, favors, tokens of gratitude, loans, benefits and entertainment, except for fair promotional or customary hospitality expenses that are proportionate and reasonable for our business.

FA1 avoids conflicts of interest. FA1 employees should avoid situations that could create a conflict of interest between FA1 and the employee or other stakeholders, family members, relatives, or companies they control that could lead to such a conflict. Conflicts of interest can take many forms, from financial interests to other personal interests that can influence the business decisions of an FA1 employee.

### WHAT DOES IT MEAN IN PRACTICE?

- *Never offer or promise bribes, gratuities, illegal discounts or any other unethical payments – even if such payments are common in the local culture or if you think they would enable an exceptionally beneficial transaction.*
- *Never offer gifts or show hospitality in such a way that the recipient feels that the giver expects something in return. They should not be extravagant, overly expensive or offered too often.*
- *Never transfer or accept cash or cash equivalents.*
- *Do not accept gifts or gestures of hospitality that seem unwarranted or overly expensive.*
- *FA1 covers travel and lodging expenses for its own employees, but ordinary business courtesies, such as paying for a meal or sharing a cab, may be considered reasonable hospitality.*
- *Contact your supervisor if any third party tries to influence you inappropriately or if the results of cooperation may look suspicious to an outsider.*
- *Working with officials usually involves a higher risk of bribery, especially in terms of expecting hospitality (such as invitations to meals and events) and gifts.*
- *If you believe you are at risk of a conflict of interest, consult your supervisor or FA1 management.*
- *Do not participate in business decisions at FA1 that may involve, for example, a company that is owned by you or your close relatives.*
- *Do not participate in the decision to hire your spouse or relatives.*

## 3. POLITICAL NEUTRALITY AND CONTACTS WITH THE AUTHORITIES

FA1 employees ensure that their personal political beliefs or involvement do not negatively affect our work and objectivity. FA1 is politically neutral and does not support political parties or individual candidates in elections. Whoever of us engages with the authorities and their representatives on behalf of FA1 should adhere to high ethical standards. Only authorized and trained individuals may maintain

contacts with the authorities. All interactions must be conducted in accordance with applicable laws and in accordance with the provisions of this Code in the chapter on Fair Competition and Countering Corruption, Bribery and Conflict of Interest.

#### WHAT DOES IT MEAN IN PRACTICE?

- *When engaging in or supporting political activities, do not act as an FA1 representative.*
- *Consult with management before working with the authorities.*
- *Confirm with your manager that you have due authorization to deal with the authorities.*
- *Always behave ethically and with integrity.*
- *Keep a record of all communications with government officials.*

#### 4. CUSTOMERS AND OTHER BUSINESS PARTNERS

FA1's success depends on the success of customers and other business partners. Understanding customers' businesses and needs allows us to incorporate their input into FA1's operations and products. By getting to know suppliers, other business partners and contractors, FA1 can keep track of the current situation. FA1 always treats business partners with great respect and "strives to continuously improve its relationship with them." In addition to this, FA1 carefully selects and gets to know its business partners so that it can comply with applicable laws on trade sanctions, anti-money laundering and terrorist financing. When cooperating with or purchasing the services of representatives, consultants or other intermediaries, FA1 is particularly careful and checks their reliability.

#### WHAT DOES IT MEAN IN PRACTICE?

- *Before entering into any transactions, consider whether you have enough relevant information about new customers or suppliers. Check whether the company is registered in the relevant company registry, check its creditworthiness and real beneficiaries.*
- *If a potential business partner is from a sanctioned country, check the applicable sanctions laws and implement them.*
- *Be alert to warning signs of potential money laundering or terrorist financing practices. Warning signals may include complex or unusual payment structures or methods (e.g., cash), a request for payment to an unrelated account to a third party, or no apparent business purpose for the transaction.*
- *Do not make binding arrangements if you have suspicions about a business partner.*

#### 5. People and society

##### ➤ HUMAN RIGHTS

FA1 supports the UN Universal Declaration of Human Rights, treats people with respect and gives everyone equal opportunities for personal and professional development, regardless of their gender, age,

race, ethnicity, disability, nationality, sexual orientation, religious beliefs, political affiliation, marital status, property status or position in the company.

Physical, psychological violence or other forms of intimidation are prohibited in FA1. FA1 does not condone any form of bullying, discrimination, harassment, sexual harassment or other behavior of a similar nature. FA1 takes measures to protect its employees from harassment and bullying of any kind.

FA1 adheres to internationally recognized labor standards set by the International Labor Organization (ILO) and the UN Global Compact, covering human rights, labor, environment and anti-corruption. FA1 in no way condones child labor or forced labor at any of our locations.

Laws pertaining to underage labor stipulate that those under the age of 18 may not perform tasks that are harmful to their health and safety (such as night work). In addition, juveniles under the age of 16 (14 or 15 in some countries) may not engage in work that impedes or adversely affects their schooling.

FA1 employees are not forced to surrender their identity documents to their employer and are free to terminate their employment relationship in accordance with applicable laws.

#### **WHAT DOES IT MEAN IN PRACTICE?**

- *Reflect on what it means to promote diversity and respect human rights in your daily working life and act accordingly.*
- *Help build and support the company's culture where different competencies, skills, experiences and backgrounds are taken into account when building teams.*
- *Do not discriminate against anyone on the basis of race, age, nationality, gender identity or sexual orientation.*
- *When dealing with other employees, with suppliers or other business partners, maintain respect for the other person and strive to create a good atmosphere by setting an example with your conduct.*

## **6. HEALTH AND SAFETY**

FA1 personnel feel responsible for the health and safety of themselves and their employees, and therefore follow internal health and safety procedures. FA1 is committed to continuously improve health and safety conditions for its employees, visitors and others affected by our operations. FA1 personnel reports safety concerns and actively share best practices within the company and the industry.

Alcohol and illegal substances are not tolerated in the workplace at FA1. Being on the premises of FA1 under the influence of alcohol or drugs is strictly prohibited for all employees, contractors and other hired persons. Alcohol poses a risk to everyone's health and safety and represents an economic risk for the company. Therefore, in cases of reasonable suspicion, monitoring for blood alcohol or drugs is allowed. FA1 offers counseling and support programs for alcohol and drug abuse.

#### **WHAT DOES IT MEAN IN PRACTICE?**

- *Be sure to familiarize yourself with safety rules and instructions in force at FA1.*

- *When entering manufacturing sites, familiarize yourself with local safety rules, view the safety instructions for the site, and use appropriate personal protective equipment as instructed.*
- *Be on the lookout for behaviors that affect safety and report potential near misses through reporting channels.*

## **7. EMPLOYEES' RIGHTS**

Employees should be aware of their role and rights in the company. All employees in leadership positions are required to actively promote a leadership culture consistent with FA1 values and the spirit of this Code.

At FA1, work is performed based on a legal employment relationship (contract) established under national labor laws. All FA1 employees have the right to conclude and sign an employment contract in a language they understand.

FA1 pays salaries and benefits to employees in accordance with the employment contract and applicable laws that meet the requirements of national legislation, enabling employees to meet their basic needs in their country of residence.

Disciplinary penalties are permitted and recorded in the event of a breach by an employee of the regulations and laws in force, in accordance with the regulations and laws in force in this regard.

FA1 guarantees that the organization of overtime work is in accordance with national laws, applicable collective agreements (regulations) and current international conventions. Efforts should be made to ensure that overtime work is performed in situations that are absolutely necessary, dictated by the special needs of the employer such as unscheduled orders, downtime or breakdown repair, while complying with relevant labor laws and measures to protect the employee's health and safety. When overtime occurs, employees are paid in accordance with applicable legal regulations. Employees of FA1 have the right to organize in trade unions. FA1 respects employees' right to freedom of association. Our employees are encouraged to engage in their own development, both personal and professional.

### **WHAT DOES IT MEAN IN PRACTICE?**

- *Familiarize yourself with FA1 values, regulations that apply to employees, and your rights and responsibilities.*
- *Ask the HR department which Regulations apply to you. Ask for further guidance on where to find information about your rights and responsibilities as an employee.*

## **8. RESOURCES AND INFORMATION**

### **➤ COMPANY RESOURCES, SECURITY AND CONFIDENTIALITY**

FA1 treats resources with respect and care. Employees must always remember that FA1 tangible and intangible resources belong to the company, not to individuals, regardless of their position.

FA1 prohibits any fraudulent behavior or actions. Employees are responsible for fraud prevention and detection. Unfair activities are subject to internal evaluation and will be reported to the appropriate authorities if necessary. FA1 takes care of the physical security of its facilities and verifies that all visitors are duly authorized to enter its premises. FA1, protects the company's confidential and proprietary information and provides it to people outside the organization only if an approved confidentiality agreement has been entered into. FA1 is also mindful of the need to protect confidential information received from its customers, suppliers or other stakeholders to the greatest extent possible.

#### WHAT DOES IT MEAN IN PRACTICE?

- *Protect FA1 intellectual property (e.g., patents and trademarks) by not disclosing protected information to persons outside the company if it is not necessary.*
- *Report any fraudulent or suspicious activity in FA1.*
- *Take care of FA1 assets.*
- *Take care of confidential materials and do not discuss confidential issues in public places.*
- *When providing confidential materials or information to persons outside the company, ask them to sign a non-disclosure agreement or ensure that the agreement between them and FA1 includes an appropriate confidentiality clause.*

#### ➤ DATA PRIVACY

Data protection and compliance with applicable privacy laws, including the EU and UK General Data Protection Regulations ("GDPR"), are a priority for FA1 and are fundamental to how FA1 operates as a company. FA1 has implemented a number of technical, organizational and legal mechanisms to protect Personal Data, which should be proactively reviewed and updated against the GDPR.

#### WHAT DOES IT MEAN IN PRACTICE?

- *Read FA1 general policies and instructions on GDPR and data privacy.*
- *Use FA1 personal data records only for predetermined and lawful purposes.*
- *Keep existing personal data records up to date, e.g., if you notice that information is out of date, correct it or contact someone who can do so.*
- *Forward contracts, corporate documents, and personnel materials for proper archiving so that retention periods can be determined and applied, rather than keeping the materials or originals in your own files.*
- *Change passwords as instructed and do not disclose them to anyone.*

## 9. ENVIRONMENTAL PROTECTION AND SUSTAINABLE DEVELOPMENT

FA1 uses natural resources, water and energy in production, so the activities undertaken inevitably affect the environment. FA1 complies with environmental regulations, keeps abreast of changes, and makes sure to act in accordance with them.



FA1 strives to reduce the negative impact of its operations on the environment, using the best available methods and techniques whenever possible. Through continuous improvement, it seeks to minimize its negative impact on soil, water, air and biodiversity. It also tries to reduce the noise, dust and vibration generated by its operations.

FA1 values relationships with people and communities in the locations where it operates and impacts. In doing so, FA1 strives to maintain good communication with local and national authorities.

#### WHAT DOES IT MEAN IN PRACTICE?

- *Keep in mind the potential environmental impact of your work.*
- *Use resources efficiently and minimize waste.*
- *Familiarize yourself with the legal requirements for your work.*
- *Share best practices with others.*
- *Conduct measurements and report results accurately and truthfully.*
- *Report any possible activities that pose a threat to the environment.*

#### 10. REPORTING OF RESERVATIONS AND CONSEQUENCES OF NON-COMPLIANCE WITH THE CODE

All employees of FA1 are required to comply with the provisions of the Code. In addition, all FA1 employees are required to report any violations of the Code.

Employees are also encouraged to report any concerns to their employer regarding possible violations of this Code.

Employees can report violations and concerns to their supervisor, as well as under the whistleblowing procedure through an external and anonymous whistleblowing channel.

All reports are treated as confidential in accordance with the Whistleblower Directive (EU 2019/1937) and relevant national laws. No negative consequences will be imposed on an employee who reports a violation of this Code.

If an employee or manager at FA1 commits a violation of this Code, any violation will be subject to appropriate consequences, up to and including termination of employment. If we suspect that an employee's behavior also violates relevant laws, the violation will be reported to the relevant authorities.





## APPROVAL

This Code was approved by the CEO of FA1 on **1 May 2024**. The Code is regularly reviewed and updated as necessary. It is distributed to employees. It can also be accessed by the FA1's stakeholders in Polish and English versions.

For over 20 years, FA1 has been building its reputation as a market leader among companies offering a range of products, including mounting elements for exhaust systems, various seals, mounting kits for turbochargers, rubber elements, flexible connectors, oil drain plugs, mounting clips, and more. Guided by the principle of "everything in one place", we guarantee full access to a diverse selection of high-quality products and exceptional customization options. Our goal is sustainable development in collaboration with our Business Partners.

