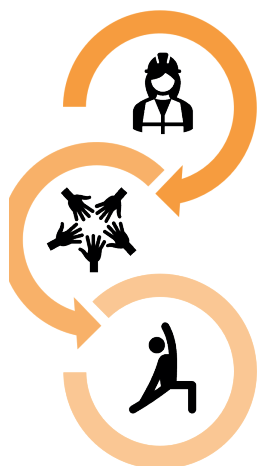


EFI AUTOMOTIVE GROUP POLICY

Within EFI Group through six values, we are determined to provide the best support and maintain continuous improvement to our stakeholders. While realizing all business activities, corporate sustainability put in the first place; as a “responsible” and diversified company; from top to bottom everyone has responsibility towards each other, our customers, and all road users. Our commitment is to be sustainable for Quality, Environment and Safety/Security aspects including, security of people, functional safety, product cybersecurity, information security, Human rights and Labour standards and being Responsible company which are all managed within regulations, requirements and needs of stakeholders.

1.1 OUR COMMITMENT TO PROVIDING HEALTH AND SAFETY TO OUR EMPLOYEES



At EFI Automotive Group, we are committed to ensuring the highest standards of health and safety for our employees. Our commitment encompasses various measures to create a safe, healthy, and supportive work environment.

Maintain the ideal working atmosphere for every individual and ensure mental, physical and social well-being of all internal and external stakeholders.

Ensure safe work conditions, to prevent traumas and work diseases

linked to our risks and activities.

Comply with applicable laws and regulations not only for sites and customers but also for all regions affected by our activities and products.

Improve safety and ergonomics of workplaces, production areas and machines for all locations, and ensure continuity by regular controls and measurements.

Be prepared for emergency situations (fire, chemical spills, etc.) and natural disasters (earthquake, flood etc.) to reduce the impact in each subsidiary.

Include all employees and, where applicable, workers’ representatives within subsidiaries in the management of safety activities.

Proactively identify and address potential risks to prevent incidents and accidents. We aim to detect and manage hazardous situations as early as possible through continuous monitoring and reporting. We manage all occurred incidents to prevent further risks.

Ensure safe handling, storage, and disposal of chemical substances to protect the health and safety of our employees and the environment. All personnel are trained to follow strict procedures when working with chemicals. Compliance with all relevant regulations is mandatory.

Provide personal protective equipment to ensure the safety and well-being of all employees, contractors, and visitors. We commit to maintaining a safe work environment by adhering to all relevant safety regulations, providing comprehensive training, and ensuring the availability and proper use of Personal Protective Equipment (PPE).

1.2 OUR COMMITMENT TO PROTECTING THE ENVIRONMENT



At EFI Automotive Group, we are committed to conducting our business in an environmentally responsible manner. We recognize the importance of protecting our planet for future generations and strive to minimize our environmental impact through continuous improvement and sustainable practices.

Our commitments include:

- **Decarbonization:** We are dedicated to reducing our carbon footprint by implementing energy-efficient technologies, sourcing renewable energy, and promoting practices that lower greenhouse gas emissions.

- **Prevent and Reduce Pollution:** We pledge to prevent and reduce pollution, not only in the context of our activities but also from the broader perspective of our products.

- **Water Quality and Consumption Management:** We will manage water resources responsibly by monitoring and improving water quality, optimizing water consumption, and implementing measures to prevent water pollution.

- **Air Quality:** We are committed to maintaining and improving air quality by minimizing emissions from our operations.

- **Manage Natural Resources:** We commit to managing natural resources and our raw materials responsibly. This includes optimizing resource use, ensuring proper waste disposal, and promoting reduction, reuse, and recycling practices across all our operations.

- **Responsible Chemical Management:** We commit to managing chemicals responsibly by minimizing the use of hazardous substances, ensuring safe handling and disposal, and seeking safer alternatives. We will comply with all relevant regulations.
- **Reuse and Recycling:** We will prioritize the reuse and recycling of materials in our operations to reduce waste and conserve natural resources. This includes implementing recycling programs, designing products for longevity and recyclability, and encouraging a circular economy approach.
- **Soil Quality:** We will take measures to preserve and improve soil quality in the areas surrounding our industrial operations. This includes preventing soil contamination by managing chemical spills and waste properly.
- **Biodiversity:** We are attentive to biodiversity considerations in the management of our sites and activities. We aim to minimize potential impacts on local ecosystems and encourage environmentally responsible practices that contribute, where possible, to the preservation of biodiversity.
- **Noise Emissions:** We will work to reduce noise emissions from

our operations to minimize the impact on local communities and wildlife.

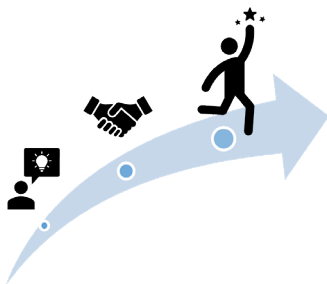
- **Continuous Improvement:** We are committed to continuous improvement in our environmental performance. We will set measurable goals, track our progress, and report transparently on our achievements and areas for development.

- **Stakeholder Engagement:** We will engage with our stakeholders, including employees, customers, suppliers, and the community, to promote environmental awareness and collaborate on sustainable initiatives.

- **Compliance:** We will comply with all applicable environmental laws and regulations and strive to exceed compliance requirements through proactive environmental management.

By adhering to these commitments, EFI Automotive Group aims to lead by example in the pursuit of environmental sustainability and the protection of our planet.

1.3 OUR COMMITMENT TO RESPECTING QUALITY STANDARDS



Provide the best quality, service and support to our customers, through their specific requirements with innovative and reliable solutions with our strong culture of service. Develop processes and parts within regulations and needs, achieving targets set internally or externally to **reach operational excellence and "0" defect.**

Remain focused and continue to develop to build together the company of tomorrow through a solid "Quality" culture.

1.4 OUR COMMITMENT TO RESPECTING FUNCTIONAL SAFETY AND PRODUCT CYBERSECURITY

- **Making functional safety and Product cybersecurity one's priority,**
- **Setting** an organization, a shared culture and safety an **expertise** by all employees and manager of the EFI Automotive Group
- **Promoting safety-security risks** prevention and management,
- **Instating the C.A.T.S (Cyber Aspice Tisax Safety) committee,** group of experts promoting quality and safety-security culture, facilitating communication and speeding decision-making,

- **Involving all the company's processes** with functional safety-security and product cybersecurity consideration.
- **Raising all our employee's awareness** and training in safety-security risks according to their level of involvement,
- **Ensuring skills** are in line with the required responsibilities,
- **Providing suitable tools,**
- Endorsing a **proactive attitude** to detect and treat quality and safety-security risks

1.5 OUR COMMITMENT TO RESPECTING INFORMATION SECURITY STANDARDS



In aspect of Information Security, EFI Automotive Group ensures the information is protected throughout its lifecycle. We do so by:

Defining and applying a security strategy, policies and guidelines that comply with laws, regulations, standards and best practices.

Implementing a continuous security risk management, aligned and proportionate with the strategic objectives of EFI Automotive Group.

Protecting sensitive information with enhanced security measures.

Ensuring business continuity by proactively limiting the impact of a security breach.

Managing information security, in continuous improvement, through an Information Security Management System.

1.6 OUR COMMITMENT TO RESPECTING HUMAN RIGHTS AND LABOUR STANDARDS

The Group's companies, along with their employees, undertake to comply with and promote international law relating to human rights.

Child Labor and Young Workers We are committed to eradicating child labor and protecting young workers. We strictly adhere to local laws and international conventions, notably the International Labour Organization (ILO) Conventions on Minimum Age (No. 138) and the Worst Forms of Child Labor (No. 182). We implement rigorous mechanisms to verify the age of workers and are committed to providing safe and appropriate working conditions for young workers in all our subsidiaries.

Wages and Benefits We ensure that all employees in all our subsidiaries receive fair wages, compliant with or exceeding local minimum wage laws. In addition to base salaries, we offer various social benefits such as paid leave, health insurance, and retirement plans. We believe these benefits contribute to the financial stability and well-being of our employees and their families.

Working Hours We strictly comply with local and international regulations regarding working hours. We are committed to not exceeding maximum allowable working hours and providing adequate rest periods in all its subsidiaries. Overtime is always voluntary and properly compensated according to prevailing laws. We regularly monitor working hours to prevent any work overload.

Modern Slavery We prohibit all forms of modern slavery, including forced labor, servitude, and human trafficking. We implement actions to detect and eliminate these practices within our organization and supply chain, regardless of the country in which we operate.

Ethical Recruitment Our recruitment processes are transparent, fair, and free from discrimination. EFI Automotive does not require any payment from job applicants and ensures that all recruitment respects the fundamental rights of candidates.

Career Management and Training We support the development and employability of its employees through fair and transparent career management practices. We provide equal access to training and professional development opportunities, based on skills and performance, to support continuous learning and long-term career progression across all our subsidiaries.

Freedom of Association and Collective Bargaining We recognize and respect the right of our employees to form and join unions of their choice and to engage in collective bargaining. We promote constructive social dialogue and ensure an environment where employees can freely express their concerns in all our subsidiaries. We are committed to working collaboratively with union representatives to resolve issues and improve working conditions.

Non-Discrimination We are committed to providing an inclusive work environment free from any form of discrimination in recruitment, working practices or conditions, including with regards to remuneration, benefits, advancement, discipline, redundancy or retirement. We uphold the principles of equal opportunity and treat all employees and candidates without distinction of race, gender, age, disability, religion, sexual orientation, nationality, social or ethnic origin, marital status, political opinions, or any other characteristic protected by law. We have implemented procedures to prevent and address any form of discrimination and harassment within our organization, across all our subsidiaries.

Harassment We treat each employee with dignity and respect and don't use corporal punishment or threats of violence or other forms of physical, sexual, psychological, or verbal harassment, bad treatment or intimidation.

Women's Rights We actively promote gender equality and support women's rights within the organization. This includes equal pay, access to career opportunities, and specific measures to protect against violence and sexual harassment. We encourage women's career progression and are committed to creating a safe and respectful work environment in all our subsidiaries.

Diversity, Equity, and Inclusion We value diversity and are committed to creating an inclusive environment where each individual is respected and valued. We promote equity in all our practices and strive to represent the diversity of society within our workforce.

Use of Private or Public Security Forces When employing security forces, we ensure that they respect human rights and act in accordance with national and international laws. We prioritize engagement with security forces trained in ethical standards and non-violent law enforcement practices.

At EFI Automotive, we believe our success relies on our commitment to ethical and responsible practices. This charter guides our actions and reflects our dedication to being a responsible corporate citizen on a global scale. Our subsidiaries in Turkey, China, the United States, and France all adhere to these principles, ensuring a consistent and universal application of our values and commitments.

1.7 OUR COMMITMENT TO BEING A RESPONSIBLE COMPANY

At EFI Automotive Group, we are dedicated to upholding the highest standards of responsibility, integrity, and ethical conduct in all aspects of our business. Our commitment is reflected through various guidelines and procedures designed to ensure compliance, fairness, and transparency.

EFI Automotive Group Compliance Guide: This guide is designed to help EFI Automotive Group employees comply with anti-corruption rules applicable to each legal entity within the Group. We provide annual training to ensure our employees are well-informed and adhere to these regulations.

Whistle-Blowing and Alert Report Procedure: This aims to reinforce our ethical and corporate approach. It extends each employee's and third parties' channel of expression, allowing everyone to play a role in risk prevention, including issues related to discrimination, harassment, conflicts of interest, and breaches of human rights. This procedure enables employees and third parties to obtain information, seek advice, and exercise their right to report irregularities confidentially.

Anti-Money Laundering: We must not tolerate, permit, or engage in embezzlement, money laundering, extortion, bribery, or other forms of corruption in our transactions with any government official, manager, or private sector individual.

Fair Competition: We must behave fairly in conducting our business to guarantee effective competition, essential for the proper functioning of the economy and market stability. To this end, we must comply with all applicable laws and regulations regarding anti-competitive and restrictive practices.

Conflicts of Interest: We are committed to preventing any situation in which employees' and business partners' personal, family, or financial interests could influence, or appear to influence, their professional judgment or decisions. Employees and business partners identified as being in positions of risk are required to complete and sign an annual Conflict of Interest Declaration to ensure transparency and compliance in all business relationships.

Fraud: We are committed to preventing all fraud. Employees and business partners must follow ethical and legal standards. We maintain robust internal controls, promote transparency, and provide secure channels for reporting concerns.

Responsible Sourcing of Raw Material: We are committed to responsible sourcing, adhering to international regulations such as the Conflict Minerals Reporting Template (CMRT), Extended Minerals Reporting Template (EMRT), REACH, PFAS, PRT. By following these standards, we ensure ethical supply chains and protect human health and the environment.

Counterfeit Parts: We are committed to preventing the use of counterfeit parts in our products and supply chain. We require our suppliers to ensure the authenticity and quality of all parts used.

Export Controls and Economic Sanctions: We adhere to all applicable export control laws and economic sanctions. Our suppliers must ensure compliance with these regulations to avoid any illegal transactions.

Intellectual Property: We respect and protect intellectual property rights. Our suppliers must ensure that they do not infringe upon the intellectual property of others and comply with all relevant laws.

Information Security: Protecting information security is a top priority. We implement a continuous security risk management system.

Personal Data Principles: We are committed to respecting and protecting personal data privacy. Our practices comply with relevant data protection laws, ensuring the secure and lawful processing of personal data.

Confidentiality: We maintain strict confidentiality of all sensitive information related to our business operations, employees, and partners.

EFI Automotive promotes social and environmental responsibility amongst its suppliers by asking them to commit to a CSR approach by signing a **Supplier Code of Conduct**.

EFI Automotive Group is committed to continuous improvement in our ethical practices and compliance measures. We believe that by upholding these principles, we can foster a responsible and sustainable business environment for all our stakeholders.