

EFI AUTOMOTIVE GROUP BUSINESS PARTNERS' CODE OF CONDUCT

VERSION 4 - NOVEMBER 2026

EFIAUTOMOTIVE.COM

A MESSAGE FROM THE MANAGEMENT OF THE EFI AUTOMOTIVE GROUP

The EFI AUTOMOTIVE Group is committed to complying with the laws and regulations applicable to its business.

The EFI AUTOMOTIVE Group endeavours to develop a responsible purchases/business procedure, which fully meets its intention to act in an ethical and honest way.

We expect the same commitment from our business partners and want to develop with them loyal, transparent, honest and sustainable business practices.

Therefore, we have decided to formalise this «Business Partners' Code of Conduct» in order to clearly state our expectations in the matter and establish that corporate and ethical responsibility is at the core of our business relations.

The compliance with the principles set out in this Code is an essential criterion for selecting and continuing to trade with our business partners.

We require each business partner to understand these principles, adhere to them and implement them with the mutual aim of shared performance and value.

Béatrice SCHMIDT
Group Chief Executive Officer

David JACQUEL
Group Operations Director (COO)

Lucie VEUILLET
Group Purchasing and Supply Chain Director

1. INTRODUCTION

The purpose of this Business Partners' Code of Conduct created by the EFI AUTOMOTIVE Group (hereinafter the "Code") is to provide guidelines to all suppliers and third parties who have or may have business activities and commercial interactions with one of the entities of the EFI AUTOMOTIVE Group.

By business partners within the meaning of this Code we mean all current or future business partners, service providers, sub-contractors, consultants, sales representatives, distributors, partners, including their employees, their subsidiaries and the employees of their subsidiaries (hereinafter the "Business Partners").

This Code adheres to the Universal Declaration of Human Rights, the UN Global Compact Principles, the general principles of the International Labour Organisation (ILO), as well as the values upheld by the EFI AUTOMOTIVE Group and stated in its Quality & Environment Manual.

Business Partners are expected to comply with the requirements of the Code or, in the event that they are more exacting, the legislative and/or regulatory provisions applicable in the jurisdictions where Business Partners operates their businesses.

Business Partners must also circulate the Code within their organisation so that all of the employees, subsidiaries, and all of the employees of the said subsidiaries, involved in commercial/business relations with the EFI AUTOMOTIVE Group are aware of them beforehand.

Although the Code only applies to Business Partners directly working with the EFI AUTOMOTIVE Group, Business Partners must ensure their own suppliers comply with these requirements.

It is specified that all the situations that the EFI AUTOMOTIVE Group and the Business Partners may encounter in performing their commercial/business activities cannot be anticipated in this Code.

For all cases not stipulated, Business Partners must act in an ethical and professional way, adhere to the principles of integrity and honesty, and comply with the laws, regulations, agreements and industrial standards in force at the local, national and international levels, notably in terms of manufacturing, pricing, sales distribution, transportation and safety of their products and/or services.

2. PRINCIPLES TO COMPLY WITH

2.1 Non-discrimination policy

Business Partners must refrain from any discrimination in recruitment, working practices or conditions, including with regard to remuneration, benefits, advancement, discipline, redundancy or retirement, as well as any discrimination based on race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, marital status, political opinions, disability or any other category protected by the law.

2.2 Child labor

Business Partners are strictly prohibited from putting to work children who are under the legal age of the country where they operate their business. Therein, Business Partners must comply with the provisions of the ILO relating to the health, safety and morality of minors.

2.3 Forced or compulsory labor

Business Partners must by no means have recourse to, participate in or benefit from any form of forced, compulsory or involuntary labour. This includes prison work, slavery, forced labour, military labour, work contracts that cannot be ended by the workers or any form of human trafficking.

2.4 Coercion and harassment

Business Partners will treat each employee with dignity and respect, and must not use corporal punishment or threats of violence or other forms of physical, sexual, psychological or verbal harassment, bad treatment or intimidation.

2.5 Health and safety

Employees and collaborators

The health and safety at work of employees must be a priority for Business Partners in all significant aspects of their businesses.

Therefore, Business Partners must at least comply with all the regulations, laws and standards applicable in health and safety matters it being included safety and security rules of the logistic and transportation chain. Business Partners must take suitable measures such as policies, standards, procedures, emergency measures and management systems, with a view to preventing occupational diseases and work accidents, and provide a safe and healthy working environment for their employees. Business Partners shall also ensure that their business partners, subcontractors and other third parties acting directly or indirectly for the account of the

EFI Automotive Group are always in conformity with applicable laws and regulations but also in conformity regarding the applicable usages in health, safety and security.

Products

Business Partners shall ensure the delivered products' safety and security (process, manufacturing, use) in accordance with the applicable laws and regulations, notably when the product is released and particularly taking into account the security laws and regulations of the products linked to its development (ex: ISO26262). In the light of the above, the EFI Automotive Group is taking into account applicable state of art during all the product's life. Therefore, the EFI Automotive Group expects the same level of implication of its Business Partners.

2.6 Reprisals

Business Partners must not tolerate any retaliatory action against an employee reporting in good faith bad treatment, an act of intimidation, discrimination, harassment or any breach of the applicable law or of this Code, or participating in an investigation based on such a report.

2.7 Remuneration and working time

The EFI AUTOMOTIVE Group expects its Business Partners to acknowledge the indispensability of wages to meet the fundamental needs of the employees.

Business Partners must, at the minimum, conform to all the laws and regulations governing employees and the working time in force, notably those relating to the minimum wage, overtime, maximum working time, hourly rates and the other items of remuneration, and provide mandatory benefits.

2.8 Protection of the environment

Business Partners must operate their businesses in an environmentally friendly way and comply with all the applicable laws and regulations in the country of manufacture or delivery of the products or services concerned. They undertake to continually minimise the impacts of their businesses on the environment.

2.9 Fair competition

Business Partners must behave fairly in conducting their business in order to guarantee the existence of effective competition, essential to the proper functioning of the economy and stabilisation of the market in which they operate.

To this end, Business Partners undertakes to comply with all the laws and regulations applicable with regard to the fight against anti-competitive and restrictive practices.

2.10 Accountability, controlling and financial reporting obligations

The EFI Automotive Group expects its Business Partners to closely follows and respect the accountability and controlling rules and if applicable, the financial reporting rules.

2.11 Compliance with the regulations regarding export control

Business Partners undertake to comply with all the regulations applicable with regard to export control and sanctions of the Member States of the European Union, the USA, and any other country concerned (hereinafter the "Regulations on the Control of Exports").

Therefore, Business Partners are prohibited from breaching, or compelling one of the entities of the EFI AUTOMOTIVE Group to breach one or more Regulations on Export Control (such as the provisioning or delivery of supplies in countries subject to a sanction).

In addition, Business Partners shall inform and ensure that their commercial partners, employees, representatives, subcontractors and other third parties acting directly or indirectly for the EFI Automotive Group's account are, at any moment, in conformity with the safety rules of the transport and supply chain which are likely to apply.

2.12 Compliance with the regulations regarding importations control

Business Partners undertake to comply with European legislation and/or any other applicable legislation on ore (such as tin, tantalum, tungsten, gold) coming from conflict-affected areas. To this end, Business Partners must already exercise their duty of due diligence and ensure that all their importations, which are concerned by the said legislation, come exclusively from responsible sources and not from conflicts. Thereby, as of January 1st 2021, Business Partners must fulfil with "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risks Areas "requirements and follow the five established steps".

2.13 Fight against corruption and prevention of conflicts of interest

Business Partners must not tolerate, permit or practice embezzlement, money laundering, extortion, bribes or other forms of corruption in their transactions with any government manager or employee or person in the private sector. Business Partners must comply with all local, national and international laws in force, as well as the principle adopted by the United Nations Global Compact, which stipulates that "companies must fight

corruption in all its forms, including extortion and bribes".

Business Partners will only engage in legitimate business and ethical practices in relation to their commercial/business operations; They will not pay, offer, give, promise or authorise, directly or indirectly, any payment of any value whatsoever to a third party with the aim or intention of inducing this third party into using its authority to come to the aid of the Business Partners or another third party; and will not accept any payment or benefit of any kind whatsoever as encouragement or reward for any act or allowance having notably a connection with any subject and/or any affair carried out by or on behalf of one of the entities of the EFI AUTOMOTIVE Group.

In particular, Business Partners are prohibited from offering to any one of the entities of the EFI AUTOMOTIVE Group or to the employees of the EFI AUTOMOTIVE Group sums of money, gifts, invitations or other benefits that can influence present or future decisions.

Business Partners must be aware that any employee of the EFI AUTOMOTIVE Group cannot offer or receive any gift, invitation, payment or other benefit that could influence or give the impression of influencing a business decision. This also applies to any person close to the employee (family, friend, etc.).

However, if the law or applicable regulation permits it, gifts of a sufficiently low value so as not to be perceived as an attempt at bribery, such as pens, diaries, cups or sweets can be offered to the employees of the EFI AUTOMOTIVE Group, on condition that the frequency at which the gifts are offered is not excessive or inappropriate and on condition that these gifts automatically bear the brand/trademark, or any other distinctive sign, specific to the Business Partners.

Equally, Business Partners must ensure that their employees avoid any situation of conflict between the interests of the Business Partners and their personal interests or those of their close relations.

2.14 Confidentiality, security and protection of the data/confidential information/business secrecy of the EFI AUTOMOTIVE Group

Business Partners undertake to comply with the confidentiality of the data/information, and business secrecy where applicable, provided by one of the entities of the EFI AUTOMOTIVE Group. For example, and without this list being exhaustive, the following are considered as confidential and business secrets: economic, commercial and financial information, manufacturing secrets and know-how, techniques, equipment, tools, methodologies, information on the personnel, information on customers, price reductions, product samples, estimates, plans, designs, photographs, etc.

Business Partners must use all information from the EFI AUTOMOTIVE Group (data/confidential information/business secrecy) only for the purpose for which it has been collected, received or made available, pursuant to the instructions provided by the EFI AUTOMOTIVE Group, and subject to the technical and organisational security measures required to protect it against any loss, alteration, disclosure or unauthorised access, or other form of illegal processing.

3. CONTROL AND PENALTIES

The EFI AUTOMOTIVE Group is authorised to carry out any checks or audits directly or through an organisation authorised to ensure the Business Partners complies with this Code.

Compliance with this Code is part of the contractual obligations between the EFI AUTOMOTIVE Group and the Business Partners.

Equally, compliance with the principles set out in this Code forms a key criterion in relation to the process to select and retain Business Partners.

Depending on the severity of the breach and the specific circumstances, any failure to comply with this Code may constitute sufficient grounds for the termination of the commercial or business relationship with the Business Partner, without any liability on the part of the terminating party and without the Business Partner being entitled to claim any compensation or indemnity whatsoever.

The EFI AUTOMOTIVE Group would also be likely to report to the competent authorities the actions of Business Partners that are contrary to the aforementioned principles.

4. BUSINESS PARTNERS' ACKNOWLEDGMENT

Business Partners hereby acknowledge that they have received the Code and agrees that all of their current or future employees, subsidiaries and the employees of their subsidiaries, dealing with one or more entities of the EFI AUTOMOTIVE Group will receive the Code and will comply with all of its terms.

Business Partners acknowledge that their failure to comply with one or more of the principles as stated in the Code, will be a breach of their main obligations under the commercial/business relations with the EFI AUTOMOTIVE Group that could compel the EFI AUTOMOTIVE Group to terminate the said commercial/business relations and to notify the competent authorities where applicable.

If Business Partners are aware of or witness to behaviour

by one of their employees, or by an employee of the EFI AUTOMOTIVE Group, that could be contrary to the principles stated in the Code, they acknowledge that they must notify the compliance department of the EFI AUTOMOTIVE Group at the following address: compliance@efiautomotive.com, in such a way that all suitable measures can be taken to stop the contrary behavior thus raised.

Business Partners also acknowledge that their commitment to comply with the Code in no way obligates any of the entities of the EFI AUTOMOTIVE Group to conclude contracts or place orders with their Business Partners.

Company: .....

Name: .....

Position: .....

Duly authorized to act in the name and on behalf of the Company

Signature dated and and followed by "read and approved":

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