

## **PWO Business Partner Code of Conduct**

PWO AG, including its affiliates as defined by § 15 of the German Companies Act (AktG) (jointly referred to as "PWO" or the "Group"), is a partner to the global automotive industry for the development and production of advanced metal components and subsystems using lightweight construction. Since PWO was founded in 1919, the Group has developed a unique knowledge in metal forming and joining. With our expertise in cost-optimized lightweight construction, we contribute to environmentally friendly driving and greater distances.

### **Basic Principle of Our Business Activities**

For a successful company rich in tradition like PWO, acting in compliance with the law is a matter of course. To safeguard and deepen trust in the Group's management among shareholders, employees, customers and suppliers, as well as among the public, we are committed to responsible corporate governance. We are true to our corporate mission in conducting our business with integrity and in compliance with ethical standards. This basic principle is the foundation of our activities and an essential factor when it comes to securing our company's long-term, sustainable success for the future. The above-noted principle is also reflected in our Code of Conduct, which serves as a guideline and standard for our managers and employees. We also expect our business partners to follow the principles defined in this Business Partner Code of Conduct. The Code of Conduct and the PWO Business Partner Code of Conduct have been published at the PWO home page <https://www.pwo-group.com/en/group/corporate-governance/principles-of-conduct/>.

The PWO Business Partner Code of Conduct goes beyond mere compliance with laws and regulations. We consider it an indispensable condition for the selection and appraisal of, and for our collaboration with, our business partners that they: act in conformity with all applicable laws and observe ethical standards, also take this into account in selecting their business partners and work towards realizing this basic understanding throughout PWO's entire supply chain. Any statutory national, supranational or international laws and regulations remain in force where applicable and take precedence over this Business Partner Code of Conduct wherever they set higher standards in individual cases. In case of lower standards, the Business Partner Code of Conduct shall take precedence.

### **1. Behaving with Integrity in All Business Activities**

#### **Prohibition of Corruption and Bribery**

Corruption is prohibited by international conventions (e.g., the principles of the UN Global Compact and the UN Conventions against Corruption) and national laws. PWO does not tolerate any form of bribery or business practices that may give rise to the impression that there is any impermissible taking of influence or manipulation among both its own employees as well as its business partners. PWO expects that its business partners refrain from offering any advantages whatsoever to third parties and receive neither any direct nor indirect advantages for themselves from others. Likewise, they shall not promise any advantages constituting an illegal action pursuant to the applicable anti-corruption laws. PWO also expects that its business partners do not tolerate any form of illegal gratuities whatsoever, particularly in business contact with official dignitaries and authorities at home and abroad. They shall likewise ensure the integrity of their employees' conduct and procedures.

### **Invitations and Gifts**

In the handling of gratuities, for example in the form of gifts or invitations, the business partner shall pay close attention generally and particularly, with respect to its activity for PWO, to avoid any appearance of impropriety or incorrectness. PWO expects that its business partners do not abuse invitations and gifts for the purpose of exerting influence. Invitations and gifts to PWO employees or persons associated with them shall be granted only if the reason and value is appropriate, i.e., if they are of low value and if they can be considered as an expression of locally generally accepted business practice. In the same way, business partners shall not solicit any inappropriate advantages from PWO employees.

### **Fair Competition**

PWO expects that its business partners act fairly in competition and observe the applicable legal regulations of anti-trust and competition law. Business partners shall neither participate in any agreements with competitors contrary to anti-trust regulations nor take advantage of any possibly existing market-controlling position.

### **Money Laundering**

PWO expects that its business partners observe the relevant legal requirements for the prevention of money laundering, that they do not get involved in money-laundering actions, and that they support the international fight against money laundering.

### **Avoidance of Conflicts of Interest**

PWO expects that its business partners make their decisions regarding their business with PWO exclusively on the basis of objective considerations. Conflicts of interest with private or family matters or otherwise with economic or other activities, as well as those of associated persons or entities or other related persons or organizations shall be avoided from the outset.

### **Financial Responsibility**

We expect our business partners to accurately record, maintain and report on business records, including, but not limited to, financial statements and transactions relevant to accounting. Our business partners must comply with accounting regulations and regularly publish information on business activities and the financial situation in accordance with legal requirements.

### **Export controls and trade sanctions**

We expect our business partners to comply with relevant import and export regulations for the movement of goods, services and information and to respect national and international restrictions on trade and monetary transactions for individual countries, regions or individuals, including relevant sanctions lists.

### **Intellectual property rights and plagiarism**

We expect our business partners to respect know-how, inventions, patents, trademarks, copyrights and other intellectual property rights of all companies as well as individuals. Our business partners are committed to preventing the introduction and use of plagiarism and counterfeit materials. When plagiarism and/or counterfeit materials are detected, they are isolated and, if necessary, law enforcement authorities are informed.

### **Whistleblower System**

PWO expects its business partners to promote a culture of openness and transparency and, for this purpose, to implement a whistleblower system in order to provide its own employees, as well as third parties, with the opportunity to anonymously and confidentially report legal violations and misconduct. Whistleblowers are protected from reprisals in the event of justified reports.

If the business partner uses workers for PWO, the business partner shall inform them about the Whistleblower System established at PWO, its purpose and functioning. The business partner shall refrain from any obstruction of information given to PWO by the workers used for PWO on violations of this PWO Business Partner Code of Conduct. PWO has the right to question the workers used by the business partner for PWO to verify compliance with the above information obligation.

## **2. In the Interest of Human Rights**

PWO expects from its business partners the recognition of the "Universal Charter of Human Rights" of the United Nations, the principles of the UN Global Compact, and the core work standards of the International Labor Organization (ILO), in consideration of the country-specific laws applicable at the different sites. PWO expects its business partners to ensure compliance with fundamental human rights in their business operations in accordance with the applicable national laws and regulations.

### **Child Labor**

PWO expects that its business partners prohibit and refrain from any kind of child labor at their companies.

### **Discrimination**

PWO expects that its business partners treat their employees fairly and that they prevent discrimination in the hiring of employees as well as in promotions, the remuneration of work of equal value or the provision of training or continued education measures. We expect from each business partner that they do not discriminate against anyone by reason of their gender, skin color, national and ethnic origin, age, citizenship, political opinion, world view, religious affiliation, social origin, health status, disability, or sexual orientation.

### **Rights of minorities and indigenous peoples**

The rights of minorities and indigenous peoples shall be respected and protected by PWO's business partners.

### **Diversity, Equality, Inclusion, and Women's Rights.**

PWO expects its business partners to actively promote gender equality and ensure equal opportunities and equal rights for women and men in all aspects of education, personal and professional development. Our business partners are expected to actively promote diversity and inclusion.

### **Human Trafficking, Slavery and other forms of Forced Labor**

PWO prohibits any kind of human trafficking, slavery, forced labor or comparable practices and expects the same from its business partners.

### **Freedom of Association**

PWO expects that its business partners respect the freedom of association as well as the right to form interest groups. Thus, they shall grant the right to their employees under national laws and regulations to represent their interests collectively.

### **Compensation and Working Hours**

PWO expects that its business partners observe the respectively applicable legislation on working hours. Furthermore, it is expected that the employees of our business partners receive compensation that is consistent with the respectively applicable national, provincial and/or state laws.

### **Health Protection and Work Safety**

PWO expects that its business partners observe the applicable legislation on health protection and work safety. The business partner shall support the protection of its employees' safety and health through appropriate measures, such as preventive and consistent work protection, appropriate instruction and training as well as a safe and healthy work environment.

### **Deployment of Security Forces**

PWO expects that its business partners, when hiring or using private or public security forces for business purposes, will discourage the use of extensive violence and interference with freedom of association and freedom of labor by providing adequate instruction and supervision of the security forces.

### **Land Acquisition**

PWO expects that when acquiring land, its business partners will not engage in unlawful evictions or other forms of unlawful deprivation of land, forests, and waters whose use provides a person's livelihood.

## **3. Environmental Protection**

### **Efficient Dealing with Resources**

The business partner shall, within the scope of its capabilities, advocate for the efficient use of energy, water and raw materials, the use of renewable resources, the decarbonization and the minimization of environmental and health damage. Non-renewable resources in particular should be used as sparingly as possible. PWO expects the business partner to continuously identify and implement potential improvements as part of its environmental policy.

### **Avoidance and Mitigation of Environmental Impacts**

#### CO<sub>2</sub> Reduction and air quality

PWO develops its climate targets in line with the Paris Climate Agreement and in collaboration with its business partners, contributing to the reduction of CO<sub>2</sub>/greenhouse gas emissions and improvement of air quality along the value chain. As such, PWO expects its business partners to record and monitor direct and indirect CO<sub>2</sub>/greenhouse gas emissions, including the upstream supply chain. The business partner shall strive to continuously improve air quality and reduce such CO<sub>2</sub>/greenhouse gas emissions in line with the Paris Climate Agreement and within the scope of its capabilities.

#### Water Quality and Consumption

PWO expects targeted prevention from its business partners, particularly in areas where environmental pollution can have a damaging effect on the basis of food production, access to sanitary facilities and safe drinking water, or the health of individuals. Water consumption is to be recorded completely and transparently and continuously reviewed for reduction potential.

#### Soil quality and noise emission

Business partners shall ensure that they do not cause harmful soil changes or harmful noise emissions that may lead to a significant impact on the natural basis for food or human health.

### **Handling Hazardous Substances and Waste**

The business partner shall observe the guidelines set by applicable laws and international agreements (e.g. REACH, the Minamata Convention on Mercury of October 10, 2013, the Stockholm

Convention on Persistent Organic Pollutants of May 6, 2005, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of March 22, 1989 the Regulation (EC) No 1013/2006 of the European Parliament and of the Council of June 14, 2006 on shipments of waste) in the use, production and trade of hazardous substances, other chemicals and wastes.

### **Sustainable Products and Recycling**

In developing products and services, the business partner shall ensure that their use is economical in terms of consumption of energy and natural resources. This includes that reuse, recycling and safe environmentally friendly disposal are taken into account, and that waste is reduced as much as possible. PWO expects its business partners to comply with the applicable environmental laws, regulations and standards.

### **Biodiversity, land use and animal welfare**

We expect our business partners to ensure the protection of natural ecosystems, in particular the protection of endangered wildlife habitats, and the sustainable use of natural resources. Within the framework of applicable law and international regulations on biodiversity, business partners shall strive for supply chains that are free of deforestation and degradation, as well as careful land use. Our business partners shall support and promote the ethical and species-appropriate treatment of animals.

## **4. Confidential Handling of Information**

In order to protect confidential and personal information, data and plans, the business partner shall store these securely and protect them against access by third parties.

PWO expects that its business partners observe all relevant laws and regulations regarding data privacy and that they gather, process and use personal data only in accordance with the conditions of the applicable data protection regulations.

Business partners may use information exclusively for authorized purposes and in an appropriate way and manner. All business partners of PWO undertake not to disclose any confidential data or business secrets to third parties without PWO written authorization and not to use these on their own for their own purposes.

## **5. Compliance and Implementation of Standards Described**

PWO calls on its business partners to carry out a self-assessment based on a supplier survey. PWO will verify the compliance and implementation of the standards described herein within the scope of a risk-based review in order to detect any compliance or integrity risks.

In case of non-compliance with the standards described in this PWO Business Partner Code of Conduct, PWO reserves the right to review the business relationship with each business partner. In doing so, PWO will adhere to the principle of appropriateness, such that PWO will review carefully which consequences are appropriate, suitable and required in each individual case. This may lead to an immediate termination of the business relationship as well as to claims being brought for damage compensation.

If the business partner uses workers for PWO, it shall communicate to them the work-related content of the PWO Business Partner Code.

### **Supplier Relations**

PWO's business partners shall require their subcontractors and suppliers to comply with the principles and requirements described in this PWO Business Partner Code of Conduct and take this

into account when selecting such subcontractors and/or suppliers. PWO's business partners strive for compliance in the supply chain leading to PWO. Particular attention must be paid to the responsible procurement of raw materials, as the extraction, further processing, and trade of certain raw materials can be associated with high risks for people and the environment.

### **Management Systems**

PWO recommends that its business partners implement the appropriate management systems or equivalent processes to ensure compliance with the principles listed herein, e.g., by using a certified management system.

## **6. Reporting of Violations**

Despite the commitment to act honestly and ethically, every company is exposed to the risk that various situations may not proceed appropriately or that unlawful or unethical acts may be committed, either knowingly or unknowingly. To ensure that PWO is able to respond to misconduct in a timely and appropriate manner, everyone's attention and willingness to cooperate is required. PWO's whistleblower system provides everyone with a way to inform PWO about misconduct within PWO or in connection with PWO. PWO expects its business partners not to obstruct communications through the whistleblower system. If the business partners have concrete, well-founded evidence of a severe infringement or breach of rules within PWO or any non-compliance in connection with PWO, the business partners can use PWO's external whistleblower system to report these. The whistleblower system is available round the clock. PWO also accept anonymous tips. The whistleblower system is available at the link below:

<https://pwogroup.integrityline.app/>

Business partners can also access it from the PWO home page under *PWO Group > Corporate Governance > Whistleblower System*.

Alternatively, business partners can also provide tips directly to PWO's Compliance Officer.

### **Compliance Officer of PWO de México S.A de C.V.**

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## Confirmation PWO Business Partner Code of Conduct

We, the undersigned, hereby confirm that

- we have received the PWO Business Partner Code of Conduct and we acknowledge and accept it,
  - we know all the relevant laws and regulations of the countries in which our company operates,
  - we conduct our business based on ethical principles, applicable laws, and social responsibility,
- and
- we take into account all standards described in the PWO Business Partner Code of Conduct when it comes to selecting our business partners.

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Company's full name

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Stamp/ seal of the company

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First and last name

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Title

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Signature

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Commercial register, place

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Commercial register No. or VAT ID

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Place, date

This document must be signed by an authorized representative of the business partner and be returned to the requesting PWO legal department.