

FLABEG CODE OF CONDUCT

1. Aim and motivation of this Policy

FLABEG stands for leadership, precision and perfection. Our core expertise lies in bending, coating and processing glass for the automotive industry. Our aim is to be a leading market player in all of the business areas in which we operate. As such, FLABEG understands itself as a global player and is fully aware of its social responsibility.

Long-term commercial success is dependent on sustainable and future-oriented management. In this context, unconditional compliance with ethical principles, legal requirements and self-imposed commitments is crucially important. This Code of Conduct promotes and consolidates a high degree of integrity in commercial transactions and serves as the basis for all business decisions.

It provides every employee and every manager with a set of legal and ethical guidelines. The rules contained in the Code of Conduct describe the minimum standards that are binding on FLABEG and its employees in terms of operating with integrity. Locally binding rules, requirements and circumstances should also be taken into account in this regard.

This Code of Conduct serves as a guide to help us make the right choices. However, it will not answer all questions you might have. As additional sources of information with regard to compliance, FLABEG has established and will establish more detailed (Group) policies on specific issues to complement this Code of Conduct.

The absence of specific guidance, however, does not relieve us of our responsibility to adhere to the highest ethical standards when engaging in business transactions.

2. Scope

This Policy applies to FLABEG Automotive Glass Group GmbH and all of its subsidiary companies and affiliated companies controlled by it (“**FLABEG**”). This includes all directors, officers and employees of each FLABEG company (which for these purposes includes, but is not limited to, temporary or contract staff) (“**Employees**”).

The managers of every FLABEG company undertake to support and enforce this Policy. The Head of the Legal Department is responsible for establishing and implementing this Policy. Questions in relation to this Policy should be directed to the Legal department. Please use the following contact details in this regard:

Telefon: +49 911 / 964 56 211
Email: legal@flabeg.com

3. Basic Conduct

3.1. Compliance with the law

We carry out all transactions of FLABEG in accordance with the principle of strict legality. This includes the payment of taxes, obtaining necessary official permits (typically pertaining to customs and export control law) and observing third-party rights. We are obliged to comply with laws and regulations as well as with the applicable internal FLABEG guidelines and policies. Violations of the law and/or breaches of internal guidelines shall be avoided. We bear personal responsibility for compliance with the law in our respective field of work. Irrespective of any sanctions provided by law, actions contrary to the law and/or internal guidelines may lead to disciplinary action.

3.2. Respect, Honesty and Integrity

We respect the personal dignity, personal rights and private sphere of each individual. We treat each other fairly, politely and respectfully.

Our decisions with regard to team members and business partners are based exclusively on facts and objective deliberation. We reject any inappropriate motivation, such as discrimination. Employees must not be affected by actual or potential conflicts of interest. We report any situation that could involve a conflict of interest to a line manager or the FLABEG legal department before proceeding with the next steps.

Nobody may be discriminated, harassed or disadvantaged because of race, skin color, nationality, gender, sexual identity or orientation, religion or political view. In this regard we also comply with local anti-discrimination laws. We shall furthermore support and respect the internationally recognized Human Rights as stated in the United Nations Global Compact. We will not tolerate any violations of these rights and will take the required action in the case of adverse events.

3.3. FLABEG Reputation

The reputation of FLABEG is particularly shaped by the actions and behaviour of every employee. Improper or illegal conduct on the part of employees could substantially harm FLABEG. Therefore, we must consider, protect and promote the reputation of FLABEG through all of our actions.

4. Product Quality, Safety and Environment

4.1. Product Quality

FLABEG's products are manufactured according to strict quality standards. Our excellent quality management system enables us to achieve our aim of maximum product safety. We require strict compliance with statutory and company production and product safety rules and regulations.

4.2. Safety

The health and safety of its employees at the workplace is of highest priority for FLABEG. The job environment must meet the requirements of a health oriented organization. This includes controlling hazards and taking the best reasonably possible precautionary measures against accidents and occupational diseases. Processes and operating resources must comply with the applicable statutory and internal provisions governing occupational health, safety, environmental and fire protection.

All managers are responsible for the health and safety of their staff pursuant to the legal requirements and must take care to ensure that their staff are regularly trained and properly supervised in this regard.

If we have any safety-related concerns, we must inform the responsible departments without delay, in order to take appropriate steps for the protection of our employees and customers.

4.3. Environment

We contribute to the protection of the environment and mitigation of climate change. This means that we use resources prudently and responsibly. We support the development of operational processes that reduce our environmental footprint and promote ecologically sustainable product development.

5. Integrity in Business Activities

5.1. Anti-trust

FLABEG upholds the rules of fair competition. Compliance with national and international competition and antitrust legislation is a fundamental principle at all levels of the company. Participation in any kind of anticompetitive practices is forbidden.

5.2. Conduct towards competitors

We must not enter into any concerted practices with competitors or anticompetitive agreements. Even the unilateral disclosure to competitors of sensitive or strategic information such as any kind of price-related information (net prices, gross prices, price lists, etc.), price increases, capacity utilization rates, incoming orders, and future research and development projects may constitute a violation of antitrust law. In addition, price agreements, allocating markets or setting target market shares are generally prohibited.

5.3. Conduct towards suppliers

Dealings with our supplier are characterized by fairness and respect. Quality, price, reliability and supply stability are the main criteria used in our decisions regarding the sourcing of materials and services.

As a matter of principle, we will compare offers from several different potential suppliers at the same time in order to promote competition. We assess offers fairly and impartially, and our decision-making process is not influenced by personal interests with regard to existing or prospective suppliers. We aim to purchase from a range of suppliers in order to avoid over-dependence on a single supplier and to prevent a situation in which vendors are excessively reliant on FLABEG. We make sure to source at best possible level by periodically reviewing the conditions of our regular main vendors. We strictly adhere to internal rules regarding decision-making and the conclusion of supplier agreements (e.g. two sets of eyes principle).

We expect high standards with a view to suppliers' compliance with local laws and regulations. We will not tolerate the exploitation of employees, child labour, forced labour, human trafficking or any similar practices. Environmental protection, resource-efficient production and performance are all key criteria in our procurement strategy and have a significant impact on our decision-making. We protect the confidentiality of information received from vendors.

5.4. Business Partners

When mandating third parties (e.g. intermediaries, agents, advisers, or representatives) to act on behalf of or in the interest of FLABEG (hereinafter referred to as "**Business Partner**"), we take care to ensure that these persons do not use any unfair business practices. Employees may also not use Business Partner to circumvent the above rules.

FLABEG has established and will flesh out the details of a process in relation to Business Partners' Compliance.

5.5. Foreign trade

When doing business abroad, we comply with foreign trade, tax and customs legislation in force in the countries in question. We obtain necessary official permits (typically pertaining to customs and export control law). We must adhere to these rules unconditionally. This applies in particular to employees involved in the purchase, manufacturing or supply of products.

6. Prevention of corruption

FLABEG is committed to meeting high ethical standards in its business. FLABEG will not tolerate unfair practices by employees and Business Partners.

Unfair advantages may not be sought or accepted from, or offered or granted to our Business Partners. Any actions that might lead to a perception of improperly influencing or being improperly influenced shall be avoided.

Advantages are any kind of benefit that improves the beneficiary's personal, economic or legal situation (including close relatives). This includes not only cash payments, but also all kinds of gifts, invitations and other benefits of a personal nature.

An advantage is unfair when it is not customary and inappropriate taking into account the circumstances of the particular case (especially the occasion for the granting of the advantage and the personal position of the beneficiary). If the aim of the advantage is to improperly influence a business decision or might be perceived as improperly affecting the recipient's independence of judgment towards the giver, this advantage could be seen as unfair.

Gifts and hospitality may be justified for the achievement of FLABEG's business objectives. In some cultures they play an important role in business relationships. However, such Business Courtesies must be reasonable and legal. We do not offer or accept gifts or hospitality that might improperly affect or appear to improperly affect the outcome of a business decision. With regard to gifts and hospitality, the guidelines outlined in FLABEG's Anti-Corruption and Anti-Bribery Policy apply accordingly.

7. Dealing with information

All records and reports, whether internal or external, must be accurate and truthful. We must comply with the accounting principles applicable to the respective Group entity.

We may only use confidential information of the company as the basis for the creation of records and files on condition that their creation serves the interests of FLABEG. Company information may only be published with prior written consent. We may not use confidential commercial data for private insider trading and may not disclose such information to third parties for this purpose.

Confidential information and trade secrets of the company are very important to our business and competitive position and therefore must not be disclosed to third parties. The obligation to maintain secrecy shall remain effective even after termination of the employment. The security of all business data must be ensured. We are required to choose passwords according to password security standards and are obliged to change passwords on a regular basis. We must ensure that third parties cannot access business data when we leave our workstation unattended.

Protection of personal data in compliance with the applicable statutory requirements must always be guaranteed. Personal data may only be collected and processed for certain specific commercial or other legitimate purposes and in accordance with the statutory rules. Unauthorized access must be prevented by appropriate security measures.

8. Anti-Money-Laundering

FLABEG fully supports international actions against money laundering. Money is laundered by slipping assets originating from criminal offences into the regular economic cycle. In order to prevent money laundering, we must take special care when any questionable financial transactions are requested by clients, business partners or other employees. We must not tolerate or participate in any misuse of FLABEG for illegal activities.

9. Support and Concerns

We are required to report internally any circumstances that indicate a violation of this Code of Conduct. All Employees are obliged to inform FLABEG of any circumstances that appear to indicate violation of this Policy. Employees are actively encouraged to report any concerns regarding bribery and corruption.

Following means of communication are available:

- **Written Notification** by mail to:
atarax Unternehmensgruppe, Luitpold-Maier-Str. 7, D-91074 Herzogenaurach, Germany
- Via a **Whistleblower-portal's** contact form:
<https://www.atarax.de/de/startseite/leistungen/hinweisgeberportal>
This link redirects you to the whistleblower-portal operated by our Data Protection Officer. It is self-understood that such redirection never is subject to any kind of tracing. This portal, of course, offers the option to issue anonymous notifications.
- Via **Phone-Hotline**: + 49 (0) 160/96210839
- Via **E-Mail**: compliance@atarax.de

You are, of course, free to approach your managers, the legal department of the FLABEG Group (legal@flabeg.com) or your local human resources department in order to report any concerns or observations.

When reporting potential violations, we ideally also include our name. However, reports may also be made anonymously. An assurance is given that all reports received will be treated confidentially and investigated.

If we report in good faith a suspected legal or ethical compliance incident or conflict of interest, and regardless of whether that suspicion turns out to be valid, we will not be subject to retaliatory or disciplinary action or to any other adverse employment conditions as a result. This includes in any situation where the suspicion raised ultimately proves to be unfounded.