



## SUPPLIER CODE OF CONDUCT

Dear Valued Partner/Supplier,

SFC Solutions expects all its suppliers to engage in responsible supply chain practices and to comply with this Supplier Code of Conduct (this “Code”).

The provisions of this Code are in addition to the provisions of any legal agreement or contract between a supplier and SFC Solutions or any of its subsidiaries or affiliates. We expect suppliers to hold their supply chain, including subcontractors, third party labor agencies and any contract and seasonal workers, to the same standards contained in this Code.

On the other hand, this Code does not create any third part beneficiary rights or benefits for suppliers, subcontractors, their respective employees or any other party.

SFC Solutions respects the law in its business operations and expects all its suppliers to do the same by complying with all laws that apply to their respective businesses and their work with us, our subsidiaries and our facilities. In case of any conflict between what the law requires and the standards of this Code, each Supplier must meet the higher standard.

## INTEGRITY

Everyone who works for and does business with SFC Solutions is expected to act with integrity, make the right decisions and take the right actions in compliance with applicable laws and regulations in the countries and jurisdictions in which they operate. Each supplier must be able to demonstrate compliance with this Code upon SFC Solutions' request and take action to correct any noncompliance. SFC Solutions, its subsidiaries and affiliates, reserve the right to audit any supplier's compliance with this Code and to terminate any agreement or arrangement with any supplier who cannot or will not demonstrate compliance with this Code.

**Anti-Corruption and Anti-Bribery:** Suppliers shall comply with all anti-corruption and anti-bribery laws. This means, no supplier can offer or accept any bribe, kickback, favor or anything of value; engage in any extortion or embezzlement; or use any improper influence when dealing with government officials or in any business arrangements in order to obtain an improper advantage. In addition, Suppliers are prohibited from providing or offering gifts to SFC Solutions employees that could inappropriately influence SFC Solutions' business decisions or gain an unfair advantage.

**Books and Records:** Suppliers shall maintain accurate and transparent financial books, business records and accounts.

**Export Controls and Sanctioned Parties:** Suppliers shall confirm that they adhere to any relevant restrictions or sanctions on the export of goods or services, as well as to any applicable restrictions on trade with certain countries, regions, companies, entities or individuals.



**Non-Retaliation:** Suppliers shall prohibit retaliation against employees who report a compliance or ethical issue learned during the work performed for SFC Solutions or who cooperate in good faith with the investigation of a complaint.

**Conflict Minerals:** To facilitate an assessment of upstream supply chain compliance, Suppliers must be able to disclose supply chain mapping back to the primary origin associated with the products or services provided to SFC Solutions, its subsidiaries and affiliates for products which contain tin, tungsten, tantalum, gold or any other material or derivative designated by the U.S. State Department as a “conflict mineral”. More specifically, suppliers are required to undertake reasonable due diligence with their supply chains to assure that conflict minerals are being sourced from mines and smelters outside the Democratic Republic of the Congo (“DRC”) or an adjoining country (collectively, the “Conflict Region”) or, if sourced within the Conflict Region, from mines and smelters that have been certified by an independent third party as DRC conflict free. To the extent any supplier does not currently have this capability, such a supplier is required to disclose its future plans to do so. Suppliers shall make all disclosures to SFC Solutions upon request within a timely manner.

**Confidentiality and Data Security:** Suppliers shall safeguard our information by keeping it secure (whether in paper, electronic or other media), limiting access and avoiding discussion or revealing such information in public places, even after our business relationship ends.

## **HUMAN RIGHTS**

SFC Solutions requires each of its suppliers to conduct its activities in accordance with the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work and the United Nations Universal Declaration of Human Rights.

### **Human rights**

We respect, protect, and promote all regulations in force to protect human rights, women's rights and children's rights (hereinafter called human rights) as a fundamental and general requirement throughout SFC Solutions and its supply chain.

### **Diversity, equity and inclusion**

We provide equal opportunities to our employees without any kind of discrimination and harassment. We do not discriminate against anyone based on a person's or group's race, color, religion, age, sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), sexual orientation, gender, gender identity or expression, marital or partnership status, family status, citizenship, genetic information, national origin, geographic background, or disability.

### **Diversity & empowerment of women**

We believe that diversity and the empowerment of women in the work context are key in fostering a more inclusive and equitable workplace. We believe that embracing diversity means recognizing and valuing the unique perspectives, experiences, and talents that individuals from different backgrounds bring to the table. All these factors contribute to enhancing creativity and innovation and promote a more collaborative and harmonious work environment.



**Forced Labor:** Suppliers will not use any form of slave, forced, bonded, indentured or involuntary labor. Suppliers will not engage in human trafficking or exploitation or import goods tainted by slavery or human trafficking. Suppliers will not require payment of fees or the surrendering of government-issued identification, passports or work permits as conditions of employment.

**Child Labor:** Suppliers shall ensure that no underage labor has been used in the procurement, production or distribution of their goods or services. Suppliers will not employ children less than the years of age allowed by local law.

**Freedom of Association and Collective Bargaining:** Suppliers shall recognize and respect the rights of employees to associate or not to associate with any group, as permitted by law and in accordance with all applicable laws and regulations.

**Employment Status:** Suppliers shall employ only workers who are legally authorized to work in their location and facility and are responsible for validating employees' eligibility to work through appropriate documentation.

**Anti-Discrimination and Fair Treatment:** Suppliers shall encourage a diverse workforce and treat employees with fairness, dignity and respect. There will be no unlawful discrimination, harassment or abuse of any kind.

**Wages and Benefits:** Suppliers shall provide employees with compensation that includes wages, overtime pay, premium pay and benefits that meet or exceed the legal minimum standards. Suppliers shall pay employees equal pay for equal work without discrimination. Suppliers shall pay employees in a timely fashion and make no deductions from pay for disciplinary reasons.

## CORPORATE RESPONSIBILITY

We ensure a safe and respectful environment with a focus on environmentally responsible materials, products and procedures.

**Health and Safety:** Suppliers shall provide employees with a safe, respectful, clean and healthy work environment. Each supplier is responsible for integrating comprehensive health and safety management practices and job-specific risk assessment, risk management and safety training into its business. Suppliers shall give their employees the right to refuse unsafe work and report unsafe or unhealthy working conditions. Each supplier will meet or exceed applicable laws and industry standards in this area. Suppliers will maintain a program to achieve continuous improvement in workplace safety. Suppliers will provide only products and services that are safe and in compliance with all applicable local and national laws.

**Environment:** Suppliers shall manage, measure and minimize the environmental impact of their facilities and demonstrate continuous improvement in areas such as air emissions; waste reduction, recovery and management; water use and disposal; energy usage; and greenhouse gas emissions.

**Chemical Compliance:** Suppliers shall maintain programs to actively participate in and comply with the requirements of all applicable chemical-related laws, such as Europe's REACH and RoHS and the automobile industry's International Material Data System (IMDS).

### **Reporting possible violations (Whistleblowing)**

Suppliers can create internal programs, processes and procedures for handling reports of workplace grievances, including anonymous reports.



Anyway, to report anonymously a concern or suspected violations of law or this Code to SFC Solutions, all Suppliers shall contact SFC Solutions at the following link:

<https://sfcsolutions.integrityline.com/>

This includes actual or suspected violations by any employee or agent acting on behalf of either the supplier or SFC Solutions.

All the above standards are binding for the entire SFC-Solutions supply chain. By signing below, you agree that you have read this Supplier Code of Conduct and agree to abide by all its terms.

Leszek Zajkowski

Signed by: Leszek Zajkowski 23-Apr-25 | 11:34 CEST  
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Chief Purchasing Officer

SFC Solutions Europe

Supplier Company Name: \_\_\_\_\_

Company Representative Signature: \_\_\_\_\_

Company Representative Name (Printed): \_\_\_\_\_

Date: \_\_\_\_\_