

CODE OF CONDUCT

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Thermoplastik s.r.o. is hereby committed to the ethical conduct and honesty of its business objectives. This Code of Conduct is a binding document derived from the company values and applies to all company employees. It sets out the principles of mutual behavior of the company, employees and entities from the external environment.

1. Protection of the good name and property of the company

Employees are obliged to behave in such a way as to spread the good name of Thermoplastik s.r.o. and protect company's interests. Every employee has an obligation to protect the intellectual property and material wealth of the company. The use of company property, including work equipment, supplies, buildings or other property for personal gain, is prohibited unless expressly permitted by agreement between the employee and the employer. Intellectual property is a valuable asset and must be protected from unauthorized use or disclosure. Such ownership includes trade secrets, confidential information, logos, customer lists, business opportunities, product specifications, whether owned by our company or business partners.

2. Protection of personal data

The company respects the privacy of employees and is committed to protecting their personal data. Personal data is processed in accordance with the Personal Data Protection Act and the applicable internal guidelines that result from this Act. Only authorized employees of the company have access to this data and process this information in order to fulfill the company's obligations.

Taking into account the protection of privacy and personal data protection, the company reserves the right to access and monitor computers and video monitoring of the company's premises for the maintenance of information technology in which personal data is processed, as well as to meet its business obligations or obligations arising from generally binding legislation and internal directives.

3. Relationships in the company

Relationships in the company are based on transparency, open communication, mutual trust and respect. Relations with employees and between superiors and subordinates are based on respect for the dignity of every human being and respect for fundamental human rights. Everyone has the right to respect for human dignity, personal honor, reputation and the protection of the name. The company's management does not interfere with

the private and family life of employees, does not tolerate any psychological or physical violence and motivates its employees to express their opinions and open discussion.

4. Safety and health

The company takes care of a high level of health and social care for employees and creates conditions for a safe working environment. The general principles of prevention and the basic conditions for ensuring safety and health at work and for eliminating the risks and factors conditioning the occurrence of work accidents, occupational diseases and other injuries are reflected in the related internal regulations. The company provides employees with information on these guidelines, as well as training on work safety and health requirements.

Care for safety and health at work and for improving working conditions is part of the performance of work tasks. The company's senior staff at all levels of management is responsible for fulfilling the tasks to a specified extent.

5. Accepting gifts and corruption

Employees must not require or accept services, gifts or benefits from customers or suppliers that affect, or may appear to affect, an employee's actions on behalf of the company. Gifts and benefits may be exchanged at a level that does not exceed the usual widespread local courtesies in accordance with ethical business practices and applicable laws.

When negotiating with our business partners, we take an honest approach that is consistent with anti-corruption behavior.

6. Relationship with business partners

We aim to succeed in a transparent market environment. Our company is therefore committed to conducting business with integrity and upholding fair competition in all markets in which we operate. We do not seek competitive advantage through illegal or unethical practices. We prioritize ethical standards in all competitive activities, fostering a marketplace that values innovation, quality, and consumer trust.

All employees must act fairly in their dealings with business partners, avoid manipulative practices, conceal relevant information, misuse of confidential information, or any unfair practices. We provide customers with up-to-date, adequate, accurate and understandable information about our products and services. Every employee of the company approaches its responsibilities in such a way as to increase the value of the products and services provided to the customer. We share the principles of ethical conduct, social commitment and respect for the environment with our suppliers, subcontractors and intermediaries.

In alignment with our commitment to responsible business practices, we expect also our suppliers to adhere to the following principles.

Suppliers are expected to comply with all applicable laws and follow key principles in the following areas:

Human Rights: Suppliers must not use child or forced labor and should respect equal employment opportunities. Working Conditions: Suppliers are expected to comply with local laws regarding work hours, minimum wage, and provide fair working conditions.

Business Ethics: Suppliers must uphold fair competition, avoid corruption, and refrain from price-fixing or other anti-competitive practices.

Health and Safety: Suppliers should ensure a safe working environment, protecting employees from accidents and occupational hazards.

Environmental Protection: Suppliers should minimize environmental impact, use resources efficiently, and manage waste responsibly.

Non-Compliance and Consequences:

For serious violations, our company reserves the right to terminate the business relationship.

This ensures our suppliers are aligned with our values and ethical standards, promoting a responsible and transparent supply chain.

7. Counterfeit Parts

Our company is dedicated to preventing the use and distribution of counterfeit parts to ensure the safety, quality, and reliability of our products. We strictly prohibit the sourcing, manufacturing, or distribution of any parts that are not fully authentic or certified. All employees and suppliers are expected to follow rigorous quality control standards and report any suspected counterfeit components. Counterfeit parts not only compromise product integrity but also pose significant safety risks. By upholding this standard, we protect our customers, maintain trust in our brand, and ensure compliance with industry regulations.

8. Export Controls and Economic Sanctions

Our company is committed to complying with all applicable export controls and economic sanctions regulations to ensure that our products, technologies, and services are used responsibly and in accordance with international laws. We expect all employees to understand and adhere to these regulations, which may restrict the export or sale of certain items to specific countries, entities, or individuals. Violations of export controls or sanctions can have serious legal and reputational consequences, and employees are required to report any suspected non-compliance. By respecting these regulations, we uphold our commitment to ethical business practices and contribute to global security and stability.

9. Illegal practices

In its activities, the company complies with applicable laws and regulations. It is not involved in illegal transactions. The company maintains the confidentiality of information obtained in business relations, does not provide it to third parties and prevents its misuse.

10. Intellectual property

Our company values and respects intellectual property (IP) rights, recognizing them as essential assets that drive innovation and competitive advantage. We are committed to protecting our own IP as well as respecting the IP rights of others. All employees must safeguard proprietary information, trade secrets, patents, copyrights, and trademarks, both within our organization and those belonging to our partners, customers, and suppliers. Unauthorized use, sharing, or reproduction of IP is strictly prohibited. By upholding these principles, we foster a culture of integrity and responsibility that supports ongoing innovation and maintains trust with our stakeholders.

11. Reporting unethical behavior

Employees of the company Thermoplastik s.r.o. are required to report any violation or potential violation of this Code of Ethics of which they have become learnt. Employees report violation of the Code of Ethics to their immediate superior or senior manager according to the organizational structure or anonymously by dropping it to the box located in the entrance corridor to Hall 2.

The report shall be made orally, by telephone or in writing. All those who receive a violation report of the Code of Ethics are obliged to guarantee the notifier anonymity. Anonymity can only be revealed with the consent of the notifier. Anyone who has received a violation report of the Code of Ethics is obliged to deal with the report and take a solution in accordance with his or her competencies.

Thermoplastik s.r.o. will not tolerate any sanctions against people who have reported problems complying with the code of ethics in good faith.

12. Principles on Working conditions and Human rights

1. Purpose and goal

The following principles on working conditions and human rights are based on the values and principles of Thermoplastik personnel policy set out in The Code of Ethics and, where appropriate, further define these principles, taking into account the provisions of the Universal Declaration of Human Rights issued by the United

Nations, which are relevant to the employment relationship as well as taking into account core labor standards International Labor Organization (ILO) as a special organization of the United Nations.

2. Principles

Thermoplastik declares that it will create and maintain working conditions considering in particular the following principles:

a. Ethical Recruiting (Prohibition of discrimination in employment and occupation)

Our company is committed to upholding the highest standards of ethics and fairness in our recruitment processes. We ensure that all hiring practices are based solely on qualifications, experience, and the candidate's potential to contribute positively to our organization. Discrimination based on race, gender, age, religion, nationality, or any other characteristic unrelated to job performance is strictly prohibited. We value diversity and strive to create an inclusive workplace where all individuals have equal opportunities to succeed. Our recruiting practices are transparent and respectful, with a focus on maintaining the privacy and dignity of each candidate throughout the hiring process.

The management of Thermoplastik s.r.o. as well as all employees were invited to in relation to employment with respect to Thermoplastik, and refrain from any discrimination.

The company's goal is to eliminate discrimination in employment and performance professions by promoting equal opportunities and equal opportunities treatment.

b. Working hours policy

Our company is committed to promoting a balanced work environment that respects both productivity and the well-being of our employees. Working hours are designed to comply with all relevant labor laws and industry regulations, ensuring fair and safe conditions. We expect employees to adhere to assigned work schedules, including breaks, to maintain efficiency and a healthy work-life balance. Overtime work is minimized and only requested when absolutely necessary, with appropriate compensation as outlined by law and company policy. By respecting designated working hours, we aim to create a sustainable and positive workplace that supports both individual and company success.

c. Prohibition of slavery and human trafficking

The management of Thermoplastik as well as all employees declare that in full respect the prohibition of slavery and trafficking in human beings within the meaning of the General Agreement the Declaration of Human Rights, according to which no one shall be held in slavery and trafficking in human beings in all its forms prohibited.

d. Prohibition of child labor

The management of Thermoplastik s.r.o. as well as all employees who are responsible for personnel issues are required to take care that the minimum age of employees was not lower than the age at which compulsory schooling ends, but in no case less than 15 years.

This does not apply to work performed by children and adolescents in general education schools, vocational schools or apprenticeships or other educational institutions or persons who are at least 14 years old, in plants, if these works constitute integral part.

- vocational education or training for which the principal is responsible, responsibility school or educational institution,
- an accredited training program, which is implemented mainly or exclusively in the plant „Dual education “
- a guidance or guidance program designed to facilitate career choice or teaching department.

e. Diversity and Inclusion

The diversity of our employees is a source of strength for our global company. We therefore value and respect people of different backgrounds, capabilities and opinions. We abide by all applicable labour and employment laws, including those prohibiting discrimination and harassment and those providing for reasonable accommodation of differences. We are committed to providing equal employment and career advancement opportunities to everyone, without discrimination based on sex, race, ethnic background, religion, disability or any other personal characteristic protected by law.

13. Conflicts of interest

Rules regarding conflicts of interest are included in several internal documents: Internal directive Nr.1/19 /01.03.2019 - Anti-social activities Article III Definition of anti-social activities of employees , Employment contract and Annex no. 2 to this employment contract in this way:

1. An employee in accordance with Company's Code of Ethics will not abuse his or her position for his or her own benefit, will act independently and objectively, and will not favor any organization or person by accepting any value.
2. The staff member shall not, directly or indirectly, use or permit the use of property of any kind for purposes other than those approved. The employee is responsible for his actions, decisions and performances.
3. The staff member shall manage his private interests in such a way as to avoid any actual or potential conflict of interests.
4. A staff member may not:
 - misuse his work for his own profit or for assistance to profit,
 - use the information in the performance of his work for private purposes or for another person,
 - abuse their own working time as well as the working time of their subordinates.
5. When recruiting employees, it is not possible to accept the advantage of related employees.
6. The staff member shall not consciously take advantage for private use from information obtained in the course of his working duties, which is not generally available to the public.
7. The employee undertakes not to act contrary to the legitimate interests of the employer and not to misuse the knowledge gained from the employer for the benefit of any competitive interests of third parties or in his own business activities. The employee shall maintain the confidentiality of the facts concerning the employer, the disclosure of which could harm its interests.
8. The employee undertakes not to:
 - act in his own name or on his own account, or as a partner in another business entity, to carry out a gainful activity that is competitive with the employer's object of activity, to enter into an employment or similar relationship with another entity without the prior written consent of the employer;
 - mediate trades for other persons in order to harm the employer;
 - to carry out the activity of a statutory body with a similar or the same subject of activity without the consent of the employer;
 - to act in such a way as to obtain, at the expense of the employer, an advantage or other unjustified advantage;
 - disseminate information about the employer's circumstances, products or performance that could cause damage to the company;
 - without the consent of the employer or contrary to the interests of the employer, reproduce, copy and otherwise reproduce the documentation concerning the Employer for third parties for use outside the employer, and within its competence to prevent their misuse;

- will not allow the movement of strangers in the workplace without a guide authorized by the employer.
9. The staff member acknowledges that a breach of the obligations set out in this appendix may be considered a serious breach of the employee's employment discipline, which could result in termination of employment due to a serious breach of employment in the form of immediate termination of employment, as well as damages by the action of the employee to the employer, as well as by the application of other provisions of the Labor Code.

14. Environmental policy and sustainability

As a responsible supplier to the automotive industry, Thermoplastik s.r.o. is committed to conducting business in a way that protects the environment, supports sustainable development, and prioritizes the health and safety of our employees. Subsequently, all employees are required to work in accordance with the environmental laws and regulations that apply to their workplace. We strive to improve our environmental performance through preventive measures and the use of environmentally friendly technologies. Recognizing that our operations impact the environment, we are dedicated to reducing this impact through various actions. Our core principles include:

a. Strict Monitoring of Environmental Requirements

We carefully monitor environmental requirements for our activities, products, and services to ensure that we not only meet but strive to exceed all environmental standards. This proactive approach helps us maintain compliance and adapt swiftly to new environmental regulations and customer expectations.

b. Sustainable Supplier Selection

We hold our suppliers to high environmental standards, selecting partners who demonstrate a commitment to environmental responsibility. We believe that collaboration with like-minded suppliers strengthens our own environmental performance and aligns us with the values of our clients in the automotive industry.

c. Continuous Reduction of Environmental Impact

Our goal is to constantly reduce our environmental impact by identifying opportunities for improvement in all areas of our business. This includes efficient use of resources, minimizing waste, and actively working to reduce emissions and our overall carbon footprint.

d. Waste Reduction

We are committed to reducing the amount of waste generated by our operations. This involves implementing practices that focus on minimizing waste at the source, increasing recycling rates, and promoting the reuse of materials. We continuously seek opportunities to reduce, reuse, and recycle in order to limit the environmental impact of our waste.

e. Greenhouse Gas (GHG) Emissions Policy and Decarbonization efforts

We recognize the critical role that reducing greenhouse gas (GHG) emissions plays in mitigating climate change. We aim to continually reduce our GHG emissions by adopting energy-efficient technologies, promoting innovative practices and utilizing renewable energy sources when possible, while working closely with suppliers and customers to reduce our carbon footprint across all levels of our operations as well as achieve collective emissions reductions.

f. Air Quality Improvement

We are dedicated to improving air quality by minimizing emissions of pollutants from our company and transportation networks. This includes implementing technologies and practices that reduce the release of harmful substances into the atmosphere, helping to ensure cleaner air for local communities.

g. Water Quality, Consumption, and Management Policy

Water is a vital resource, and we are committed to protecting water quality and optimizing water use in Thermoplastik s.r.o. Our water management policy focuses on reducing water consumption, ensuring that wastewater is treated properly, and preventing contamination of local water sources. We aim to improve water efficiency across our operations, monitor water quality regularly, and adopt technologies that minimize water usage and waste.

h. Responsible Chemical Management

The safe and responsible handling of chemicals is essential to protecting both human health and the environment. We adhere to strict guidelines for the use, storage, and disposal of chemicals and work to substitute harmful substances with safer alternatives wherever possible and keep these guidelines updated and easily accessible.

i. Animal Welfare

We are committed to respecting animal welfare throughout our operations and supply chains. We ensure that in case any materials used are sourced from animals are obtained ethically and sustainably, adhering to industry standards that prioritize humane treatment.

j. Soil Quality Protection

Our company recognizes the importance of preserving soil quality as part of a healthy ecosystem. We implement practices to prevent soil contamination and degradation, aiming to maintain soil health and fertility in the areas impacted by our operations.

k. Noise Reduction

We are dedicated to minimizing noise pollution from our operations, especially in manufacturing and logistics. Using a private access road outside of a residential area we seek to reduce the impact on surrounding communities and maintain a quieter environment.

l. Sustainable Resources Management

We recognize the importance of sustainable resource management in our business operations. Our goal is to utilize resources efficiently and reduce waste, striving for a circular economy model. This includes sourcing renewable materials where possible, promoting recycling and reuse, and continuously exploring new ways to reduce our environmental impact through responsible resource management.

m. Learning and Improvement

We acknowledge that growth comes from both our successes and our mistakes. By analyzing past actions, we learn valuable lessons and implement necessary changes to prevent reoccurrence, ensuring we maintain and improve our environmental standards over time.

n. Compliance with Environmental Laws and Regulations

Compliance with all relevant environmental laws, regulations, and industry standards is fundamental to our operations. We take pride in not only meeting these requirements but also working to exceed them where possible, fostering a proactive culture of environmental stewardship.

o. Efficiency and Eco-Friendly Operations

Efficiency and ecological responsibility are at the core of our operations. We work to optimize processes to be as resource-efficient as possible, integrating environmentally friendly practices into all aspects of our production and supply chain activities.

p. Health and Safety as a Priority

The health and safety of our employees are paramount. We implement rigorous health and safety protocols to ensure a safe working environment, fostering a culture where well-being is as important as productivity. A safe

workplace is also essential for achieving our environmental goals, as a protected workforce is a motivated and responsible one.

q. Transparent Communication and Employee Engagement

We are committed to open communication about our environmental performance with all stakeholders, including employees, customers, suppliers, and the community. We encourage feedback to further refine our practices and engage employees in environmental training and awareness to empower each team member to contribute to our goals.

By embedding these principles into our daily operations, we aim to reduce our environmental footprint, support a sustainable automotive industry, and contribute to a healthier planet for future generations.

15. Land, Forest, and Water Rights and Forced Eviction

Our company respects the land, forest, and water rights of all communities and is committed to conducting business in a way that supports sustainable and responsible use of natural resources. We recognize the rights of indigenous populations and local communities to their lands and resources, and we strictly oppose any form of forced eviction. Our operations are guided by principles that protect human rights and the environment, ensuring that our activities do not lead to the displacement of communities or the destruction of vital ecosystems. We work collaboratively with local stakeholders to promote environmental stewardship and to respect the social and cultural significance of natural resources.

16. Use of Private or Public Security Forces

Our company is committed to ensuring that any engagement with private or public security forces aligns with our ethical standards and respect for human rights. Security personnel, whether internal or contracted, are expected to act professionally and responsibly, prioritizing the safety of employees, visitors, and surrounding communities. We strictly prohibit the use of excessive force or any actions that may infringe upon the rights and dignity of individuals. Our company works to ensure that all security measures are implemented transparently and in compliance with local laws and international human rights principles, and we regularly review these practices to maintain accountability and integrity.

17. Financial Responsibility (Accurate Records)

Our company is committed to maintaining the highest standards of financial integrity by ensuring that all financial records and transactions are accurate, complete, and transparent. We adhere to all applicable laws, regulations, and accounting standards, and expect all employees to handle financial information responsibly and with diligence. Accurate record-keeping is essential to building trust with our stakeholders, including investors, customers, and regulatory authorities. Any falsification or intentional misrepresentation of financial data is strictly prohibited, and all employees are encouraged to report any discrepancies or unethical practices related to financial matters. Our commitment to financial responsibility supports our long-term success and accountability.

18. Ensuring sustainable respect for and adherence to these principles

a. Thermoplastik management

Thermoplastik management was encouraged to use appropriate measures in the area of its responsibility to ensure compliance with the principles concerning working conditions and human rights.

b. Thermoplastik suppliers

Thermoplastik expects to adhere to the principles concerning labor conditions and human rights from its suppliers, subcontractors and their employees as well as from other contractors. Employees of company Thermoplastik involved in the award of contracts were invited to be in the process informing business partners of these principles.

In case of detected violations of these principles by suppliers, the company Thermoplastik could award appropriate sanctions, which extend to the cancellation of contracts.

c. Internal audits

The "Audits" department during the validation and due diligence performance of actions and processes to the organizational unit also analyzes compliance and respect for these principles.

19. Sanctions for violations of the principles

In the event of a breach of these principles, the necessary organizational and legal measures will be taken to adequately respond to identified infringements and to eliminate them in future.