Vintech Industries Inc.
Code of Conduct

Revision 8

September 2026

Preamble

As a company with global operations and a history spanning more than twenty years, Vintech Industries, Inc., and its affiliates ("VINTECH") enjoy an excellent reputation worldwide and are one of the leading tier-1 and 2-suppliers to the automotive industry. We attribute the economic success of our company to our ongoing commitment to respecting the laws, regulations, and societal values in the many countries around the world in which we operate.

Corporate social responsibility to our employees, business partners, community, and to society in general, is an integral part of our principles. Following national and international laws and regulations, as well as complying with ethical values, standards, internal policies, and rules ("Compliance ") is an essential part of this responsibility. It is the only way we want to dobusiness.

Our corporate governance systems, including the Compliance Management System ("CMS"), support our efforts to ensure Compliance at Vintech. Our global Vintech Code of Conduct ("Vintech Code of Conduct") is a key part of the CMS and serves as a guideline for our conduct in our everyday business life.

Compliance at Vintech can only work if we all do our part to uphold this code. Any violations of laws, internal regulations or other malpractice must be identified early and decisively counteracted. We have implemented a whistleblowing system ("Vintech Whistleblowing System") to enable our employees, business partners and other third parties to confidentially and anonymously make submissions concerning actual or potential non-compliant incidents, as well as other forms of malpractice at Vintech. This tool helps us to identify and eliminate any malpractice at an early stage, avoiding or reducing harm to Vintech, its employees and business partners. Please find the direct link to the Vintech Whistleblowing System below.

Compliance matters for Vintech. It is imperative to fulfill our legal and social obligations and, moreover, Compliance is essential for ongoing success in business. We invite you to support us to continually improve Compliance at Vintech.

Thank you for helping us do the right thing.

Kevin Zirnsak, Vice President of Operations

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1. General Compliance

This policy establishes a compliance code of conduct applicable to all Vintech employees at all locations globally.

Vintech respects and adheres to all applicable local, national, and international laws and regulations. Our success crucially depends on our compliance with relevant laws and regulations, labor agreements as well as our binding internal policies. Infringements of these laws and regulations can result in profound consequences for our company as well as our employees, business partners, and many other stakeholders.

The Vintech Code of Conduct forms a core element of our rules on responsible management and serves as a guideline for our daily conduct of business. It represents a binding policy for all members of the respective managements, the managerial staff, and every individual employee of the Vintech Group (collectively, "Employees").

All Employees must expect that breaches of Compliance have consequences. If the policy is violated, disciplinary sanctions will ensue depending on the severity of the respective breach. Disciplinary measures include but are not limited to claims for damages under civil law and/or criminal sanctions.

1.1 Supply Chain Standards Flow Down

All Vintech Industries suppliers, indirect suppliers, subcontractors, and other third parties involved in the supply of goods or services under this agreement must adhere to Vintech Industries Code of Conduct. All suppliers shall include provisions in their contracts with sub-suppliers sufficiently to ensure their compliance with Vintech Industries' Code of Conduct. Upon Vintech Industries reasonable request, Supplier shall provide evidence of sub-supplier's compliance with our Code of Conduct and cooperate with audits or assessments conducted by Vintech Industries or its designee.

2. Business ethics principles

2.1 Anti-Corruption

Vintech does not tolerate and therefore rejects all forms of bribery and corruption. This applies not only to individuals but also to companies, authorities, and other institutions. We do not, directly, or indirectly, accept a bribe from, or offer a bribe to others in the private or in the public sector.

Corruption is subject to criminal sanctions and can lead to criminal charges and penalties for Employees. Moreover, there is the risk that the authorities may impose financial penalties on Vintech as a company. The criminal charges and penalties and the risks of a financial penalty can be even more serious in individual cases, if public officers, i.e. natural people being employed by governments, government agencies or other public institutions, are involved.

All Employees must adhere to the anti-corruption laws of the countries in which Vintech conducts business. Additionally, we expect our business partners to act in accordance with the principles of our Vintech Code of Conduct and to observe all statutory requirements - particularly those relating to avoidance of corruption and bribery.

2.2 Gifts, Hospitality, and Invitations

Accepting or granting benefits, including, but not limited to, presents, hospitality or invitations to events to individuals in connection with business relationships is only permissible if they are appropriate and transparent. Inappropriate benefits carry the risk that may give rise to doubts concerning the integrity or the independence of

our Employees or even constitute the elements of the criminal offense/crime of direct or indirect corruption in individual cases.

Employees may only grant or receive benefits and/or advantages of any kind, directly or indirectly, to the extent that this is legally allowed and within the framework of the relevant Vintech policies, including, but not limited to, the provisions of the Vintech Code of Conduct. It is prohibited to accept or grant benefits in any form for the purpose of influencing persons in the private or public sector.

2.3 Donations and Sponsoring

The purpose of donations is to promote non-profit causes. Sponsoring activities are used to sustainably generate a positive public image and perception for Vintech. Caution is necessary about requests and offers for donations and sponsoring, as this type of benefit can also be seen as bribery. To avoid conflicts of interest, every donation and every sponsoring activity must therefore conform to the applicable laws and Vintech internal regulations.

2.4 Anti-competitive behavior

Vintech does not tolerate any anti-competitive conduct, but transacts business solely based on free, fair, and unimpeded competition in compliance with national and international competition and antitrust laws.

Securing free competition in the markets is to the benefit of all consumers. For this reason, the applicable competition and antitrust laws prohibit business practices that prevent, restrict, and/or distort free competition, or are suitable for doing so, or that aim at preventing, restricting, or distorting competition.

Anti-competitive conduct, particularly Vintech and Vintech's competitors, can lead to considerable financial penalties and claims for damages under civil law against Vintech as well as to the criminal prosecution of the respective Employees. Moreover, this will cause great harm to Vintech's reputation. Vintech expects and requests from the Employees not to participate in practices that are in contravention of competition and antitrust law.

2.5 Anti-money laundering and financing terrorism

Vintech carefully checks the identity of customers, business partners and other third parties with whom we intend to do business. It is our declared aim to conduct business solely with reputable partners who operate in line with legal provisions and who use resources from legitimate sources.

We neither participate in activities connected with money laundering and the financing of terrorism, nor do we allow or tolerate it. Every Employee is required to report all financial transactions that may give cause to suspect money laundering and to initiate a review of these transactions by the Compliance department.

2.6 Conflict of Interest

The Employees are committed to the company's well-being. Therefore, Vintech expects loyalty and integrity from all its Employees. Every Employee has the duty to devote their full working capacity to the company and to perform the tasks assigned to the best of their knowledge and ability. Employees may not hold a second job or engage in other activities that may impair this duty, unless Vintech has consented to such jobs or activities.

No Employee may utilize their position within Vintech for their own benefit or the benefit of their family members or related people or enterprises. Every Employee who has relationships with persons or enterprises that maintain business relationships with Vintech that can lead to conflicts of interest, must report this fact on their own initiative and in writing to the Human Resources Department.

3. Export Controls and Sanctions Law

Legal regulations on export controls, including the requirement to fight international terrorism, being applicable in the USA, Mexico, or the European Union, restrict the exchange of goods or services by a country or an economic area due to security-politicalreasons.

Vintech ensures by means of appropriate processes that transactions and activities both with third parties and within the Vintech Group do not contravene export control and sanctions laws. All Employees involved in the import and export of goods, services, software, or technology are required to observe the relevant export control laws and import/export regulations.

4. Protecting Company Assets and Other Data

4.1 Handling company assets

Vintech is the owner of many tangible and intangible assets. This is obvious with respect to fixed assets and current assets (e.g., buildings, production machinery, and equipment). However, all business information, in particular but not limited to business and trade secrets, are also assets of Vintech (e.g., business plans, financial records and data, customer information and intellectual property and physical manufactured parts).

Vintech protects all tangible and intangible in a careful and responsible manner. Employees may use such assets solely for business purposes and always ensure confidentiality. This responsibility includes the accurate creation, maintenance, and retention of financial and business records, ensuring that all records are complete, truthful, timely, and in compliance with applicable laws, regulations, and internal controls. The unauthorized disclosure, transfer, licensing, passing on and/or use of the assets of Vintech in any other way can cause considerable harm to Vintech. To further protect Vintech Industries against the manufacture or use of counterfeit parts, we clearly apply part marking to our manufactured product. We pass this on to our supply base by thoroughly vetting each supplier and following our approval process satisfying our standard for authenticity and reliability and proper financial and transactional documentation.

The above applies equally to third-party assets. Their unauthorized use, misuse or inaccurate recording is not allowed.

4.2 Information security and protection of company relevant and personal data

For the efficient and proper execution of Vintech business activities and to support innovation, the use of information technology, e.g., any electronic means including hardware, software, infrastructure, and cloud systems is imperative, requires high investments and represents an important asset of Vintech.

In addition, any data and information of Vintech as well as the personal data of Employees, customers, suppliers, and/or other business partners are protected by the applicable laws, e.g., intellectual property laws, cybersecurity laws, or data protection laws. In particular, the collection, storage, processing, and/or other use of personal data requires either the voluntary prior consent of the person concerned on an informed basis or a statutory basis as outlined in our Information policy.

Vintech protects its own data and information as well as the personal data of Employees, customers, suppliers, and business partners by utilizing the relevant technical and organizational safety standards and implementing appropriate confidentiality measures.

5. Taxes and Customs

Vintech ensures that any national and international tax and customs regulations (e.g., laws, edicts issued by the financial authorities, decisions of the tax courts judgments, administrative acts, etc.) applicable to the companies belonging to Vintech are complied with and observed. We do not pursue any improper tax avoidance strategies.

6. Social and Environmental Principles

6.1 Human Rights

Ethical behavior is a basic principle at Vintech. Vintech respects, protects, and promotes the applicable regulations for the protection of human rights in accordance with the Universal Declaration of Human Rights of the United Nations and the European Convention for the Protection of Human Rights and Fundamental Freedoms. This applies not only to Vintech, but also to external third parties. Child labor, infringement of applicable regulations for in particular young workers as well as any kind or shape of modern slavery or forced compulsory labor and human trafficking is not tolerated within Vintech.

Therefore, we respect human rights in our dealings with others, whether within Vintech or vis-a-vis external third parties. Every Employee is required to report any indications of infringements of human rights and fundamental freedoms in their working environment. Vintech recognizes the rights of its Employees to form representatives' bodies and participate in collective bargaining regarding working conditions. Vintech pays its Employees at least the legal minimum wage applicable in the economic area concerned and remunerates with competitive compensation which is completed with additional benefits. We have adopted a set of guidelines that ensure our hiring process is fair, transparent, and respectful to all candidates, treating everyone equally without discrimination based on factors such as race, gender, age, or background. Our goal is to employ the best person for the job based solely on merit and qualifications. While none of our plant locations are operating in or near Indigenous communities, Vintech respects local and national laws addressing land tenure, forest management, and water rights, which may include protection against forced evictions and violate animal welfare and biodiversity.

6.1.1 Private and Public Security

Vintech Industries remains transparent to ensure the protection of human and civil rights by outlining our principles in Public and Private Security. Security forces are typically government-funded and operate under government control. They include police, military forces, and other state-run agencies tasked with maintaining law and order, national security, and enforcing criminal justice. These forces are generally bound by national laws, policies, and international human rights standards.

- Policy Goals:
  - Protect public safety and national security.
  - Prevent and investigate crime.
  - Enforce laws fairly and equally.
  - Uphold human rights and civil liberties.
- Regulation and Oversight:
  - Public security forces are usually heavily regulated by the state, with oversight mechanisms such as civilian review boards, internal affairs departments, and independent ombudsman offices.
  - Policies regarding the use of force, accountability, and transparency are key parts of public sector security policies.
  - Public security forces are bound by international conventions and treaties (e.g., Geneva Conventions for military, human rights laws for police forces).

Private Security Forces
While Vintech Industries does not employ private security forces, we do employ cybersecurity professionals to help mitigate risk to our customers and internally by helping enforce our policy goals of protecting private assets, property, and individuals. To help ensure the safety of specific areas (mailings, corporate offices etc). To help protect against theft, vandalism, and trespassing.

6.2 Social Commitment

Vintech is aware of its social responsibility. Our national subsidiaries and locations around the world have been engaged in charitable projects in their regions for a long time.

6.3 Equal opportunity and non-discrimination

Equal opportunity and non-discrimination are key principles of Vintech corporate policy and corporate culture. Due to its global business activities, Vintech is in contact with many diverse cultures and has long been open to and tolerant of new and other approaches. Vintech appreciates and promotes diversity. The various backgrounds, cultures, languages, and ideas held by the Employees help us to maintain competitive advantages for Vintech by generating innovations. In the daily business, Vintech as a principle respects and protects applicable laws regarding wages and benefits, working hours, women's rights (which include the right to live free from violence, slavery, and discrimination; to be educated; to own property; to vote; and to earn a fair and equal wage), all forms of child labor / young workers, indigenous peoples and the freedom of association for all of the Employees.

Therefore, Vintech offers everyone equal opportunities. The Vintech company policy intends to ensure that Employees do not discriminate or harass a person due to gender, race, ethnic or national origin, religion, belief, age, disability, sexual orientation, or other characteristics protected by law.

6.4 Sustainability, Environment, health and safety, product safety

Vintech handles matters relating to environmental protection, employee health and safety, and product safety issues with the same degree of responsibility as matters relating to quality, productivity, and cost efficiency issues. As part of our commitment to sustainable development, we proactively take steps to deploy new, sustainable technologies and processes to minimize the consequences of our activities for the environment (e.g., reduction of waste and water consumption, improve water and air quality, management of chemicals, reducing greenhouse emissions, using renewable energies), as outlined in our GHG policy. Vintech Industries' goal is to reduce greenhouse gas emissions across the full value chain in line with climate science, and to ensure suppliers adhere to stringent emission standards including their own supply chains. Our long-term goal is net zero by 2050 which includes our full value chain. Our supplier requirements include:
Renewable Energy: Suppliers shall use or commit to use renewable / green energy for their processes.
Contractual Flow Down: Vintech Industries direct suppliers must include in their own supplier contacts, obligations to meet equivalent GHG emissions and standards.
Material Use: Suppliers should increase the use of recycled or secondary materials, design for recyclability and minimize emissions from raw material sources.
Energy Efficiency: Vintech Industries and its suppliers shall implement energy efficiency measures across their operations where possible. This includes adopting energy efficient equipment and processes, optimizing production and facility systems to reduce energy waste, and continuously monitoring energy consumption to identify further opportunities for reduction.

All suppliers are required to meet Vintech Industries' soil quality standard. All suppliers, contractors, and sub suppliers involved in the manufacture, transport, storage and disposal of materials or products on

All suppliers are required to meet Vintech Industries' soil quality standard. All suppliers, contractors, and sub suppliers involved in the manufacture, transport, storage and disposal of materials or products on behalf of Vintech Industries must adhere to our guidelines of (A) Prevention of soil contamination. All necessary measures must be taken to prevent release of hazardous substances, oils, fuels, chemicals, or waste into soil or groundwater.
(B) Sustainable land management. Processes must be established in such a manner that minimizes soil erosion, compaction, and loss of biodiversity. Where possible, rehabilitate disturbed areas and promote re-vegetation.
(C) Comply with all applicable national, regional, and local regulations regarding soil protection and hazardous waste handling and
(D) cascade these requirements (or equivalent) to their own supply chains.

All suppliers are required to comply with Vintech Industries' noise emissions and sound management policy. This includes regulatory compliance with all national, local, and regional regulations regarding environmental noise, workplace noise exposure, and vehicle or product sound emissions. Vintech Industries is committed to our Stakeholders and recognizes that noise emissions affect worker health, community wellbeing, and environmental quality. All suppliers are expected to collaborate in maintaining high standards of acoustic and environmental responsibility.

Vintech conducts business in compliance with the applicable health, work safety, environmental protection, and product safety laws as well as our company policies and best practice standards. Vintech takes all appropriate and feasible measures to ensure a safe, healthy, and clean working environment, to protect the environment, and considers all the legal and technical requirements and standards for product safety (i.e., technical compliance). Vintech complies with the prohibition of child labor and compulsory labor.

We systematically implement Vintech work safety, environmental protection, and product safety policies with the aid of all required technical, organizational, and staffing measures. Vintech adheres to relevant employment laws regarding maximum working hours, and overtime pay and regulations, along with standard break times to ensure clear guidelines for all employees promoting fairness and consistency between our plants globally.

7. Consultation, Reporting of Misconduct and Contact Persons

All Employees must be conscious of the fact that breaches of national or international laws, labor agreements and/or binding internal policies can lead to considerable damage to the respective company, the respective Employees as well as to the respective business partners.

The interests and rights of everyone within Vintech can only be protected and preserved from harm if suspected or actual breaches of Compliance are actively addressed.

Employees are required to report any infringements of the Code of Conduct stated within this document to their supervisor, the local HR department, the group HR department (HR@vintechplastics.com Reporting a Compliance incident anonymously is always an option. The contacts are also available from third parties.

All violation reports are consistently followed up, and proven misconduct is sanctioned appropriately.

Kevin Zirnsak, Vice President of Operations

Revision Log:

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