

CODE OF CONDUCT

Status August 2023

NBHX Trim Group Europe:

NBHX Automotive System GmbH

NBHX Trim Management Services GmbH

HIB Trim Part Solutions GmbH

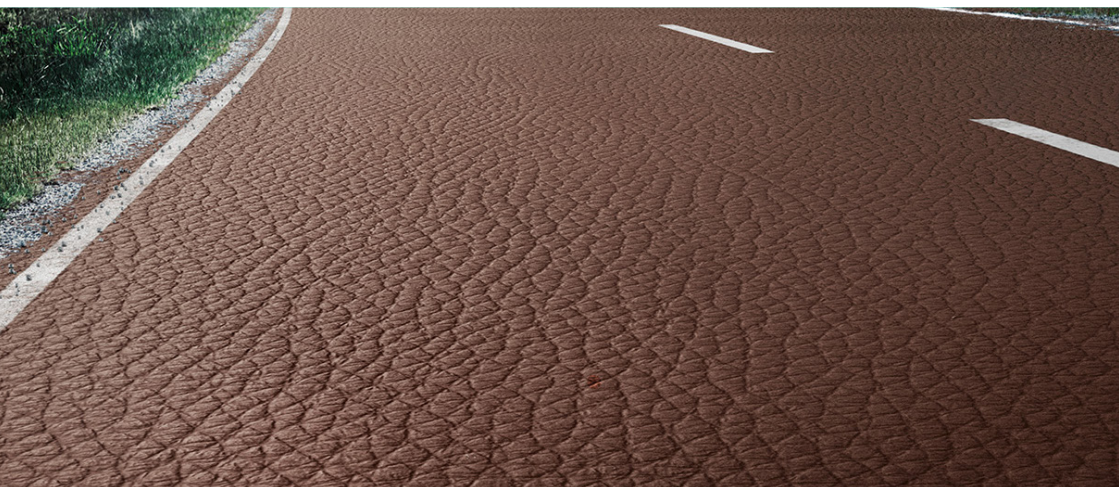
NBHX Rolem SRL

Northern Automotive Systems Limited

*(Hereinafter referred to collectively as the "Group",
or individually referred to as the "Group Company")*

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0.1 FOREWORD

NBHX Trim Group Europe is a leading European group of companies for vehicle interiors with innovative surfaces and a diverse portfolio of materials used. In order to offer trim parts with appealing surfaces and functions, NBHX Trim Group Europe sources raw materials, goods and services from other companies, suppliers and business partners.

NBHX TRIM GROUP bears corporate responsibility towards its customers, employees, business partners, investors and the public as well as towards the environment. This corporate responsibility includes that NBHX Trim Group Europe and its employees, business partners and suppliers comply with applicable laws at all times and in all places, respect fundamental ethical values and act sustainably.

Conscious and ethically correct behaviour towards employees, business partners, society and the environment are an integral part of the value system of the NBHX Trim Group Europe. We want to continue to live up to this high standard. Therefore, each individual is required to behave responsibly, fairly and in accordance with the rules. In addition to compliance with the relevant laws and corporate guidelines, the following definition of our ethical standards is an elementary component of our self-image and actions.

This Code of Conduct is valid for the NBHX Trim Group Europe companies in Europe named at the beginning of the document as well as their business partners and suppliers and not only takes into account the diverse cultures and values of the markets in which the NBHX Trim Group Europe operates, but is also a clear commitment to the social responsibility of a globally active and sustainably operating company. All employees, managers and directors of the respective companies working in the

NBHX Trim Group Europe are obliged to comply with the principles laid down here. We also expect this from our business partners and suppliers as the basis for a trusting cooperation.

For us, sustainable continuous growth and economic success are inseparably linked to NBHX Trim Group Europe's commitment to social responsibility and our position as a trustworthy and reliable business partner.

The decisive factor here is that each individual makes his or her own contribution through his or her daily work in observance of these principles, in order to be able to successfully continue on this path together. We ask you all for your support.

Bruchsal, August 2023

Jianxiong Hu
CEO

Christian von der Linde
CFO



0.2 SCOPE OF **APPLICATION**

The principles, regulations and guidelines of this Code of Conduct set out below apply to all managers, employees of the NBHX Trim Group Europe as well as to suppliers, customers and other business partners of the NBHX Trim Group Europe and their employees.



1 HUMAN RIGHTS AND WORKING CONDITIONS

NBHX Trim Group Europe, represented by the respective bodies and employees, and our business partners and suppliers, respect human rights and support their observance. Human rights, based on accepted international laws, including the United Nations Universal Declaration of Human Rights (UN Charter of Human Rights), are considered fundamental and universal.

NBHX Trim Group Europe, its business partners and suppliers ensure occupational health and safety within the framework of the applicable national regulations. The continuous improvement of the working conditions of employees for a safe and healthy working environment is an important concern.

NBHX Trim Group Europe, its business partners and suppliers, shall ensure, especially when procuring relevant raw materials such as tin, tantalum, tungsten, gold or cobalt, to take appropriate measures to identify and prevent the direct or indirect financing of armed conflicts and/or human rights violations including child and forced labour as well as slavery in the extraction of raw materials.

1.1 CHILD LABOUR AND YOUNG WORKERS

With regard to child labour and young workers, there is a ban on the employment of children below the legal minimum age. In addition, it must be ensured that, in accordance with the ILO (International Labour Organization) Convention on the Minimum Age for Admission to Employment, young workers under the age of 18 do not perform night work or overtime and are protected from working conditions that are harmful to their health, safety and development.

NBHX Trim Group Europe, its business partners and suppliers, ensure that young workers' duties do not interfere with school attendance. The added service and teaching time of young workers must not exceed the legal regulations.

1.2 WAGES, BENEFITS AND WORKING TIME

NBHX Trim Group Europe, its business partners and suppliers guarantee that the working hours comply with the respective national legal requirements or the standards of the respective national industry regulations. This also applies to wages, remuneration and social benefits, which are paid or provided for a normal working week and must at least correspond to the legally valid and guaranteed minimum.

Compensation systems include paid sick days for sick leave, leave for family reasons, paid overtime, etc.... The ILO Declaration on Fundamental Principles and Rights at Work must be taken into account.

1.3 MODERN SLAVERY, HUMAN TRAFFICKING, ETHICAL RECRUITMENT

NBHX Trim Group Europe, its business partners and suppliers pay attention to ethical recruitment. Ethical recruitment means that workers are hired lawfully, in accordance with international labour standards and in a fair and transparent manner that respects human rights.

NBHX Trim Group Europe, its business partners and suppliers reject any form of forced and child labour, modern slavery, human trafficking also in the individual domestic and foreign companies at the respective business partners worldwide.

This refusal also refers to any kind of work or service that is required of a person under threat of punishment or that a person does not provide voluntarily.

1.4 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The right of employees to organise themselves in trade unions or comparable associations and to negotiate and determine collective agreements jointly is recognised. National legal regulations and existing agreements in this regard must be observed. NBHX Trim Group Europe, its business partners and suppliers work together with employees and employee representatives in a trusting, constructive and goal-oriented manner.

1.5 HARASSMENT AND NON-DISCRIMINATION, WOMEN'S RIGHTS, DIVERSITY, EQUALITY, INCLUSION

NBHX Trim Group Europe, its business partners and suppliers support a working environment that allows for individual development. Therefore, diversity, equal opportunities, equality, inclusion, personal development and professional training, regardless of ethnic origin, skin colour, gender, disability, world view, political conviction, religion, nationality, sexual orientation, social origin or any other status, shall be guaranteed and promoted. Discrimination, harassment or intimidation of any kind is prohibited, as it contradicts the basic principles of fair dealings with one another. In particular, any kind of mental and physical violence, in the form of discrimination, harassment, corporal punishment, mobbing, etc., is strictly rejected.

1.6 USE OF PRIVATE OR PUBLIC SECURITY FORCES

If private or public security forces are deployed to protect business projects, NBHX Trim Group Europe, its business partners and suppliers ensure that there are no violations of human rights, no injury to life and limb and no impairment of freedom of association due to inadequate training or control of the security forces.

2 OCCUPATIONAL HEALTH AND SAFETY

(Personal protective equipment, machine safety, emergency preparedness, incident and accident management, workplace ergonomics, handling of chemical substances, fire protection)

NBHX Trim Group Europe, its business partners and suppliers comply with the national occupational health and safety and fire protection laws and thus ensure that the workplaces or infrastructure are designed in accordance with occupational health and safety and fire protection requirements.

All occupational health and safety measures are free of charge for the employees (ILO Convention 155). Furthermore, a process must be established that enables a continuous reduction of work-related health hazards and an improvement of occupational health and safety and fire protection.

NBHX Trim Group Europe and its business partners and suppliers ensure that workplaces are designed to be safe and healthy, above and beyond the minimum legal standards. In doing so, current findings from science and technology must be taken into account, including age-appropriate working conditions. The focus should be on a preventive reduction of risks in order to eliminate possible dangers at an early stage.

An important component of the strategy outlined is the training of employees at all hierarchical levels to raise awareness. This often results in valuable suggestions for improvement from the workforce.

Managers should be aware of their responsibility and, with the support of the specialist departments, set regular targets

for improving working conditions.

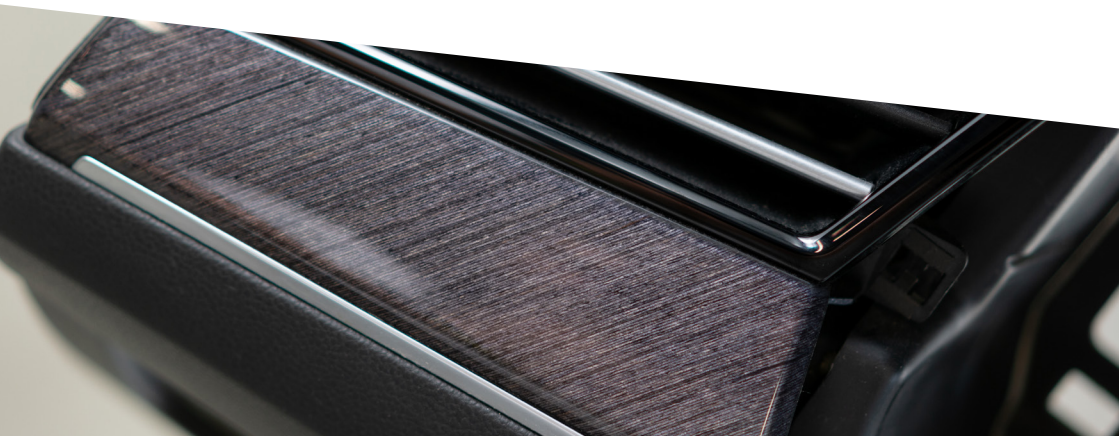
Cooperation with external bodies, such as the responsible employers' liability insurance association and the labour inspectorate, shall be open and trustworthy.

Emergency preparedness through trained first aiders and corresponding preventive measures and facilities to avoid accidents must be implemented.

If, despite all efforts, an occupational accident occurs, first aid must be ensured in accordance with the relevant country-specific regulations. Records of occupational accidents and first aid measures shall be kept and regular reports on the development of incident figures shall be made. In addition, employees and, if existing, employee representatives are informed about this at employee events.

Important topics and procedures such as fire prevention, fire and smoke propagation, escape and rescue routes, alarm and extinguishing devices, behaviour in case of fire, etc. are to be regulated via internal fire protection regulations.

The resources necessary for the implementation of the above, both human and financial, shall be made available.



3

BUSINESS ETHICS

(Corruption, anti-money laundering, data protection, data security, financial responsibility, disclosure of information, fair competition, antitrust, conflict of interest, plagiarism, intellectual property, export controls, economic sanctions)

NBHX Trim Group Europe, its business partners and suppliers are committed to fair and undistorted competition in compliance with the respective competition and antitrust laws. Any form of corruption, extortion, embezzlement, money laundering and bribery is rejected.

No employee of NBHX Trim Group Europe, its business partners and suppliers may offer, promise, grant or approve - directly or indirectly - unjustified advantages to public officials or business partners. Likewise, no such employee may allow such unfair advantages to be granted to him/herself or to NBHX Trim Group Europe, its business partners and suppliers, or illegally force such advantages by means of violence or threats. Therefore, each employee of NBHX Trim Group Europe, its business partners and suppliers must inform himself/herself about the country-specific applicable rules before making or accepting gifts, invitations and hospitality.

In order to avoid a conflict of interest, it is prohibited to exploit the business position or business connections of the NBHX Trim Group Europe, its business partners and suppliers for one's own or third-party advantage.

NBHX Trim Group Europe, its business partners and suppliers make decisions solely on the basis of objective criteria and are not influenced by personal interests and relationships. Where donations or other contributions are made for social or charitable reasons, this is always done on a voluntary basis, without expectation of any consideration in return and always within the framework of the respective legal system and in accordance with relevant corporate guidelines.

NBHX Trim Group Europe, its business partners and suppliers are committed to implementing appropriate policies and procedures to ensure compliance with applicable export control and economic sanctions laws and regulations of all relevant countries.

These laws and regulations impose restrictions on the export or re-export of goods, software, services and technology to certain countries and prohibitions on transactions with certain countries, regions, companies and persons.

When procuring raw materials, care must be taken to ensure that no raw materials are used that have been obtained illegally or in an ethically reprehensible manner. Conflict materials that are subject to embargoes or import restrictions must not be used. To ensure this, it must be ensured that information on the origin and source of raw materials is available in the supply chain.

The protection of confidential, secret and personal data is one of our corporate principles.

NBHX Trim Group Europe, its business partners and suppliers comply with the relevant laws and regulations when collecting, storing, processing or transferring personal data and information.

Every employee of the NBHX Trim Group Europe, its business partners and suppliers is obliged to comply with the provisions of data protection law and all other regulations on IT and information security.

An up-to-date technical standard for the protection of information processing must be ensured. All components of information processing must guarantee the confidentiality, integrity, availability and verifiability of the information worthy of protection. Unauthorised external and internal use is prohibited and must be prevented in advance.

Every employee of the NBHX Trim Group Europe, its business partners and suppliers is obliged to maintain absolute secrecy

about business and trade secrets to which they have access in the course of their operational activities and to treat these in strict confidence.

The protection of own and third-party intellectual property (such as patents, trademarks, copyrights, designs, samples, vehicle concepts, models or know-how) is essential. Therefore, employees are encouraged to take appropriate and effective measures to protect intellectual property as well as the tangible and intangible assets of NBHX Trim Group Europe, its business partners and suppliers and not to use them for non-business purposes.

The tangible and intangible assets of the NBHX Trim Group Europe, its business partners and suppliers are to be treated appropriately and carefully and protected against loss or damage.

Plagiarised and/or counterfeit materials will not be accepted.

The principles of freedom of expression and the protection of personal rights are respected. Employees of NBHX Trim Group Europe, its business partners and suppliers must take responsibility for ensuring that their individual appearance is perceived professionally and that expressions of opinion do not damage the reputation of NBHX Trim Group Europe, its business partners and suppliers. In the case of personal expressions of opinion in the business and public environment, it must always be made clear that this does not reflect an opinion of NBHX Trim Group Europe, its business partners and suppliers.

Financial responsibility includes, but is not limited to, the responsibility to accurately record, maintain and report on business records, including, but not limited to, e.g. financial accounts, quality reports, time records, expense reports.

Books and records shall be kept in accordance with applicable law and generally accepted accounting principles.

All reporting and disclosure in the form of financial statements, reports, records and announcements shall be truthful, in accordance with generally accepted accounting principles and shall be comprehensive and understandable.

4 ENVIRONMENTAL PROTECTION

(greenhouse gas emissions, energy efficiency, renewable energies, decarbonisation, water quality, air quality, responsible chemical management, sustainable resource management, waste prevention, recycling, animal welfare, species conservation, land use, deforestation, soil quality, noise emissions).

NBHX Trim Group Europe, its business partners and suppliers consider the protection of the environment to be an essential part of social responsibility. NBHX Trim Group Europe, its business partners and suppliers assume responsibility with regard to environmental protection issues and comply with all legal and regulatory requirements concerning the environment and sustainability.

The aim is to prevent environmental pollution and to reduce negative environmental impacts as far as possible within the framework of technical and economic possibilities.

This goal cannot be achieved without the help of the employees. For this reason, regular training and qualification, an open information policy and the use of the employee suggestion system must be implemented.

Concrete targets for improving environmental performance are to be set by managers with the support of the specialist departments, with the involvement of external experts if necessary.

The economical use of energy, water and (renewable) raw materials, the use of renewable energy sources and the minimisation of damage to the environment and health are taken into account in the development, extraction of raw materials and manufacture of products, right through to recycling. This also refers to the reduction of emissions of all kinds (especially with regard to air and water quality, greenhouse gas emissions or similar), the avoidance and reduction of waste as well as responsible chemical management (related to the chemical life cycle, handling, storage and disposal).

NBHX Trim Group Europe, its business partners and suppliers are committed to halting deforestation and conversion of natural ecosystems in supply chains.

Natural ecosystems shall be protected and alteration, deforestation and degradation of natural forests and other natural ecosystems shall be avoided.

Where given and possible, we check the soil condition in order to maintain the soil quality or to achieve an improvement of the environment.

We give preference to suppliers and business partners who are committed to certified, sustainable agriculture or forestry in the context of their land or forest use.

At all operating sites, the applicable national environmental standards and laws must be complied with in order to reduce or avoid harmful air pollution and noise emissions.

The continuous improvement of ecological efficiency and energy efficiency is the declared goal. Each individual is required to support the achievement of this goal through his or her own responsible actions and to use natural resources as efficiently and sparingly as possible.

5 IMPLEMENTATION AND MONITORING

Compliance with this Code of Conduct and also with all other applicable laws and internal guidelines is binding for our employees, business partners and suppliers. In the event of a breach of the rules, the principle of proportionality is always observed and in each individual case it is examined which consequences are suitable, necessary and appropriate.

Managers of the NBHX Trim Group Europe, its business partners and suppliers must ensure that the employees in their areas know and comply with the Code of Conduct. In addition, the employees are to be regularly trained on the Code of Conduct with suitable measures.

The implementation and verification of compliance with these principles shall be accompanied and supported by the management as well as by the specialised departments.

The Code of Conduct is available or can be viewed via all supervisors or via the NBHX Trim Group Europe management system. New employees of NBHX Trim Group Europe receive it when they join the company.

The latest version of the Code of Conduct is available to suppliers and business partners at <https://nbhx-trim.com/de/lieferanten/>.

Our business partners and suppliers are required to demand and verify compliance with the contents of this Code of Conduct and corresponding due diligence principles or guidelines for responsible business conduct in their own supply chain.

Violations by NBHX Trim Group Europe employees may result in action under labour law.

Any breach by our business partners and suppliers of the principles codified in this Code of Conduct constitutes a material breach of contract and significant disruption in the business relationship with our suppliers. We reserve the right to require remedial action in the event of non-compliance. If corrective measures are not implemented within a reasonable period of time set by us or if the violation is particularly serious, we have the right to terminate the cooperation for good cause.

NOTES AND CONTACT PERSONS

Employees who have questions about the Code of Conduct or would like to report a possible violation of the Code of Conduct can contact their supervisor, works council or human resources department with their concerns at any time.

Business partners, suppliers or external third parties who wish to report a specific violation can submit their report via the respective contact partner.

A whistleblower system is available to both business partners and staff for anonymous reports. Access to the whistleblower system (link and QR code) as well as the whistleblower policy are published on our homepage and stored in the management system for employees.

Questions, concerns and information in connection with the Code of Conduct are always taken seriously and treated confidentially and promptly. No whistleblower has to fear disadvantages if concrete information and concerns are submitted.

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