

SPEAKUP POLICY | WHISTLEBLOWING POLICY

Status December 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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- NBHX Trim Group Europe has a system/tool for whistleblowing for employees and business partners (access data at the end of the policy)
 - Violations of laws, regulations, company guidelines, unethical behavior, etc. can be reported
 - Reports / communication are possible anonymously
 - Information will be treated confidentially
 - Whistleblowers are protected

FIRST AND FOREMOST

We are committed to responsible business practices, and always acting, in accordance with our internal guidelines and policies as well as with respective relevant laws and regulations. We want to behave with integrity and treat others with respect. During your work or business activities, you may be confronted with ethical concerns or dilemmas. If you observe something that worries you, or that seems to violate our guidelines, we encourage you to speak up to help us address the situation proactively.

We understand that it takes courage to speak up, so therefore we are committed to providing you with an easy and safe way to raise your concerns. Speaking up is an essential part that enables us to protect our people, our company values, our stakeholders and society as a whole. No one should be alone when dealing with an ethical dilemma. In this document (our SpeakUp / Whistleblowing - Policy) we clearly explain what your options are and how you can raise your concerns.



1 SCOPE

This Whistleblowing-Policy describes how you can speak up about suspected breaches of internal guidelines, policies as well as laws and regulations. Furthermore, it describes the process, so that you know what to expect, and the ways you will be protected when speaking up (**confidentiality, anonymity, non-retaliation**).

The Whistleblowing-Policy applies to all employees, other key stakeholders and business partners (customers and suppliers) of the following NBHX Trim Group Europe companies:

NBHX Automotive System GmbH
NBHX Trim Management Services GmbH
HIB Trim Part Solutions GmbH
NBHX Rolem S.R.L.
Northern Automotive Systems Limited



2 **WHEN DO I SPEAK UP?**

As soon as possible, or as soon as you suspect that there has been a violation of internal guidelines and policies, company values or laws and regulations. We do not expect you to have all the answers and encourage you to use what is described in this policy as a reference point to determine if something is not right.

3 **WHAT SHOULD I SPEAK UP ABOUT?**

We encourage you to speak up about suspected breaches of internal guidelines and policies, or laws and regulations, or, when in doubt, about anything that does not constitute ethical, compliant or lawful behaviour.



4 HOW DO I SPEAK UP?

You can speak up, provide feedback or ask your questions in a variety of ways. For many matters, it can be a good first step to talk to the person involved directly. Thus, speak up should not entirely replace the direct dialogue that forms the foundation of our transparent company culture. However, we recognize that this is not always easy to do.

If this is not possible, or if you do not feel comfortable doing so, please turn to the SpeakUp channels as described below:

1

Employees, Internal Stakeholders:

1. Speak up to your manager or your manager's manager.

If this is not possible, or you do not feel comfortable doing so,

2. Speak up to your local HR, Compliance or Ethics office.

If this is not possible, or you do not feel comfortable doing so,

3. Speak up via the "NBHX SpeakUp" system

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Business partners, External Stakeholders:

1. Speak up to the manager or manager's manager of your NBHX contact person.

If this is not possible, or you do not feel comfortable doing so,

2. Speak up via the "NBHX SpeakUp" system

Our NBHX SpeakUp system is operated by an independent service provider and is available 24/7. Via the NBHX SpeakUp system you can speak up or ask questions directly to the SpeakUp head office based at our European headquarter at Bruchsal, Germany. We have qualified specialists handling reports. You can speak up in your own language, via phone or via internet. Qualified colleagues will handle your report internally. You can decide to remain anonymous.

At the end of this Policy you will find contact information, useful links and relevant practical details.

5 REPORTING OUTSIDE THE COMPANY?

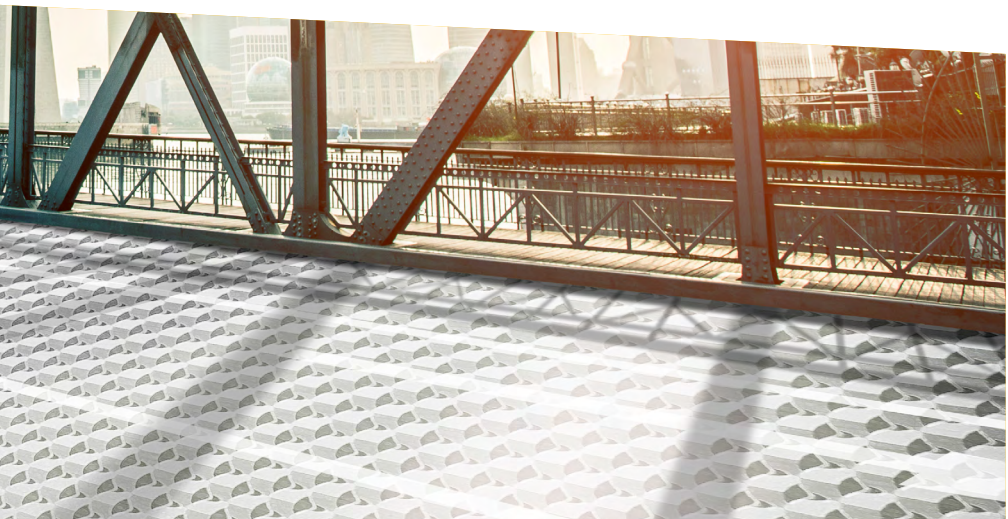
If, after careful consideration, you do not feel comfortable to speak up within the company, it is possible to raise your concern outside the company. [To understand all conditions involved, please see the website of the competent authorities in your country of residence.](#) Whenever you are considering such a significant step, we strongly recommend you to seek advice and not do this alone. Above all, we encourage you to speak up within the company. This way you can hand the burden over to us, and we have the opportunity to look into the matter immediately.



6 I SPOKE UP. NOW WHAT?

If you submit a report, the SpeakUp Office will send you an acknowledgement of receipt within seven days. Your report will be evaluated and assessed, and the appropriate course of action will be determined. Sometimes you will be asked follow-up questions. You will receive feedback within (ultimately) three months after the acknowledgement of receipt. You will be informed on the status of the complaint. Please note that we may not always be able to give you details of the outcome of the investigation for reasons of confidentiality, privacy and the legal rights of the involved parties. All parties involved, including the accused, are entitled to confidentiality. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

Please note that not all issues raised will automatically lead to a formal investigation. Sometimes following another course of action is better for all parties involved (e.g. mediation). Furthermore, sometimes there is insufficient information for an adequate investigation to take place and there is no possibility of obtaining further information.



7 PROTECTING YOU, SPEAKING UP

Protecting your right to speak up is essential. Protecting you as a reporter is one of the main purposes of this policy. Below, some key principles are highlighted:

CONFIDENTIALITY

All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis. Depending on the purpose of sharing, the SpeakUp Office will (further) anonymise the information prior to sharing it. Information will only be shared outside of this group if we are required to do so by law or an important public interest is at stake. In principle, we are obliged to inform any person under investigation that he or she is the subject of a report being investigated as soon as possible (this may be delayed if there is a substantial risk that this notification jeopardizes the investigation or the gathering of evidence). The identity of the reporter will not be disclosed. Regardless of all measures taken to protect your confidentiality, it can never be fully guaranteed that in a course of an investigation you will never be implicated by subjects.

SOLID INVESTIGATION PROCEDURES

The SpeakUp Office is responsible for solid, confidential and precise fact-finding. Procedures are in place.

ANONYMOUS

You can share information anonymously by using the NBHX SpeakUp Line. This offers you the best protection. Please note that the SpeakUp Office has – in addition – also the responsibility to anonymise any information that comes in, in order to protect your identity. The NBHX SpeakUp Line makes safe dialogue possible in an anonymous way. An anonymous letter does not offer any possibility of further correspondence, hence any anonymous letter or e-mail outside the NBHX SpeakUp line will – in principle – not be handled.

SAFEGUARDING YOUR PRIVACY

Our Company is committed to protecting the privacy of everyone involved in the SpeakUp process. We will do everything within reason to safeguard personal data from unauthorized access and processing. Any personal data obtained will be processed in line with data protection law and will only be used for the purposes explained in this policy or to comply with the law or an important public interest.

NON-RETALIATION

We encourage speaking up and any person that speaks up is protected. The right of non-retaliation is guaranteed under our internal guidelines and policies; violation of this right will not be tolerated. Any form of threat or retaliation aimed at those speaking up may lead to disciplinary measures. If you notice or experience any retaliation, you can report this via one of our SpeakUp channels.



PROTECTING YOU, **AS THE ACCUSED**

A person who is subject to a concern needs our utmost protection. The presumption of innocence is a leading principle. The SpeakUp Office is responsible for protecting the rights of anyone who is accused - or otherwise involved – in any issue.

CONFIDENTIALITY

All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis.

SOLID INVESTIGATION PROCEDURES

The SpeakUp Office is responsible for solid, confidential and precise fact-finding. Procedures are in place to make sure this is achieved.

INFORMATION RIGHTS

When a person is officially under investigation, they need to be notified about this fact as soon as possible, unless there is a substantial risk of destruction of evidence and/or an impediment to the investigation.

RIGHT TO DEFEND AND APPEAL

After the facts are determined, the accused receives an opportunity to not only give a statement (responding to the accusations) but also have the right to comment on the draft findings. The subject has the right to appeal against the fact that he or she is subjected to during the time that the report is being investigated.

SPEAKUP: A DIALOGUE

We selected the SpeakUp system as it allows for anonymous dialogue with the reporter. The SpeakUp Office has the right not to proceed with a case due to limited information. A procedure is in place for this.

9 THE SPEAKUP OFFICE

The SpeakUp Head Office is located at Bruchsal Germany. Local Speak Up Offices in Romania and United Kingdom are set up. Together these offices constitute the "SpeakUp Office" within the meaning of this Policy.

The SpeakUp Office consists of qualified professionals from the organisation. Professionals from different departments are appointed into the SpeakUp Office to avoid conflict of interest situations.

The SpeakUp Office is responsible for the execution of this Policy and the handling of questions and SpeakUp reports. All reports coming in through the NBHX SpeakUp Line and all reports via other channels will be made available to the SpeakUp Office. The SpeakUp Office registers, monitors and is responsible for solid, confidential and precise fact-finding. Procedures are in place to ensure this.

The management is accountable for the SpeakUp policy overall. The SpeakUp Office has a direct escalation line towards the management. All members of the SpeakUp Office are protected against non-retaliation themselves.

The SpeakUp Office will provide a (anonymised) report to the management and the Supervisory board. Explicitly included in the report are issues raised on non-retaliation and complaints on the handling of the issue by the SpeakUp Office.

10 MISUSE OF THE POLICY

We take the practice of reporting in bad faith or any other form of misuse of this policy very seriously. This act is considered to be a serious breach and disciplinary actions will be taken.

11 NOT SATISFIED WITH THE SPEAKUP PROCESS

If you believe your concern has not been handled in accordance with this policy, if you are not satisfied with the follow-up and/or the outcome of your report, or if you do not feel protected, please report this directly to the SpeakUp Office or through the SpeakUp Line.



CONTACT DETAILS & USEFUL LINKS:



When reporting have pen and paper ready and carefully note your report number and PIN Code – only then conversation is possible and you can receive answers to your report !

ONLINE (external Server):

<https://nbhx.speakup.report/compliance>

Using mobile/QR code:



BY PHONE (free access, some mobile phone services might charge fees)

UK: 0800 0022 4118

Germany: 0800 1818 952

Romania: 0800 400 653

When reporting by phone you will need to enter our **NBHX organisation code: 103659**

The reporting channels listed above use German, English, Romanian, Chinese, French, Spanish or Turkish at the discretion of the reporter; you can report in any other language however and your report will be translated.

NBHX

TRIM GROUP

NBHX TRIM GROUP EUROPE