

ANTI-FRAUD POLICY

Status December 2023

NBHX Trim Group Europe:

NBHX Automotive System GmbH

NBHX Trim Management Services GmbH

HIB Trim Part Solutions GmbH

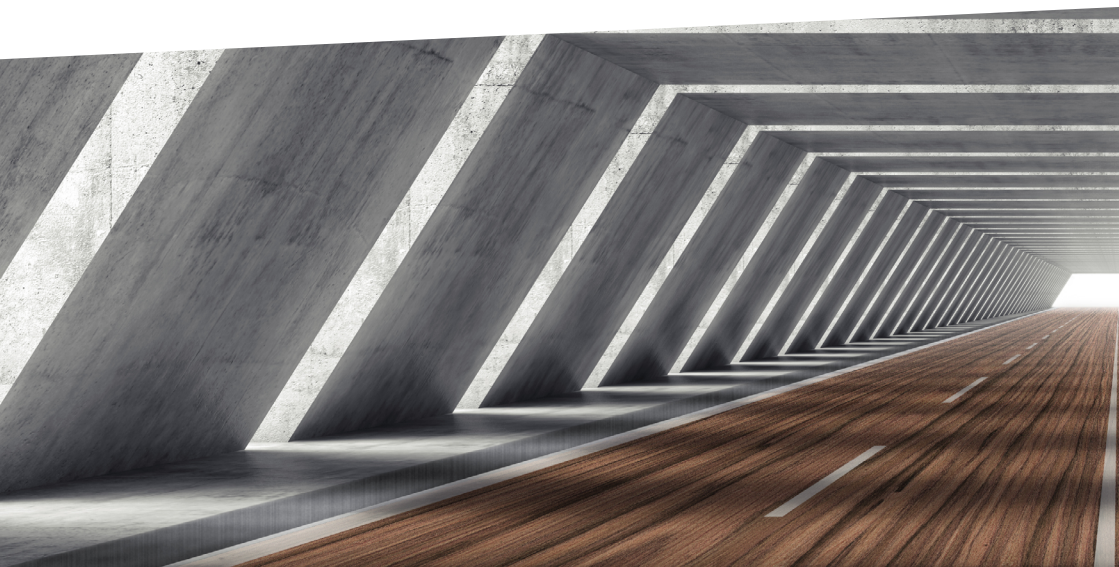
NBHX Rolem SRL

Northern Automotive Systems Limited

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

CONTENT

EXPLANATIONS AND DEFINITIONS OF TERMS	3
PURPOSE OF THE NBHX ANTI-FRAUD-POLICY	4
OBJECTIVE OF THE ANTI- FRAUD POLICY	5
SCOPE OF APPLICATION	5
DEFINITION OF FRAUD	6
TYPES OF FRAUD	7
FOCUS AREAS ANTI-FRAUD	9
INTERNAL ANTI-FRAUD ORGANISATION	12
COMPLAINT MANAGEMENT (WHISTLEBLOWING)	16
REMEDIAL ACTION AND CONSEQUENCES	16
IMPLEMENTATION OF THE POLICY	17
ATTACHMENT 1	18
ATTACHMENT 2	19

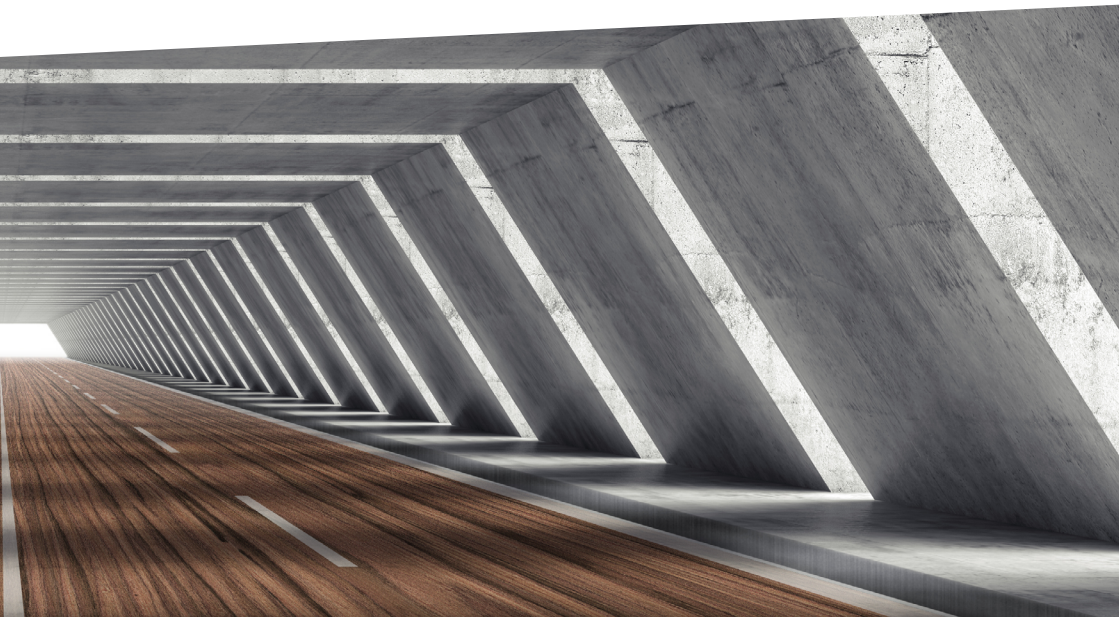


EXPLANATIONS AND DEFINITIONS OF TERMS

The term **Fraud Management** refers to all measures within a company that are aimed at preventing, detecting, and processing so-called deliberate fraudulent activities as described below.

A **Whistleblower** is defined as a person who blows the whistle, reveals, or uncovers something. **Whistleblowing** means uncovering something or giving indication of potential grievances in companies.

Compliance Managers implement control systems with the aim of preventing financial and image damage. It is the responsibility of the **Compliance Manager/s** to continuously review and improve the processes and standards introduced.



1 PURPOSE OF THE **NBHX ANTI-FRAUD POLICY**

The Anti-Fraud-Policy is introduced to support the Group's management in the internal control of the Group, to standardize processes, to enable the achievement of business objectives and to ensure sustainable, stable, and healthy business development. This policy is intended to contribute to preventing fraud and other illegal behaviour and thus protecting the rights and interests of Group Companies, Group and shareholders and minimising the risks to them.

The policy contains a standardized internal control process with rules and regulations for Group Companies that meet the requirements of stock exchange and supervisory authorities. The current situation of the Group Companies is taken into account accordingly.

The Anti-Fraud-Policy thus represents a targeted bundling of functions and processes for the prevention, detection, and processing of fraudulent, deceptive and other similar non-standard actions.



2 OBJECTIVE OF THE **ANTI-FRAUD POLICY**

The main objective of this Anti-Fraud Policy is to control the conduct of corporate bodies, directors, senior and middle management, and employees to ensure that relevant laws, industrial regulations and standards, professional ethics and internal guidelines of the Group Companies are complied with. The policy also aims to create an ethical and careful work culture and environment to prevent harm to Group Companies and the interests of those involved in them.

3 SCOPE OF **APPLICATION**

This policy applies to the Group Companies, their functional areas, subsidiaries, and their employees.



4 DEFINITION OF **FRAUD**

For the purposes of this policy, “fraud” means any act in which internal or external personnel of a Group Company use illegal or irregular means to obtain unfair personal advantages and thus jeopardize the legitimate business interests of a Group Company.

For the purposes of this Policy, “fraud” may also be any fraudulent act which appears to be in the interests of a Group undertaking but which is carried out in order to promote unfair personal interests.



5 TYPES OF FRAUD

5.1 Direct business-damaging fraud is inappropriate conduct by personnel (internal or external) of a Group Company that uses illegal or irregular means such as deception to pursue unfair personal interests, while at the same time jeopardizing the legitimate business interests of a Group Company and those involved in the Group Company.

Examples of fraud that directly harms business:

- A** Receive and accept bribes.
- B** Transfer of profitable business to others to promote personal interests.
- C** Placing orders with a personal interest representative .
- D** Work for or provide paid services to competitors, business partners, or personal stakeholders.
- E** Unlawful use of company assets, embezzlement, or theft of company assets.
- F** To burden a Group Company financially by fake transactions.
- G** Intentionally hide transactions or knowingly provide false information about transactions.
- H** Falsification or manipulation of accounting documents or receipts.
- I** Provide false information when disclosing the financial reporting of a Group Company.
- J** Disclosure of confidential business information or know-how.
- K** Breach of duty and abuse of power by board, superiors, managers, and other senior executives.
- L** Other fraudulent acts that jeopardize the business interests of a Group Company.

5.2 Indirectly business-damaging fraudulent acts are inappropriate actions by personnel (internal or external) of a Group Company in which illegal or irregular means such as deception are used and thereby the profit of a Group Company is unduly promoted, but the actions are out of personal self-interest and the actions jeopardize public interest, the interests of other organizations, individuals or those involved in the company.

Examples of indirectly business-damaging fraudulent acts:

- A** Expenses incurred for inappropriate activities, e.g. bribery or making illicit payments.
- B** Intentional and deliberate misrepresentation of transactions.
- C** Carry out fake transactions such as declaring higher revenues or undervaluing liabilities.
- D** Preparation of fake financial reports that lead to inappropriate investment and financing decisions.
- E** Conceal or delete important information that should be publicly disclosed.
- F** Engaging in illegal business activities such as antitrust agreements, circumvention of export regulations.
- G** Falsify or modify accounting documents or receipts.
- H** Anti-competitive agreements with business partners.
- I** Tax evasion or tax fraud.
- J** Other fraudulent activities that seek improper business interests for a Group Company.



6 FOCUS AREAS

ANTI-FRAUD

- 6.1 COMPANY ASSETS:** No embezzlement or misappropriation of company assets to promote improper interests.
- 6.2 BOOKING PROCESSES:** No incorrect information and execution of bookings based on them.
- 6.3 FINANCIAL REPORTING:** No concealing of material information when disclosing the financial reporting of a Group Company.
- 6.4 ABUSE OF POWER:** No abuse of power by management (officers, directors, managers, superiors, and other executives).
- 6.5 ARRANGEMENTS:** No institutional or personal arrangements.
- 6.6 GIFTS/HOSPITALITY OFFICIALS:** Gifts or hospitality offered to public officials must have a face value, comply with local regulations, and be approved in advance by the Compliance Officer. Alternatively, you can contact the compliance department.
- 6.7 SALES INCENTIVES:** All sales and marketing incentives must be transparent, reasonable and in accordance with the guidelines of the compliance and legal departments and follow the defined process models.
- 6.8 SPONSORSHIPS AND DONATIONS:** Group Companies may support charitable causes, but not in anticipation of a reward or influence in return. All applications for sponsorship or charitable donations requests must be reviewed by the Compliance Department prior to donation or sponsorship. For more information, please contact the Compliance Department.

6.9 DUE DILIGENCE - THIRD PARTY DEALING: All requests for the appointment or engagement of third parties acting on behalf of or in partnership with the Group must be reviewed. Appropriate due diligence is carried out on all third parties before any agreements are made with them. For further guidance on due diligence, including corruption and bribery issues, please contact the Compliance Officer. Group Companies must have a written contract with all third parties with whom they do business, which includes protective measures, in particular termination rights in the event that third party violates anti-bribery laws and / or the terms of this policy.

6.10 CONFLICT OF INTEREST: A conflict of interest is a situation that occurs when business, financial, political, or personal interests could impair or give the appearance of such impairment to a person's judgement in the performance of his or her duties on behalf of the Group. Directors, managers, and employees who work for a customer, partner, supplier, competitor or have a similar business relationship or who are involved in a customer, partner, supplier, or competitor must disclose their relationship. Without disclosure, such a relationship may be inadmissible. Directors, employees and third parties working on behalf of the Group are required to act in the best interests of the Group and in accordance with this Anti-Fraud Policy.

Conflicts of interest can create problems because they:

- A** *impair free discussion,*
- B** *lead to decisions or actions that are not in the best interests of the Group,*
- C** *contribute to anti-competitive (antitrust) or criminal activity that undermines the Group's*

reputation through unethical and inappropriate behaviour,

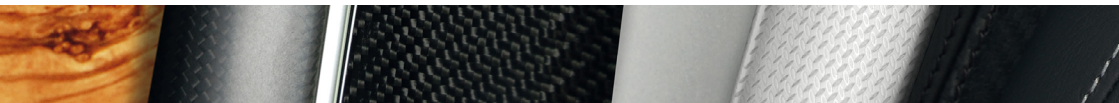
- D** *create an impression of misconduct through inappropriate provision of gifts or hospitality in actual or potential mutual business relationship.*

If a person has a conflict of interest (for example, if a group sales manager is associated with a customer's procurement manager), he or she shall not be involved in the conclusion, execution or monitoring of any business relationship affected by this without prior disclosure and independent review and approval by a Compliance Officer.

An undeclared material conflict of interest can be a reason for disciplinary action as well as labour law measures up to and including dismissal.

6.11 NEPOTISM: Nepotism is a form of unequal treatment in which family members or friends are hired for reasons unrelated to their experience, knowledge, or skills. Employees will not hire or offer employment to a close family member or friend without going through the Group Companies' recruitment and selection process.

6.12 CRIME: All employees, contractors, suppliers and all other persons working on behalf of a Group Company are expected not to commit any other offences prohibited by law such as theft, fraud, extortion and cybercrime. In addition, it is the policy and expectation of the Group Companies that all appropriate measures are taken to protect themselves and the Group Company from such crimes.



7 INTERNAL ANTI-FRAUD ORGANISATION

- 7.1** The tasks of the entire internal anti-fraud organization are:
 - 7.1.1** Prevention and detection together with adequate reaction to fraudulent activities in the Group Companies.
 - 7.1.2** Review and update of anti-fraud procedures and control measures.
 - 7.1.3** Identification of fraud risks and implementation of anti-fraud measures.
 - 7.1.4** Review of the annual fraud risk assessment and reports from the Compliance Officers.
 - 7.1.5** Review of investigative reports and comments on fraud cases and corresponding communication and coordination with auditors.
 - 7.1.6** Coordinate anti-fraud proposals with management.
 - 7.1.7** Review of the compliance officers' plan and internal audit for anti-fraud risk.
- 7.2** The head of the central finance department must support and continuously monitor anti-fraud work. It reviews the work plans and status reports of the Compliance Officers on an annual basis.
- 7.3** The managing directors of a Group Company are responsible for all anti-fraud activities within their company.
- 7.4** It is the responsibility of management to establish and improve an anti-fraud system and risk assessment mechanism, effectively ensure the implementation of anti-fraud procedures, and to remedy and address detected fraud issues.

The tasks of the management include in particular:

7.4.1 Promote a culture of integrity and create a work environment that does not tolerate fraud. These include the following measures. These include the following measures:

- A** Top management must adhere to the culture of integrity and lead by example by adhering to Group policies and procedures.
- B** The anti-fraud policies, procedures and the corresponding measures are made known to the employees through notices, intranet, company regulations, through the employee manual etc. Employees should be informed about all relevant laws, regulations, and professional ethics. A code of conduct is intended to sensitize the employee about the difference between legal and illegal activities and ethical and unethical behaviour.
- C** Employees should be encouraged to comply with laws and company policies in their daily work, and to deal correctly with conflict of interest situations and temptations regarding unethical benefits.
- D** Training of new employees in the areas of anti-fraud, law, compliance and ethics.

7.4.2 The assessment of fraud risks and institution-specific control mechanisms to reduce fraud risks should be achieved through the following measures:

- A** Management should evaluate and assess potential fraud risks at the company level, at the business unit level and at the level of key financial reporting positions.

- B** This risk assessment should also take into account the risks of falsified financial reporting, misappropriation of corporate assets, unauthorized and inappropriate earnings and expenses, and the risks of fraud in relation to senior management.
- C** Management shall establish and apply appropriate procedures to detect, prevent and reduce the risk of falsified financial reporting or misuse of assets. In areas with a high risk of fraud, such as financial reporting, management, information system and technology, the necessary internal control measures must be put in place.
- D** Before appointing or promoting a person to a key position, human resources reviews information about a job applicant's educational background, work experience, credentials, and references.
- E** In the case of a high-risk key position, background checks can be carried out if the job applicant agrees to this beforehand.
- F** Management must embed continuous fraud prevention in routine control activities, including day-to-day management and supervisory activities.

7.5 The Group Companies each appoint a Compliance Officer for the organization and implementation of anti-fraud measures, whose tasks are:

7.5.1 Responsibility for carrying out the continuous management of anti-fraud activities within the Group company and its subsidiaries, including the organization of various functional departments to conduct an annual risk assessment and self-assessment of fraud.

7.5.2 Assessment and evaluation of the anti-fraud mechanism and its implementation, implementation of anti-fraud campaigns, acceptance and recording of fraud reports, organization of investigations, provision of proposals and reports to management, the compliance manager, and the head of the central Finance department.



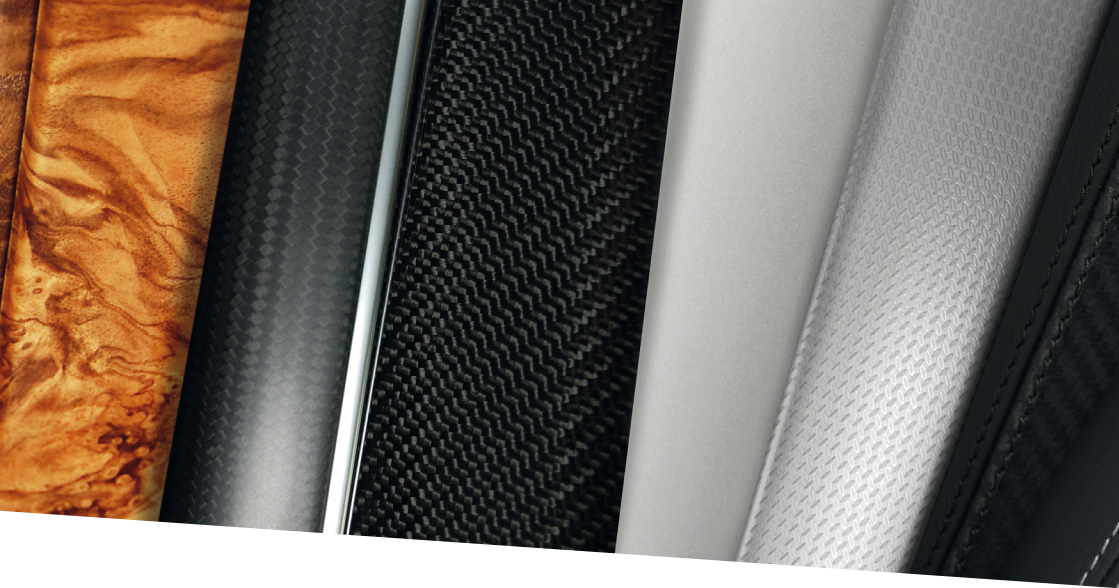
8 COMPLAINT MANAGEMENT (WHISTLEBLOWING)

For whistleblowing, the Group Companies have drawn up a guideline (Whistleblowing Policy) that meets the requirements of European law for whistleblowing processes. This policy regulates in detail the possibilities of disclosure, the handling of information (in terms of time, subject matter, and expertise), the handling of investigation results and the protection of whistleblowers.

9 REMEDIAL ACTION AND CONSEQUENCES

Group Companies expressly prohibit discrimination or retaliation for whistleblowing, hostile action toward participating investigators and behavior that hinders anti-fraud investigations or builds barriers, such as false statements or concealment of the truth. In the event of such incidents, a Group Company shall take appropriate labour law, criminal law, or other legal measures.

In the event of proven fraud within the meaning of this policy, the management of the Group Company concerned, or its affiliated organizations shall submit a written report on remedial action and monitor the implementation of those measures.



10 IMPLEMENTATION OF THE POLICY

The implementation of this policy takes place after approval by the managing directors of the individual Group Companies. Managing directors are responsible for the interpretation and amendment of this policy.

Date:

Released by:

Jianxiong Hu and
Dieter Schadenberger
CEO NBHX Trim Europe

ATTACHMENT 1: RELATION INFORMATION CHART

Relation Information Chart							
Associated person name	Relationship with the informer	Associated company	Working Period in NBHX	Major business and products or internal relationships within NBHX Trim Europe Group company	Trade of volume in recent 3 years of associated company with NBHX (TEuro)		
					20__ (Y)	20__ (Y)	20__ (Y)
Confirmation and Signature:							
Date:							

ATTACHMENT 2: CONFIRMATION

Confirmation

I hereby confirm that I have received and understood the Anti-Fraud Policy. I hereby undertake to strictly comply with the Group's provisions regarding anti-fraud systems, appropriate procedures and professional ethics and to carry out management tasks consciously with integrity and trustworthiness. In particular, I commit myself to:

1. to clearly distinguish between public and private matters, to treat official matters impartially, not to take advantage of the position held for personal gain or interests (such as accepting bribes and kickbacks, etc.) and not to harm the legitimate economic interests of the company through deception and illegal methods.
2. not to engage in any ancillary activity linked to the Company's interests in other economic entities (including but not limited to the activity of majority shareholder, partner, legal representative, director, supervisor, managing director, chief financial officer, consultant, etc.). I do not use my position to introduce relatives and other stakeholders directly into transactions with the Group, affiliates, customers, and suppliers. I will point out such connections immediately when initiating a transaction. If such a connection already exists, I hereby truthfully disclose it (see appendix).
3. not to carry out any prohibited unlawful use of company assets (such as corruption, embezzlement, embezzlement, and theft) and misappropriation of funds of the Group or of customers.
4. adhere to the operational principles of compliance, adhere to the company's internal compliance systems and procedures, and strictly observe policies/processes to minimize operational risks.
5. to consciously avoid any situation in which there is a professional or disciplinary superior/subordinate relationship with a related person or a relative in a group company or the group, especially with regard to performance evaluation.

This confirmation is available in duplicate. A copy is intended to remain with the signatory, a copy to remain in the personnel file of the signatory.

Name in block capitals: _____

(Signature): _____

Company/Department: _____



NBHX

TRIM GROUP

NBHX TRIM GROUP EUROPE