

BORBET

BORBET

BORBET

CODE OF CONDUCT
EMPLOYEES

2024

TABLE OF CONTENTS



INTRODUCTION

scope of application
compliance with the law

03



DEALING WITH INFORMATION

IT security
confidentiality

08



HUMAN AND LABOUR RIGHTS

prohibition of child labour and forced labour
no discrimination
freedom of association
fair pay and benefits
safety at work and working hours

04



TRANSPARENT BUSINESS RELATIONS

avoidance of conflicts of interest
prohibition of corruption

09



ENVIRONMENTAL PROTECTION

environmental protection in the workplace
active handling of ecological challenges
animal welfare
waste and recycling
quality and product safety

06



FAIR MARKET BEHAVIOUR

fair competition
money laundering prevention
import and export control
responsibility for compliance

11

RESPONSIBILITIES

for violations of the code of conduct

13

LEGAL CONSEQUENCES

of violations of the code of conduct

13

Status February 2024



SCOPE OF APPLICATION

The BORBET Code of Conduct applies to all employees, managers, managing directors and board members. BORBET reserves the right to change or adapt the contents and requirements of the Code of Conduct if necessary. In this case, BORBET expects its employees to take such changes into account.



COMPLIANCE WITH THE LAW

Our business partners (e.g. customers, suppliers, representatives and consultants) expect to be able to rely on BORBET as a legally compliant partner. This also requires us to be familiar with our contractual obligations to our business partners. We also ensure that our business partners comply with applicable laws and regulations in their business practices.



HUMAN AND LABOUR RIGHTS



Prohibition of child and forced labour

It is forbidden to recruit employees who are not at least 15 years of age. In countries that come under the exception for developing countries in the ILO Convention no. 138, the minimum age may be reduced to 14 years.

In accordance with the provisions of principle 4 of the United Nations Global Compact, it is prohibited to promote or tolerate any kind of modern slavery or forced labour.

Example: Through hearsay, you have become aware that a supplier has children working in a factory.

Desired conduct: Report this immediately to the purchasing department and to the compliance officer. This statement will then be investigated. Since we do not tolerate child labour, either in our company or in the factories of our suppliers, the supplier relationship must be reassessed by the purchasing department.



No discrimination

BORBET provides equal opportunities and equal treatment, irrespective of ethnic origin, skin colour, gender, religion, nationality, sexual orientation, age, disability or social background. At BORBET, employees are generally selected, recruited and promoted on the basis of their qualifications and skills. Everyone has the same opportunities. Our employees are also expected to respect the rights and national, cultural and ethnic characteristics of each individual with whom they come into contact during their business activities.

Example: You become aware that a colleague or supervisor regularly harasses an employee in front of all employees because of his or her ethnic origin.

Desired conduct: This is bullying, which is not tolerated at BORBET. Report this immediately to Human Resources or via the Compliance Hotline/homepage.



HUMAN AND LABOUR RIGHTS



Fair pay and benefits

Remuneration and benefits correspond to the legally valid framework. Insofar as statutory or collective agreements do not make any fixed specifications, BORBET aligns itself with the sector-specific, regional and market-appropriate remuneration and benefits. As a family business, BORBET helps pragmatically and unbureaucratically in social emergencies.



Freedom of association

Every employee of BORBET has the right to freely join trade unions or employee representatives. In conjunction with local works councils, BORBET seeks fair and sustainable solutions in the best interest of the healthy continuation of the company. We are fair negotiating partners vis-à-vis trade unions. The local works council is the chosen negotiating partner in the interest of our employees.

Example: BORBET plans to acquire land for a new manufacturing facility on Kayapó (indigenous) land in Brazil. The Kayapó would have to be evicted / resettled in order to build the plant.

Desired conduct: Eviction and forced removal of indigenous peoples is prohibited. Immediately contact the Compliance Officer about the proposed project.



Rights of minorities and indigenous peoples

BORBET, as well as all employees, respects the rights of local communities to decent living conditions, education, employment and social activities. Furthermore, minorities and indigenous people have the right to free, prior and informed consent (FPIC) regarding developments that affect them and the land on which they live. Furthermore, no private or public security forces will be deployed to protect a business project if the prohibition



Safety at work and working hour

Occupational health and safety are an integral part of all BORBET operations and are included in the technical, economic, ecological and social considerations from the outset - right from the planning phase. For this reason, all our locations are also certified in accordance with ISO 45001. Each of our employees is responsible for health and safety in their working environment and complies with occupational health and safety regulations. Every manager is obliged to instruct and support their employees in exercising this responsibility. The same safety standards apply to employees of subcontractors as to our employees. This is taken into account in the selection and cooperation. Working hours shall, at a minimum, comply with the respective national legal requirements or the minimum standards of the respective national economic sectors.



ENVIRONMENTAL PROTECTION



Environmental protection in the workplace

With our products, we combine the intention to bring high quality into line with our ecological requirements. We take our responsibility seriously and want to continuously improve environmental protection, both with regard to products and manufacturing, which is why we have introduced and implemented an environmental management system at all locations and an energy management system at all German locations. In doing so, BORBET relies on advanced and efficient technologies. Where possible, the consumption of water, energy, raw materials and consumables must be minimised.

Every employee must comply with environmental protection laws and regulations in the course of their activities. Employees receive annual briefings on the topic of environmental protection and can view the laws regarding occupational safety and the environment. Energy and resources are used economically and appropriately during all process steps. Each individual employee contributes to making production more environmentally friendly and energy-efficient.

Example: You notice that a drum of solvent is leaking small amounts of fluid that are collecting on the floor.

Desired conduct: Immediately inform your supervisor and the environmental protection officer at your location. Please do not assume that this has probably already been reported by another employee.



animal welfare

We comply with nationally and internationally applicable legal standards on animal welfare and animal protection as well as recognized frameworks that define ethical principles in this regard.



Active handling of ecological challenges

When developing new products and services as well as operating production facilities, BORBET ensures that all the resulting effects on the environment and climate are minimised and that our products make as positive a contribution to environmental and climate protection as possible. Water consumption and noise shall be reduced to a minimum and the quality of the water shall be checked regularly.

The quality of the air shall be monitored regularly so that BORBET can guarantee good air quality.

Recycling and reuse of materials shall be implemented in areas where it is possible. By 2040, BORBET aims to be climate neutral. This is only possible with the help of the ideas of our employees. Optimization potentials are to be reported to the suggestion system / idea management.

In order to improve the environmental performance indicators of products and services, the supplier should proactively manage the main environmental indicators, including the reduction of greenhouse gas emissions along the entire supply chain. This must be regularly queried and checked by purchasing employees.



ENVIRONMENTAL PROTECTION



Waste and recycling

The prevention of waste, reuse, recycling, the economical use of resources and the safe and environmentally friendly disposal of waste are taken into account in development, production, packaging and all other activities within our area of responsibility. All waste must be sorted by type and put into the containers provided for this purpose.

Example: An assortment of liquid, hazardous waste has been generated in your department. To save space, you decide to combine the liquids and then request collection of the waste.

Desired conduct: Mixing different hazardous wastes can greatly increase disposal costs and combining several non-hazardous liquids can create a hazardous one. In addition, mixing hazardous waste is prohibited. For this reason, always contact the environmental protection officer at your location first and report such incidents immediately.



Quality product safety

Our products must meet the contractually defined criteria for quality and legal requirements for their intended use before delivery. This applies both to products that BORBET receives from its suppliers and to alloy wheels manufactured by BORBET. In order to continuously improve the quality processes, we have introduced and implemented a quality management system.

Example: When accepting a delivery of aluminium alloy, you notice that the quality does not meet the specified requirements.

Desired conduct: Proceed in accordance with the internal rules for dealing with faulty or suspect products and inform your supervisor immediately.



DEALING WITH INFORMATION



IT Security

Information Technology (IT) and Electronic Data Processing (EDP) as well as ERP systems are indispensable in everyday work at BORBET, but at the same time also involve a number of risks. These include, in particular, the impairment of data processing by malware (viruses), the loss of data due to program errors or the misuse of data (for example by hackers). BORBET pays attention to IT and EDP security. All BORBET employees must comply with the applicable IT/EDP guidelines. If you have any questions or problems, the IT department is the correct contact. The protection of personal data is guaranteed in all areas.

Example: At a business meeting, you receive a USB stick to exchange documents.

Desired conduct: Ask the document owner to send you the document by e-mail, or use a USB stick from the BORBET IT department. Only these USB sticks may be used. If you have any further questions or uncertainties regarding IT security, please contact the IT department at your location.

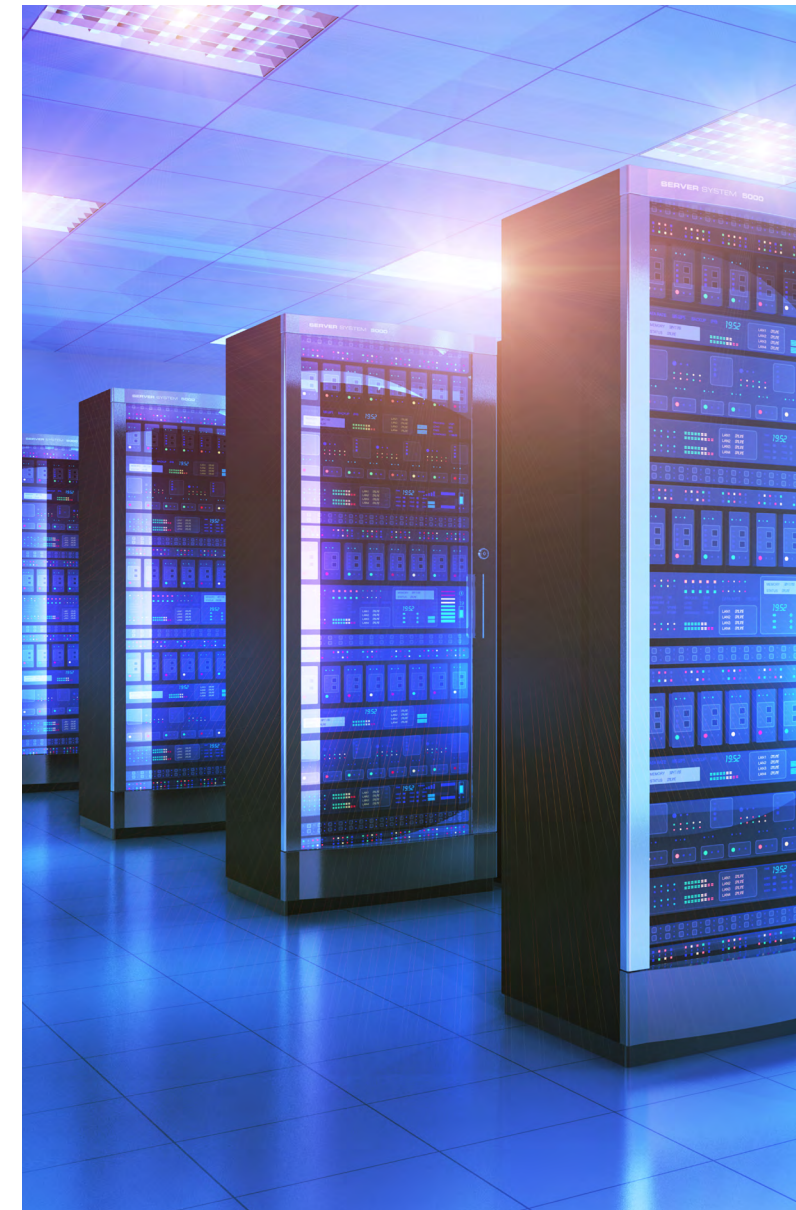


Confidentiality

All information that has not been made publicly available is subject to confidentiality in accordance with the employment contract and may not be disclosed to unauthorised third parties either during or after termination of the employment relationship. This does not apply if there is prior written consent from the respective managing director of a BORBET location or the disclosure is based on a legal obligation, e.g. the obligation to testify in judicial proceedings. In this case, the responsible party (supervisor) should be informed in advance of such disclosure, if possible.

Example: At a school reunion, you have a conversation with a former classmate. He is now working at an automotive manufacturer and asks you specific questions about a new process at BORBET, which is intended to save a lot of electricity.

Desired conduct: Such information is subject to confidentiality and may not be disclosed. Tell the other person that you will not comment on this.



TRANSPARENT BUSINESS RELATIONS



Avoidance of conflicts of interest

At BORBET, business decisions are made exclusively in the best interests of the company. Conflicts of interest with private concerns or with other activities of a business or other nature, including those of relatives or other related persons or organisations, should be avoided from the outset. However, if they do occur, they must be resolved in accordance with the law and the applicable company guidelines. This requires transparent disclosure of the conflict.

Example: BORBET intends to place an order with a new supplier. The head of this supplier is your sister.

Desired conduct: Report this immediately to the purchasing department and to your supervisor. A contract may be concluded, but make sure that you are not involved in the decision-making process.



TRANSPARENT BUSINESS RELATIONS



Prohibition of corruption

At BORBET, any form of bribery, venality or corruption is prohibited, whether by public officials or in business and social dealings. All business must be conducted in an ethical manner and in accordance with the provisions of applicable national and international anti-corruption laws and regulations. The acceptance and granting of benefits in South Africa is governed by different rules than those in Germany and Austria.

Germany and Austria: Benefits, e.g. in the context of invitations or in connection with advertising measures, which serve the purpose of promoting business relations or presenting products or services, are permissible - as far as moderate. However, such benefits may only be accepted or granted if they serve a legitimate business purpose and are not accepted or granted in return for an unlawful advantage. The benefit must not be unreasonably high in value and must not disproportionately exceed the limits of customary business practice or the recipient's normal local standard of living. Donations to public officials are not tolerated. If you are unsure whether a gift received was appropriate, please contact the Compliance Officer. Gifts received should be given to the Executive Assistant and will be raffled off to employees once a year in a Christmas raffle. The money from the raffle is then donated to charitable, regional institutions.

South Africa: Invitations to presentations of products or services are - as far as moderate - permissible. However, such invitations may only be accepted or granted if they serve a legitimate business purpose and are not accepted or granted in return for an unlawful advantage. Invitations to meals and gifts may not be accepted. Contributions to public officials are also not permitted.

We are extremely cautious about requests for sponsorship or „donations for charitable purposes“ or similar offers and carefully check whether this is not a covert attempt at bribery. Furthermore, such a commitment must also fit in with our products and regionally with our locations. Any donations, whether to charities or political parties, must be made in the long-term interest of the company and in accordance with applicable laws. A decision in this regard is the responsibility of the management.



We are extremely cautious about requests for sponsorship or „donations for charitable purposes“ or similar offers and carefully check whether this is not a covert attempt at bribery. Furthermore, such a commitment must also fit in with our products and regionally with our locations. Any donations, whether to charities or political parties, must be made in the long-term interest of the company and in accordance with applicable laws. A decision in this regard is the responsibility of the management.

Example: You have an external auditor on the premises who notices several issues that are preventing certification or approval. The auditor offers you approval in exchange for an appropriate expense allowance.

Desired conduct: This type of allowance would constitute corrupt behaviour and is not permitted. Inform your supervisor and the compliance officer immediately.

FAIR MARKET BEHAVIOUR



Fair competition

In all countries, relationships and arrangements with competitors, suppliers, distributors and dealers that affect fair competition are prohibited by law. This includes, for example, price agreements, the division of customers or sales territories between competitors, anti-competitive boycotts and other unfair methods of competition. BORBET is committed to fair competition and complies with these laws and regulations.

Example: A former colleague of yours is now working for a competitor. He approaches you at an automotive trade fair and tells you about a new sales strategy at his company.

Desired conduct: The former colleague should not have told you anything about this, and you should also tell him that.



FAIR MARKET BEHAVIOUR



Money laundering prevention

One of BORBET's expressed objectives is to maintain business relationships exclusively with reputable business partners whose business activities are in accordance with statutory provisions and whose financial resources are of legitimate origin.

Example: A BORBET customer pays too much for the wheels received and asks you to transfer the excess amount to a Swiss bank account.

Desired conduct: Report this to your supervisor. Such a request must undergo thorough investigation.



Import and export control

BORBET uses export controls to record the cross-border exchange of goods and services, not only with third parties, but also with groups belonging to the company.

Example: You receive a request from a potential customer from a country for which you are unsure whether an export restriction exists.

Desired conduct: Please check with Export Control which provision applies to this country.





RESPONSIBILITY FOR COMPLIANCE

The guidelines are intended to become integral to corporate reality and thus be incorporated into the day-to-day work of all BORBET employees. Every employee is therefore responsible for adherence to the rules and principles of conduct defined in these guidelines. Supervisors/managers ensure that their employees are familiar with the contents of the guidelines and observe the rules and principles of conduct applicable to them. They set an example for their employees with their own conduct.

Conversely, employees should contact their supervisors if they have doubts about the application of these guidelines.



REPORTING OPTIONS IN CASE OF VIOLATIONS AGAINST THE CoC

In order to protect BORBET, its employees, suppliers and business partners, misconduct must be detected at an early stage, reviewed and remedied immediately. This requires the awareness of everyone, as well as your willingness to point out possible violations of the rules when there are concrete indications. In the event of concrete evidence of misconduct on the part of your colleagues or the employees of our suppliers, customers or other parties, we request that you report this to one of the following bodies:

- to the mailbox Compliance@borbet.de
- via the message field on the homepage under the „Code of Conduct & Compliance“ tab
- by telephone to the HR department of the respective location
- in a one-to-one conversation with your immediate supervisor
- by mail or telephone to the Local Compliance Manager:
- to the Compliance Officer:
Carola Scheikel, Tel. +49 151 400 90 787 or
Nicole Prestele, Tel. +49 2984 301 2288
- or to an ombudsman: Matthias Rappel, Telephone: **+49 2981 92 090**
info@sbr-winterberg.de
- for the South African location via the KPMG hotline: **0800 777 117**

Reported information is processed confidentially by the compliance officer in a transparent and fair procedure. Whistleblowers must be protected from retaliation by law.