POLICY

Supplier Sustainability Requirements

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1. PURPOSE AND SCOPE

1.1. INTRODUCTION

Since 1976, CEBI Luxembourg S.A. ((later only called "CEBI") has been manufacturing electromechanical products for the automotive and household appliance industries. CEBI product range covers components for temperature and level control. CEBI is the worldwide leader in automotive washer systems including pumps and various components and are the European leader in the temperature sensor and closing mechanism markets. For more information, visit CEBI Site: https://www.cebi.com/

With more than 3000 employees worldwide, CEBI Group has set up 11 production plants in 8 different countries. To facilitate relationships with our customers and to ensure global sales coverage, CEBI has also established sales offices all over the world. CEBI's headquarter (CEBI International S.A.) is located in Luxembourg.



By investing considerably into the development of new technology, CEBI has always placed innovation, automation, technology and sustainability at the center of its strategy to produce electromechanical components for the automotive industry, household appliances, e-mobility applications and industrial applications.

1.2. SCOPE

CEBI long standing experience derive from the passion combined with the knowledge accumulated all these years, which enable their experts to develop high quality products to exceed customers' requirements.



This Supplier Sustainability Requirements Policy has been developed to communicate to the supplier the general expectations and requirements of CEBI and their customers in regards to the sustainability.

CEBI attaches great importance to its relationships with its suppliers, as they play a crucial role in the product life cycle and have a direct impact on the sustainability of the final products.

1.3. PURPOSE

The purpose of the Supplier Sustainability Requirements Policy is to communicate CEBI's sustainability requirements to its suppliers. CEBI expects this policy, which specifies the basic requirements for environmental and ethic management of CEBI, to provide the foundation for the working relationship with its Suppliers.

As part of its sustainable management, the supplier shall carry out advanced sustainable planning and sustainable control not only on company level but within the whole supply chain as well as continuous improvement in line with CEBI and all legal requirements.

1.4. **REQUIREMENTS**

1.4.1. DEFINITIONS

In this policy, the terms "shall" and "must" mean that the described action is mandatory; "should" means that the described action is necessary and expected with some flexibility allowed in the method of compliance; and "may" means that the described action is permissible or discretionary.

1.4.2. CEBI REQUIREMENTS IN SUPPLIER SUSTAINABLE RELATIONSHIP

CEBI believes that its strategic advantage with our growing customer base can be enhanced by further strengthening its commitment to sustainable production and supply chain to best fulfil its social, ethical and environmental commitments. In order to simplify the necessary communication with suppliers, it is therefore essential:

• To provide CEBI with a list of contact details of the persons responsible for the most important areas related to sustainability: Social Sustainability, Compliance/Business Ethics, Environmental Sustainability.

The results will be included in the SUPPLIER evaluation.

The following chapters list the various sustainability criteria that are taken into account in the global procurement strategy in order to become a globally recognised CEBI supplier. This applies to new and existing suppliers.



2. ENVIRONMENTAL RESPONSIBILTY

The supplier shall take responsibility to ensure compliance to all relevant environmental legislation that has to be applicable to the regions in which goods are produced as well as sold. The compliance shall also cover all additional requirements from OEMs including, when required, investigations within the supply chain to assure that all requirements are met and communicated effectively.

Feedback from the supplier applies to all sites of the supplier organization and shall be communicated internally as such. In this regards, supplier should develop relevant environmental procedure. CEBI encourages its suppliers to develop a certification plan along the lines of the ISO 14001:2015 standard or registration to EMAS. This plan shall be communicated to CEBI.

CEBI respects the needs and concerns of the communities in which we live and work. Our products, services, and manufacturing methods reflect this concern.

Suppliers to CEBI shall comply with all applicable governmental regulations. These regulations relate to the health and safety of the workers, environmental protection, use of toxic and hazardous materials, and free trade. Suppliers must recognize that the applicable regulations might include those in the country of manufacture, as well as the country of sale. Registration to ISO14001 (Environmental Management System) and ISO 45001 (Health and Safety Management System) is strongly recommended. The compliance shall also cover all additional requirements from OEMs including, when required, investigations within the supply chain to assure that all requirements are met and communicated effectively.

2.1. ENVIRONMENTAL IMPACT

Suppliers shall be sensitive to its impact on the environment (including but not limited to air emissions, water discharge, toxic substances and hazardous waste disposal) and local communities. Supplier shall comply with the environmental laws and standards within its facilities. Suppliers must be careful in handling hazardous materials or operating processes or equipment that use hazardous materials to prevent unplanned releases into the workplace or the environment.

Minimum Requirements for CEBI Suppliers

Suppliers, if so required by CEBI, must have a documented and updated environmental policy that includes targets (no-exhaustive list) to:

- protection of water quality,
- protection of biodiversity,
- protection against hazardous substances on the premises and use of appropriate waste management systems and procedures,
- compliance with the applicable laws and continuous improvement



2.2. CEBI REQUIREMENTS REGARDING CO2 NEUTRALITY

Respecting European and National obligations concerning decarbonization, supporting our customers in the common objective to reduce the CO2 footprint and with regards to our Corporate Social Responsibility, CEBI has started already some years ago to reduce the impact on the environment. However, to achieve the various targets on the road to climate neutrality by 2040, CEBI needs the full support of its valuable suppliers CEBI therefore encourages its suppliers to reduce their impact on the environment as quickly as possible by reducing CO2 emissions, minimizing energy consumption in production and transport, increasing the use of recycled materials, using renewable energy, among other things. In order to be able to share this with the customer, CEBI requires the following from its suppliers:

Minimum Requirements for CEBI Suppliers

- Creation of a Company Roadmap towards a CO2 neutrality latest in 2040
- Willingness to carry out product emission calculations or to transmit the necessary data for calculation to CEBI promptly upon request.
- Willingness to inform CEBI about the measures already implemented and those planned to reduce CO2 emissions
- Willingness of the suppliers to cooperate within the whole supply chain to implement measures for the reduction of the CO2 Emissions.

Expectations towards CEBI Suppliers

- The Supplier should work with its upstream supply chains to strengthen its ability to assess risks and improve its due diligence measures.
- The Supplier should collaborate in industry-wide initiatives that work to strengthen entrepreneurial due diligence in raw material supply chains.

2.3. RESTRICTED AND DECLARABLE SUBSTANCES

2.3.1. COMPLIANCE WITH LOCAL LAWS AND REGULATIONS

Suppliers must adhere to the laws and regulations in the locality in which they reside. This includes all local, state, and federal laws/regulations in the country of origin.

2.3.2. INTERNATIONAL MATERIAL DATA SYSTEM (IMDS)

CEBI supplier must ensure that its products comply with GADSL - Global Automotive Declarable Substances List. More details can be found at <u>http://www.gadsl.org</u>.

The supplier is obliged to declare the use in their products of substances "restricted" or "declarable" specified in GADSL by completing an IMDS base - International Material Data



System if required by CEBI. Evidence of entering data into IMDS system has to be included in the package of PPAP.

2.3.3. REACH AND RoHS

CEBI suppliers shall comply to the requirements of the European Parliament and Council Regulation EC 1907/2006 and 2011/65/EU concerning the safe use of chemicals by their registration and evaluation, and in some cases, authorization and restriction of trade and the use of certain chemicals, and also the restriction of the use of certain hazardous substances in electrical and electronic equipment. (**REACH** - **R**egistration, **E**valuation, **A**uthorization and **R**estriction of **C**hemicals, **ROHS**- **R**estriction of **H**azardous **S**ubstances).

2.3.4. RESPONSIBLE SOURCING OF RAW MATERIALS FROM CONFLICT AFFECTED AND HIGH-RISK AREAS (CAHRAS)

On August 22, 2012, the US Securities and Exchange Commission (SEC) adopted final rules to implement reporting and disclosure requirements related to "conflict minerals", as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The term "conflict minerals" defines columbite-tantalite (cola), cassiterite, gold, wolframite, tantalum, tin and tungsten, and any other mineral or its derivatives determined by the US Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.

CEBI suppliers shall ensure compliance with these requirements and provide all requested reports. For more information regarding conflict minerals, please refer to <u>http://www.conflict-minerals.com</u>

Minimum Requirements for CEBI Suppliers

The Supplier undertakes not to commit or contribute to any severe human rights violation, including torture, cruel, inhumane, and degrading treatment, including corporal punishment, sexual violence, war crimes, and crimes against humanity. Suppliers of raw materials that originate from conflict-affected and high-risk areas or are transported through conflict-affected areas and suppliers that use such raw materials in their products must effectively meet their due diligence obligations in the supply chain in order to minimize the risk of actual and potential adverse impacts along the supply chain. They must establish a policy that sets out how they systematically identify and prioritize risks and initiate countermeasures.

Suppliers of 3TG3 (tin, tantalum, tungsten, and gold) and suppliers that use these raw materials in their products must identify and disclose all the smelters and refiners in their supply chains and assess whether they have conducted an OECD-compliant due diligence process. In doing so, suppliers must apply established procedures, such as the Responsible Minerals Assurance Process (RMAP), as a minimum. The supplier shall ensure that the purchase of these materials is made exclusively from refineries and smelters that meet the requirements (status: "Conformant") of the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Reporting Template (CMRT) annually by March 1 at the latest. If a smelter or refinery used does not comply with the requested standard, the CEBI Group may require the Supplier to remove refineries and smelters that are not RMAP-compliant from the CEBI Group supply chains in the long term.



Expectations towards CEBI Suppliers

The Supplier should work with its upstream supply chains to strengthen its ability to assess risks and improve its due diligence measures.

The Supplier should collaborate in industry-wide initiatives that work to strengthen entrepreneurial due diligence in raw material supply chains.

3. CORPORATE SOCIAL RESPONSIBILITY

Corporate Social Responsibility and ethical standards are very important and part of CEBI Vision to remain a company that is trusted and respected by our clients as well as by our community.

CEBI operates business in a responsible manner. At CEBI, the way we conduct business is as important as the products and services we provide. Accordingly, CEBI will only do business with suppliers, contractors, and consultants (collectively herein referenced as "Suppliers") that comply with applicable and controlling laws, rules, and regulations (collectively herein referenced as "applicable laws") and at a minimum, with standards of business conduct consistent with those set forth in this Supplier Code of Ethics ("Code"). It is CEBI's expectation that Suppliers, their employees, sub-suppliers and any other parties involved with the execution of CEBI work, similarly comply with the applicable laws and the standards set forth in this Code.

CEBI expects the following, without limitation, including respecting the human rights of employees from all its Suppliers.

In order to ensure the compliance with the minimum requirements defined in the following, the supplier is obliged to inform about identified risks and mitigating measures without being asked and to provide a documentation of his due diligence measures on request of CEBI.

The supplier sustainability requirements should cover:

- Rights of Minorities and Indigenous People
- Diversity, Equity and Inclusion
- Land, Forest and Water Rights and Forced Eviction
- Use of Private or Public Security Forces
- Export controls and economic sanctions
- Whistleblowing and protection against retaliation
- Decarbonisation
- Reuse and recycling of materials
- Animal welfare



- Biodiversity, land use and deforestation
- Soil quality
- Noise emissions
- Binding requirements towards tier-1 suppliers to pass on standards along the supply chain

3.1. HUMAN RIGHTS AND LABOR STANDARDS

The Code of Ethics and Business Conduct is based on the standards of Social Accountability International (SA 8000).

Minimum Requirements for CEBI Suppliers

In cases where potential risks to human rights defenders arise in connection with the products or services provided, the Supplier must speak out against any form of intimidation, threat, defamation, and criminalization of human rights defenders.

Expectations towards CEBI Suppliers

The Supplier should work towards the protection of human rights defenders and declare its commitment to their protection in a publicly available document as well as demand the same commitment from its subcontractors. The Partner should engage in a dialogue with human rights defenders and seek constructive cooperation with them.

3.1.1. FORCED LABOR, HUMAN TRAFFICKING AND SLAVERY

Supplier shall not use any form of forced labor including prison, indentured, bonded, military, slave or any other forms of forced labor. Supplier shall not participate in the recruitment, transportation, transfer, harboring or receipt of any persons by means of threat, use of force, or any other forms of coercion, abduction, fraud, deception, abuse of power or position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation. Suppliers shall not retain an employees' government-issued identification, passports or work permits as a condition of employment and shall allow employees to resign from their positions at any time.

Minimum Requirements for CEBI Suppliers

The Supplier ensures that all its employer practices are in line with the ILO Conventions No. 29 on Forced Labour and No. 105 on the Abolition of Forced Labour at a minimum, particularly that all employees, including contract employees, are working on their own will and that they are free to terminate their employment giving appropriate notice. The Supplier must prohibit all forms of forced labor, including especially compulsory labor, debt bondage, human trafficking, and any other form of modern slavery.

Employees must not be financially burdened through the withholding of wages or expenses or the imposition of fees as part of the hiring process.



The Partner must not restrict the employee's freedom of movement by withholding their identity documents or taking other measures against their will.

Expectations towards CEBI Suppliers

Suppliers should establish clear policies setting out the implementation procedures for hiring, promotion, and termination. The Supplier should further set out how it monitors its own labor and hiring practices within the company and with third parties, such as employment agencies and recruiters, and how it retains appropriate documentation. Working conditions and employment contracts should be documented clearly and in writing.

The Supplier should work collectively, for example in industry associations, to reject all forms of modern slavery and to protect workers' rights.

The supplier prohibits discrimination based on race, color, sex, language, religion, political or other opinions. We further expect our suppliers to consider the diversity of their employee selection are skills and qualifications. The supplier shall take into consideration the health and livelihood of minorities, local communities and indigenous people, and preserve cultural and ritual sites. The supplier must also commit to respect women's rights and help develop skills and open up opportunities.

3.1.2. PROTECTION OF LOCAL COMMUNITIES AND INDIGENOUS PEOPLES

Minimum Requirements for CEBI Suppliers

The Supplier assures to respect the rights of local communities and indigenous peoples who may be affected by doing business in the Supplier's locations and to take into account the local impact of its business activities. In particular, the Supplier must avoid potential adverse impacts on the health, safety, and living conditions of the affected local communities and indigenous peoples by taking appropriate preventive measures. The Supplier must neither unlawfully engage in the forced relocation of local communities and indigenous peoples nor unlawfully contribute to their involuntary relocation.

The Supplier must uphold the principles of free, prior, and informed consent of indigenous peoples in its activities in the sense of ILO Convention No. 169 on Indigenous and Tribal Peoples in Independent Countries. The Supplier must respect the rights of indigenous peoples, their social and cultural heritage, and their environmental and economic interests. This includes their connection to the land and its cultivation as well as other natural resources.

Expectations towards CEBI Suppliers

The Supplier should work together with local authorities and relevant stakeholders in a trustful manner to achieve the best possible outcome for the people affected by these business activities. To this end, they should also actively contribute to the development of the local community and create employment opportunities.

3.1.3. CHILD LABOR

Supplier shall ensure that no underage labor has been used in the production or distribution of their goods or services. Employees must not be younger than the minimum employment age established by the respective country or local jurisdiction. In the event no minimum



employment age is established, employees must not be younger than the age of compulsory education; or if no minimum age for compulsory education is established, employees should not be younger than age 14.

Minimum Requirements for CEBI Suppliers

The Supplier ensures that child labor is not tolerated within its own operations or within its direct suppliers under any circumstances. The Supplier is obliged within its own business area to comply with ILO Conventions No. 138 on Minimum Age and No. 182 on the Worst Forms of Child Labour as a minimum and to check the age of employees and applicants accordingly. Children must not be hampered in their development and education. Their health and safety must not be adversely affected. The Partner is obliged to agree with its direct suppliers on the requirements for the prevention of child labor and also to request them to forward these.

Expectations towards CEBI Suppliers

The Supplier should establish a separate policy prohibiting child labor within their business activities and supply chains in line with the relevant ILO conventions. The Partner should integrate this requirement into their legally binding contracts and agreements.

If the Partner identifies child labor in its workforce, the Partner should not only terminate the employment, but also take care to create adequate measures to remedy the situation, for example, including them into an appropriate education program. A mere postponement of child labor is to be prevented.

The Partner should work collectively, for example, in industry associations, to promote the rights of children and their access to education and healthy development.

3.1.4. WORKING HOURS

Supplier's employee working hours must comply with all applicable laws and regulations. Suppliers should encourage employees to receive at least one day off every seven days in compliance with all applicable laws.

3.1.5. WAGES AND BENEFITS

Suppliers must have a system in place to verify and accurately record payroll, deductions and the hours worked by legally authorized employees. Suppliers must comply with all applicable wage and compensation requirements as defined under applicable labor laws for regular work, overtime, maximum hours, piece rates, and other elements of compensation and employee benefits.

3.1.6. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Supplier must adhere to applicable laws regarding the right to affiliate with lawful organizations without interference.

3.1.7. NONDISCRIMINATION

Employment by Supplier shall be based solely on person's ability and not personal characteristics. Supplier shall maintain a workplace free of unlawful discrimination, which



includes, but is not limited to, race, gender, sexual orientation, age, pregnancy, caste, disability, union membership, ethnicity, religious belief or any other factors protected by applicable law. Employees shall not be subject to verbal, physical, sexual or psychological abuse or any other form of mental or physical coercion and shall be treated with respect and dignity.

3.1.8. HEALTH AND SAFETY / WORKING ENVIRONMENT

CEBI and its suppliers are responsible for health and safety of their employees. Work processes and policies must be designed and implemented to minimize risk. Suppliers must routinely review and improve workplace conditions to ensure a safe and healthful workplace and report unsafe working conditions anywhere in the world to supervisors and management.

Minimum Requirements for CEBI Suppliers

The Supplier as employer warrants health and safety at work within the framework of the applicable national law. Insofar as the product manufacture or the provision of services may have a significant impact on the health and safety of its employees, Cebi recommends strongly that the Supplier introduces and operates a recognised and certified occupational health and safety management system (e.g. in accordance with ISO 45001 or OHSAS 18001).

The Supplier must establish guidelines on health and safety at work that support the continuous development and improvement of working conditions and provide all employees with regular access to relevant training.

The Supplier must protect its employees against work-related hazards in the form of accidents, hazardous substances, and excessive physical and mental stress. The Partner must ensure a safe workplace, the necessary working tools and materials, and adequate protective equipment.

Expectations towards CEBI Suppliers

The Supplier should support the continuous development and improvement of working conditions with the objective of having no occupational accidents and illness. The Supplier should have policies and guidelines on occupational health and safety in place and foster a preventive approach according to which occupational accidents and illness can be prevented.

The Supplier should conduct regular inspections to warrant employee safety, set ambitious targets in terms of accident rates, deaths and days lost, and report on their progress annually.

The Supplier should document all the health and safety trainings provided to its employees and provide them with access to healthcare services. Appropriate services may include, for example, on-site clinics or a system for referring employees to external healthcare providers.

3.1.9. BRIBERY AND CORRUPTION

Suppliers shall not engage in any form of corrupt practices including without limitation to, extortion, fraud, impersonation, false declarations, bribery, money laundering, supporting or involved with terrorist or organized crime organizations or activities. Suppliers shall not offer bribes, kickbacks, illegal political contributions or other improper payments to CEBI representative or agency, any customer, government official or third party, with the intention of



obtaining or retaining a business or other improper advantage. Suppliers must have a written anti- corruption / anti-bribery policy that includes an annual review with its employees of such policy.

No matter where we operate around the world, we are steadfast in our dedication to service and integrity. Strong Supplier partnerships are a cornerstone of CEBI's business and a vital link in setting and achieving expectations for ethical sourcing and corporate social responsibility. At CEBI, the way we conduct business is as important as the products and services we provide.

In the event CEBI determines that a Supplier's efforts to comply with this Code have been deficient and the Supplier fails to cooperate in developing and implementing reasonable remedial steps, CEBI reserves the right to take appropriate actions up to, and including, discontinuing purchases from the Supplier.

3.1.10. PRIVACY AND DATA PROTECTION

The personal data collection, storage, and use is required to be

- Processed lawfully, fairly and in a transparent manner in relation to the data subject;
- Collected for specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- Processed in a manner that ensures appropriate security of the personal data.

3.1.11. FAIR COMPETITION AND ANTI-TRUST

Supplier represents, warrants and undertakes that Supplier and its affiliates, and their respective staff, directors, employees, successors, suppliers, distributors and agents (hereinafter referred to as "Supplier's Related Parties") will comply with the competition laws and regulations throughout the world, including but not limited to, the Fair Trade Act of Taiwan, Anti-Trust Law of the U.S.A., Thailand Trade Competition Act and laws and regulations related to fair competition or anti-trust applicable in any other countries or territories (hereinafter referred to as the "Competition Laws" collectively), and will engage in ethical management and fair competition, and refrain from engaging in any malicious competition by means against the law, including but not limited to, unfair concerted actions, restricted selling prices, abuse of monopoly power, or restriction of trade , concerted actions, unfair trade, bid rigging, combined pricing, allocation of customers, or any other actions against said laws and regulations.

3.1.12. PROTECTION OF INTELLECTUAL PROPERTY

Minimum Requirements for CEBI Suppliers

The Supplier must comply with all applicable national and international laws concerning the protection of intellectual property. Intellectual property includes registrable intellectual property



rights (for example, patents, trademarks, and designs), domains, copyrights, and requirements under competition law. The Supplier must also take care to ensure that it holds all the necessary rights of use to avoid infringements of intellectual property rights.

3.1.13. SANCTIONS

Minimum Requirements for CEBI Suppliers

The Supplier must ensure that it observe all applicable national and supranational sanctions and trade embargoes. The Supplier must therefore take all necessary measures to avoid the risk of sanction violations.

3.1.14. ARTIFICIAL INTELLIGENCE

Minimum Requirements for CEBI Suppliers

Suppliers that develop and/or use artificial intelligence (especially machine learning and deep learning) must ensure that artificial intelligence is used and handled responsibly, that its use can be explained, that privacy is protected, and that its use is safe, secure, and reliable. In this context, they must follow an approach that ensures that development remains human-centric and that risks and opportunities are taken into account in equal measure.

3.1.15. ANIMAL PROTECTION

Expectations towards CEBI Suppliers

The Supplier should implement standards and best practices in order to comply with the following ethical principles:

• The Five Freedoms of the British Animal Welfare Committee (AWC) to assess animal welfare (freedom from hunger, thirst, and malnutrition, freedom from discomfort, freedom from pain, injury, and disease, freedom from fear and distress, and the freedom to express normal behavior.

• The standards of the World Organization for Animal Health (OIE) on animal welfare (Terrestrial Animal Health Code and Aquatic Animal Health Code)

• The 3R principles for animal testing (Reduction, Refinement, Replacement). The goal of the 3R principle is to completely avoid animal testing altogether (Replacement) and to limit the number of animals (Reduction) and their suffering (Refinement) in tests to the minimum necessary.

3.1.16. CONFLICTS OF INTEREST

The Supplier and its employees have to avoid any Conflicts of Interest.

Minimum Requirements for CEBI Suppliers

In dealing with business partners, the Supplier must make decisions solely on the basis of objective information and may not allow itself to be influenced by personal interests. The Supplier must disclose potential or actual conflicts of interest and identify an appropriate response.



3.1.17. WHISTLEBLOWING AND PROTECTION AGAINST RETALIATION

CEBI requires its suppliers to have a Whistleblowing and Retaliation Protection Policy that applies to anyone who in good faith reports suspected wrongdoing by the Company and may be subject to retaliation as a result. Wrongdoing includes, but is not limited to:

- Fraud
- Corruption
- Waste of resources
- Sabotage
- Substantial and specific danger to public health or safety
- Sexual exploitation and abuse.

3.1.18. CASCADING IN THE UPSTREAM SUPPLIER MANAGEMENT

CEBI expects its suppliers to enforce sustainability requirements throughout their entire supply chain by:

- Defining and implementing similar standards towards their own tier-1 suppliers.
- Establishing binding requirements towards tier-1 suppliers to pass on standards along the entire supply chain.

Nothing in this CSR terms and conditions is intended to, in any way, grant any additional rights or expectations to a CEBI Supplier or, in any way, modify or otherwise limit any of CEBI's contractual or legal rights.

3.2. VIOLATION REPORTING AND HANDLING

Following CSR DIRECTIVE 2014_95_EU, complainants may report any violations of these standards to CEBI using CEBI's Direct Channel (<u>mailto:legal@cebi.com</u> for anonymous communication and/or available information's on CEBI website <u>Request info on CEBI website</u>) is available to CEBI's professionals and partners (including suppliers and their employees) as a confidential way to communicate any concerns regarding the interpretation or application of the Code of Ethics and Legal Compliance and its implementing regulations, as well as for the mandatory reporting of any illicit behaviour or any irregularity or infringement detected in relation to said Code and regulations.

All the correspondence received via this channel is handled in accordance with the principles of impartiality, confidentiality and independence, with full respect for rights and guarantees in the process, both in the analysis and verification of the correspondence received and in the resolution and, as applicable, adoption of corrective measures whenever appropriate.



Suppliers must inform CEBI as soon as possible if they become aware of any non-compliance with the obligations imposed by this Policy on their own part, during their own operations or in their supply chain (including their subcontractors).

4. TERMS AND DEFINITIONS

Term	Definition
CAHRAS	CONFLICT AFFECTED AND HIGH-RISK AREAS
CMRT	Conflict Minerals Reporting Template
CO2	Carbon dioxide, possibly also intended as CO2 equivalent
CSR	Corporate Sustainability Report
EMAS	European environmental management system EMAS (Eco-Management and Audit Scheme)
GADSL	Global Automotive Declarable Substances List.
ILO	International Labour Organization
IMDS	International Material Data System
OE (OEM, OES)	Original Equipment (Original Equipment Manufacturer, Original Equipment Spare part). Terminology mainly used in Automotive to define that a product is the validated product for the vehicle, according the specific customer design requirement. It differs from an After Market product (designed as a product on shelves, not specifically to a particular final customer design requirement)
REACH	Registration, Evaluation, Authorization and Restriction of Chemicals
RMAP	Responsible Minerals Assurance Process
RMI	Responsible Minerals Initiative
RoHS	Restriction of Hazardous Substances

5. LIST OF APPENDIX

Appendix 1: Self-Assessment_MAQMSR & ISO 14001_ 15 questionnaire

Appendix 2: Supplier Questionnaire Policies