



Corporate Principles

Code of Conduct for Business Partners

Version 1.1
July 2025

Commitment to compliance	<p>1. Purpose of this Code of Conduct for Business Partners</p> <p>Auto Export Corporation and its direct and indirect subsidiaries as well as Iron Parts & Services BV and Auto Magnus GmbH (collectively "AEC Group") maintain the highest level of professional and ethical standards in the conduct of their business. The AEC Group places great emphasis on its reputation for honesty, integrity and high ethical standards. This Code of Conduct is <i>inter alia</i> based on and takes into account local laws and regulations such as the German Supply Chain Due Diligence Act (<i>Lieferkettensorgfaltsflichtengesetz</i>), on international conventions such as International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD (Organization for Economic Cooperation and Development – OECD) Guidelines for Multinational Enterprises, the International Labour Organisation's (ILO) International Core Labour Standards, and the United Nations Global Compact. To the extent applicable local laws are more restrictive, Business Partners are expected to comply with applicable local laws.</p>
For all Business Partners	<p>This Code of Conduct for Business Partners defines the minimum requirements that AEC Group expects in all business relationships. It applies to all companies and organizations that work for or with AEC Group, including those that supply goods, provide services, execute projects, or engage in joint ventures with AEC Group (each a "Business Partner" and collectively "Business Partners").</p> <p>2. General Principles</p> <p>AEC Group expects its Business Partners:</p> <ul style="list-style-type: none">➤ to act honestly, responsibly and fairly;➤ to observe applicable laws, in particular the rules on anti-corruption, competition, import and export control and customs set out in more detail below (Section 3);➤ to comply with the standards on corporate social responsibility set out in more detail below (Section 4);

- to work to ensure that the principles set out in this Code of Conduct for Business Partners are respected by their directors, officers, employees as well as their own Business Partners;
- to inform AEC Group of any instances that might constitute a violation of this Code of Conduct for Business Partners and to cooperate with AEC Group in the investigation of such violations in line with the requirements set out below (Section 5); and
- to implement adequate measures in their organization to prevent violations of applicable laws or the principles set out in this Code of Conduct for Business Partners (compliance program).

3. Compliance with Applicable Laws

3.1 Anti-Corruption

AEC Group commits to comply with the anti-corruption laws and regulations of every nation in which it operates and expects its Business Partners to do likewise.

In particular, in connection with their activities for AEC Group, Business Partners must never offer, promise or grant gifts or other benefits:

No bribes to public officials

- to a public official in exchange for performing an official act or discharging his/her duties;

Public officials include, among others: civil servants, officers and employees of any government, public authority, agency, department or other public body as well as any person acting in an official capacity for or on behalf of any public body;

No bribes in the private sector

- to a representative of a private business with the purpose of gaining an unfair competitive advantage;
- to a representative of a private business if the Business Partner knows, or has reason to believe, that the recipient is prohibited from accepting the gift or benefit.

**No requesting of
bribes**

In addition, in connection with their activities for AEC Group, Business Partners must never request from other businesses gifts or other benefits that they are not entitled to in exchange for providing an unfair competitive advantage to a competitor.

3.2 *Antitrust*

AEC Group complies with all relevant competition laws and expects the same from its Business Partners.

In particular, Business Partners shall not engage in any conduct that unlawfully restricts or may restrict competition. This includes:

**No price fixing,
market allocation,
bid rigging**

- ➡ Business Partners must not unlawfully participate in agreements or arrangements with competitors to fix sales prices, allocate markets or customers or manipulate tenders ("bid rigging");

**No exchange of
sensitive
information**

- ➡ Business Partners must not unlawfully exchange with competitors competitively sensitive information. Competitively sensitive information includes, in particular, confidential information on prices, volumes or terms and conditions of sale agreed with individual customers.

3.3 *Import/Export Control, Sanctions, Embargos and Customs*

Business Partners ensure that their business practices are in accordance with all applicable laws and regulations

**Import and export
control**

- ➡ Governing the import and export of products, services or other items (including parts, components, technology and data);

**Sanctions and
embargoes**

- ➡ Imposing sanctions, embargos or other restrictive measures.

For this purpose, Business Partners have established an internal import/export and sanctions and embargos control compliance system, which includes the appointment of at least one sufficiently competent and reliable employee who is responsible for all import/export applications and the internal organization, the monitoring of the compliance with sanctions and embargos and supervision of import/export control matters.

Information

Business Partners shall provide AEC Group on first request with information on the Business Partners internal import/export and sanctions

and embargos control compliance system, including the name and business contact details of the person responsible for such matters as well as all information on the classification of goods or services supplied to AEC Group under the applicable import/export lists.

Documentation,
labelling,
authorizations,
tariffs and duties

Business Partners ensure that all documents required for the import/export of goods and services are provided to the competent customs offices and administrative authorities. Business Partners ensure that all required licenses and authorizations are obtained in time and that all customs, tariffs and duties are paid as legally required. Business Partners ensure that their products are labelled in accordance with applicable laws and regulations.

4. Corporate Social Responsibility of our Business Partners

AEC Group is convinced that social corporate responsibility is a key factor for its long-term success. We, therefore, expect Business Partners to align their conduct with the following principles:

Human Rights

➡ Business Partners respect commonly accepted human rights.

No Forced labor

➡ Any kind of forced labor, bondage, involuntary prison labor and trafficking is a violation of this Code of Conduct for Business Partners. Business Partners ensure that their employees are not subject to inhuman or degrading treatment, corporal punishment and are free to leave their employer after reasonable notice.

No discrimination

➡ Discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation is a violation of this Code of Conduct for Business Partners. Business Partners do not tolerate discrimination in the employment or occupation of their staff.

No harsh,
no inhumane
treatment

➡ Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is a violation of this Code of Conduct for Business Partners.

Freedom of association	➔ Business Partners respect that their employees have the right to join or form trade unions of their own choosing and to bargain collectively. Employee representatives are not discriminated against and have access to carry out their representative functions in the workplace.
Safe and hygienic working conditions	➔ Business Partners provide a safe and hygienic working environment, in particular to avoid accidents and injuries. Employees receive regular and recorded health and safety training. Accommodation, where provided, is clean, safe, and meets the basic needs of employees. In addition, Business Partners minimize or eliminate, where reasonable, all sources of danger in the workplace and do so based on the general level of knowledge regarding health and safety in the relevant industrial sector.
No child labor	➔ Business Partners do not use child labor as defined in the provisions of the ILO and UN conventions and/or national law. The minimum age for employment of minors is not below the applicable age of compulsory education and is at least 15 years, unless ILO exceptions apply.
Regular employment	➔ Before entering into employment, employees are provided with clear information about their rights, responsibilities, working conditions and wages. To the extent possible, work performed must be on the basis of a recognized employment relationship established through national law and practice. Obligations to employees under labor or social security laws and regulations arising from the regular employment relationship shall not be avoided through, e.g., the excessive use of fixed-term contracts, sub-contracting or other working arrangements.
Payment and wages	➔ Employees are rewarded adequately and in accordance with the applicable laws and industry standards.
No excessive working hours	➔ Working hours comply with national laws or collective agreements, whichever affords the greater protection of employees.

Environmental protection

- ➡ Business Partners comply with applicable environmental standards. They are committed to the principles of sustainable business and to environmental protection as an indicator of corporate value. They take effective measures which reflect their sense of responsibility for the environment. This *inter alia* includes to identify the environmental impacts of the Business Partners business and to minimize adverse effects on the community, environment, and natural resources within the Business Partners manufacturing operations, while safeguarding the health and safety of the public.

Data protection

- ➡ Business Partners comply with all applicable laws for the protection of personal data, particularly of employees, business partners and customers.

5. Investigation of suspected violations

Duty to cooperate

Business Partners are obliged to actively contribute towards preventing violations of this Code of Conduct for Business Partners. Business Partners must investigate suspected violations and cooperate fully with AEC Group in this respect.

Periodic self-evaluations help to ensure conformity to legal and regulatory requirements, the content of this Code of Conduct, and customer contractual requirements related to social and environmental responsibility. AEC Group shall be entitled to use a self-assessment questionnaire, sustainability third-party audits, and on-site inspections at the Business Partners sites to monitor compliance with the standards and regulations stated in this Code of Conduct annually or on an incident-related basis. The Business Partners agrees to AEC Group conducting the audits to monitor compliance with this Code of Conduct at the Business Partners sites during normal business hours, with reasonable advance notice and as carried out by persons tasked by AEC Group.

Reporting violations

If a Business Partners learns of circumstances that might represent a violation of this Code of Conduct for Business Partners, the Business Partners must report them immediately in writing to:

legal@support.aecsolutions.com

**Duty to
investigate and
terminate
violations**

If such violation lies within the sphere of the Business Partner, the Business Partner is obliged to investigate the circumstances of the case. If the suspicion is confirmed, the Business Partner is obliged to take appropriate specific technical, organizational, or personnel measures to terminate the violation without delay and, if this has not already been done, to take action to prevent such violations in the future. The Business Partner has to promptly inform AEC Group in writing on the progress and outcome of the investigation of the circumstances of the case and on any measures taken.

6. Consequences of non-compliance

Termination, damages

A violation of this Code of Conduct for Business Partners can lead to the termination of the business relationship with AEC Group and/or claims for damages from AEC Group, in particular as set out in AEC Group's General Terms and Conditions of Purchase.

Other sanctions

In addition to contractual consequences, violations of applicable law and regulations may trigger legal sanctions, including but not limited to fines and/or criminal prosecution.