



We engineer, you drive

RÁBA Automotive Holding Plc.

SUPPLIER CODE OF CONDUCT

OF RÁBA AUTOMOTIVE HOLDING PLC.

2024

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I. INTRODUCTION

Responsible business activity is a key priority for Rába Plc. and its subsidiaries (hereinafter: Rába or Company or Rába Group). Sustainability is firmly rooted in our core values and in our work method with continuous improvement. Rába is committed to the responsible procurement of materials, products, and services in a way that does not harm the environment or exploit people.

This Supplier Code of Conduct (Code) outlines the minimum requirements and the expected rules of business conduct that apply to all business relationships between Rába and its cooperating, interested partners.

In accordance with Rába's responsible procurement policy, it continuously reviews and evaluates its strategy and partners in order to ensure that the used materials and products come from responsible sources.

If both the applicable laws and the internal regulations of the Company formulate regulations and requirements on a given topic, the stricter rule must always prevail.

Scope of the Supplier Code of Conduct

The Supplier Code of Conduct applies to all cooperating and interested partners of Rába, all suppliers of goods and services and subcontractors. Partners are expected to take all reasonable steps to ensure that all of their employees, including permanent, temporary, leased employees and all other persons who work for them directly or indirectly, can learn about the requirements of the Supplier Code of Conduct of Rába and ensure its implementation.

II. EXPECTED ETHICAL SUPPLIER CONDUCT

Data protection

Rába handles personal data subject to data protection legislation based on its Data Protection and Data Security Policy. The Company wishes to ensure the legal order of the operation of the registers, the enforcement of the constitutional principles of data protection, the requirements of data security, and wishes to prevent unauthorized access to personal data and their unauthorized change, use, and disclosure. The Company handles personal data only in order to exercise a right or fulfill an obligation. The personal data handled shall not be used for private purposes, the data management always complies with the principle of purpose-boundness. If the purpose of the data management has ceased or the data management is otherwise illegal, the data will be deleted. The Company handles personal data only on the basis of the prior consent of the data subject or on the basis of law or legal authorization. By complying with the principles of the GDPR regarding the handling of personal data, the Company ensures the enforcement of the rights of the data subjects and the conditions of accountability. Rába also expects its partners to handle personal data accordingly.

Reports

The accounts and reports prepared on the basis of the applicable accounting standards give a true and reliable picture of the Company's assets, liabilities, financial position and results. The integrity of financial and non-financial records and reports is fundamental to good decision making. Any lack of regular, comprehensive and efficient management of records and reports carries significant business risks, may result in legal consequences, financial and competitive damages and can harm the Company's goodwill. Rába expects responsible financial thinking and business conduct from its partners.

Equal treatment, equal opportunities

As a responsible employer, Rába considers diversity, respectful thinking and action to be the determining factors of its success and follows this in its principles. Rába expects its partners to enforce the requirement of equal treatment during employment, to prevent and eliminate discrimination against employees (based on race, color, gender, disability, language, religion, political or other

opinion, national or social origin, property, birth or other status), to refrain from all behaviors that may result in direct or indirect discrimination, retaliation, harassment or illegal segregation of certain employees or their groups based on their certain characteristics, and to try to make their decisions based on performance, education and other work-related factors. In the labor recruitment process, Rába manages the process of filling the advertised position in a transparent manner by adhering to fair principles, selecting the most suitable candidate for the task in a controllable manner, correctly informing the stakeholders and expects the same from its partners. Furthermore, it expects them to act decisively against all forms of discrimination, not to spread documents and stories that may violate the dignity of others.

Human rights

Rába is committed to respecting human rights, and we expect the same from our suppliers. We condemn all forms of human rights violations.

Human dignity

Rába is committed to the protection of human dignity and condemns all who do not give the minimum respect and recognition to the other person, which they are entitled to by virtue of their human nature. Our workplace relationships must be defined by cooperation, trust, mutual recognition and support. All employees are responsible for supporting a work environment based on trust and mutual respect.

Rába does not tolerate harassment or any other humiliating, demeaning, insulting, intimidating or hostile act, conduct or behavior and strongly expects this from its partners as well. Sexual harassment, defamation and calumny are serious violations of human dignity.

Combating human trafficking, child labour and forced labor

Rába condemns human trafficking, child labour and forced labour, and expects its partners to strive to prevent all such activities in the course of their activities and within their supply chain. Rába also strictly prohibits rough and cruel treatment of employees.

Conflict of interest, incompatibility, protection of goodwill

Rába expects its partners to inform them in all cases where a conflict of interest may arise with respect to an employee of Rába. Rába's employees and their close relatives cannot have a business relationship with a company that is Rába's business partner. Exceptions to this can be granted by the employer's authority.

Organizations for interest reconciliation

Rába respects the freedom of association of employees and recognizes that each employee has the individual right to choose organizational membership, participation in meetings, and interest protection organization membership, and expects this from its partners as well.

Responsible procurement of raw materials

Rába is committed not only to producing safe products, but also to producing these products from raw materials and processes that have a minimal negative impact on our environment, and expects the same from its partners. Rába expects its partners to comply with all legal requirements for their purchases of raw materials.

Sustainable development

Rába is committed to sustainable development, i.e. we make economic, environmental and social decisions that ensure our current needs in such a way that they do not endanger the needs of future generations, and it expects this from its partners as well.

Commercial compliance, product safety

Rába ensures that its business practices comply with all applicable laws and regulations, including international economic, financial, commercial (export, import) sanctions and embargo laws, and expects this from its business partners as well.

Rába strives to ensure the highest level of quality and reliability in all its products. It makes every effort to minimize the risk of using counterfeit parts and materials and expects its partners to help meet this expectation. Rába reserves the right to check the safety and quality of products and services provided by partners at any time. Rába expects its partners to take responsibility for errors attributable to their products and services. All partners of Rába are obliged to inform the Company immediately if a security-related question arises regarding the delivered product or service.

Prevention of corruption, gifts, representation

It is forbidden to unfairly influence Rába employees.

All employees of Rába are obliged to refrain from giving, promising or asking for an illegal advantage, or accepting an illegal advantage or the promise of it, in view of their activities for or on behalf of Rába.

An advantage may be a financial, personal or moral benefit, treatment, or other circumstance, as a result of which, either directly or indirectly, the person concerned or another person (e.g. his relative) is in a more favorable position than before. The concept of advantage also includes a gift.

Pursuant to Rába's guidelines and spirit, it is prohibited to apply or transfer payments contrary to the law in any country, whether it is a government office, a public institution, or representatives of private companies.

With regard to other intellectual activities (e.g. giving lectures, writing a study), care must also be taken to ensure that the employee does not accept invitations on the basis of which anyone can be considered obligated to the inviting or requesting party.

During the performance of their employment, Rába's employees may not accept remuneration or any other benefit from a third party in view of their activities in the employment relationship. Any service of financial value that a third party provides to the employee in addition to the service to which the employer is entitled is considered such remuneration or benefit.

The executives and employees of Rába must avoid any situation in which the granting of an illegal advantage or even the suspicion of it may arise. A gift or hospitality provided by a business partner may not influence business decisions and may not create the appearance of influence. If any employee of Rába is suspected of soliciting a gift by explicit or suggestive behavior, indirectly or directly, it must be reported immediately in Rába's internal employer misconduct reporting system (<https://raba.hu/en/employee-feedback-notification>).

Employees may not ask for or accept any gifts, benefits, invitations, services or any other benefits promised to them, their family members, relatives, friends, other relations or the organizations they support, which can be related to their work or workplace in any way.

Improper payment contrary to the provisions of the legislation and the Code is not the same as small gifts, gifts of consideration received from a client, business entertainment opportunities, acceptance of usual hospitality received at a work-related event, or reimbursement of directly related costs incurred by the client in order to execute the contract. Giving gifts during business and customer relations can strengthen the company's reputation and help establish a good business relationship.

A reasonable gift can be accepted and given. Especially

- as a gift giver and gift recipient, a gift given up to a maximum value of HUF 30,000 per occasion
- usual business lunch or other meal for such a purpose during business trips.

A gift with a value exceeding HUF 30,000, or a gift with an annual value exceeding HUF 30,000, given repeatedly by the same giver within a business year, can be accepted if the employee has

indicated this in writing to Rába and it has approved it.

Depending on the role, position and rank of the person giving and accepting the gift, as well as the purpose of the gift and the occasion, a gift of the usual value can be given and accepted.

It is not considered a business gift and therefore recurring, regular benefits received from the partner (on a daily, weekly, monthly basis) are not acceptable.

A gift cannot be - regardless of value - money, cash, substitute means of payment, purchase, gift and travel vouchers, securities and additional benefits provided in exchange for any service directly related to it.

To influence a decision, to make or not make a decision, to take or not take a measure, to display behavior that is illegal or contrary to the internal regulations of the employer, it is expressly forbidden to give or accept a gift, or to display behavior that suggests it.

Incorrect payments include the following:

- A business benefit, entertainment, gift, business invitation that gives the business partner some advantage.
- Any opportunity offered for the purpose of gaining an advantage, for a business partner, its employee, or a government official.
- Sharing the property, product, value or other intellectual property or value of the Company with other interested partners.
- The use and transfer of material and other assets of the Company for political purposes.
- Accepting gifts of disproportionate value from business partners or other interested parties.

Representative events and business lunches do not violate the regulations, unless doubts arise in relation to the circumstances and appropriateness criteria. Non-binding catering corresponding to the position level of the invitee shall be regarded as usual hospitality.

The quality and value of the services provided during the reception of guests must be determined according to the guest's job, position and rank in the organization, the purpose and occasion of the reception. You must refrain from providing ostentatious services that exceed the justified and necessary cost level, that give the appearance of abuse or are suitable for it.

Rába expects its partners to comply with the above principles and the anti-corruption and anti-bribery (legal) rules.

Environmental protection, sustainability

Rába's environmental policy strategy is determined by the pursuit of sustainable development and an environmentally conscious way of thinking. Because of all this, the optimization of waste management and the reduction of the environmental risk of hazardous substances generated in connection with the operation are given a prominent role in the environmental policy. In order to ensure a sustainable future, Rába strives to create a transparent supply chain with low carbon dioxide emissions and expects its partners to participate in achieving this goal.

Rába expects its partners to pay special attention to environmental protection and sustainability aspects, and to work in an environmentally conscious manner. Rába strongly encourages its partners to comply with the ISO 14001:2015 standard and expects the relevant national and international regulations. The partners must strive to minimize energy consumption and greenhouse gas emissions, to reduce carbon dioxide intensity. Partners are obliged to share with Rába the requested information regarding their own emissions and those of their supply chain, and to respond to all questionnaires and audits conducted on this topic.

Rába expects its partners to sustainably use their resources (energy, water, raw materials, other supplies), prevent environmental pollution and minimize waste, sewage and air emissions resulting from their business activities.

Rába expects its partners to prioritize, among other things, decarbonization, energy conservation and efficiency, use of renewable energy sources, reduction of air pollution, waste reduction and

responsible handling of hazardous materials, recycling, minimization of water use and water quality deterioration, noise prevention, farmland and forest protection, biodiversity, respect for the rights of indigenous peoples, prohibition of illegal forced evictions.

Rába's Sustainability Report provides additional information on the Company's commitments and activities.

Appreciation

Rába strives to employ and retain well-educated and dedicated employees, ensuring their high level of financial and moral appreciation commensurate with their performance, to continuously ensure their professional development and to support their advancement, and it expects this from its partners as well.

Healts and safety at work

Rába is committed to creating, maintaining and continuously developing a safe and healthy workplace environment and work tools. Rába expects its partners to always comply with the relevant occupational health, safety and fire safety regulations.

Working conditions

Rába does everything to encourage equality in its employment practices and expects this from its partners as well. All forms of undeclared work are to be condemned.

It is expected that the working hours specified for different positions are always established in accordance with the applicable legislation. Furthermore, efforts must be made to ensure that the partners provide fair remuneration and safe working conditions for all their employees.

Corporate social responsibility

Rába intends to continue its growth based on honesty and commitment, and takes into account the interests and aspects of the owners, employees, the immediate environment and those related to the Company's activities during its operation. This ensures that the Company creates as much value as possible for its owners, employees and society.

For the Company, the Corporate social responsibility (CSR) is a company management method and approach that it intends to extend to all areas of its operation in order to achieve sustainable development and growth. The purpose and task of social responsibility is for Rába to carry out its activities in a responsible manner, in accordance with the recognized needs of the stakeholders, taking into account the environmental and social impacts.

Rába encourages its partners to make social responsibility an extremely important aspect.

Fair market behavior, contact with partners

A fair and honest relationship with partners is the basis of long-term successful business management.

Rába is committed to fair market behavior and competition. We respect our competitors, we refrain from any unfair and illegal behavior that would damage the reputation and esteem of our competitors, and we expect the same from them.

We do not abuse our market position and are committed to creating equal conditions for our business partners.

When establishing, maintaining and terminating relations with contractual partners, the Company adheres to the principles of fairness, impartiality and transparency. Care must be taken when choosing business partners, taking into account especially quality, reliability, accuracy, and practical experience.

Business secret management

A trade secret is any information whose disclosure or use for one's own benefit could cause damage to Rába, i.e. information related to the economic activity, secret - as a whole or as a set of its elements not known to the public or not easily accessible to the persons performing the economic activity concerned -, therefore, all facts, information, details, solutions or data with financial value, and the compilation made from them, the disclosure, acquisition or use of which by unauthorized persons harms or threatens the legitimate financial, economic or market interests of the Company.

We expect Rába's executives and employees to preserve the business secrets they learn in the course of their activities and not to use them for personal gain. The confidentiality obligation also extends to information received from interested partners and suppliers, as well as their intellectual property. Rába expects the same confidentiality obligation from its partners.

Corporate asset values

The driving force behind Rába's success is the Company's physical and spiritual assets. In the course of their activities, employees are obliged to protect the intellectual property of Rába, including our patents, brand, copyrights, trade secrets, all other protected information, know-how and expertise that arise and accumulate in the course of our business activities.

Rába respects the legitimate claims of third parties regarding intellectual property. Employees are prohibited from duplicating or abusing third-party intellectual property without permission, as this may result in large fines or criminal prosecution.

Rába expects the same behavior from its partners.

Employer misconduct reporting system

Rába is committed to fair and transparent business operations. To this end, it operates an internal employer misconduct reporting system, the purpose of which is to ensure the possibility of reporting employer abuse due to violations of laws, internal procedures, and rules that violate the Company's ethical principles. The scope of the system covers all natural persons who are entitled to make a report in Rába's internal misconduct reporting system. The Company's employees, as well as external natural persons who have a contractual relationship with the Company or external natural persons who have a justifiable legitimate interest in making the report or remedying the behavior that is the subject of the report can make a report in the Reporting System. The Reporting System does not apply to the rights of customers of the Company's products and services. Rába expects employees and partners to make a report in all cases when they experience abuse, breach of obligations, conduct contrary to the provisions of the Code of Business Conduct and Ethics or the law, or suspect such conduct comes to their attention (<https://raba.hu/en/employee-feedback-notification/>).

Rába expects its partners to operate the misconduct reporting system.

III. LEGAL CONSEQUENCES, COMPLIANCE

Violation of the provisions of the Code

Compliance with the rules of this Code is the ethical responsibility of Rába's partners and a fundamental and mandatory element of the business partnership with Rába. Rába considers compliance with the requirements to be of fundamental importance to its contractual relations and reserves the right to terminate the relevant contract with immediate effect with justification if the partner does not fulfill these requirements and refuses to take the necessary measures to eliminate non-conformities.

The operation of the partner can be checked through surveys, questionnaires, and possibly audits. Rába can request a supplier self-assessment at any time and reserves the right to conduct audits at any time to check whether the partner complies with the Supplier Code of Conduct of Rába. Such checks are always in accordance with the relevant legislation, in particular with regard to data protection. In such situations, suppliers are obliged to cooperate and transparently display the requested documents and other information.