

# **CODE OF CONDUCT**

Correct, responsible and sustainable business management and accepting corporate social responsibility are fundamental components of our corporate policy. The Cimos Group require all suppliers and service providers to make a commitment to respect national and international laws and regulations at their locations worldwide. Cimos reserves the right to verify compliance with the Code of Conduct. If suspected that a business partner has failed to comply with requirements from the Code of Conduct, Cimos reserves the right to adopt suitable measures.

The Cimos Group Code of Conduct is structured according to the following key areas:

- Business Ethics
- Working Conditions and Human Rights
- Environmental Responsibility



## **BUSINESS ETHICS**

At Cimos, we believe that integrity and transparent business practices are crucial to maintain sustainable and viable business operations. This is why we expect that our business partners follow the principles of honesty and fairness in their operations by complying with local laws and promoting these principles throughout the supply chain.

In addition, we encourage the development of long-lasting relationships with our business partners on the basis of a reciprocal approach to ensure legality, transparency, integrity, and cooperation.

#### Corruption and Bribery

Cimos undertakes to prevent any form of corruption or distortion and opposes any bribery activity. We expect our business partners to refuse any form of corrupt activities and conduct that may harm the company, including facilitation payments, unacceptable donations, or other unacceptable payments or unjustified benefits for clients, officials, or other parties. In addition, individuals must not accept or offer gifts, meals, or entertainment if there is a possibility that such behaviour negatively affects individual business relationships.

#### **Fair Competition**

Cimos follows the principle of fair competition and refrains from any anti-competitive practices or conduct that demonstrates conspiracy or constitutes abuse of a dominant position. Business partners are expected to respect applicable competition and anti-trust legislation, and not abuse their dominant position on the market, or conclude anti-competitive agreements with competition, business partners, or third parties.

## Conflicts of Interest

To avoid conflicts of interest, the decisions taken by Cimos business partners should not be influenced by personal interests or relationships, whenever this is possible. Business partners should work together to prevent circumstances that include persons involved in transactions, or circumstances that indicate conflicts of interest.

## **Protection of Intellectual Property Rights**

At Cimos, we believe that the intellectual property rights of every individual must be protected. The transfer of technology or know-how must include the protection of intellectual property rights. This means that Cimos business partners should protect intellectual property rights in accordance with international standards and local requirements.

# Counterfeit parts

The Group's Counterfeit Prevention Policy is based on having a secure supply chain. Cimos may only purchase or source items directly from original component manufacturers, authorised (e.g. franchised) distributors or aftermarket manufacturers. Use, purchase or the sourcing of items from non OCM authorised independent distributors or brokers is not permitted. Suppliers shall maintain a method of traceability that ensures tracking of the supply chain back to the manufacturer of all items supplied to Cimos.

# Respect for Business and Personal Data

As clearly stated in Management Policy Principles, Cimos observes privacy and confidentiality. This means that business partners must ensure data privacy and compliance with provisions concerning personal data privacy.

# Accounting and Business Records

At Cimos, we are committed to properly record all performed transactions and operations with the purpose of providing for transparent and verifiable decision-making, authorisation, and execution. This means that Cimos business partners must comply with such conduct and prevent incorrect or deceptive record-keeping.



## Supervision over Imports and Exports

Export supervision and legislation define where and how Cimos and its business partners are allowed to sell goods, technology, or exchange information. With the import and export of goods and services, business partners must fully comply with applicable laws.

# Responsible Sourcing and Conflict Minerals

At Cimos, we strive to observe the provisions set out by regulatory and customer requirements regarding the limitation and prohibition of the use of conflict minerals and substances. This is why business partners should adopt measures to ensure that goods (especially the aforementioned substances, if they are provided within the company) are in accordance with all relevant regulations and requirements.



## WORKING CONDITIONS AND HUMAN RIGHTS

Internationally recognised human and labour rights are among the main requirements that we observe in our business operations and are considered the basics of all business relationships. A common understanding of the key questions throughout the entire supply chain begins with responsible working conditions. At Cimos, we expect that our business partners will comply with the following principles that are in accordance with local laws in the countries of their operation.

#### Occupational Health and Safety

For Cimos, occupational health and safety are the key elements of sustainable development. Therefore, we provide proper training and information transfer to actively encourage the culture of preventing accidents and raising risk awareness among our workers and business partners. We expect our business partners to share and encourage the same culture in order to endorse a safe and healthy working environment throughout the entire business practice. Business partners should assess the potential effects of activities, products, and services on the health of their employees, and should work towards preventing accidents and unsafe conditions.

#### Child and Forced Labour

Cimos does not tolerate any form of forced labour and supports its business partners in their commitment to abolish any form of slavery, human trafficking, threats, physical and sexual violence.

In addition, Cimos business partners should refrain from endorsing or using child labour. For this reason, they should observe the statutory minimum employment or working age to prevent child abuse.

#### Discrimination and Harassment

Cimos rejects any form of discrimination. Cimos business partners should ensure and encourage equal opportunity regardless of gender, ethnicity, skin colour or social background, and religious and political beliefs. Cimos encourages the valorisation of diversity, also in connection with the company's efforts and activity planning, and ensures equal access to education and training in its chain of values. This is how Cimos encourages its business partners to share its commitment, refuse any form of discrimination, and value diversity.

## Freedom of Association and Collective Bargaining

Cimos recognises the fundamental rights of all employees to organise in trade unions and appoint representatives of all employees. Consequently, business partners must also ensure their workers the right to associate and the right to collectively bargain in accordance with local laws. Business partners should not discriminate members of workers' organisations or trade unions, but rather encourage and promote indirect communication between workers and management.

In countries where this right is limited by the local legislation, business partners must support alternative legitimate possibilities for workers' participation.

# Working Hours, Remuneration, and Benefits

At Cimos, we promote fair employment and professional conditions. Business partners must make sure that working hours, including overtime, are in accordance with local laws and provisions. They must provide for fair working conditions, ensure competitive remuneration and benefits, and ensure minimum remuneration in accordance with local legislation and collective agreements.



## **ENVIRONMENTAL LIABILITY**

At Cimos, we are accountable for continuously improving the environmental compatibility of our products, reducing the use of natural resources, and promoting activities aimed at reducing logistical impacts.

We use a management system in the field of environmental management in order to commit to the protection of the environment, reduce and control environmental risks and impacts, including prevention of pollution. All plants in the Cimos Group have implemented the ISO 14001 standard.

Cimos undertook to implement environmental responsibility throughout the entire supply chain in order to reduce the environmental footprint of its products in their life cycle.

In the same way, business partners must observe all applicable environmental legislation and provisions in all countries of their operation. In addition, business partners should include environmental responsibility in their business strategies and adopt proper measures to reduce environmental risks relating to their activities. Cimos recommends that its business partners adopt a system of environmental certification.

Business partners must be aware of the environmental policy followed by Cimos and promote suitable training with their own business partners.

#### Use of Materials and Waste Management

Business partners should make an effort to reduce the use of raw materials whenever possible, assess the implementation of technological improvements, change of materials, recycling or re-use, and changes in production. To reduce waste, business partners should encourage the use of recycled materials in production.

In addition, in case that business partners use hazardous or restricted substances should identify chemicals and other materials that pose a danger to the environment in order to protect air, water, soil, and biodiversity.

## **Energy Consumption and Greenhouse Gas Emissions**

In accordance with the Cimos environmental policy, its business partners should establish their own production process focused on energy efficiency and reducing greenhouse gas emissions, which facilitate and promote the use of renewable energy sources.

## Water Consumption and Release

Business partners must use water sources responsibly. In particular, when their operations are performed in territories with restrictions regarding water, they should encourage the adoption of water-saving water saving strategies. In addition, business partners should monitor water bodies and the wetlands of natural habitats that may be affected by releasing water due to their activities.