



Code of Conduct

TB&C Holding GmbH
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Foreword

TB&C, headquartered in Herborn (Germany) is a leading manufacturer of bespoke high voltage components and sunroof systems for the automotive industry. The company was founded in 2004 and has since developed into an international manufacturer with production locations in Germany, Romania and Mexico. Its core competence lies in hybrid injection moulding technology – an area in which our expertise and development capabilities are - almost unrivalled. Over the past 30 years, we have gained a wide experience in outsert technology, as well as in insert technology and overmoulding.

At TB&C we show a deep value chain integration with unique expertise ranging from engineering of prototypes till production of large volume series. We support our clients in engineering innovative products with highly integrated functionality and engineer the tools in which we mould metals, plastics, and fabrics into hybrid precision products. Our company design the industrialisation concepts in order to produce large volume series whilst maintaining the highest standards in quality, reliability, durability and safety.

TB&C’s industry-leading technology and production concepts assure the highest production quality and over the past years we consistently received excellent quality ratings. The continuous development of innovative products, processes and applications for new and existing customers is of enormous importance to us and enables us to strengthen our leadership as the Hybrid Technology Expert.

At TB&C we focus on four market segments: e-mobility solutions, sunroof systems, other automotive products, and medical assemblies:

 <p>E-MOBILITY</p> <ul style="list-style-type: none"> » Bespoke components such as <ul style="list-style-type: none"> • Battery junction boxes • Busbars 	 <p>SUNROOF SYSTEMS</p> <ul style="list-style-type: none"> » Sunroof mechanisms that tilt and slide the glass panel » Wind deflectors, controlling air flow in and around the car » Water channels / cross-members 	 <p>OTHER AUTOMOTIVE</p> <ul style="list-style-type: none"> » Fuel filler » Camera brackets » Air ducts 	 <p>MEDICAL</p> <ul style="list-style-type: none"> » Carrier plates for medical devices (blood glucose meter) » Gearboxes for keeping syringes in place in devices » Carrier plates for holding shafts 
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At TB&C we are guided and driven by our mission statement: **“To engineer and mass manufacture precision moulded products of superior quality and build lasting business relationships with our customers”**.

Our corporate values revolve around showing responsibility – in cooperation with our colleagues, our business partners and towards our wider communities and the ecological environment and can be summarised as follows:

Corporate Values							
							
Many years of hybrid technology for innovative high-voltage experience	Top creativity for innovative high-voltage components	Close cooperation with development centers	Maximum quality thanks to certified quality management	Innovation push driven by company culture	Diverse teams with high-level of energy and determination	High loyalty by building long-term relationships with clients	Sustain trust by being reliable and responsible

We continuously invest in market and product development, the improvement of production processes the optimization of our logistic network and a safe working environment. All employees are engaged in the organisation's innovative spirit and ambitions to grow the business whilst reducing our ecological footprint.

The guiding principle in our daily actions is described in our Code of Conduct. If, for any reason compliance to the Code of Conduct does not offer a solution or if there is doubt how the Code of Conduct should be understood, it is essential that clarification is asked from Group management before taking any action.

Herborn, June 2023

R. van van der Weck

Robert van der Weck

CEO

Timo Arnold

Timo Arnold

COO

Article 1: Compliance with legal requirements

TB&C and its workforce are legally bound to comply with all national and international laws. Therefore, as a company, it is important to us that all our employees comply with these requirements, as credibility and trust are crucial values for us. Violations affect the reputation of our company and lead to legal consequences. Only by complying with legal standards and regulations can our business success be secured worldwide.

General obligations

All employees of our company are obliged to comply with all applicable laws and regulations related to their work and the activities of our company. This includes, in particular, compliance with laws and regulations in the area of labour law, data protection, environmental protection, antitrust law, as well as consumer protection. We observe the legal prohibitions and obligations at all times, even if this should entail short-term economic disadvantages for our company.

Management responsibility

The management of our company is responsible for ensuring that all employees understand and comply with applicable laws and regulations. Management must ensure that all necessary training and resources are provided to enable our employees to understand and apply the laws and regulations.

Responsibility of the employees

It is the responsibility of our employees to understand and comply with applicable laws and regulations so that our business operates in accordance with the highest ethical standards.

Consequences in the event of infringements

Violations of applicable laws and regulations can have serious consequences for our company and its employees. Any employee who violates laws and regulations may face disciplinary action, up to and including termination of employment or even criminal prosecution. Our company will use all means to ensure compliance with legal obligations and to avoid violations.

Reporting and disclosure

We are responsible for implementing a culture of disclosure and compliance. Our management will ensure that all employees are aware of their reporting and compliance obligations. This includes the disclosure of financial information, corporate data and other relevant information necessary to ensure transparency and accountability to our stakeholders.

Article 2: Fair competition

Our company, TB&C, is committed to promoting and supporting fair competition because we recognise that fair competition is critical to economic growth and job creation. Therefore, it must be in our own interest to adhere to the principles of fair competition practices.

Compliance with competition laws

Our company is committed to complying with all applicable competition laws and policies and ensures that our business practices are in compliance with applicable regulations. All TB&C employees are committed to complying with competition laws and policies.

Prohibition of unfair competition

As TB&C, we prohibit unfair competition in all areas of our business. Our company ensures that employees and business partners do not engage in practices that could distort or restrict competition. This includes, for example, price fixing, cartelisation, abuse of market power and theft of intellectual property.

Misinformation & Manipulation

As TB&C, we reject unethical behaviour, including the dissemination of false information or deliberate manipulation of information to gain competitive advantage.

Transparency

Our company is committed to transparency in its business practices. We encourage our employees to engage in open and transparent dialogue to find solutions together that are fair and respectful. We expect our employees to report any activities that violate this principle.

Article 3: Fight against corruption

Our company is committed to fighting corruption in all its forms and to pursuing a zero tolerance policy towards bribery, extortion and other forms of corruption. We recognise that corruption is harmful to our reputation, our business and our society as a whole.

Definition of corruption

As TB&C, we define corruption as the abuse of power or position for personal gain or to the detriment of others. This includes bribery, extortion, embezzlement, money laundering and other forms of corrupt behaviour.

Prohibition of bribery and corruption

Within our company, we prohibit bribery and corruption in all areas of business. We ensure that employees and business partners do not accept or offer gifts, payments or other benefits that could give the appearance of bribery.

Compliance with anti-corruption laws and policies

Our company is committed to complying with all applicable anti-corruption laws and policies and ensures that our business practices are in line with applicable regulations. We ensure that our employees comply with anti-corruption laws and policies.

Obligation to report suspicions

Our company has implemented a separate Whistleblower Policy which contains detailed procedures and safeguards for whistleblowers. This policy ensures that whistleblowers are adequately supported and that breaches are investigated confidentially and independently. We ask all employees to use the Whistleblower Policy to report possible violations.

Sanction & Sanction Lists

Our employees are encouraged not to do business with companies on the Specially Designated Nationals and Blocked Persons List issued by the Office of Foreign Assets Control (OFAC) in the US, the EU Sanctions List, the Consolidated List of Financial Sanctions Targets issued by the EU, and the Majesty's Treasury (HMT) Investment Prohibition List in the UK. The same applies to any similar lists issued, maintained or published as amended, supplemented or replaced from time to time by any of the sanctioning authorities.

Neutral politics and political donations

Our company as such and our employees within their business activities must not actively participate in local politics, financially or otherwise. Accordingly, no political donations may be accepted or made in connection with orders or contracts (see also Article 11).

Article 4: Data Protection & Information Security

Our company places the highest value on protecting the data of our customers, business partners and employees. We are aware that data protection and data security, specifically with regard to the confidentiality, integrity and availability of this data, are essential components of our responsibility. This article serves to define our policies and standards with regard to these important aspects.

Data protection

We are committed to handling personal data in accordance with applicable data protection laws and regulations. This includes the collection, storage, processing and disclosure of data only on a lawful basis and with the express consent of the data subjects. We will not store personal data longer than necessary and will take appropriate security measures to ensure the protection of this data.

Data security

Our company ensures that all personal data is kept safe and secure. We implement appropriate security measures to ensure the protection of personal data, such as access controls, encryption and high network security.

Data confidentiality

We are committed to adequately protecting all confidential information entrusted to us in the course of our business. We will only make this information available to internal employees or authorised third parties who require it for business purposes.

Data integrity

Integrity refers to the accuracy, completeness and timeliness of data. We will ensure that all data we collect is accurate and complete. Similarly, we will ensure that appropriate processes and controls are in place to ensure data integrity and prevent unauthorised changes or manipulation.

Availability of the data

We will take reasonable steps to ensure that our users' and customers' data is available whenever it is needed. This includes the use of appropriate infrastructure, backup systems and recovery procedures to minimise data loss or downtime. We will carry out regular checks to ensure that the availability of our systems and data is guaranteed.

Secrecy

Our employees must not disclose confidential information to unauthorised persons. This includes information about TB&C's activities, transactions or business affairs, as well as confidential information about suppliers, customers, systems, processes used, software or intellectual property. This obligation continues after termination of employment.

Obligation to use European servers

To maximise the protection of personal data, we will, where possible, store data in Europe or on European servers. This ensures the following points:

- **Strict data protection standards:** The European Union has introduced strict data protection laws and regulations to protect the rights of individuals. By storing data on European servers, we can ensure that these high standards are met.
- **Legal security:** By using European servers, we are better able to comply with legal requirements and obligations related to data protection. This strengthens the trust of our users and customers in our company.
- **Minimising data transfer risk:** Transferring data outside the European Union poses potential data protection risks. By using European servers, we minimise the risk of unauthorised access, data loss or data breaches during data transfer.

In some cases, it may be unavoidable to store data outside Europe, for example when working with international partners or using cloud services that use servers outside the EU. In such cases, we will ensure that appropriate safeguards are in place to ensure compliance with the highest security standards.

Article 5: Human Rights, Labour Law & Diversity

As TB&C, we are committed to providing fair working conditions to ensure that our employees at all sites are treated fairly and equitably. We believe that honouring these commitments is essential to the well-being of our employees and helps to build a successful and sustainable business.

Working time

We comply with all applicable working time laws and ensure that our employees are not forced to work excessive overtime. We respect our employees' right to regular breaks and holidays and promote a good work-life balance.

Wages

We ensure that our employees' wages are fair and competitive and at least meet local legal minimum wage regulations and standards. We support the right of our employees to negotiate wages in a way that takes into account their needs and capabilities.

Social benefits

We provide our employees with adequate social security and other social benefits that meet or exceed legal requirements. We ensure that social benefits provide our employees with adequate protection in case of illness, accidents, old age or other situations.

Respect for human rights

As TB&C, we respect fundamental human rights and protect our employees from human rights abuses. We promote a working environment that is free from any form of discrimination or harassment and do not tolerate it at any time. We are committed to avoiding child labour, forced labour and minerals from conflict areas and not using them in the supply chain.

Employment Exclusion, Slavery & Human Trafficking

We do not employ people who cannot act of their own free will (especially children) or are deprived of their personal freedom. We are actively committed to preventing slavery in all forms and human trafficking at all TB&C sites and along our supply chains.

Social diversity

We reject discrimination. No one is discriminated against at or by us on the basis of gender, age, ethnic origin, religious affiliation, world view, disability, marriage & civil partnership, pregnancy & maternity or their sexuality.

Our employees should reflect the composition of the local community.

Article 6: Avoidance of conflicts of interest

We strive to ensure that our business is operated in a fair and transparent manner and that conflicts of interest are avoided. A conflict of interest arises when employees, because of their position in the company or their personal relationships, have their own interests in decisions that may conflict with TB&C's business interests and representation.

We expect each of our employees to be open and honest about potential conflicts of interest to ensure that such conflicts are avoided.

Examples of conflicts of interest can be:

- An employee uses his position to gain advantages for himself or his own interests.
- An employee participates in a decision in which he or she has a personal interest that may conflict with the interests of our company or other employees.

To avoid conflicts of interest, each employee must:

- Be open and honest about potential conflicts of interest when they arise.
- Withdraw from discussion and voting on decisions when he has a vested interest.
- Make decisions in the best interest of our company and its employees.

We value integrity and transparency in our business and expect every employee to uphold the highest ethical standards. Any employee who violates this principle will be held accountable.

Article 7: Business assets

The tangible and intangible assets of our TB&C company are earmarked for specific purposes. Thus, they serve to support the respective employees in achieving the business objectives and to promote them. The use of these assets is exclusively for business and not for private purposes.

Article 8: Health

Our company encourages all employees to take care of their health and safety. Likewise, the health and safety of our customers' employees, colleagues and members of the public who are on TB&C sites or who come into contact with TB&C products must be taken into account. This applies to both manufacturing and service. Applicable safety regulations must be observed at all times.

Article 9: Social and ethical responsibility

Equal consideration of the rights and interests of all social groups is important to us as a company to ensure that we as TB&C promote an open and inclusive culture.

Gender equality

As a company, we are committed to ensuring gender equality. Therefore, we support and promote women's rights to achieve gender equality. We will not tolerate discrimination, harassment or violence directed against a specific gender in any form due to prejudice or personal attitudes. We will ensure that women have equal career opportunities, salaries and chances in our company to realise their full potential.

Ethical recruitment

We will ensure that our recruitment process is fair and ethical and that all candidates are treated equally. We will not discriminate on the basis of gender, race, ethnicity, religion, sexual orientation or disability. We will actively seek candidates who share our commitment to diversity, equality and inclusion.

Diversity and equality

As a company, we value diversity and promote an inclusive culture. We will ensure that all our employees are equal and that they are treated with respect regardless of their origin, gender, race, ethnicity, religion, sexual orientation or disability. We will ensure that our company is a safe and inclusive place for all people equally.

Inclusion

We will ensure that all employees are included in our basic decision-making and planning, regardless of their position, hierarchy or physical and mental constitution. Inclusion means that all employees in our company can enjoy the same opportunities, resources and benefits. We strive to create a work culture that recognises and respects people's differences. Inclusion also means breaking down barriers and ensuring that everyone has equal opportunities to develop and reach their full potential.

Respect for Indigenous Peoples

As a TB&C company, we are committed to respecting and protecting the rights of indigenous peoples. We will ensure that our activities do not negatively impact the culture, way of life, land and water use, and other rights of indigenous communities. We will seek to collaborate with indigenous communities and involve them in decision-making processes.

Recognition of land, forest and water rights.

TB&C recognizes the right to land, forest and water rights and will ensure that our activities respect these rights. We will ensure that we do not engage in activities that interfere with, restrict or expropriate land, forest and water rights. We will seek to work with local communities and landowners and involve them in decision-making processes.

Avoiding forced evictions

As TB&C, we are committed to avoiding forced evictions. We will ensure that our activities do not cause forced evictions or relocations of communities or individuals. We will seek to work with local communities and landowners and involve them in decision-making processes to ensure fair compensation when necessary.

Article 10: Sustainability and environmental protection

Our company has a strong commitment to sustainability and environmental protection. The primary objective is to ultimately increase the environmental compatibility and eco-efficiency of our products and their production. In this context, it is of utmost importance for us to take preventive steps in our business operations in order to prevent environmental incidents and their causes.

Contamination avoidance

TB&C avoids unnecessary air & water pollution or soil contamination that falls within its area of responsibility. We are aware of the potential dangers to the environment that can be caused by irresponsible handling of raw materials, materials and emissions.

Commitment to energy efficiency

Our company is committed to considering energy efficiency as an important goal in our business operations and to implementing measures to reduce energy consumption.

Promotion of renewable energies

TB&C is committed to promoting the use of renewable energy, for example by giving preference to solar energy, wind energy or hydroelectric power as energy sources.

Natural resource management

Our company is committed to ensuring environmentally conscious and sustainable use of natural resources, for example by ensuring that water resources are not wasted or that the use of chemical fertilisers or pesticides is minimised where it is within our control.

Waste prevention

We are committed to reducing, separating and preventing waste, for example by introducing recycling programmes or initiatives to reduce single-use products.

Monitoring and reporting

TB&C will ensure that our environmental targets and programmes are regularly monitored and evaluated to ensure we are meeting expectations. We will also report regularly on our environmental initiatives and progress in relation to energy efficiency, renewable energy, natural resource management and waste reduction.

Article 11: Interaction with community, authorities and politics

Documentation obligation

Our company TB&C is committed to documenting administrative, financial, operational and commercial data. All significant procedures covering our company's administrative processes, operations and transactions are recorded.

Where fiscal reporting differs from internal (company) reporting, clear records of the nature, magnitude, timing and causes of such differences will be documented. Where costs and expenses reported for a particular client or contract differ from the actual expenses incurred, accurate records are kept of the nature, size, timing and causes of such differences.

Auditing

We provide free access and full support for the work of TB&C's controllers and auditors, both for regular reporting and spot checks.

Duty to inform

TB&C employees in all areas are required to inform the responsible management comprehensively and openly about everything that is of business relevance. For this purpose, the communication channels according to the organisation chart are to be observed.

Community interests

We are committed to paying taxes and duties in a timely manner. We as TB&C also maintain a friendly and supportive relationship with the local community and support local initiatives, charities, and sporting and cultural events with appropriate funding.

Distance from local politics

TB&C refrains from interfering in local politics.

Political donations

TB&C and its employees do not participate financially or otherwise in local politics within the scope of their business and do not make politically motivated donations. Where there is serious doubt as to the nature of a possible politically inspired donation or amount, we follow the procedure set out in TB&C's Anti-Bribery and Corruption Policy.

We expect employees to keep records and reports of all expenditures made with a view to obtaining an appointment. The same rules apply in reverse to those who enter into or renew contracts on behalf of TB&C, for both products and services. We ensure that subcontractors also follow the same rules of conduct.

Article 12: Business Partner

Choice of business partners

Only reputable business partners are to be involved in TB&C's trade relations from all points of our company. This applies to both customers and suppliers. A reputable business partner is defined as one who can demonstrate a sound financial record, sound business practices, legally compliant management and a code of ethics that is not materially different from that of TB&C. To ensure this, TB&C employees are required to check the credentials of any new business partner of material importance and to keep written records of all important contracts and agreements.

Violations by partners

If it becomes known that a business partner is knowingly violating applicable law or a material rule of conduct, business relations with that partner must be frozen immediately and, if necessary, terminated.

Counterfeits

We expect our customers, partners and suppliers to develop, implement and maintain methods and processes appropriate to their products and services to minimise the risk of introducing counterfeits (parts and materials) to their products. An effective process should be in place to identify and mark counterfeit parts and materials.

Patents and patent law

Respect for intellectual property is an essential part of our corporate values. When developing new products, technologies or services, we will carefully check whether existing patents are relevant and that our developments do not infringe any existing patent rights. If we find that our developments could potentially conflict with existing patents, we will actively work with the relevant patent holders and, where appropriate, reach agreements or licences to both respect their rights and be able to advance our own innovative solutions.

Article 13: Export Controls and Economic Sanctions

TB&C and TB&C's suppliers agree to strictly comply with all applicable national and international export control laws and regulations and economic sanctions. Compliance with export controls and economic sanctions is an essential part of the business relationship between us and our suppliers.

Export Prohibition

Suppliers are prohibited from exporting goods, services or technology, directly or indirectly, to any person, company or country subject to export restrictions or economic sanctions, except as expressly permitted by applicable laws and regulations.

Control Mechanisms

Suppliers must implement appropriate internal control mechanisms to ensure that products and services are not supplied in violation of export control laws or economic sanctions. This may include suppliers carefully screening and monitoring their business partners and customers to ensure they are not engaging in prohibited activities.

Duty to inform

In case of suspicion of a potential violation of export control laws or economic sanctions, suppliers must immediately inform TB&C and cooperate in the investigation.

Suppliers are required to provide information and evidence of their compliance with export controls and economic sanctions upon request by the Company.

Any employee or representative of a supplier who becomes aware of a possible violation of export control laws or economic sanctions is required to immediately report it to TB&C.

Training

Suppliers must ensure that their employees are adequately trained and aware to ensure compliance with export controls and economic sanctions.

Consequences

Violations of export control laws or economic sanctions can have serious legal and financial consequences, including penalties, loss of business licenses or loss of reputation.

Audits

TB&C Company reserves the right to conduct unannounced audits to verify compliance with export controls and economic sanctions.

Article 14: Use of private or public security forces

If the case should arise that we as TB&C use private or public security forces, we will consider the following aspects:

Responsibility and Liability

As a TB&C company, we take full responsibility for the actions of our private or public security forces. We will ensure that our security forces comply with applicable laws, international human rights standards and ethical principles. We will ensure that our security forces are held liable if they violate these policies.

Training and Preparation

As TB&C, we will ensure that our security forces, whether private or public, are trained and prepared to perform their duties. We will ensure that our security forces know and understand relevant laws and international human rights standards. We will ensure that our security forces know how to handle difficult situations and how to respond appropriately to escalations.

Respect and Dignity

As TB&C, we are committed to ensuring that our security forces, whether private or public, respect and protect human dignity. We will ensure that our security forces treat all individuals with whom they interact in a respectful and professional manner and avoid discriminatory behavior or violence.

Transparency and accountability

We are committed to ensuring that our security forces, whether private or public, are transparent and accountable. We will ensure that our security forces are clearly identified and that their activities are documented. We will ensure that our security forces are prepared to explain and justify their actions and decisions.

Collaboration and Engagement

As a TB&C company, we will work closely with our security forces, whether private or public, and involve them in decision-making processes. We will ensure that our security forces know how to share relevant information and how to report issues or concerns. We will ensure that we solicit feedback from our safety forces and respond to their concerns and needs.

Article 15: Information and training

TB&C ensures that our employees are regularly trained on this Code of Conduct and its contents. The contents include:

- Legal compliance
- Fair competition
- Fighting corruption
- Data protection and information security
- Human rights, labour law and diversity
- Avoidance of conflicts of interest
- Social and ethical responsibility
- Business assets
- Health
- Sustainability and environmental protection
- Interaction with community, authorities and politics
- Business Partner
- Export controls and economic sanctions
- Deployment of private or public security forces
- Training
- Violations of the Code of Conduct

This is to ensure that our employees always act according to the highest ethical standards and thus sustainably protect the business interests of our company. We will also provide regular training and education to ensure that our employees are aware of, understand and consciously apply current laws and regulations.

Article 16: Breaches of the Code of Conduct

This Code of Conduct applies to all employees at all TB&C locations. Violations of this Code of Conduct will not be tolerated. We will seriously consider any incident that is reported to us as a potential violation. A report may be made verbally or in writing, for example to a supervisor or Human Resources. We will ensure that all reports and related information are treated confidentially.

Our management or designated representatives will take appropriate action to investigate and resolve any incident. Employee violations may result in both disciplinary action and criminal prosecution. The decision as to what disciplinary action will be taken is at the discretion of our management and will be considered on a case-by-case basis.

Similarly, it is not acceptable for employees of our company to behave in an inappropriate manner towards persons who report a possible violation or breach of this Code of Conduct or support an investigation. Any form of revenge or retaliation is inappropriate and will not be tolerated.

It is important to us that all TB&C employees are treated safely and with respect and act accordingly towards each other. We expect every employee to abide by this Code of Conduct, upholding the integrity of our community and the sustainability of our operations.

Release

This current version of the Code of Conduct, as well as all provisions and obligations, are approved by the management of TB&C Holding GmbH.

Herborn, June 2023

R. van van der Weck

Robert van der Weck
CEO

Timo Arnold

Timo Arnold
COO