

# Code of Conduct

## Bharat Forge Global Holding GmbH

The success and sustainability of a company are based on the integrity and transparency of its actions and the loyalty and compliance of its employees. Our Code of Conduct defines our philosophy and our goals, which are based on compliance with the law, sustainability, fairness and social responsibility. The national and international legal requirements and the following guidelines of our Code of Conduct serve as a binding framework.

This Code of Conduct applies to all employees of Bharat Forge Global Holding GmbH and its subsidiaries Bharat Forge CDP GmbH, Bharat Forge Daun GmbH and Bharat Forge Aluminiumtechnik GmbH (hereinafter: company). It summarises how we are and how we want to be.

We expect the same commitment from our business partners, They confirm their consent to us with an express written declaration.

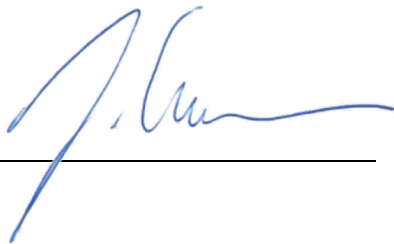
The provisions of these guidelines are binding. We are aware that violations may have consequences under labour and civil law, and possibly also under criminal law.

Bharat Forge Global Holding GmbH

*The company*

Dr Jens Ludmann, CEO

*Name and position*



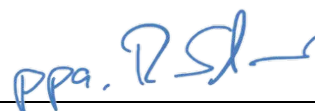
*Signature*

29/8/2024

*Date*

Thore Schwampe, CFO

*Name and position*



*Signature*

29/8/2024

*Date*

## Anti-corruption measures

We do not tolerate corruption. We make our decisions solely on the basis of professional standards. And we expect the same commitment from our business partners.

We dissociate ourselves from any form of improper donations. We are aware that even offering, promising, demanding or being promised an improper benefit is not permitted.

The general limit for donations is € 50. Monetary donations are never permitted. In case of doubt, we undertake to submit an enquiry to the ombudsman's office.

Business meals and events must not serve to gain unfair advantages and must not be held to an extent or in a manner that could call into question the professional independence or judgement of the participants.

Donations are to be offered or accepted via the business address.

We are aware that particular caution is required when making donations to public officials. In addition to civil servants, this may also include other persons involved in the provision of public services. If such a situation arises, we always consult with the ombudsman's office.

## Protection against conflicts of interest

Personal interests in companies or work for others who have business relationships with the company must be reported in writing.

This also applies to 'indirect' shareholdings via family members or third parties.

## Protection of fair competition and antitrust law

We respect fair competition and the requirements of antitrust legislation. We reject competitive advantages gained through unfair business practices. We expect the same from our business partners and competitors.

We do not participate in agreements with other companies that restrict competition, in particular direct or indirect agreements on customers, prices, contractual conditions, profit margins, costs, salaries, sales methods, quotations, sales or purchasing conditions, production or sales volumes or market sharing.

We are aware that not only explicit agreements, but also implicitly concerted actions are prohibited.

In dealings with competitors, we ensure that we do not accept or pass on any information that allows conclusions to be drawn about current or future market behaviour.

Insofar as concerns arise regarding vertical agreements with customers or suppliers and companies that have a supply-demand relationship with us, we contact the ombudsman's office.

If our company is a market leader, we ensure we do not abuse the market by exploiting the dominant position.

We keep accurate records that comply with legal and industry standards. This includes accurately documenting financial accounts, quality reports and other relevant business documents.

We disclose all relevant information, both financial and non-financial, transparently and in accordance with the applicable regulations.

## Data protection and protection of confidential information

We respect the personal rights of our employees, business partners and customers. We process and use personal data in compliance with legal requirements. We protect personal data from unauthorised access by third parties.

Personal data is only collected, processed and used insofar as it is necessary for authorised and specified purposes. The use of data is transparent to the data subjects. We respect the data subjects' rights to access, rectification, revocation, blocking and deletion.

## Protection of intellectual property

We protect our business secrets and other confidential information, as well as that of our business partners and customers, from unauthorised access and use by third parties.

We protect the intellectual property of our business partners, customers and other third parties. To this end, we ensure that sufficient precautions are in place to protect them.

## Dealing with social networks

When using social networks, we ensure our business partners, customers and employees are treated with integrity, appreciation and respect, and their privacy is protected.

We do not tolerate inflammatory, offensive or discriminatory posts.

Company information is handled responsibly.

When making statements in public and on social networks, we identify our personal statements as such.

## Measures against import and export offences and money laundering

We comply with the applicable import and export control regulations, as well as national and international economic sanctions.

We comply with the applicable regulations on the prevention of money laundering and combating the financing of terrorism.

## Respect for human rights and labour standards

We respect internationally recognised human rights and labour standards and are committed to respecting and promoting these.

This includes the following points in particular:

- Banning the employment of children under the age of 15. Young people under the age of 18 must not perform night work or overtime that endangers their health, safety or development.
- We ensure our employees are paid at least the basic or minimum wage and receive all resulting entitlements. Our pay is fair and sufficient to cover basic needs and provide a decent standard of living.
- We adhere to regular working hours that do not exceed 48 hours per week. In exceptional cases, a working week be a maximum of 60 hours, including overtime, in accordance with statutory regulations. Our employees work overtime voluntarily and everyone is entitled to at least one day off per week.
- We strictly reject any form of forced labour and any other form of modern slavery.
- We ensure that employees are recruited lawfully, in accordance with international labour standards and in a fair and transparent manner that respects human rights.
- We respect our workers' right to assemble and form trade unions, including the right to participate in collective bargaining, without fear of retaliation, intimidation or harassment.
- We do not tolerate any form of discrimination or harassment and are committed to a working environment in which respect and dignity prevail. We treat all individuals or groups equally, regardless of personal characteristics, race, religion, gender, skin colour or social origin, ethnicity, age, disability or sexual orientation, and promote equal opportunities and equal treatment. In all aspects of employment, such as recruitment, compensation and benefits, training, promotion, transfer and termination of employment, we will treat individuals fairly and non-discriminatorily, based solely on their ability to fulfil the requirements and standards of their role.
- We are committed to equality for women in all areas of social life and are guided by international conventions for the advancement of women.
- We promote a culture in which diversity is valued and everyone can make their full contribution and realise their full potential.
- We respect the rights of local communities and are committed to ensuring humane living conditions.
- We avoid forced evictions and unlawful seizure of land resources.
- We ensure that the deployment of security forces does not lead to human rights violations.
- We are committed to promoting human rights awareness among employees at various levels of our operations through training and communication.

- We are committed to providing access to remedial measures by resolving complaints of human-rights violations in a timely manner.
- We endeavour to work with players who practise similar values.
- We are committed to continuously improving our human-rights performance by conducting risk analyses, defining and regularly reviewing clear objectives and actively monitoring, reporting and transparently presenting our human-rights performance.

## Dealing with conflict minerals

Procuring minerals requires special care. In high-risk or conflict areas in particular, the irresponsible extraction and trade of mineral resources can contribute to social and political tensions and lead to the outbreak of violent conflicts and the exploitation of local communities. We therefore ensure that the minerals we purchase do not contribute to the financing of conflicts.

We classify areas in which armed conflicts are being waged or which are in a fragile situation following conflicts, as well as areas in which governance and security are weak or non-existent, as high-risk and conflict areas. These include states in which widespread and systematic violations of international law, including human rights violations, take place.

We classify the following as conflict minerals and metals: Ores and concentrates containing tin, tantalum or tungsten and gold, as well as metals containing or consisting of tin, tantalum, tungsten or gold.

We are committed to the following goals:

- Avoiding the procurement or use of conflict minerals that are illegal or obtained by unethical means.
- Prohibiting any violation of human rights during the procurement of raw materials.
- Ensuring that the minerals used in our products come from responsible sources.
- Implementing responsible sourcing practices throughout our supply chain.
- Requiring our suppliers to exercise appropriate care within their own supply chains.

## Ecological responsibility and commitment

We integrate environmental protection and the sustainable use of natural resources into our corporate management and implement these through clear objectives and rules of conduct in all areas. We promote public dialogue and support environmental awareness programmes. In order to avoid environmentally harmful emissions, we take the necessary measures and develop special procedures in co-operation with the authorities. In doing so, we maintain a trusting working relationship with the authorities and strive for a positive relationship with our neighbours.

We take measures to avoid environmental pollution and resource waste as far as this is economically and technically possible. Where avoidance is not possible, we endeavour to minimise emissions and waste. We promote recycling and the circular economy in order to conserve resources and reduce waste.

We avoid the use of restricted or hazardous substances in order to minimise potential risks to the environment and health. However, if this is not possible, we ensure that our hazardous/restricted substances are clearly labelled in accordance with the standards and are not misused.

We are committed to avoiding and reducing emissions from operations, including air and noise emissions, wherever possible, ensuring protection from air and noise pollution through technical inspections and regular site inspections.

We favour technologies designed to prevent deterioration of water quality due to wastewater contamination. We are also committed to preventing the deterioration of soil quality through pollution.

Natural resources are protected and preserved through the use of environmentally friendly and efficient technologies. We support the procurement and implementation of energy-efficient systems and continuously monitor our energy consumption in order to constantly improve our energy efficiency. In doing so, we promote the use of renewable energies and alternative green energy sources.

Technologies designed to avoid and reduce greenhouse gas emissions are a top priority for us. In line with the Paris Climate Agreement, we are taking concrete measures to reduce both direct and indirect greenhouse gas emissions in line with our decarbonisation strategy.

We comply with the legal regulations on animal welfare and the protection of biodiversity.

## Safety, health and labour protection

We provide sufficient resources for health and safety and carry out regular risk assessments and reporting to ensure continuous improvement of the occupational health and safety system. We make sure our employees are equipped with suitable personal protective equipment.

Our production machines are fitted with the necessary operational safety devices. We guarantee the highest possible technical safety standard through regular technical inspections conducted in accordance with prescribed or determined deadlines, operational inspections and conformity tests of the installed systems.

We make sure that our workstations are well lit and ergonomically designed to ensure that work can be carried out safely and efficiently. We minimise health risks through regular occupational medical check-ups and workplace-related instructions and checks.

We ensure that our working environment is safely and efficiently prepared for potential incidents and accidents. We increase the responsiveness of our employees through regular training and emergency drills.

Our emergency exits are clearly labelled to ensure safe and orderly evacuation of our employees in the event of a fire or other emergency.

We take precautions to ensure that the company's contractual partners working on the company premises comply with the statutory regulations and ordinances relating to safety, health protection and environmental protection.

## Ombudsman's office and whistleblower protection

Violations of the law or this policy should be reported, clarified and remedied. The company is setting up an ombudsman's office for this purpose. All employees, as well as external whistleblowers such as business partners and suppliers, can contact this office, particularly in the event of the following concerns:

- Human-rights complaints
- Environmental complaints
- Unethical business practices

The company's external lawyer of trust and ombudsman is Dr Ingo Bott from Plan A - Kanzlei für Strafrecht. He can be contacted by telephone (+49 211 54 28 24 0) and by e-mail ([ombudsstelle.bf@kanzlei-plan-a.de](mailto:ombudsstelle.bf@kanzlei-plan-a.de)).

Whistleblowers have the option of contacting the ombudsman's office anonymously or, if their identity is disclosed as part of the report, to remain anonymous to the company.

Whistleblowers are protected from sanctions by the company. This does not apply in the case of wilful or negligent misinformation.

The ombudsman's office will confirm receipt of the report to the whistleblower within seven days at the latest. It shall inform the whistleblowers of the result of its review no later than three months after confirmation of receipt.

The ombudsman's office documents the process and keeps this documentation for at least six years.

## Acknowledgement and consent

We ask you to sign this Code of Conduct and return it to the HR department.

By signing this document, you undertake to recognise and comply with the obligations, expectations and objectives set out in this Code of Conduct.

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*The company*

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*Name and position*

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*Signature*

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*Date*