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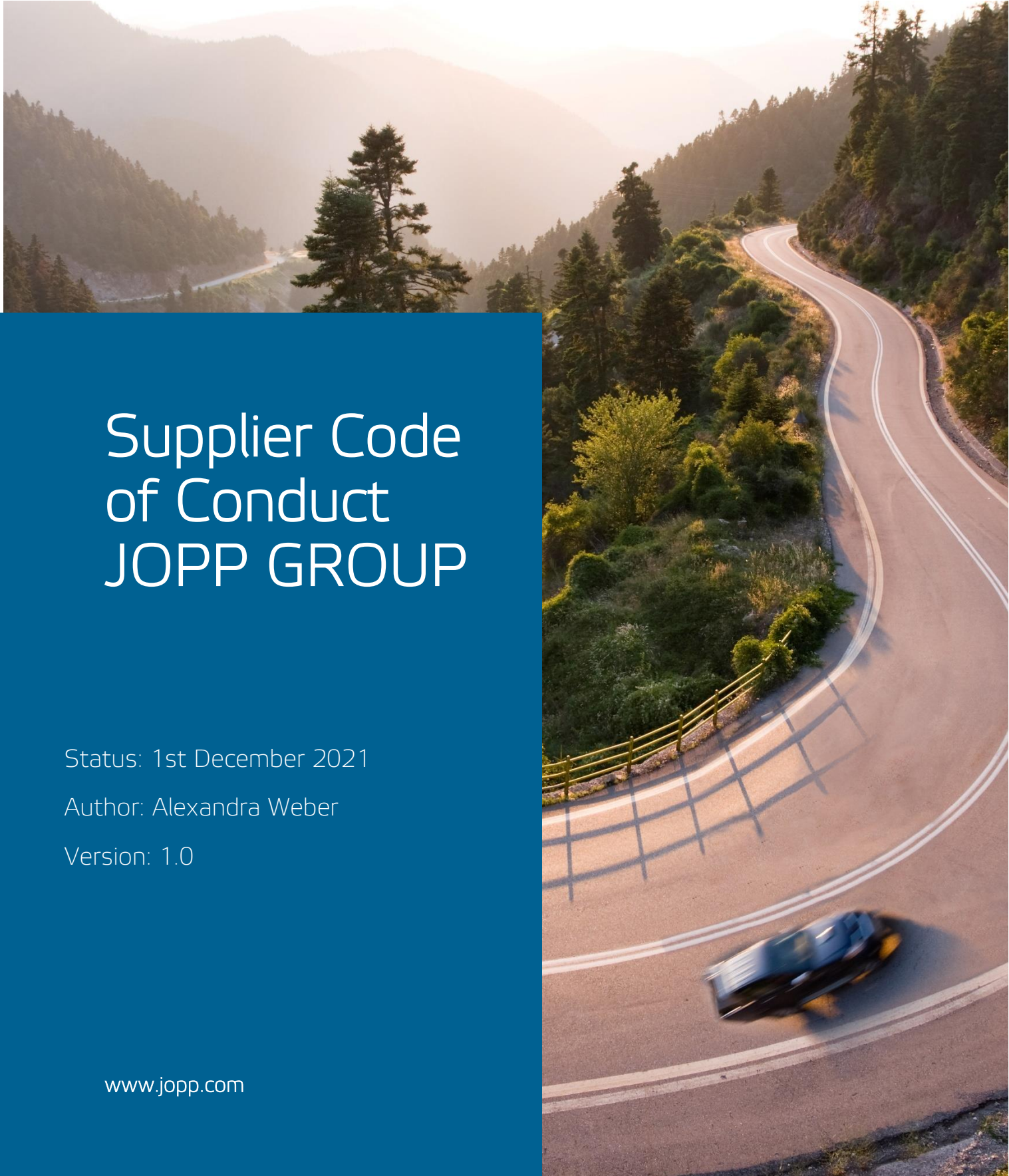
Supplier Code of Conduct JOPP GROUP

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www.jopp.com





CONTENT

- 1 Statement of the Management
Page 3
- 2 Human Rights and Workers' Rights
Page 4 - 6
- 3 Environment
Page 7
- 4 Compliance
Page 8 - 10
- 5 Compliance with the Supplier Code of Conduct
Page 11
- 6 Whistleblower System
Page 12
- 7 Indication of Source for Images and Graphics
Page 13



1) Statement of the Management

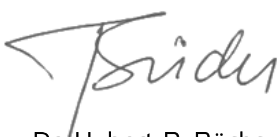
JOPP is an international automotive supplier and excels with a long-term and sustained business strategy and good cooperation with its business partners based on mutual trust.

Compliance with applicable laws and regulations plays a central role for JOPP which is also strongly committed to ecologically, socially and ethically responsible corporate leadership and expects the same behaviour from all its suppliers.

We also expect our employees to observe the principles of ecological, social and ethical behaviour and to integrate such behaviour into JOPP's corporate culture. Furthermore, we continuously strive to optimize our business activities and our products in terms of sustainability and ask our suppliers to contribute to this in the sense of a comprehensive approach.

This Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the International Labour Standards of the International Labour Organization and the United Nations Global Compact. JOPP expects its suppliers to respect and comply with the following rules and standards.

Bad Neustadt, 24th November 2021



Dr. Hubert P. Büchs
Managing Director
Jopp Holding GmbH



Martin Büchs
Managing Director
Jopp Holding GmbH



Richard Diem
Managing Director
Jopp Holding GmbH



2) Human Rights and Workers' Rights

The JOPP Group expects its suppliers to comply with internationally recognised human rights, such as the United Nations Declaration of Human Rights and the basic labour rights of applicable national legislation, as well as acknowledge the core labour standards of the International Labour Organisation (ILO).

Discrimination

JOPP expects its suppliers to ensure equal opportunities in employment and to refrain from discrimination of any kind unless national law expressly permits selection according to certain criteria. There shall be no different treatment of employees on the basis of gender, race, skin colour, disability, origin, religion and age or gender orientation. The personal dignity, privacy and personal rights of each individual shall be respected.



Forced Labour and Child Labour

JOPP expects from its suppliers that any kind of forced labour (ILO Conventions No. 29 and 105), servitude or involuntary labour as well as child labour is prohibited (ILO Conventions No. 138 and No. 182). The minimum age of employees is determined by the respective national law or collective agreement regulations, provided that these do not fall below the minimum employment age stipulated in ILO Convention No. 138.

JOPP expects its suppliers not to use, participate in nor benefit from any trafficking-related activities nor any form of trafficking throughout the recruitment and employment period.

Freedom of Association

JOPP expects its suppliers to acknowledge the right of workers to freely form or join trade unions of their own choice (ILO Conventions No. 87 and No. 98). Suppliers shall accept and positively welcome the establishment of workplace or trade union representative bodies of workers, provided that they do not conflict with national law.

Working Conditions

JOPP expects its suppliers to comply with the applicable national legislation on working hours. If there is no national legislation, the international ILO standards shall be applicable. Furthermore, it is expected that the suppliers' employees receive wages that at least comply with the respective applicable national laws and the legally valid and guaranteed minimum income and social benefits. JOPP expects suppliers to comply with the respective applicable national legislation on occupational health and safety and to ensure humane working conditions.



In order to prevent accidents and work-related illnesses in the best possible way, JOPP expects its suppliers to set up and apply an appropriate occupational health and safety system, to take the necessary measures to prevent accidents and damage to health that may arise in connection with work activities, and to inform and train employees regularly about the applicable occupational health and safety standards and corresponding measures.

Deployment of External Personnel

JOPP expects its suppliers to comply with applicable national law and to respect human and labour rights in its contractual and labour relations, regardless of the type of contract (e.g. contract for work and labour or temporary work).



3) Environment

JOPP expects its suppliers to comply with applicable energy and environmental laws, regulations and standards. The suppliers shall apply an appropriate energy and environmental management system that complies with the requirements of ISO 14001, the EMAS Regulation of the European Union or a similar national standard and whose effectiveness is regularly verified by an audit or certification system.

JOPP expects its suppliers to use resources efficiently and responsibly, to ensure the best possible environmental protection and to reduce environmental pollution on a continuous basis. This refers in particular to the reduction of energy and water consumption, the reduction of greenhouse gas emissions, the increased use of renewable energies and the encouragement of appropriate waste disposal management.

JOPP expects its suppliers to ensure that all products manufactured in the supply chain, including all materials used, comply with the relevant environmental protection standards.

4) Compliance

JOPP expects its suppliers to comply with all applicable laws, rules and regulations in the countries in which they operate or are located and to establish adequate procedures to ensure compliance with these laws, rules and regulations.



Anti-Trust and Competition Law

JOPP expects its suppliers to comply with all applicable anti-trust and competition laws. Suppliers shall not enter into agreements with competitors, suppliers, customers or other third parties that violate anti-trust laws, nor shall they inappropriately exploit a potentially dominant market position. All actions that merely appear to be a concerted practice must be refrained from.

Foreign Trade Law

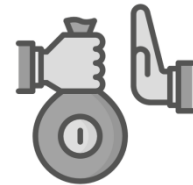
JOPP expects its suppliers to comply with all applicable laws governing the import and export of goods, services and information, including sanctions, embargoes, regulations, government orders and directives.

Conflicts of Interest

JOPP expects its suppliers to make decisions based strictly on objective, business-related criteria and not to make decisions influenced by private or financial interests or personal relationships. Any potential or actual conflict of interest with JOPP employees is to be avoided by the suppliers from the beginning.

Corruption and Bribery

JOPP expects its suppliers, as well as their employees, subcontractors, agents and consultants, to conduct business in a proper manner, in compliance with all applicable laws, regulations and industry standards.



In the context of the business relationship, corruption or attempted corruption of any kind and other illegal practices such as bribery, fraud, extortion, embezzlement, theft, tax evasion or money laundering will not be tolerated. The suppliers must have a zero-tolerance policy. They shall not offer, grant nor accept - either themselves or through third parties - illegal payments nor any other benefits of value in order to realise business opportunities or expedite routine administrative procedures in any way related to JOPP's business activities.

The suppliers must have a process in place to monitor and enforce standards to ensure compliance with anti-corruption laws.

Money-Laundering and Terrorist-Financing

JOPP expects its suppliers to take appropriate measures to comply with applicable legal obligations to prevent money-laundering and terrorist-financing and not to engage, directly or indirectly, in money-laundering or terrorist-financing activities.

Supply Chains and Due Diligence

JOPP expects its suppliers to comply with national supply chain and due diligence requirements, to ensure that their affiliates also comply with and accept all the principles and requirements described herein, and to make reasonable efforts upstream in the supply chain to ensure that their suppliers comply with the basic principles of this Supplier Code of Conduct. "Affiliates" are companies that are directly or indirectly owned by the suppliers with at least fifty percent (50 %) or through which the suppliers directly or indirectly exercise at least fifty percent (50 %) of the voting rights.

In addition, JOPP expects its suppliers to identify risks within the supply chain and to take appropriate measures to minimise such risks. In the event of suspected violations and in order to safeguard supply chains with increased risks, the suppliers will inform JOPP immediately and, if necessary, on a regular basis about the violations and risks identified as well as the measures taken to minimise such risks.

Raw Material Procurement

JOPP expects its suppliers to comply with all applicable legal regulations on so-called “conflict minerals”. In the event that a product contains one or more of the so-called “conflict minerals”, such as tin, tantalum, tungsten, gold or the corresponding ores, JOPP expects from its suppliers that these ores and metals have been acquired in a conflict-free manner and that the suppliers can, upon request, show transparency regarding their supply chain to the smelter or refinery.

Quality and Safety

All products and services of the suppliers must meet the contractually defined criteria for quality and safety upon delivery and be safe for use in their intended purpose.

Intellectual Property

Intellectual property rights must be respected. The transfer of technology and know-how must be carried out in such a way that intellectual property rights and customer information are protected.

Data Protection and Information Security

The suppliers agree to comply with JOPP's reasonable expectations regarding the protection of private data and information. The suppliers shall comply with all applicable data protection and information security laws and government regulations in the collection, storage, processing, transfer and disclosure of personal information. JOPP expects that the data and information in the suppliers' information systems will be appropriately managed and protected against unauthorised access by suitable measures of protection.



5) Compliance with the Supplier Code of Conduct

Compliance with the principles of ecological, social and ethical conduct in the value chain is of great importance to JOPP and JOPP continuously makes an effort to improve such conduct together with our suppliers.

The Supplier Code of Conduct is a prerequisite and an integral part of the business relationship. All suppliers are requested to provide evidence of compliance with the Supplier Code of Conduct within the scope of a self-assessment. JOPP reserves the right to check the suppliers' compliance with the requirements within the scope of audits or other measures deemed suitable by JOPP and to define necessary measures for improvements with the suppliers.

JOPP also expects its suppliers to communicate the expectations and contents of this Supplier Code of Conduct to their own suppliers, to oblige them to adhere to it accordingly and to ensure compliance. Any violation of the rules and standards set forth in this Supplier Code of Conduct shall be considered a material impairment of the business relationship and the contractual relationship. JOPP expects its suppliers to investigate any suspected violations actively and to co-operate with JOPP unreservedly. JOPP reserves the right to request information on the relevant facts in the event of suspected non-compliance (e.g. in the event of negative media reports).

Furthermore, JOPP has the right to terminate without notice individual or all contractual relationships with suppliers who demonstrably do not comply with the JOPP Supplier Code of Conduct or who do not strive for improvements and/or implement such measures after having been given a reasonable period of time to do so by JOPP. A statutory right to extraordinary termination without notice remains unaffected, as does the right to compensation for damages.

JOPP would like to encourage its suppliers to report any violation of the rules and standards of this Supplier Code of Conduct committed by a third party or a representative of JOPP itself to their contact person at JOPP or - anonymously if so desired - within the framework of JOPP's whistleblower system.

The Supplier Code of Conduct is available for download on the JOPP Group website. JOPP reserves the right to update the content of the Supplier Code of Conduct from time to time if required by legal or regulatory changes.



6) Whistleblower System

In order to avoid violations of applicable law and to reduce damage to JOPP, our employees and business contacts, suppliers, but also other third parties, can submit earnestly meant references and information to the following central contact address in the event of specific indications of potential misconduct:

compliance@jopp.com

Whistleblowers are subject to special protection. At their request, their identity will be treated confidentially by JOPP in accordance with legal requirements. Whistleblowers can decide for themselves whether they wish to report by name or remain anonymous.

JOPP welcomes the use of a whistleblowing system by its suppliers and also expects this from its suppliers as soon as the establishment of an appropriate whistleblowing system is required by law.

A reference to the availability of JOPP's whistleblowing system can also be found on JOPP's website at www.jopp.com under the tab "Company", "Corporate Social Responsibility" (CSR).

7) Indication of Source for Images and Graphics



Discrimination - Page 5

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Working Conditions - Page 6

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Compliance - Page 8

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Corruption and Bribery - Page 9

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Data Protection and Information Security - Page 10

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Whistleblower System - Page 12

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Content - Page 2 - *Skizze Hatchbox*

Human Rights and Workers' Rights - Page 4 / Image ID: 904657466, www.istockphoto.com

Environment Seite 7 - *Skizze Marius Ballasus*

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