BOGE
RUBBER & PLASTICS

CRRC NEW MATERIAL TECHNOLOGIES GMBH

Code of Conduct

Form Follows Future

Modifications

Date	Issue	Description
25.04.2023	1.0	First version of a Code of Conduct for employees and business partners
15.01.2024	2.0	Update in chapter I and III.3: Position on war crimes and non-state armed groups
07.03.2024	3.0	Contribution General Workers Council
31.08.2026	4.0	Update in chapter III.4: Working hours and overtime and III.5: Fire safety and overtime

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I. Foreword

Conducting business with integrity, responsibility and sustainability as well as assuming social responsibility are key elements of our corporate policy. We have committed ourselves to a fair and transparent conduct of our business and ensure that we act in accordance with the applicable law and regulations of the countries in which the BOGE Rubber & Plastics Group operates. Our key corporate values are defined in corporate guidelines and policies, adherence to which is mandatory for all employees*. In compliance with these principles, we commit ourselves to sustainable development, fair market behavior and the fight against corruption. Our actions are guided by key international guidelines on human rights and working conditions, such as the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. The BOGE Rubber & Plastics Group is therefore neither engaged in war crimes nor supports non-state armed groups. Where local law and international human rights are not aligned, we will act in accordance with the higher standard. Where they are in conflict, we will adhere to national law while seeking ways to respect international human rights to the greatest extent possible.

Cooperation in the BOGE Rubber & Plastics Group is characterized by mutual respect, appreciation, trust, responsibility, transparency, and openness. These values are an integral part of our corporate culture and determine the attitudes and conduct of our employees worldwide.

We expect our business partners to share this basic understanding. In this respect, this Code of Conduct goes beyond merely complying with laws and regulations. For us, mutual trust, and compliance with the contents of this Code of Conduct are indispensable for a successful business relationship.

The implementation of this Code of Conduct is overseen by the Group's management and the regional managing directors. This ensures that each division of our company is aware of its own responsibility for respecting human rights and their implementation in its day-to-day operations.

CRRC New Material Technologies GmbH
Damme, January 2024

*For reasons of better readability, the simultaneous use of the masculine, feminine and diverse (m/f/d) pronouns is dispensed with. All references to persons apply equally to all genders.

II. Preamble

This Code of Conduct defines the requirements as well as the basic principles for the employees of CRRC New Material Technologies GmbH (hereinafter referred to as BOGE Rubber & Plastics Group or BOGE Rubber & Plastics) and for the cooperation with business partners of BOGE Rubber & Plastics Group.

Business partners of BOGE Rubber & Plastics are natural persons or legal entities from whom goods or services are procured or to whom goods or services are provided, without being employees of BOGE Rubber & Plastics or companies affiliated with BOGE Rubber & Plastics. Business partners can be, for example, suppliers, customers, sales representatives, agents, brokers, consultants or other providers of goods and services.

All employees of the BOGE Rubber & Plastics Group are personally responsible for compliance with applicable laws and internal guidelines in their work environment. Observing statutory requirements and internal guidelines as well as the resulting lawful and ethical conduct has top priority at the BOGE Rubber & Plastics Group.

BOGE Rubber & Plastics expects from all business partners

- to conduct their business with integrity and fairness based on applicable law and to accept and implement the principles set out in the Business Partner Code of Conduct.
- to ensure that the principles of the Code of Conduct are also observed by their own business partners and to demand this accordingly.
- that they cooperate in providing the information necessary for BOGE Rubber & Plastics to establish and conduct a business relationship based on partnership.

III. Human rights and working conditions

1. Human rights and protection against discrimination

The BOGE Rubber & Plastics Group is aware of its social responsibility.

For us, only personality, ability, performance, and aptitude are key factors. We therefore do not tolerate any discrimination on grounds of color, gender, religion, age, nationality, social and ethnic origin, disability, ideology, sexual orientation or political or trade union activities. We also respect the rights of minorities, such as Indigenous people, and do not tolerate violations of these rights.

These principles, i.e. the rules of ethical recruiting, apply to the recruitment of new employees, to employees with a valid employment contract and to the professional promotion of our employees.

Therefore, we expect our business partners not to tolerate any discrimination on the grounds of race, color, sex, religion, age, nationality, social and ethnic origin, disability, ideology, sexual orientation or political or trade union activity.

2. Prohibition of child labor

BOGE Rubber & Plastics does not tolerate any form of child labor.

We respect and support internationally recognized human rights and expect the same from our business partners. In accordance with the United Nations regulations on human and children's rights, the BOGE Rubber & Plastics Group observes the minimum age for employment and rejects any form of child labor. This principle applies in particular to the worst forms of child labor that threaten their health, safety, and morals.
Business partners must observe the minimum age for admission to employment in accordance with the applicable government regulations, provided that these regulations do not fall below the age of 15.

3. Prohibition of forced labor and torture

BOGE Rubber & Plastics does not tolerate any form of forced labor.

Any work performed within the BOGE Rubber & Plastics Group must be performed voluntarily. In accordance with the regulations of the United Nations on human and children's rights, the BOGE Rubber & Plastics Group rejects any form of forced and compulsory labor and does not tolerate any form of torture, whether physical or psychological. Therefore, we are committed to the abolition of slavery, human trafficking, and forced labor and expect our business partners to do the same.

4. Working conditions

BOGE Rubber & Plastics supports the rights of all employees to form employee representations and to bargain collectively on working conditions and adheres to valid company and collective agreements.

Even in the event of controversial discussions, we aim to cooperate constructively and in a spirit of trust with the respective employee representatives in order to achieve viable solutions for all parties involved. We tolerate neither preferential treatment nor discrimination because of their membership or non-membership of an employees' representative body, and our employees are not threatened with any penalties because of their engagement in such a body.

BOGE Rubber & Plastics always complies with the applicable local working time regulations. Standard working hours shall never exceed the maximum limits established by local law. In addition, total weekly hours, including overtime, should generally not exceed maximum hours defined by law. Exceptions may apply only in cases of emergencies or extraordinary circumstances. Our goal is to ensure that all overtime is performed on a voluntary basis.

In terms of a work-life balance, we actively promote the compatibility of professional and private life and consider both operational and individual needs when organizing working hours and breaks. We also offer our employees flexible working models within the framework of collective bargaining agreements and company-internal agreements.

At BOGE Rubber & Plastics, all employees receive a competitive and performance-based compensation.

We ensure fair compensation for all our employees and comply with statutory minimum wages and collectively bargained agreements. We consider our employees crucial to our success and our continued existence in the market. In addition, we offer our employees attractive compensation with additional benefits, even when compared to the market.

Our employees and their skills play a decisive role in determining the Company's success. Therefore, BOGE Rubber & Plastics demands and promotes lifelong learning for all employees.

Based on individual needs, we offer our employees a wide range of vocational training and continuing education opportunities and continuously develop new offerings to meet changing work requirements. In line with the approach of enhancing professional skills, we focus on the holistic development of technical, social, methodological, and personal competencies. With our extensive qualification program, we do not only ensure long-term performance and employability, but also the satisfaction of our employees.

BOGE Rubber & Plastics requires its business partners to be aware of their social responsibility towards their employees and to ensure fair and appropriate remuneration, other social security benefits and working hours in accordance with applicable laws.

Business partners should also support the development of their employees to guarantee a high level of performance.

In addition, business partners must respect the freedom of association and the right to form interest groups. Thus, they grant their employees the right to represent their interests within national laws and regulations.

BOGE Rubber & Plastics pays attention when hiring security personnel that the assigned staff follows our standards of conduct regarding working conditions and human rights. We do not tolerate arbitrariness and unauthorized actions. Likewise, we expect our business partners to ensure that the private and public security forces used also comply with these standards.

5. Occupational health and safety

BOGE Rubber & Plastics is committed to occupational health and safety.

Safety at work, the preservation and promotion of health, fitness, and job satisfaction of our employees are fundamental principles of our corporate policy.

We observe the valid statutory requirements and standards for a safe and healthy working environment and take appropriate measures to ensure this. At BOGE Rubber & Plastics, these are based on company agreements between employer and employee, which are represented by the general works council. To avoid risks and to protect employees, we regularly carry out risk assessments at the workplace. In doing so, we consider aspects such as machine safety, ergonomics at the workplace, emergency preparedness, the handling of hazardous substances and the influence of noise (noise emissions and noise immissions).

Fire safety is an essential part of our emergency preparedness. All sites comply with local fire safety regulations, and install, maintain, and regularly inspect fire alarm and extinguishing systems. Emergency exits are clearly marked, freely accessible, and unobstructed at all times. Evacuation routes and assembly points are communicated and displayed throughout the facility, and regular evacuation drills are conducted to ensure readiness. In the event of an alarm, employees must stop work immediately, proceed calmly to the nearest exit, and gather at the designated assembly point. Re-entry is only permitted when authorized by emergency personnel or head of plant.

In their work, our employees are obliged to implement the statutory regulations and internal guidelines on occupational health and safety. We also expect preventive and consistent occupational safety from our business partners and continuous further development to improve the working environment.

IV. Business ethics

1. Fair competition and antitrust law

BOGE Rubber & Plastics is fully committed to the principles of fair and free competition as an elementary component of the free market economy.

All employees of BOGE Rubber & Plastics are obliged to comply with the respective provisions of antitrust and competition law. BOGE Rubber & Plastics prohibits any conduct which has the aim or effect of hindering, restricting, or distorting free and fair competition.

Our competitive position is based solely on our entrepreneurial success factors, in particular our innovative capability, quality, reliability, and fairness. We therefore always conduct ourselves in compliance with antitrust law in our dealings with competitors, business partners and end customers. In particular, we do not tolerate: Contracts, agreements or collusion with actual or potential competitors for the purpose of fixing prices and premiums, limiting the type or number of products or services supplied, or dividing up markets; abuse of a

leading position in a particular market; vertical collusion or contracts (with suppliers or customers) if these intend or have the effect of hindering or restricting free and fair competition in violation of applicable laws.

BOGE Rubber & Plastics expects the same from its business partners.

The business partners are therefore obliged to comply with the applicable statutory provisions of antitrust and competition law. In particular, they shall not participate in price agreements or in undertakings to concert the market conduct of competitors.

Likewise, business partners do not exchange sensitive information with competitors.

2. Export control and economic sanctions

Employees and business partners must comply with all applicable international trade regulations in their global business activities. They shall take care to comply not only with the respective applicable rules and regulations governing imports and exports of goods and services, but also with applicable economic embargoes. As part of the supply chain, BOGE Rubber & Plastics expects from its suppliers to be informed about restrictions on exports and classifications.

3. Combating corruption, extortion and bribery

Corruption is banned by international conventions and national laws. BOGE Rubber & Plastics does not tolerate any form of bribery among employees or business partners or any business practices that could create the impression of improper manipulation or influence. All employees of the BOGE Rubber & Plastics Group are prohibited from directly or indirectly demanding, accepting, offering, or granting advantages in business transactions if this is intended to influence business processes in a prohibited manner, or even if they merely create the impression of doing so.
Particularly in business dealings with public officials and authorities in Germany and abroad, we ensure that our employees conduct themselves with integrity.
In dealing with gratuities, for example in the form of gifts or invitations, in principle and in particular in connection with their activities for BOGE Rubber & Plastics, strict care must be taken to avoid any appearance of dishonesty or incorrect behavior.

The business partners undertake within the business relationship with BOGE Rubber & Plastics neither to offer advantages of any kind directly or indirectly to third parties nor to obtain advantages directly or indirectly for themselves or others. They shall also not allow themselves to be promised advantages which constitute an illegal act according to the applicable anti-corruption laws.
BOGE Rubber & Plastics expects its business partners not to tolerate any form of unlawful gratuity, particularly in business dealings with public officials and authorities in Germany and abroad. Business partners also undertake to make sure their employees act with integrity.

Business partners and employees must also reject facilitation payments (i.e., payments to public officials not required by law with the purpose of inducing the public official to accelerate or conduct an official act to which a right principally exists).

4. Money laundering

BOGE Rubber & Plastics undertakes to assist in the international battle against money laundering and adopts applicable measures to comply with the relevant provisions. BOGE Rubber & Plastics expects the same of its business partners.

5. Conflicts of interest

Within BOGE Rubber & Plastics, we stand for absolute transparency in all business processes, decisions and actions. We ensure this through written documentation and regular checks. Focusing on successful and sustainable business activities, we provide our customers with products that are convincing in terms of innovation, quality, and service.

At BOGE Rubber & Plastics, we make decisions exclusively based on business considerations and in the interest of the company. We ensure that business decisions are not influenced by private or personal interests.

We expect our employees to remain objective in all circumstances and to ensure that their judgment is not influenced by personal or family interests. All BOGE Rubber & Plastics employees must immediately disclose situations in which personal interests could collide with the interests of BOGE Rubber & Plastics and consult with the superiors responsible to ensure that appropriate actions are taken as a means to prevent or resolve the conflict of interest.

Both internal and external data acquisition, records, and reports must be truthful, correct, and complete. We expect our employees to exercise the utmost care in all processes as well as to observe valid standards. This particularly includes complying with generally accepted accounting principles.

BOGE Rubber & Plastics welcomes and supports voluntary activities of employees in associations or other institutions, provided that these activities do not conflict with the interests of BOGE and do not impair the obligations set out in the employment contract.

Secondary activities and (equity) participations in a company or other organization not belonging to BOGE Rubber & Plastics must not impair the interests of BOGE. They require disclosure or approval in accordance with the labor law regulations.

Transparency is of utmost importance to the business partners in all business transactions.

BOGE Rubber & Plastics on the one hand expects its business partners to make decisions exclusively based on business considerations and in the interests of the company. On the other hand, personal or family conflicts of interest in particular, which may lead to irrelevant considerations, are to be avoided.

Business partners shall make sure that no impression of any non-businesslike conduct is given.

6. Donations and sponsorship

BOGE Rubber & Plastics is aware of its social responsibility and is committed to making donations to support education, culture, social or humanitarian causes and sports. Donations may not be linked to any counter-performance for BOGE.

BOGE Rubber & Plastics uses its sponsoring activities to regularly pursue its own, company related advertisement or public relations objectives. In doing so, we make sure to act in a proper and transparent manner.

The business partners shall adhere to the principle of acting unselfishly when making donations. Their donations are made only on a voluntary basis and in accordance with the applicable laws and regulations. The business partners do not use their sponsorship activities to gain business advantages unlawfully.

7. Handling of information, data protection, IT security

One of the essential aspects of the cooperation with BOGE Rubber & Plastics is the confidential handling of information.

BOGE Rubber & Plastics attaches great importance to the protection of the privacy rights of employees and business partners.

We ensure the protection of privacy rights in all business processes, considering the applicable legal requirements and data protection standards.

In addition, we have adopted principles for handling personal data that must be adhered to in all companies worldwide.

BOGE Rubber & Plastics ensures and protects the confidentiality of sensitive information, data and trade secrets.

Our innovative strength is a key success factor in international competition. For BOGE Rubber & Plastics Group as a globally leading technology group, the protection of intellectual property rights and expertise is therefore of particular importance.
We ensure that sensitive information and trade secrets are adequately protected and not disclosed without authorization. We respect the business secrets of our business partners and competitors to the same extent.

For BOGE Rubber & Plastics, the protection of intellectual property is of utmost importance.

BOGE is committed to respecting the intellectual property of third parties. Therefore, we also expect all employees to respect the rights of third parties in their daily work.
In doing so, we not only comply with applicable laws and regulations regarding the intellectual property of market participants, but also protect the intellectual property of our employees by following the specifications and rules of the German Employee Invention Act.

We at BOGE are aware that intellectual property is a valuable asset and tied to the inventor as a person. Therefore, a "claim" and, in case of exploitation, an inventor's remuneration is made on the basis of the invention amount, the reference amount and the license rate.

BOGE Rubber & Plastics does not tolerate any disclosure or use of insider information.

Insider information is all nonpublic information that investors would consider significant to their investment decisions. Such insider information must be treated with strict confidentiality. It must not be disclosed to third parties. Acquiring or selling or recommending the purchase or sale of securities based on insider information is prohibited.

The availability and integrity of the IT systems of BOGE Rubber & Plastics is fundamental.
We protect personal and business-related data against unauthorized access, loss, or manipulation with all available technical and organizational means, taking into account the applicable national laws. To ensure this in the long term, we have adopted a minimum IT security level of protection that must be complied with throughout BOGE Rubber & Plastics Group worldwide.

To protect confidential and personal information, data and projects, business partners must treat such information with strict confidentiality and protect this information from unauthorized access by third parties. Business partners may only use sensitive information and data for authorized purposes and in an appropriate manner. The impact on privacy must be kept to a minimum while respecting the rights of everyone.

Confidentiality agreements must be consistently adhered to internally and externally.

8. Disclosure of information

Business partners agree to comply with the statutory requirements for financial and non-financial reporting and are committed to archiving correct records.

9. Counterfeiting and piracy

BOGE Rubber & Plastics takes measures to minimize the risk of counterfeiting, product piracy, and zu prevent plagiarisms. We also expect this of its business partners.
To protect BOGE's know-how and to limit the distribution of counterfeit parts, a continuous spot check of the market is conducted. For this benchmark, we use the services of an online service provider offering detailed whole vehicle analysis for a continuously growing inventory.

V. Environmental protection and safety

1. Environmental protection

BOGE Rubber & Plastics attaches immense importance to sustainable environmental protection.

We show consideration for the planet's natural habitat and are committed to the sustainable conservation of resources, reduction of environmental pollution and procurement of environmentally friendly as well as energy-efficient products. We continue to ensure that our business processes have the minimum possible impact on the environment and comply with applicable environmental laws and regulations. To protect our resources, we aim to reduce water consumption and monitor water quality by minimizing the risk of contamination. In addition, the BOGE Rubber & Plastics Group has also set itself targets for the expansion of the share of renewable energies and for decarbonization.

Business partners of BOGE Rubber & Plastics are also committed to a sustainable, responsible and careful use of resources and raw materials. In products and processes, they pay attention to an efficient use of energy and resources, such as water, air, and natural resources, as well as to the applicable environmental standards for products and processes. They commit their employees to minimize hazards for the environment and to use resources carefully.

To protect the environment, we and business partners meet air quality standards in accordance with applicable laws and regulations and strive to reduce pollutant emissions when they are discharged into the environment. To protect resources, we aim to reduce water consumption and monitor water quality by minimizing the risk of contamination, both for ourselves and for our business partners.

Protecting forests and restoring and promoting the sustainable use of other natural ecosystems is critical to preserving biodiversity, combating climate change, and sustaining livelihoods for people and wildlife. We are committed to eliminating ecosystem conversion though forced clearing and deforestation from our supply chains. As natural rubber is a known cause for deforestation in some cases, we are explicitly committed to sourcing sustainable natural rubber. Human rights shall be protected in all our operations and at the supplier.

With responsible chemical management, the BOGE Rubber & Plastics Group monitors the introduction and use of substances in accordance with occupational health and safety and environmental regulations. We strive to further advance the substitution or reduction of hazardous chemicals with a major impact on the environment.

Business partners who supply BOGE Rubber & Plastics with production material shall record environmentally relevant data per calendar year and, upon request by BOGE Rubber & Plastics, shall communicate this to the extent required by the customers of the BOGE Rubber & Plastics Group.

To this end, the business partners should set targets for a sustainable reduction of environmental damage. These goals also include targets for reducing CO2 emission volumes and decarbonization.

The business partner shall keep the environmentally relevant data for a period of at least 10 years after the end of the respective calendar year. The provision of the data shall serve to assess the environmental performance of the partner.

2. Responsible raw material sourcing

Business partners are committed to supporting any efforts to ensure responsible sourcing of resources. The aim is to avoid the procurement and use of raw materials that have been obtained illegally or through ethically reprehensible or unreasonable measures (conflict minerals).

To exclude such sourcing in the future and to identify possible conflict minerals in manufactured products in the supply chain, business partners are required to take precautions to disclose the origin or source of their resources.

We will work in our own facilities and in cooperation with our suppliers to increasingly source natural rubber products that are manufactured and processed in accordance with the requirements of the GPSNR guideline. GPSNR is a platform with various international members to ensure that sustainability is more firmly anchored in the natural rubber value chain (GPSNR = Global Platform for Sustainable Natural Rubber).

We will collaborate with our current suppliers to identify, prevent and mitigate environmental and social harm in natural rubber supply chains, and we will assess the environmental and social performance of new suppliers/partners before they start their activities. We will require our suppliers to establish a due diligence process that is consistent with GPSNR guidelines for natural rubber production and sourcing, and to implement the necessary time-bound measures outlined in future GPSNR implementation guidelines. Our goal is to not contribute to deforestation and forest degradation with our products, thereby reducing greenhouse gas emissions and biodiversity loss.

3. Internal and external communication

To ensure that this Code of Conduct is lived by everyone, we consider controlled internal and external communication to be necessary. Therefore, we will regularly raise awareness and provide information to our employees and our business partners. In addition, we also offer our employees specific training on the topics of social responsibility, due diligence and human rights.

4. Notices and reports

BOGE Rubber & Plastics demands and promotes transparent business activities.

Our employees can turn to us in confidence at any time. To protect the company from damaging conduct, to prevent white-collar crime and to protect employees, every employee is encouraged to report criminal acts, compliance breaches and special risks within the company. The usual reporting channels (supervisor, compliance organization, HR department or the person directly responsible) can be used for this purpose. We follow up on all notices and reports and take remedial action where necessary. Within this process, we do not tolerate any form of discrimination against persons who give such notice to us in good faith.

Misbehavior and infringements of applicable statutory and regulatory provisions, internal regulations, and the Code of Conduct will not be tolerated. When implementing any necessary measures we adopt the principle of proportionality, which means that in each case we carefully examine which consequences are appropriate, suitable, and necessary.

To comply with international human rights standards, national laws and BOGE Rubber & Plastics Group guidelines, we conduct appropriate human rights due diligence to identify, assess and address potential and actual negative impacts on human rights in our business activities and supply chain.

To protect against conduct detrimental to the company, to prevent white-collar crime and to protect employees, every business partner is requested to report criminal acts, compliance breaches and special risks that may have an impact on BOGE Rubber & Plastics.

Neither BOGE Rubber & Plastics nor its business partners tolerate any form of discrimination against persons who give such notice to BOGE Rubber & Plastics or to the business partners.

BOGE Rubber & Plastics requests selected suppliers to perform a self-assessment based on the so-called Supplier Self-Assessment Sustainability. In addition, BOGE Rubber & Plastics performs a risk-based audit for business partners in order to identify compliance and integrity risks (Business Partner Compliance Due Diligence).

BOGE Rubber & Plastics reserves the right to review the business relationship with each business partner if deviations from this Code of Conduct are reported. BOGE Rubber & Plastics will follow the principle of proportionality, which means that it is carefully examined in each individual case which consequences are appropriate, suitable, and necessary. This can even lead to the immediate termination of the business relationship as well as to the assertion of claims for damages.
If a risk is identified that our business activities are causing or contributing to negative human rights impacts, we have a process in place to assess, modify, stop and/or correct the activity. We encourage our employees to report suspected violations of this Human Rights Policy Statement through the existing complaint or dispute resolution procedures. This includes local management, relevant HR departments or the Compliance Hotline. Our partners and third parties have the opportunity to report potential violations of this Statement of Principles on Human Rights to our Compliance Officer via ***whistleblower@boge-rubber-plastics.com*.**

VI. Contact

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