

SUPPLIER AND BUSINESS PARTNER CODE OF CONDUCT

AUTOCIRC GROUP



autocirc



Words from our CEO

Autocirc's mission is to give new life to cars by maximizing the reuse of components. Our values of "Trust, Customer, Get it done, and Together" guide us in everything we do.

To create the best conditions for achieving our agenda, it is important to us that we all work towards the same vision and goals. This Code of Conduct has been created to ensure that Autocirc's values and ethical standards are clearly understood and followed by all Autocirc suppliers and business partners¹. The Code is based on the UN Global Compact's ten principles in the areas of human rights, work, environment, and anti-corruption.

This Code defines the minimum we expect our suppliers and business partners to respect and meet within their own operations and within their supply chain. Even if it stipulates higher standards than required by national or local laws or regulations.

Hugues Delval, CEO Autocirc Group

Business ethics

Anti-bribery and corruption

The supplier/business partner has zero tolerance for all kinds of corruption and guarantees that applicable antibribery laws and UN convention against corruption are strictly followed. The supplier/business partner refuses to accept or retain business through bribery. The supplier/business partner does not directly nor indirectly offer, promise, grant, or authorize the giving of money or anything of value to someone to unduly influence the recipient in the performance of professional duties or to obtain or retain an improper business advantage.

The supplier/business partner neither asks for, nor accept, improper benefits from others for the performance of duties on behalf of Autocirc.

Fair competition

The supplier/business partner supports the principles of free enterprise and fair competition. Employees of the supplier/business partner do not engage in discussions with competitors regarding market allocation, information exchange, production, and sales quotas, or bid rigging.

Trade compliance

The supplier/business partner complies with relevant export controls and sanctions laws, including United Nations sanctions and applicable sanctions under the laws of the European Union, the United States, and the United Kingdom. Employees of the supplier/business partner never attempt to circumvent applicable trade sanctions.

Anti-money laundering

The supplier/business partner carries out its financial activities in ethical, transparent, and legal ways.



Compliance with the law

The supplier/ business partner complies with the laws of the applicable legal system, including statutory requirements and local regulations.

Conflicts of interest

The supplier/business partner avoids situations in which personal interests, or the interests of family members, may affect the supplier/business partner's ability to make business decisions that are in the best interests of Autocirc.

Counterfeit parts and materials

The supplier/ business partner is responsible for implementing and maintaining methods and processes appropriate for their products and services to minimize the risk of counterfeit parts and materials in delivered products.

Disclosure of information

The supplier/business partner shall ensure that all business dealings are transparently performed and accurately reflected in its books and records. The supplier/business partner must disclose any information relating to its operations, structure, financial situation, and performance in accordance with applicable laws and industry practices. Information must not be falsified and must be disclosed honestly to Autocirc when requested.

Intellectual property

The supplier/business partner respects intellectual property rights and safeguards confidential information. All intellectual property, including trademarks, copyrights, patents, and trade secrets, must be used only with proper authorization. The supplier must take appropriate measures to prevent disclosure or misuse of proprietary information belonging to Autocirc or others.

Information – Data Security

The supplier/ business partner shall comply with all applicable laws and regulations in the area of personal data and information security and protect confidential and sensitive information from unauthorized use and dissemination. Suppliers must implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including protection against unauthorized access, accidental loss, destruction, or alteration of personal data. This includes regular risk assessments, staff training, and secure data handling procedures.





Human rights and labor standards

Human rights

The supplier/business partner respects internationally recognized human rights. Employees of the supplier/business partner shall not be subjected to mental or bodily harm in the workplace.

The supplier/business partner commits to prevent, mitigate, or remedy adverse human rights impacts with the business partner causes or contributes to, directly or indirectly.

Equal opportunity, fair treatment, and non-discrimination

The supplier/business partner treats its employees with dignity and respect. Employees of the supplier/business partner are provided equal opportunity, and the supplier/business partner strives to have a diverse workforce. Discrimination or harassment based on race, ethnicity, gender, physical disability, sexual orientation, religion, or any other characteristic protected by applicable law is not tolerated. The supplier/business partner guarantees that all its employees with the same qualifications, training, and skill set receive equal pay for equal work.

Modern slavery and forced labor

The supplier/business partner does not, directly, or indirectly, make use of any work or service which is extracted from any person under any form of modern slavery, including forced, bonded, or compulsory labor or human trafficking or child labor.

Freedom of association, collective bargaining, and political involvement

The supplier/business partner's employees are free to join associations and unions and express

political views and engage in political activities outside of working hours without discrimination, harassment, or retaliation.

Health and safety

The supplier/ business partner shall offer a good and secure work environment for all its employees. A good and secure work environment is a physically secure one and a good psychosocial one where stress, discrimination, abusive treatment as well as violence, and threats are prevented, and measures are taken to prevent accidents and ill health. As a minimum requirement regarding the standard of the internal work environment, we require that our suppliers/ business partners at least are following the local legal requirements.

Use of private and public security forces

The supplier/business partner must ensure that any private or public security forces used to protect business operations act in accordance with internationally recognized human rights standards. Security forces must not use force, harassment, or intimidation and must be adequately trained in ethical conduct and the rights of individuals.

Climate, environmental sustainability, and impact

Environmental responsibility

The supplier/business partner recognizes that environmental sustainability is an important factor in long-term business success. The supplier/business partner guarantees that it systematically works to address any environmental issues uses resources and conducts its business in an environmentally responsible way.

The supplier/business partner aims to have the least possible negative impact on the climate and environment.



Greenhouse gas (GHG) emissions

The supplier/business partner is encouraged to monitor and work towards reducing greenhouse gas emissions across its operations. This may include setting targets to lower emissions over time and aiming to improve energy efficiency and increase the use of renewable energy where feasible.

Energy

Energy consumption is a heavy contributor to climate change. To fulfil the challenges of a net-zero GHG emissions supply chain, we require all suppliers and partners to monitor and reduce their energy consumption and to advance the use of renewable and alternative energy sources for their operations and logistics systems.

Biodiversity, land use, water, deforestation, and waste

The supplier/business partner must prevent deforestation, harmful land-use practices, and unlawful deprivation of land, forests, or waters; assess and minimize the environmental impact of operations; protect biodiversity and ecosystems; avoid pollution and excessive water use; manage water, waste, and air quality responsibly; and implement strategies to reduce resource consumption and dispose of waste in environmentally safe ways.

Animal welfare

All suppliers must follow national and international legislation regarding animal welfare.

Soil quality

The supplier/business partner shall ensure that its operations do not degrade soil quality. Measures must be in place to prevent contamination, erosion, and nutrient depletion. Sustainable land management practices must be adopted, especially in agricultural or resource extraction activities.



Corporate Governance

Regulatory Monitoring

All suppliers are expected to actively monitor relevant legal and regulatory developments that may affect their operations. This includes changes in environmental, labor, trade, and data protection laws. Suppliers must ensure timely updates to internal policies and practices to remain compliant to reinforce proactive compliance and align with best practices.

Implementation, Compliance, and Reporting

- 1. Roles and Responsibilities:** Suppliers and business partners are responsible for ensuring that their operations, employees, and subcontractors comply with this Code of Conduct and all applicable laws. Suppliers must communicate these standards clearly within their organization and ensure that relevant staff understand and follow them.
- 2. Consequences of Non-Compliance:** Autocirc will take appropriate action in cases of non-compliance, including terminating the business relationship. If a supplier or business partner is suspected of violating applicable laws, Autocirc will report the matter to the appropriate authorities.
- 3. Training:** Suppliers and business partners are expected to ensure that their employees and subcontractors receive appropriate training to understand the expectations of this Code and to identify and reduce the risk of violations in their operations.
- 4. Monitoring and Auditing:** Autocirc may monitor and assess supplier compliance with this Code, including through audits based on risk. Suppliers must provide access to relevant documentation and sites if requested.
- 5. Reporting Violations:** Suppliers and their employees must report any suspected violations of this Code to Autocirc. Reports can be made through the designated contact within the relevant country organization or through Autocirc's whistleblowing channel: <https://report.whistleb.com/en/autocirc>. Autocirc investigates all concerns promptly and thoroughly.



CONCERNS OR QUESTIONS

Any concerns or questions regarding the Business Partner Code of Conduct can be raised with the business partner's contact person at Autocirc Group.

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