

CODE OF CONDUCT

COMMON PRINCIPLES FOR CORRECT BEHAVIOR

Table of content

FOREWORD	3
RIGHTS AND RESPONSIBILITIES	4
FAIR AND FREE BEHAVIOR IN THE MARKET	5
COMBATING CORRUPTION	6
AVOIDING CONFLICTS OF INTEREST	8
COMMUNITY AND SOCIAL RESPONSIBILITY	9
OCCUPATIONAL HEALTH AND SAFETY AND ENVIRONMENTAL PROTECTION	11
HANDLING OF INFORMATION	13
COMMUNICATION	15

Foreword

Companies don't transform themselves. It is people who do. People work as a team, at corporate level align with the local and global laws and at individual level with responsibility and in accordance with our corporate culture.

We commit to provide a sustainable business management model, we embrace the ten principle of responsible sustainable business defined by the United Nations Global Compact, the labor standards of the ILO (International Labor Organization), the OECD Guidelines for Multinational Enterprises and we observe the 17 Sustainable Development Goals, adopted by all United Nations.

Our corporate guidelines and our principles of social responsibility are binding expressions of our adoption of basic principles in the fields of human rights and working conditions, quality and environmental management, health and safety, fair market behavior and combating corruption.

We encourage our engaged personnel to raise any concern regarding the applications of the principles of this Code, using the communication channels and to bring their contribution for the benefit of the company and society. This Code of Conduct is binding for all BCS employees worldwide. It defines our common principles for acting in line with the law. Our commitment to these basic principles unites all of our employees, across national borders and cultures.

Our internal guidelines are presented in the form of concrete instructions and procedures to supplement and enhance this Code of Conduct. It is essential that all BCS employees have read and understood the Code of Conduct. Ultimately, employees are required to integrate it into their daily work, actively implement it.

Together, we are responsible for BCS's strong reputation and the level of confidence in the quality and integrity of our business activities. This Code of Conduct is revised annually or at any appearance of need.



Luis Gonzalez
Chief Executive Officer
BCS Automotive Interface Solutions
July 2025

RIGHTS AND RESPONSIBILITIES

All BCS AIS¹ engaged personnel² are personally responsible for upholding with the law and adhering to internal guidelines in their work environment. BCS's top priority is compliance with legal provisions and internal guidelines as well as ensuring legal and correct behaviour. We are responsible for our products and our work and, in turn, for their impact on our engaged personnel, society, our business partners and the environment. In order to fulfil this responsibility, we act legally, honestly, and responsibly. In particular, our Executive Directors and members of the BCS Business Management Service guarantee, within the scope of their authority, compliance with the statutory provisions, internal guidelines and principles of this Code of Conduct.

Our company and all of us are responsible for complying with applicable laws and internal guidelines

We expect all engaged personnel inform themselves about the content of these guidelines and to comply with all laws. BCS will not tolerate any violations of internal guidelines or legal provisions and will prosecute such violations regardless of the employee's hierarchical position. We also expect our business partners to comply with the law, generally accepted standards of social responsibility and our core principles of integrity.



¹ BCS-AIS, BCS – referring as BCS Automotive Interface Solutions as a Group with extent for each of the subsidiaries.

² all individuals working under or on behalf of the organization, including employees, subcontractors, agency staff, consultants.

FAIR AND FREE BEHAVIOR IN THE MARKET

Fair Competition

All BCS engaged personnel must comply with the relevant requirements of antitrust law and competition law. BCS bans any behaviour that aims at or results in hindering, restricting or distorting free and fair competition.

We endorse, without restriction, the principles of fair and free competition as a fundamental component of the market economy

Our competitive position is based solely on our business success factors, especially our innovative capacity, quality, reliability and fairness. Therefore, we always comply with antitrust law when dealing with our competitors, business partners, and end customers. In particular, we do not tolerate:

- Contracts, agreements, or collusion with current or potential competitors aimed at fixing prices or premiums, limiting the type or quantity of products or services delivered, or subdividing markets;
- Abuse of a dominant position in a given market;
- Vertical collusion or contracts (with suppliers or customers) that aim to, or achieve, prevent or restrict free and fair competition in violation of applicable laws.

Export Controls

With our global activities and when venturing into new markets, we strictly follow international trade regulations and adhere to regulations governing import and export controls, as well as any applicable economic embargoes.

COMBATING CORRUPTION

Ban on corruption

Corruption is prohibited by international conventions, national laws and internal guidelines. BCS does not tolerate any form of bribery among employees or business partners, or any business practice that may give the impression of improper influence.

All BCS employees are prohibited from demanding, accepting, offering, or granting, directly or indirectly, advantages in business transactions if they are designed to dishonestly influence business procedures, or even if they merely give the impression of doing so.

As part of our worldwide business operations, we do not tolerate any form of corruption.

Facilitation payments are not tolerated. Facilitation payments are payments to public officials not required by law, with the purpose of inducing the public officials to accelerate or carry out an official act to which they are primarily entitled.

Gifts, invitations, and other gratuities

When it comes to gratuities in the form of gifts or invitations, we strictly ensure that no impression of dishonesty or misconduct is given. We do not tolerate rewards that may raise doubts about our integrity or that appear to influence business decisions.

Donations

In line with our corporate social responsibility, donations to promote education, culture, social or humanitarian causes and sport should not be linked to any benefit to BCS.

Sponsorship

In case of sponsorship activities, they must regularly pursue our own advertising or public relations objectives related to the company. In this context, we ensure proper and transparent procedures.

Money laundering

We commit ourselves to contributing to the international fight against money-laundering and to taking appropriate measures to comply with the relevant provisions.

Transparency and documentation

At BCS, we stand for absolute transparency in all our business relationships, decisions and activities. We guarantee this through written documentation, regular checks and public disclosures on the internet website or media.

Data collection, logs, and reports, financial and nonfinancial, both internal and external, must be truthful, correct, and complete. We expect our employees to exercise the utmost care in all processes and to respect the applicable regulations.



AVOIDING CONFLICTS OF INTEREST

Conflicts of Interest

At BCS, we make decisions based on the business model and the interest of the business. We make sure not to give the impression of non-commercial conduct. We expect our employees to remain objective in all circumstances and that their judgment is not influenced by personal or family interests. All BCS employees must immediately inform us of any situation where their personal interests collide with those of BCS and consult with their responsible superiors to ensure that appropriate measures are taken to prevent or resolve the conflict of interest.

We make decisions based on business considerations and for the benefit of the company. We ensure that business decisions are not influenced by private or personal interests.

Secondary Employment and Participations

We encourage and support the volunteering activities of our employees in clubs or other institutions, provided that these activities are not contrary to the interests of BCS or do not infringe on duties set out in the employment contract.

Secondary employment and (equity) interests in a non-BCS company or in another organization must not prejudice the interests of BCS. These also require disclosure and approval in accordance with labour law regulations.

COMMUNITY AND SOCIAL RESPONSIBILITY

Human rights and Labour Policy

We respect and support internationally recognized human rights. We are especially committed to fulfilling our corporate and social responsibilities. We make every effort to create a climate between our employees and in contact with our business partners that is characterized by mutual respect, trust, tolerance and fairness. We respect the dignity, privacy, and personal rights of each individual. We reject any form of violence – physical or mental and the disciplinary policies and procedures are clearly defined and communicated to workers.

We embrace corporate and social responsibility and consider it a key factor in our sustained corporate success.

Prohibition of human trafficking, forced labour and child labour

We reject any form of human trafficking, modern slavery, forced labour and child labour. All work performed within BCS Group must be voluntary. At BCS, we always respect the minimum age of employment stipulated in national legislation and we adapt the work and safety conditions to the young workers, disability people, pregnant woman and people on risk.

Equality and equal opportunities

We do not tolerate any discrimination on the grounds of race, gender, religion, age, nationality, social or ethnic origin, disability, beliefs, religion, skin colour, sexual orientation, or political or trade union affiliation. For us, the only decisive factors are performance, personality, skills/abilities and qualifications.

Non-harassment and human treatment

BCS is committed to maintain a workplace free of harassment, discrimination and any form of inhumane treatment. All employees are expected to contribute to an environment where dignity, respect, and fairness are upheld at all times. Any form of harassment, discrimination, or abusive behaviour is strictly prohibited. This applies to all aspects of employment, including recruitment, compensation, promotion, training, and access to opportunities. For detailed definitions, reporting procedures, and enforcement mechanisms, please refer to the BCS “Prohibited Harassment Policy”.

Labor legal framework

We do our best to create a social labour framework, including adequate wages and benefits, working hours compliant with labour law regulations as well as the freedom of association and collective bargaining, and we expect the same from our suppliers and other business partners.

Community implication

BCS recognizes its role in the broader community. We strive to operate in a socially responsible manner by supporting local development, minimizing harm, and respecting the rights and interests of community members. We aim to build positive relationships with the communities where we operate through transparency, dialogue, and ethical behaviour.

Security and human rights

The private or public security forces commissioned to protect the business project will act with respect of human rights.



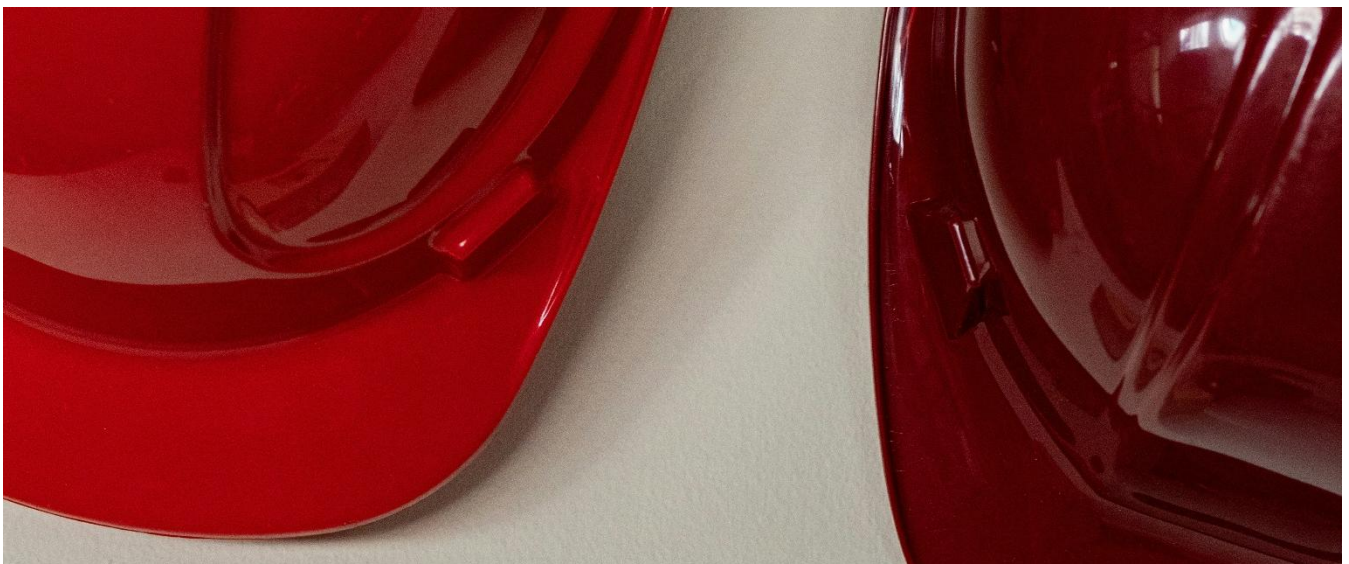
OCCUPATIONAL HEALTH AND SAFETY AND ENVIRONMENTAL PROTECTION

At BCS, we comply with the current legal requirements and standards for a safe and healthy work environment, and we take appropriate measures to ensure this, conducting periodically emergency drills, providing trainings, equipment and preparedness procedures according to the risks associated.

We inform the workers about the workplace hazards identified and we provide access to the facilities.

Workplace safety, the preservation and promotion of the health and job satisfaction of our employees, combined along with the reduction of environmental pollution, are fundamental principles that govern business operations.

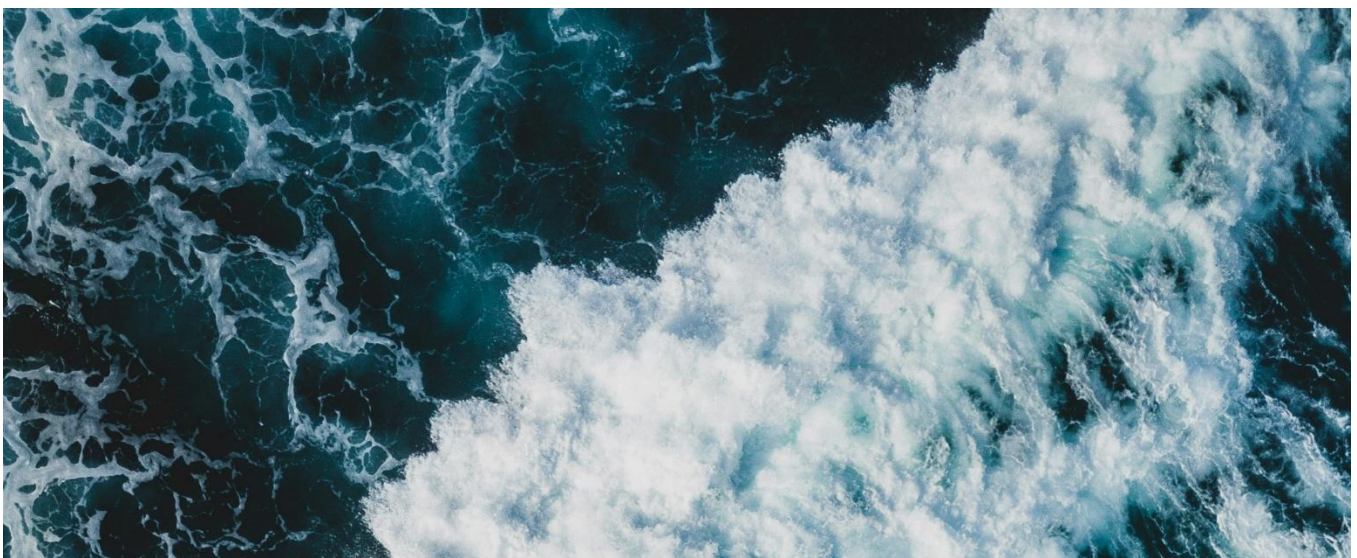
Our engaged personnel must implement legal and internal occupational health and safety requirements.



We respect the natural habitat of our planet and we are committed to conserving resources and reducing environmental pollution. This commitment to sustainable environmental protection forms the basis of our work.

According to these principles, we are committed to design environmentally friendly products, reducing the environmental impact of our business processes and of our products for the entire life cycle, continuously improving on environmental initiatives, reducing the energy consumption and using energy from renewable sources where available, using the resources responsibly (raw materials, water), managing the waste/outcomes properly.

We protect the biodiversity and the animals and we do not benefit from activities derived from illegal deforestation or illegal conversion from natural ecosystems.



HANDLING OF INFORMATION

Protection of Confidential Information

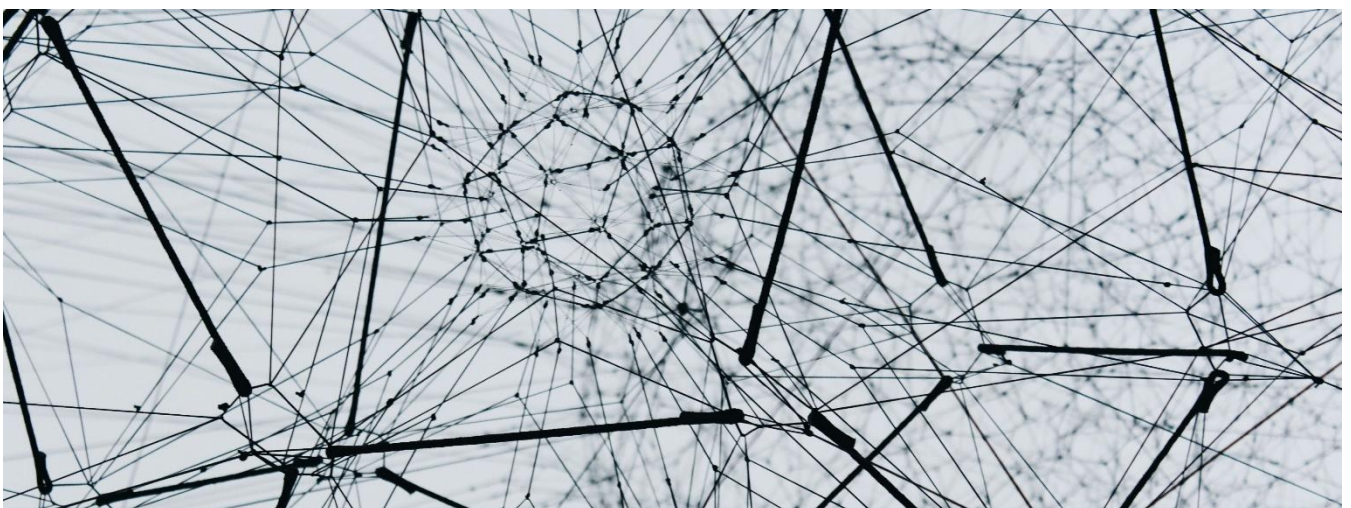
Our ability to innovate is a crucial factor for success in international competition. For BCS the protection of intellectual property rights and expertise is therefore of particular importance. Information security plays a central and sensitive role for us. Therefore, we ensure that sensitive information and business secrets are properly protected and are not passed on without authorization.

Similarly, we also respect the business secrets of our customers, business partners and competitors. Our employees are duty-bound to keep sensitive information and business secrets confidential.

We secure and protect the confidentiality of sensitive information, data and business secrets

Data Protection

In all business processes, we ensure the protection of the right to privacy, in with applicable law and regulations. Furthermore, we have established principles for the handling personal data that must be observed worldwide.

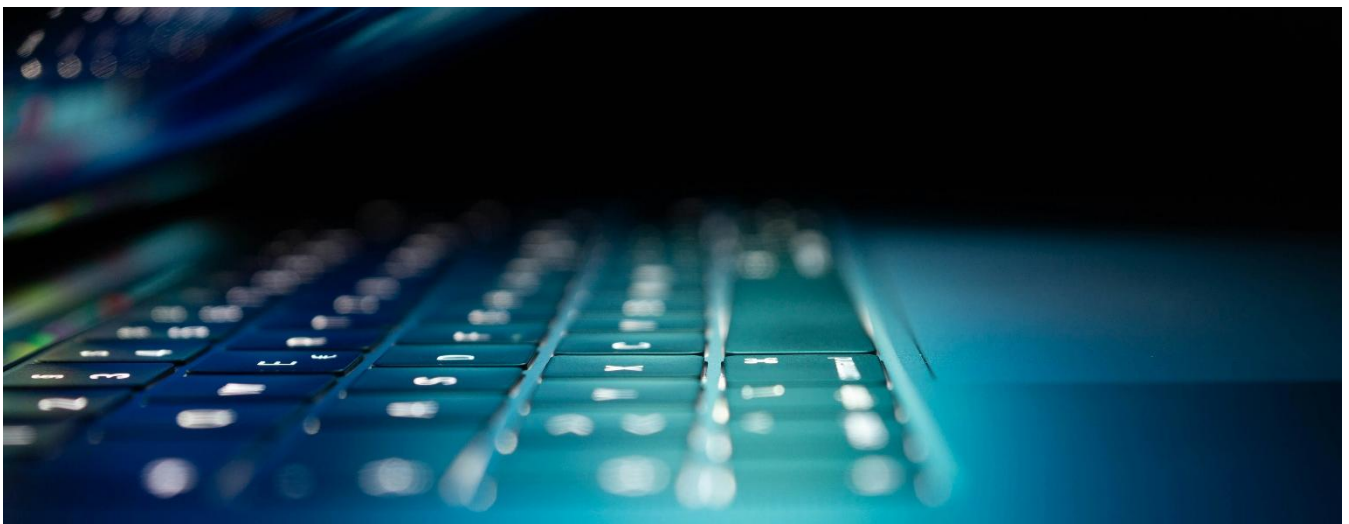


IT Security

The availability and integrity of our IT systems are fundamental. Personal and business-related data are protected against unauthorized access, loss, or manipulation using all the available technical and organizational means. This is performed taking into account the applicable national legislation. To ensure this long-term protection, we have adopted a minimum standard of IT protection that must be implemented throughout the BCS Group.

Insider Information

Inside information is considered to be all non-public information, especially any commercial information. Such insider information must be treated with strict confidentiality and must not be made available to any third party.



COMMUNICATION

As a measure of protection against actions that harm the company, prevent white-collar crime and protect the stakeholders, people are invited to report criminal behaviour, deficiencies or particular risks in the company.

Employees can use the usual reporting channels (supervisor, HR department, Business Development department or the person immediately responsible).

For the public all the concerns can be addressed at ethic@bcs-ais.com.

We ensure confidentiality, non-retaliation and feedback.

We demand and promote transparency in our business activities. With this motto, our employees can contact us at any time in with complete confidence.

We follow up on all reports and take preventive measures when necessary. Within this process, we reject any form of discrimination against those who report these circumstances to us in good faith. Misconduct and infringements of applicable statutory provisions, internal regulations and the Code of Conduct will not be tolerated.

When implementing the necessary measures, we adopt the principle of proportionality, which means that in each case we carefully examine what consequences are appropriate, adequate and necessary.

If you observe or suffer any behavior or action that goes against our Code of Conduct, please act accordingly.