



Code of Conduct Common Principles for Ethical Behavior

Edition 2025



ZF Foxconn
Chassis Modules

Contents

03 Foreword

Our World

05 We Respect Each Other
Diversity, Equal Rights & Opportunities

06 We Take Care
Work Environment & Safety

07 We are Transparent
Transparency & Documentation

In the World

09 We are Trusted Partners
Dealing With Business Partners

10 We are Fair
Free and Fair Market Behavior & Government Affairs

11 We are Ethical
Combating Bribery & Corruption, Money Laundering,
Gratuities & Conflicts of Interest

12 We Comply
Product Compliance

13 We are Secure
Handling of Information Security, IT Security & Data Protection

14 We are Mindful
Social Media & Marketing Claims

For the World

16 We Care for the Planet
Sustainability & Protecting the Environment

17 We Protect Others
Human Rights & Social Responsibility

18 We are Here to Help
Further Assistance & Support



Dear Colleagues,

ZF Foxconn Chassis Modules is a young company with a remarkable legacy. Our global reputation stems from over three decades of innovative suppliership for the world's leading automakers.

What in particular makes ZFFCN an outstanding company?

It is primarily our purpose, which goes beyond our services and economic targets. This Code of Conduct defines the standards of how we conduct all of our activities and gives a transparent outline of the principle of accountability on corporate and individual level. It helps us to continuously aspire to do what is right, directed by a strong sense of responsibility and ethical standards.

Forming a group of different individuals who achieve extraordinary goals together, everyone at ZFFCN is responsible for using good judgement and obeying our Code of Conduct. This comprises all team members, from part-time employees to the Board of Management. As a trusted partner, we continuously strive to enhance our reputation with colleagues, customers, suppliers and other business partners. Furthermore, ZFFCN managers at all levels must guide and support their teams in terms of enabling and encouraging them to make the right decisions.

This Code of Conduct represents a beneficial guidance in situations, where doing the appropriate thing is ambiguous. Paying special attention to our environmental footprint, we constantly aim to minimize ecological impacts and adapt our behavior towards a more sustainable use of our resources.

Please use the following chapters to learn about the impact and consequences of your actions. Show responsibility, embrace our guiding principles and continuously act in their interests.

Thanks for your future cooperation.

Osnabrueck, March 2025



Eike Dorff
Chief Executive Officer



Urs Rienhoff
Chief Financial Officer



Christopher Gruhn
Vice President Human Resources



Our World



We Respect Each Other

The diversity of ZFFCN's employees is a tremendous asset

Providing an environment in which all employees are empowered, have a sense of belonging and the ability to rise to their full potential is vital to their success as well as the overall success of ZFFCN.

The diversity of ZFFCN's employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and prohibiting discrimination or harassment, including on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, sexual orientation, gender identity or expression, age, marital status, mental or physical disability, or any other characteristics protected by law, as well as any unwelcome physical or verbal advances.

Please be aware that discrimination and harassment may take any form – verbal, physical or visual – and includes jokes or use of slang that may be uncomfortable or offensive to others.

ZFFCN expects its employees to lead by example and do what they can to stop others from engaging in such behavior, and prohibits retaliation against anyone who makes a good-faith complaint or participates in an investigation of such a complaint.



I suspect a colleague is being harassed – what do I do?

If you see, experience or suspect harassment or discrimination, inform your manager or Human Resources or your local workers representative.

We take this behavior seriously and do not tolerate retaliation against anyone who makes a report in good faith.



We Take Care

Our goal is to have an injury free workplace and the safest facilities in our industry

ZFFCN strives to provide each employee with a safe and healthy work environment that enables and encourages innovation.

Our goal is to have an injury free workplace and the safest facilities in the industry. We establish and maintain Health and Safety Management Systems that limit exposure to occupational hazards, prevent emergencies, safeguard machines, manage physically and mentally demanding work and provide access to healthy working facilities, potable water and sanitary eating facilities.

Work conditions are expected to keep employees healthy and not expose them to harm. ZFFCN requires that you do your part by following health and safety rules and practices and report either openly or confidentially, any accidents, behavior (such as use of illegal drugs or abuse of legal drugs) or unsafe work conditions to your manager, supervisor, Human Resources or the Legal & Compliance Department.



How does this affect me?

Employees are encouraged to actively participate in Environmental Health Safety (EHS) activities such as hazard identification, behavior-based safety programs, workplace ergonomic improvements, etc. as well as look after each other when it comes to safety.



We are Transparent



ZFFCN Trustline

We provide an anonymous grievance mechanism for compliance breaches such as anti-trust, money laundering, labor related topics, human rights and other values.

All submissions made in good faith can be done so without fear of retaliation.

zffcn.meldestelle.compliance-center.eu/

ZFFCN needs accurate reporting of information in order to make responsible business decisions

Accurate record keeping and reporting helps us meet our legal and regulatory requirements. Maintaining financial and legal integrity also reflects positively on our reputation and credibility. Each of us – at every level of our Company – has a responsibility for ensuring the accuracy of all Company records.

From resumes, time sheets and benefit claim forms to expense reports, quality assurance records, budget forecasts and regulatory filings, we all handle Company records. Be sure to follow all internal processes, policies and generally accepted accounting principles so that our records accurately reflect all transactions. Be honest, accurate and complete in what you record. Correct time recording protects against exploitation.

Many employees regularly use business expense accounts, which must be documented and recorded accurately. If you are not sure whether a certain expense is legitimate, check with your supervisor.

All of ZFFCN's books, records, accounts and financial statements must be maintained in reasonable detail, appropriately reflect our transactions and conform to ZFFCN internal controls and legal requirements. All unrecorded or "off the books" funds or assets are not tolerated.

Business records and communications often become public and we should be careful to be accurate and thoughtful in what we say to avoid misunderstandings. This applies equally to e-mail, internal memos and formal reports. Records should always be retained or destroyed according to our record retention policies. In accordance with those policies, if requested to retain records, you should do so until the Legal & Compliance Department informs you retention is no longer necessary.

In the World

We are Trusted Partners

Be fair and honest in your interactions with customers, suppliers, consumers and business partners

Our suppliers, customers, consumers and other business partners place a great deal of trust in our brands and we strive to exceed their expectations. We see them as marketplace team members – essential to the growth and success of ZFFCN.

Integrity is not a unilateral obligation – it is a responsibility that we share with our suppliers and business partners. That is why we require our suppliers and business partners to adhere to our Business Partner Code of Conduct.

If you are responsible for a supplier relationship, help us ensure that we are doing business only with suppliers and business partners who share our commitment to doing what is right by including contractual provisions and, where applicable, supporting audits to ensure compliance.

If you are involved in selecting suppliers on behalf of the Company, make sure you are choosing objectively based on price, performance and quality of product or service provided. Follow all procurement requirements.

Be fair and honest in your interactions with customers, suppliers, consumers and business partners. Avoid anything that even looks like a possible conflict of interest and do not offer or provide anything to these business partners in exchange for an improper advantage for the Company.

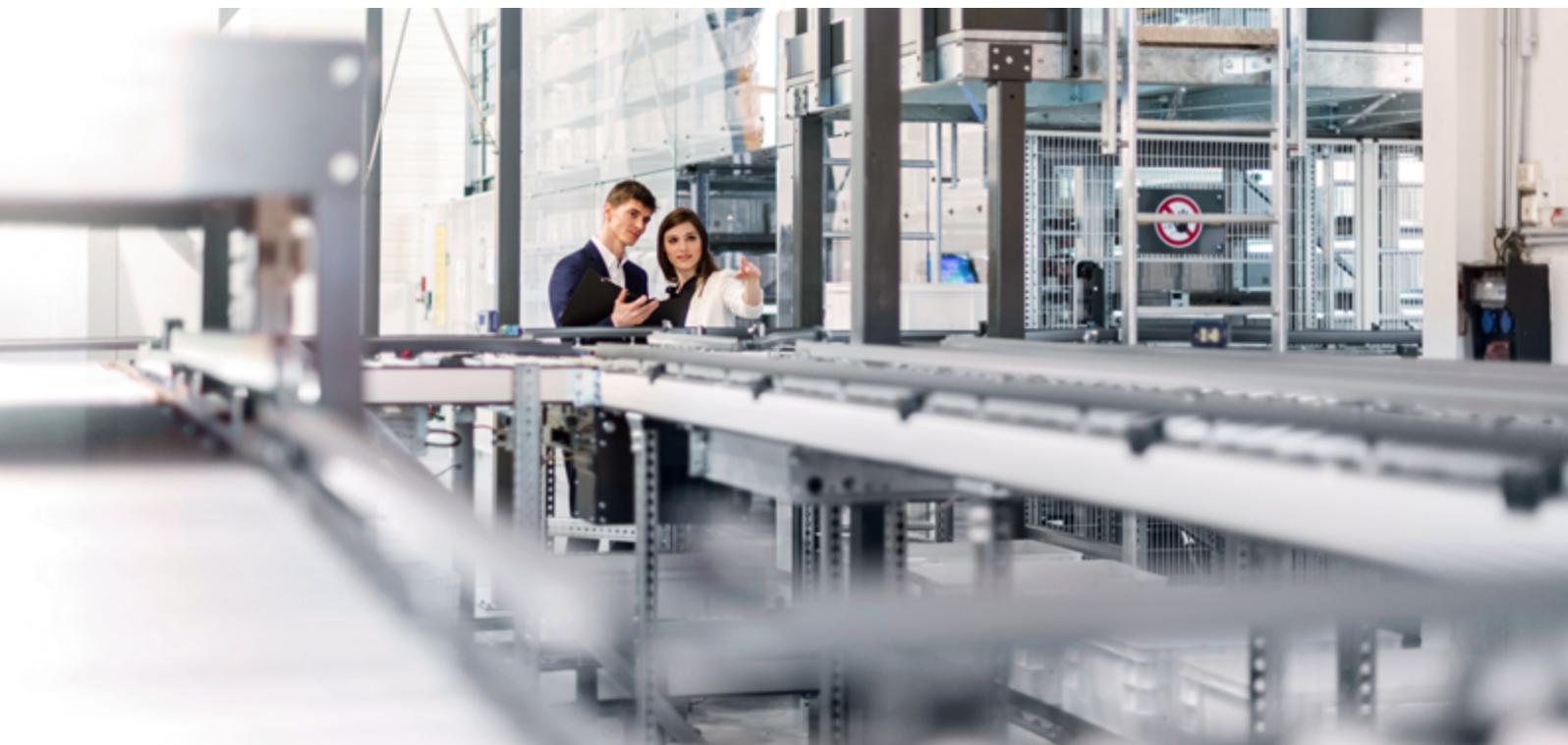
If you work with a supplier or business partner, make sure that they know about and uphold their commitment to our values and policies.

If you are aware of a potential or actual violation of any element of the Business Partner Code of Conduct, or the law, by a ZFFCN Business Partner, please report it to Legal & Compliance Department.



I'm responsible for hiring a new design partner. Coincidentally, a friend runs a design business – can I hire him?

You should disclose this potential conflict of interest to your manager to eliminate any impression of impropriety.





We are Fair

Our moral compass guides us to make fair decisions without exception

ZFFCN seeks to compete fairly and honestly and in full compliance with applicable laws and regulations, including international antitrust and competition laws.

In particular we do not tolerate:

- Anticompetitive agreements or collusion with actual or potential competitors, including but not limited to agreements aiming at fixing prices or price components, limiting the type or quantity of products or service delivered, rigging bids or subdividing markets;
- Abuse of a leading market position;
- Vertical agreements which deter, prevent or restrict fair and free competition in violation of applicable laws.

Our competitive position is based solely on our business success factors, especially emission reduction, vehicle safety, automation and data. You should deal fairly and respectfully with ZFFCN's customers, suppliers and competitors. Stealing or otherwise taking proprietary or trade secret information without the owner's consent is prohibited.

We should not take advantage of anyone through unfair dealing practices such as:

- Abuse or disclosure of privileged information;
- Misrepresentation of material facts;
- Collusion with competitors on pricing and other terms;
- Violating fair bidding practices including bidding quiet periods, or providing information to benefit one vendor over others.

Such practices may also be illegal.

ZFFCN carefully manages our engagement in government affairs and the public policy process and has internal teams

that coordinate those efforts. Strategic decisions about advocacy are made at the highest levels and only approved personnel participate in this process.

We may engage in policy discussions where they matter to our business and customers, in areas including privacy, intellectual property and sustainability. Here, we strive to help policy makers at every level of government understand our products, our innovations and our business.

We never attempt to gain an unfair advantage through lobbying practices.

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



A local well known politician wishes to hold a media event at one of our facilities – can I approve it?

ZFFCN is non-partisan – refer the decision to the appropriate internal department.



On a business trip, I am presented with an expensive watch, can I keep it?

An expensive gift cannot be accepted.

For any questions, consult with your manager, Compliance Delegates, Compliance Officer or Legal & Compliance Department.

We Are Ethical

Whether a decision is ethical and legal or not should be the guiding question for every ZFFCN employee and officer. ZFFCN provides trainings on regular basis for employees on ethical and compliant behaviour

Corruption is banned by international conventions, national laws and internal guidelines. ZFFCN does not tolerate any form of bribery among employees or business partners, or any business practices that could create the impression of improper influence. This applies irrespective of any alleged regional customs.

The purpose of gratuities, whether business entertainment or gifts involving customers, suppliers, or other business partners is to create good will and good working relationships, not to gain an improper advantage.

Gifts and entertainment can be improper, even if merely offered or requested, if they:

- Are cash or equivalent to cash;
- Are inconsistent with customary business practice;
- Are excessive in value;
- Could be seen as a bribe or payoff;
- Violates the law.

The offer or acceptance of cash gifts is prohibited. Please discuss with your Compliance Delegates, Compliance Officer or Legal & Compliance Department any gifts of significant

value or gifts that you believe may be inappropriate. Money laundering (i.e., using transactions to conceal the illegal source of funds or make such funds look legitimate) is strictly prohibited. Any suspicious activity that you believe might involve money laundering should be reported to Legal & Compliance Department.

Here are some examples of suspicious activity:

- Payments in cash;
- Payments made in currencies atypical given the circumstances or differing from what is listed in the contract;
- Requests for payment amounts that differ from what is required in the contract; or
- Payments made by an individual or a Company that is not party to the contract.

A conflict of interest exists when a person's private interest interferes in any way with the interests of ZFFCN.

A conflict can arise when an employee takes actions or has interests that may make it difficult to perform his or her work for ZFFCN objectively and effectively. Conflicts of interest may also arise when an employee, or members of his or her family, receives improper personal benefits as a result of his or her position at ZFFCN. It is almost always a conflict of interest to work simultaneously for a competitor, customer or supplier.

We Comply

We are proud to set high standards and our employees, processes and products comply with applicable legal requirements

We hold ourselves to the highest standards of legal and ethical conduct and are committed to making high quality products that are safe and comply with applicable laws, regulations and standards.

We expect everyone in our Company to know and understand the requirements that apply to the production and distribution of our products, services and technologies.

These principles are implemented through ZFFCN's policies, processes and structures, essential to driving our business forward.



Plan for the Future

We anticipate trends and regulatory requirements to ensure uninterrupted compliance group-wide.



We are Secure

You play a key role in helping us protect ZFFCN

Assets include ZFFCN's proprietary information (such as intellectual property, confidential business plans, unannounced product plans, sales and marketing strategies and other trade secrets), as well as physical assets such as cash, equipment, supplies and product inventory. Therefore, you must not use or share any of ZFFCN's confidential information for any purpose other than conducting ZFFCN business.

All non-public information about ZFFCN should be treated according to its confidentiality requirements.

- Watch what you say. Being aware of where you are, who is around you and what they might see or overhear is an important way we all can protect ZFFCN's confidential information.
- Protect our assets. Keep track of the assets and information that ZFFCN has entrusted to you and prevent loss, misuse, waste, or theft.

- Set an example. Model behavior that protects our assets and information at all times.
- Be alert and aware. As our first line of defense, you are part of the "Human Firewall" and able to make smart security decisions, building a barrier between Cyber criminals and our infrastructure.

If you have any questions, please consult ZFFCN's Corporate Security.

We respect everyone's right to privacy and protect the personal data of our employees, suppliers, customers and every other party with whom we have dealings.

We keep such data secure, use it only for the intended business purpose and do not keep it for longer than necessary.

Contact Data Protection: dataprotection.zffcn@zffcn.com



My manager asked me to log on to a Company system using her password to retrieve some reports – is this okay?

No. It is against ZFFCN policy to share passwords. You should remind your manager that you do not have access to this system.



We are Mindful

The basis of any good relationship is trust

When our customers do business with us, they place faith in the claims we make about our products.

Our relationships with our suppliers, customers, consumers and other business partners must be fair, positive and productive, and always based on mutual trust and respect. Building these relationships is an ongoing process and requires an enduring commitment to high standards of business conduct. In every interaction we have with these parties, we must demonstrate honesty and a commitment to our values.

We should always speak the truth. Everything we tell our customers, suppliers, consumers and other business partners must be truthful, including our product labels, advertising and other communications. Do not engage in any unfair, deceptive, or misleading practices. Reputations are hard won and easily lost.

Use social media wisely and communicate responsibly. If you comment about ZFFCN on social media, make clear you are not speaking on behalf of the Company. Never disclose confidential information about the Company, our customers, suppliers, competitors, or other business partners and never post anything that might constitute a threat, intimidation, harassment, or bullying.



How does this affect me?

If you are concerned that you may have sounded as though you were speaking for ZFFCN in a post, contact your manager or the Corporate Communications & Marketing team so that we can respond and minimize any harm that may have been done.



For the World



We Care for the Planet

We act in ways to prevent and minimize environmental impacts and create a more sustainable and better shared future

Sustainability at ZFFCN makes a difference in people's lives, communities and our planet.

In the fight against climate change, the actions of each of us matter. ZFFCN contributes to reducing emissions and protects the climate.

We contribute to the decarbonization goals along our value chain, together with our suppliers and business partners.

We respect our planet's natural habitat and are committed to conserving resources, reducing environmental pollution (including waste minimization and adapting circular economy principles) and preventing environmental damages, such as biodiversity loss, water and marine stress and microplastics.

This commitment to sustainable environmental protection forms a basis of our work.

According to these principles, we are committed to environmentally friendly product design, reducing the environmental impact of our business processes, continually improving our energy utilization and environmental efforts and establishing

ourselves as a global model. As a technology provider, ZFFCN continues to be dependent on the use of conflict minerals; however, we do everything that we can to reduce their share and to effectively exclude critical sources.



How does this affect me?

Do your part by using resources responsibly, helping to curb emissions, following environmental laws and regulations and participating in our sustainability, recycling and replenishment efforts.

We Protect Others

Characterized by mutual respect, trust, tolerance and fairness

We ensure that we act in accordance with human rights regulations, the principles of the UN Global Compact and recognized international labor and social standards, such as ILO and OECD Guidelines.

ZFFCN strongly believes in fostering in human dignity of all humankind and equality, mutual respect, trust, tolerance and fairness.

These principles apply to recruitment of new employees, to interaction with and encouragement of employees in their current role and to the professional promotion of our employees. We respect the dignity, privacy and personal rights of every individual.

Forced, imprisoned, bonded, indentured, or slave labor and all forms of human trafficking are prohibited as they take advantage of people who are not able to consent to their actions.

We reject any form of modern slavery, such as human trafficking, forced labor and exploitative child labor.

Work that deprives children of their childhood, their potential and their dignity and that is harmful to physical and mental

development, as defined by the International Labor Organization, is inconsistent with ZFFCN's values. At ZFFCN, we always observe the minimum age for employment stipulated in national legislation.

We focus our efforts to create a climate between our employees and our business partners that is characterized by mutual respect, trust, tolerance and fairness.

Upholding human rights as our social responsibility means that observing and complying with the law is a matter of course. We have a duty to observe the law under which we operate in all our business decisions. This also includes human rights issues in the supply chain. ZFFCN has undertaken a "Commitment to Remedy" any violations once identified.

We adhere to the relevant regulations concerning fair working conditions, including freedom assembly, freedom of association, and collective bargaining. We promote social security in our sphere of responsibility and respect the right to freedom of opinion and freedom of expression.

Think about the impact that your work has on people. If you think that there may be any negative impact to anyone inside or outside of ZFFCN, contact your manager, your workers representation or the ZFFCN Trustline.





We are Here to Help

Employees who have any questions or doubts on behavior in compliance with the aforementioned rules can contact their supervisor at any time. Additionally, they can contact the Compliance Organization, which is available to support our employees in all Compliance matters.

In addition, ZFFCN has supplementary documentation to further clarify internal regulations and guidelines.

Contact Legal & Compliance Department
Email: compliance.zffcn@zffcn.com

We provide an anonymous reporting channel for compliance breaches through the ZFFCN Trustline:
zffcn.meldestelle.compliance-center.eu/

Our employees can find additional information on the intranet:
trw1.sharepoint.com/sites/ChassisModulesInfo-Hub/SitePages/Compliance.aspx



ZF Foxconn Chassis Modules GmbH

Grosshandelsring 3 · 49084 Osnabrueck · Germany
compliance.zffcn@zffcn.com