

	<b>CODE OF ETHICS &amp; SOCIAL RESPONSIBILITY</b>		MG-HR-001
Classification: Internal Document	Emission: 31/05/2017	Rev.:5, 01-05-2023	

## Introduction

Coindu develops its activity in the area of the automobile industry producing covers for automobiles. The sense and **orientation of Customer Service**, always trying to exceed your expectations; **A highly competitive and differentiating position** in the business market, - offering the most innovative and comprehensive solutions; As well as a demanding professionalism, where **integrity, ethics and management rigor are a norm**, based on a standard of conduct of all its Employees, Suppliers, Clients and surrounding Community, are part of the guiding and basic set of all its action.

Increasingly, the future of organizations and the respective external recognition is associated with their ability to be in business world achieving positive results in an integrity, reliable and responsible way in the most absolute and demanding legality.

That is our position: a strong sense of social responsibility and an active and permanent concern with the environment - Customers, Shareholders, Employees, Suppliers and Community - we are doing everything to honour the commitments and meet the expectations.

A key tool to achieve and to keep us aligned with the positioning expressed, is the Code of Ethics & Social Responsibility, which contains the guiding principles of Coindu everyday professional action.

## General Principles

### 1. Legality and Compliance

Coindu and all their workers, or related to it professionally, are obliged to act always within the strictest legality, fulfilling and enforcing all legal rules applicable to their activity.

The daily professional activities should be characterized by full compliance with the current context regulations, a relentless quest to do well and to safeguard the good name and image of the organization.

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## 2. Statutory Goals

The knowledge of the statutory objectives of Coindu, alongside the lawful and efficient way to achieve them, it should be a concern of all Coindu workers, at the different levels, and, most particularly, it's Top Management Team.

## 3. Social Responsibility

The Coindu has not only an oriented attitude for business purposes and the lawful scope of the profit, but also gives special attention directed to the surrounding community.

Coindu is committed to the well-being of the wider global community in which they are involved and to embracing standards of ethical behaviour that are socially and environmentally responsible.

The sense of solidarity and active assistance translates into a keen interest, together with the different social and economic actors in meeting pragmatic solutions that lead to a more balanced society and a better quality of life.

Coindu respect the local culture by supporting and promoting initiatives involving local institutions, populations and communities in general.

## 4. Sustainability

The Coindu follows eco-efficient behaviours in order to contribute to the sustainability of the company and the business itself. This attitude is translated into concrete actions, framed in the current action program every time. The objective is to be an industry leader in health, safety and environmental practices and it is Coindu expectation that the suppliers show the same commitment towards minimizing their own impact on the environment, while also providing safe and healthful working conditions.

The products available to the market demonstrate the commitment of Coindu for a perspective of civil and environmental responsibility, especially to minimize the impact of waste and energy efficiency.

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## Ethical Commitments

### 5. Impartiality and independence

The Coindu guides its activity by the principles of transparency establishing the internal conditions for their employees to participate in decision-making processes that are involved in an impartial and independent form, adopting the attitudes and recommendations which are considered technically more appropriate to the organization.

The impartiality and independence implies that whenever there are potential conflicts of interest, whether with shareholders, customers and / or suppliers, the employee must give them immediate and thorough knowledge to Coindu, in order to refrain any other form of action (see point 23).

This binding behaviour is extended to all potential conflicts of interest arising from family relationships or any other affective nature, which can distort an overall objectivity and independence in the decision-making process.

### 6. Honesty and Integrity

All those involved in Coindu activity should act professionally and with integrity and honesty, avoiding any action likely to undermine colleagues or any entity that relates to Coindu, or create any atmosphere of mistrust that affects the image and good name of Coindu and its employees.

It's not allowed any practice of corruption in all its active and passive forms, either through acts and omissions or through the creation and maintenance for favours or irregular situations.

Coindu and its employees shall not pay, monetary contributions behalves Coindu name that could be interpreted as a way of obtaining improper advantage in their business.

It is not allowed to receive any offer from third parties, even if the offer is symbolic, that can be considered as an attempt to influence COINDU or the employee. In case of doubt, employees shall notify in writing the situation to their superiors. The offers received cannot exceed the value of € 25.

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The Coindu and its employees undertake to report illegal practices, immoral or illegitimate, referring to the activity of Coindu, which may interfere with their economic, environmental or social situation.

The Coindu and its employees will not participate or agree with actions funds diversion or property resulting from Coindu activity, for personal investment or applications and unlawful benefit.

#### 7. Loyalty

Coindu acts in a totally loyal and direct way with those who interact with it, looking reasons for its decisions so that they are not likely to lead to misunderstandings.

Employees should ensure a direct and loyal relationship with all Customers, Suppliers, Colleagues and Hierarchies.

#### 8. Secrecy and Confidentiality

Coindu and their workers, keep full secrecy and confidentiality of any kind of information to which they have access by virtue of qualifying relationship with the different entities which they interact and information with restricted character, and it is not of the normal and regular knowledge of the general market. Coindu and all that works there, as well as suppliers, keep secrecy under any and all information.

#### 9. Full Compliance with the Obligations

Employees internalize the importance that covers the fulfilment and timely compliance with obligations to business success, especially toward customers, striving for all means at its disposal to ensure the result, provided they are safeguarded by law.

#### 10. Recognition and Respect for Diversity and Human Rights (non-discrimination)

Coindu is a plural and open entity, recognizing and actively respecting diversity in religious, ethnic, social, sexual, politics or any other nature, considering that diversity is a factor that's induce growth and business innovation.

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Employees adopt an attitude of full respect and personal regard for those with which they interact, regardless of their origin, creed and political and trade union, as specified in Work Code.

Coindu is an equal opportunities employer and all co-workers receive equal fair treatment. The aim is to ensure that all of the workers have equal access to development, career progression and opportunities within the unit. Coindu also ensure that all workers are treated with respect and dignity and will not suffer discrimination on the basis of race, religion, gender, sexual orientation, ethnicity, nationality, colour, marital status, age, disability, union orientation, or any other reason, in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, termination and retirement (see ILO Convention n° 100, 111).

Non-discrimination in disease: COINDU will not discriminate against any workers that have been victims of an infectious disease. The rights of our workers are fully guaranteed, overlapping the value of life and common welfare of our workers and families. If the health of the workers is at stake, the Medical Services will take the necessary measures to safeguard the health of all workers and families and of the community in general, while giving the necessary support for the recovery of the victim.

Coindu recognises that everyone is different and we believe that diversity is vital to Coindu success.

#### 11. Commitment to the transmission of values

The transmission of constructive values, oriented to foster professional and personal attitudes are inducers of a grounded work environment and team spirit and cooperation, this is a concern and recurring bet of Coindu and as well of all the workers.

### **Professional Commitments**

#### 12. Demanding and Rigour

Employees have a professional attitude of demanding and rigour, looking to do well at the first time, and transmitting repeatedly that level of personal requirement and efficiency to the teams to which they belong.

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They recognize that the success of Coindu is founded on professional successes of each one its employees and that they are only possible to achieve with great personal commitment, dedication and strong sense of responsibility.

### 13. Training and Qualification

The Coindu adopts a positioning of continuing improvement, providing a structure collection of suggestions that are assessed and treated by Human Resources, having in account the individual needs of each one of the workers.

New employees will be subjected to a training period, during which they will receive specific preparation for the performance of the duties assigned to them. Training is an ongoing process and must be understood as an important qualifying factor for all employees and of vital importance in the quality of the products produced in the company, as advocated in the labor code.

### 14. Attendance and Punctuality

All who work in Coindu should engage deeply in attendance and punctuality, to adequately carry out the duties and timely fulfilment of deadlines with clients and with all entities which interacts.

### 15. Tools and Work Environment

In production areas, clothing rules should be respected in accordance with the activities of processes. Hygiene and Safety at Work (HSW) will ensure the compliance of this obligation, providing the equipment deemed necessary for each area, according to the existing risk matrix in the company.

The different work tools placed by Coindu available to its employees, will be used by these diligently and appropriately, seeking to share resources and avoid any deterioration and returned on the date they leave the company.

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Employees will be careful in the use of limited resources and with significant economic cost, promoting in the team that they are part, a demanding spirit in its maintenance and custody, recognizing that associated with the deterioration of the available means, is the degradation of Coindu work environment and image an also of who works there.

Coindu ensures the compliance with the standards for safety, health, hygiene and wellness in the workplace. All employees should know, comply with, and enforce the rules relating to this matter and report any non-conformities verified.

With regard to IT, employees respect the "Information Security Policy".

#### 16. Communication

Employees are, by nature, positive and constructive communication agents with which one they interact.

The flow of communication should be open, free and conductive to the transmission of an innovative and positively image, differentiating Coindu and all who work in it.

### **Labour & Social Policies**

#### 17. No Child Labour

COINDU does not accept child labour. All measures to prevent child labour shall be implemented taking into account the best interests of the child.

Coindu under any circumstances uses child labour, and take the appropriate measures to ensure that no child labour occurs at their own place of production or operations or at their sub-contractors' place(s) of production or operations. The minimum age for employment shall be the country legal minimum age, or the age for completing compulsory education in that country, whichever is consider adulthood.

#### 18. No Forced Labour

COINDU does not, in any circumstance, resort to forced or compulsory labor. Forced labor is any work or service that is imposed upon any person under the threat of a penalty

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or sanction, and the person acts against his own will. Forced labor may include several practices such as:

- Restrict people's movement;
- Withhold wages or identity documents to force them to remain at work;
- Involve them in fraudulent debts from which they cannot escape in order to deduct amounts from their salary;
- Make payments in kind that jeopardize their livelihood;
- Deprivation of food, shelter or other necessities;
- Loss of social status; among others (see ILO Convention 29, 105).

Coindu ensure that workers understand their rights with regard to payment of wages, overtime, retention of identity documents, etc. Migrant workers, workers who are part of a group that has suffered from longstanding discrimination, young people and unskilled or illiterate workers, and women among these groups, constitute populations which may not be aware of their legal rights.

Therefore Coindu ensure that workers are treated fairly and their rights are respected. In the case which workers are recruited by third parties, Coindu pays particular attention that these principles are properly applied.

#### 19. Harassment

All Coindu employees have the right to work in a harassment free environment. It includes, but is not limited to, sexual, racial or other intimidation, discrimination or abuse, as well as acts or threats of physical violence.

Harassment is characterized as any abusive behaviour - gestures, words, attitudes, confrontational behaviours, discrimination, devaluation, humiliation, maltreatment and behaviours of undesirable sexual connotation, which offends the dignity and / or physical, psychological and moral integrity of their performance and professional progress, violating their constitutionally guaranteed right to work and employment (Paulos, 2009).

Harassment also includes defamation, offensive comments, jokes, and other visual, verbal, or physical conduct, including electronic communications which may create an intimidating, hostile, or offensive work environment.



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These behaviours are subject to disciplinary processes, and the applicable laws and directives regarding harassment, abuses and disciplinary procedures, presented in the Labour Code. To do so, they may be reported through the complaint channel available at <https://coindu.protecaodedenunciantes.com/#/> or to [compliance@coindu.com](mailto:compliance@coindu.com). Complaints submitted will be assessed by the COINDU Whistleblowing Team (see point 24).

## 20. Wages

Coindu complies with all applicable laws and regulations, including those relating to minimum wages, overtime hours and legally mandated benefits.

Wages are always paid on the last working day of each month.

## 21. Freedom of Association

Coindu respect the right of association, form and join workers organization they freely choose to represent them, in the various business processes, this in strict compliance with the legal provisions on this matter.

Coindu ensure that representatives of such personnel are not subject of discrimination and that such representatives have access to their members in the workplace as well as adequate working space in order to work effectively and without interference (see ILO Convention n° 98/87).

Where the right to freedom of association and collective bargaining is restricted under law, Coindu provide workers a parallel mechanism to make their views known to the management, and take those into consideration.

## **Knowledge and Disclosure**

## 22. Conduct and Attitude

The employees only begin their activity in COINDU after previous knowledge of the Code of Ethics & Social Responsibility, committing to comply with the principles expressed in it and signing a register as they became aware of it.

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Each employee will be a permanent agent of dissemination of these principles through its everyday professional conduct and personal example.

### 23. Non-conformities

Any individual behaviour that does not comply with the principles of this Code of Ethics or that violates any of the behaviours linked under it, shall be liable to disciplinary proceedings.

### 24. Participation of Violations of the Code of Ethics & Social Responsibility

Any employee or other interested party may submit, provided in good faith and duly substantiated, cases that constitute violation to compliance with the standards of conduct established in this Code.

COINDU has implemented a Whistleblowing Channel, in compliance with the legal regulations in force, under the Whistleblower Protection Policy accessible at <http://www.whistleblowingofficer.com/coindu/regulatory-norms/whistleblower-protection-policy/>.

The complaints submitted will be examined by the Team in Charge of Handling Complaints at COINDU, which can be contacted at the email address [compliance@coindu.com](mailto:compliance@coindu.com).

Immediate action will be taken as deemed appropriate and at all stages of the process, the confidentiality required for a proper analysis will be maintained.

COINDU's Whistleblower Platform is accessible at <https://coindu.protecaodedenunciantes.com/#/>.

### 25. Doubts and Contacts

If the employee has any questions regarding the best way to respond to a situation, they should consult with their supervisor or the responsible Resources Human of their unit, or through the contacts identified below:

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### Change Control:

Version	Date	Change	Resp.
Rev. 0	31-05-2017	First Emission	HR
Rev. 1			HR
Rev. 2			HR
Rev. 3	13-12-2019	Inclusion of Fuxin Unit's contacts	HR
Rev.4	15-12-2020	Inclusion on paragraph on Non Discrimination in Disease; Addition of each country's complaint email	HR
Rev. 5	01-05-2023	Change point about Participation of Violations of the Code of Ethics & Social Responsibility and point about Doubts and Contacts	QEMS