

**ARCHION
CODE OF CONDUCT**

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ARCHION - CODE OF CONDUCT

Our Guiding Principles

ARCHION's guiding principles shape how we design, build, and deliver solutions that move people and industries forward. They reflect our aspiration to create mobility that is smarter, safer, and more sustainable.

Impact

We strive to create meaningful impact through excellence in engineering, innovation, and performance. Our products and services aim to set benchmarks in quality, reliability, and customer value.

Sustainable Business

We focus on long term, resilient growth by investing in future ready technologies, strengthening supply chains, and acting responsibly across all stages of our operations.

Environmental, Social & Governance (ESG)

We integrate ESG principles into every stage of our operations. We work to reduce emissions, advance clean and energy efficient solutions, and contribute positively to society through road safety initiatives and community support. Strong governance and ethical conduct form the foundation of our business.

This Code of Conduct

The ARCHION Group including its controlled companies worldwide (collectively, "the ARCHION Group", "ARCHION" or "We") are committed to conducting business with integrity. The ARCHION Group's Code of Conduct is built with our Corporate Values in mind – a culture of ethics and compliance are fundamental to adhering to those Values and achieving our vision.

This Code of Conduct applies to all employees and all members of governing bodies of ARCHION Group entities (hereinafter jointly referred to as "**ARCHION Officers and Employees**"), as well as temporary workers, consultants and agents. We expect and work towards ensuring that our business partners, in particular suppliers and outsourced services partners, understand the ARCHION Group's values set out in this Code of Conduct and adhere to all applicable laws and regulations.

Our Expectations

This Code of Conduct defines the behavior that we expect from everyone in the ARCHION Group. As such, the provisions contained in this Code of Conduct are binding for all of us.

All ARCHION Officers and Employees should review and understand the ARCHION Group policies, procedures, and guidelines that are applicable to their job duties and complete required compliance training programs. These training programs provide essential instruction on the compliance areas set out in this Code of Conduct, and equip all ARCHION Officers and Employees to meet ARCHION's ethical, legal and regulatory obligations. We expect everyone to work together to contribute to an environment that maintains the highest ethical standard in conducting our business.

Expectations for Managers

Above the expectation which we place on all ARCHION Group employees, ARCHION Group managers should act as leaders within the ARCHION Group. This means not only living by the principles set forth in this Code of Conduct, but also creating a positive work environment which prioritizes compliance, where all ARCHION Officers and Employees are comfortable raising

concerns. If compliance issues are reported to managers, it is their responsibility to encourage employees to follow the applicable local reporting procedure or, if none, promptly report the issues to Human Resources, the Legal and Compliance Department or through ARCHION's Whistleblowing channels. If employees raise compliance issues but are not comfortable following the applicable reporting procedure, it is the manager's responsibility to report. They should keep matters confidential and not attempt to investigate issues themselves. Any direct or indirect retaliation against any ARCHION Officer or Employee for reporting a compliance issue is prohibited.

PRINCIPLES FOR WORKING TOGETHER

1. DIVERSITY, EQUAL OPPORTUNITY AND INCLUSION

ARCHION values diversity and inclusion, recognising the uniqueness of every individual as a strategic advantage. We commit to treating everyone with dignity and fairness, embracing all dimensions of identity. Our culture fosters trust, respect, and professionalism, enabling all to reach their potential. We respect local customs while upholding our shared values.

Discrimination, workplace harassment, and exclusionary behaviours are not tolerated. Inclusive behaviour (as defined below) is essential to our collaboration and innovation globally.

* Inclusive behaviour refers to an inclusive and embracing mindset and approach that enables all individuals -regardless of differences such as age, gender, disability, nationality, religion, or sexual orientation - to participate in society and thrive.

2. WORK-LIFE BALANCE, AND OCCUPATIONAL HEALTH

ARCHION is committed to supporting work-life balance and prioritising the safety, health, and wellbeing of all ARCHION Officers and Employees. We ensure compliance with relevant laws and take swift action to address any unsafe working conditions. Behavior which jeopardises workplace safety, such as use of intoxicating or impairing substances at work, is not tolerated.

We aspire to foster a healthy, sustainable, and engaged workforce. We value and protect ARCHION Officers' and Employees' physical and mental health. Where possible, we offer flexible work arrangements and reintegration support, as well as other internal programs such as preventative health services to support ARCHION Officers and Employees .

3. DREAMS, GOALS AND DRIVING FORCES

ARCHION supports the goals of our colleagues and other partners and work together to achieve them with a sense of collective ownership. We will periodically reflect on our goals with the benefit of past experiences and learn from our successes and failures. We always strive to improve, and we are committed to the development, education and qualification of all ARCHION Officers and Employees.

4. CONSTRUCTIVE COLLABORATION WITH EMPLOYEE REPRESENTATIVES

ARCHION is committed to constructive engagement with employee representatives and unions, recognising that open and respectful social dialogue supports both business sustainability and employee interests. We respect lawful union activities, promote transparent communication, and encourage meaningful employee participation.

We do not tolerate obstruction, intimidation, or retaliation against ARCHION Officers and Employees or their representatives. Actions undermining good-faith dialogue or bypassing

consultation processes are not supported. We aspire to build mutual trust and strengthen our social license through respectful collaboration.

5. MUTUAL VALUES WITH BUSINESS PARTNERS

All ARCHION business partners – sales partners, suppliers, and their affiliates – must comply with all applicable laws and regulations.

We conduct risk-based due diligence and ongoing compliance monitoring of our business partners to ensure that our ethical standards are upheld. We require our business partners to conduct business in a compliant and ethical manner. Any concerns regarding integrity or potential violations of applicable laws or regulations by our business partners may result in legal action against or termination of the business relationship. We do not support partnerships that compromise our ethical standards or legal obligations.

We build relationships with our business partners in a transparent and ethical manner, and through those relationships we promote sound and sustainable mutual growth.

6. RESPONSIBLE USE OF COMPANY RESOURCES

The ARCHION Group's physical and intangible assets are vital to its success and must be used solely for legitimate business purposes, in line with laws and internal policies. All ARCHION Officers and Employees are responsible for using these resources appropriately, efficiently and sustainably. Wasteful or improper use diminishes assets and can harm the Group's reputation. All use of company resources should reflect prudent and economic practices.

7. SPEAK-UP CULTURE AND WHISTLEBLOWER PROTECTION

ARCHION is committed to integrity and encourages ARCHION Officers and Employees to report any potential violations through managers, Human Resources, Legal, Compliance, or the Whistleblowing system, which ensures confidentiality and fairness for all parties involved.

The ARCHION Whistleblowing system is also open to all business partners and third parties which interact with the ARCHION Group. All reports are investigated thoroughly to facilitate appropriate corrective action, and data protection laws are observed.

In accordance with all relevant laws, we prohibit retaliation against anyone reporting concerns in good faith or assisting in investigations, and we foster an environment in which all ARCHION Officers and Employees feel comfortable reporting their good faith concerns while ensuring that all individuals who are subject of allegations are treated with fairness and respect. ARCHION Officers and Employees are required to cooperate with any investigations when requested.

8. LEARNING FROM FAILURES AND MISTAKES

At ARCHION, we recognize that mistakes can occur in complex and fast-moving environments. What matters is how we respond. We address failures openly and constructively, focusing on identifying root causes, preventing recurrence, and improving our products, processes, and culture.

We encourage ARCHION Officers and Employees to report concerns without fear, and we treat everyone involved - including those who made or are affected by mistakes - fairly, respectfully, and in accordance with our values and the law. By fostering a culture of

transparency, responsibility, and continuous improvement, we turn setbacks into opportunities for learning and long-term progress.

9. RESPONSIBLE USE OF SOCIAL MEDIA

ARCHION Officers and Employees must use social media responsibly, upholding ARCHION Group's core values and reputation. We do not disclose confidential or proprietary information about the company, customers, or partners. Any communication that could be perceived as offensive, derogatory, or damaging to the company's reputation is prohibited.

All social media activity must adhere to laws, regulations, and internal policies. Official company communications on social media require approval from Corporate Communications or the Public Relations Department. Further, any use of the ARCHION Group's names, logos, or branding materials on social platforms requires prior authorisation.

10. RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE

Responsible use of Artificial Intelligence ("AI") is essential, requiring compliance with all applicable laws, regulations, and the best interests of ARCHION Group, clients, and employees.

AI outputs should be treated with caution - we always verify their accuracy before relying on them. Significant use of AI must be disclosed to supervisors or reviewers, with clear attribution if used in work. We never input confidential, sensitive, or customer-related data into AI systems unless explicitly authorised. Transparency, accuracy, and data protection are critical when deploying AI technologies.

COMPLIANCE WITH LAWS, REGULATIONS AND STANDARDS

11. PRODUCT SAFETY AND REGULATORY COMPLIANCE

ARCHION is dedicated to ensuring product safety and compliance at every stage of production and service process, adhering to all relevant laws, standards, and regulations. We employ our Product Compliance Management System (PCMS) to ensure all products meet applicable requirements and we record and retain thorough documentation.

We investigate and address product safety, regulatory conformity and emission of the greenhouse gases (hereinafter collectively "SCE") concerns thoroughly and we prohibit non-compliance with applicable vehicle laws and regulations as well as with ARCHION's internal policies and business standards relevant to "SCE". Our commitment to safety and compliance is constant and uncompromising.

12. TAX AND CUSTOMS OBLIGATIONS

ARCHION complies with applicable tax, customs, and trade obligations in markets where we operate, upholding integrity and transparency in fiscal matters. We adhere to relevant laws and submit accurate, timely declarations, supported by complete records.

Tax evasion, customs fraud, and any practices that undermine fiscal integrity are not tolerated. Our aspiration is unwavering compliance, recognising that fiscal integrity underpins the trust of stakeholders and the sustainability of our business.

13. **ACCOUNTING AND REPORTING**

ARCHION complies with applicable laws and regulations for proper accounting as well as financial reporting. We maintain transparent, accurate and complete business and financial records because irregularities may have serious consequences for ARCHION and any ARCHION Officers and Employees responsible.

14. **FAIR TRANSACTIONS AND ANTITRUST COMPLIANCE**

ARCHION is committed to fair, ethical competition and compliance with antitrust and competition laws. We avoid anti-competitive practices such as price-fixing, bid rigging, and unlawful information sharing. Business is conducted fairly, respecting contractual terms. We protect confidential information shared by business partners. Interactions with competitors and trade associations are carefully managed and documented.

15. **FOREIGN TRADE LAWS AND SANCTIONS**

ARCHION complies with the applicable national and international sanctions, export controls, anti-money laundering, and counter-terrorism financing laws. We implement robust policies, procedures, and due diligence to address these risks and only conduct business with reputable counterparties. We do not engage in or support efforts to circumvent these laws or work with sanctioned or illicit entities. Our commitment to vigilance and compliance safeguards our reputation and ensures continued global market access.

16. **DATA PROTECTION AND CYBERSECURITY**

ARCHION considers data protection and cybersecurity as ethical imperatives and strategic priorities. We comply with all relevant data privacy laws, apply thorough standards, and continuously strive for improvement. Personal and sensitive data are safeguarded through robust security practices embedded in our operations. We analyse data only within legal and transparent boundaries. The misuse of data or insufficient protection of data is not tolerated. ARCHION Officers and Employees and partners are expected to handle data carefully and lawfully and remain vigilant against data security risks.

17. **INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION**

Intellectual property and confidential information are critical assets for ARCHION. We safeguard our patents, trademarks, and know-how against misuse. Equally, we avoid unauthorized use of third-party intellectual property.

We protect ARCHION's intellectual property and confidential information through secure practices, ongoing security awareness and compliance with company policies. Security is prioritized in all technology and information handling.

18. **INSIDER TRADING PREVENTION**

Insider trading is prohibited at ARCHION. ARCHION manages inside information in its possession to ensure that it is not improperly disclosed or used for securities transactions. Examples of possible inside information include: Changes in earnings projections, important merger, partnerships or takeovers, significant technical innovations, and important changes in management organization.

Until the inside information is published in the legally required manner, such information is only made available to those ARCHION Officers and Employees who require it to perform their duties. ARCHION Officers and Employees with access to inside information are

prohibited from using such information (directly or indirectly) for securities transactions that may be affected by the confidential information.

19. ANTI-CORRUPTION AND ANTI-BRIBERY

ARCHION enforces a zero-tolerance stance on bribery and corruption. All ARCHION Officers and Employees and partners must comply with anti-corruption laws, maintain transparent, accurate and complete financial records, and act with integrity. Bribery – including offering or accepting anything of value to improperly influence decisions – is prohibited, whether involving government officials or commercial parties. Reasonable gifts and entertainment may be permitted when compliant with applicable laws and local business culture, but anything that could be perceived as creating undue influence is not allowed. Facilitation payments - which are small payments made to public officials to expedite routine actions - are prohibited, whether made directly or indirectly.

Bribery and other forms of corruption are prohibited both by national laws such as the Japanese Criminal Code and the Japanese Unfair Competition Prevention Act, and international laws such as the U.S. Foreign Corrupt Practices Act. Violations carry serious consequences for both individuals and the company.

20. CONFLICTS OF INTEREST

When acting for the ARCHION Group, we avoid any actual or perceived conflicts between personal interests and company interests. Examples of such conflicts include seeking personal gain from customers or partners, holding outside employment with clients or competitors, or engaging in business with friends or family.

We do not let our personal or private financial interests influence business decisions, and we disclose any potential conflicts to management, our supervisors or Human Resources in advance for resolution. In case of uncertainty, we raise it with our supervisors or Human Resources, who can request guidance from the Group Compliance function if required.

CONTRIBUTIONS TO OUR CUSTOMERS AND SOCIETY

21. HUMAN RIGHTS AND LABOR STANDARDS

ARCHION upholds internationally recognised human rights, adhering to the United Nations Guiding Principles on Business and Human Rights and International Labour Organization core labour standards. We ensure a safe, inclusive, and discrimination-free workplace, respecting all forms of diversity. Child labour, forced labour, modern slavery, discrimination, and any human rights violations are rejected.

We are committed to continuous education, fair treatment, and respect for individual and cultural differences. Our business partners are expected to observe these standards, and we fulfil our due diligence responsibilities regarding human rights across our operations.

22. ENVIRONMENTAL PROTECTION

ARCHION is committed to environmental stewardship and integrates sustainability into all aspects of our business. Our goal is to create eco-friendly, energy-efficient products across the value chain and comply with relevant safety and environmental laws. We continuously leverage technology to minimize emissions of the greenhouse gases and reduce our environmental impact. Our operations consider the entire product lifecycle, from design to disposal and recycling. We work with an awareness of environmental issues such as air

and water pollution and climate change. We consistently seek ways to reduce our footprint and energy use, and transparently report on our environmental performance and initiatives.

23. **ROAD SAFETY**

ARCHION promotes road safety by observing all relevant road safety laws and regulations. We drive in an exemplary manner as members of the automotive industry. We will also strive to further enhance road safety through product development and improvement.

24. **CORPORATE CITIZENSHIP**

ARCHION is dedicated to advancing societies globally through Corporate Citizenship, focusing on Community Engagement and upholding Compliance and Integrity. We take proactive action to solve social issues. We support local communities via ethical business practices, charitable giving, and volunteering, ensuring donations go only to recognised charitable organisations with no expectation of return. All donations must comply with legal and internal standards, with political donations requiring special approval. We actively encourage and support employee volunteering efforts in the regions where we operate.