

# Fémalk Zrt. Supplier Code of Conduct – Ethics, Sustainability and Information Security

Validity: August 28, 2026.

Karlheinz Braisch  
CEO

| Dokument       |              |
|----------------|--------------|
| Prepared by    | Varga Andrea |
| Classification | Public       |
| Version        | 1            |

# FÉMALK Zrt. Supplier Code of Conduct

## Ethics, Sustainability and Information Security

FÉMALK Zrt. is committed to sustainable development and ethical business conduct. Our goal is to maintain the high quality and competitiveness of our products and services while continuously optimizing our environmental footprint and corporate processes. We believe that long-term success can only be achieved together with responsible partners. Therefore, we expect our suppliers and partners to share these values and to conduct their activities in accordance with the principles set out below

The provisions listed herein supplement the **General Terms and Conditions (GTC)** of FÉMALK Zrt. and the provisions set forth in specific business contracts.

### 1. General Compliance and Integrity

- The Supplier guarantees that all statements made prior to the conclusion of the contract are true and accurate.
- The products supplied and services provided comply in all respects with applicable environmental and other legal requirements.
- **Monitoring Changes in Legislation:** The Supplier shall continuously monitor changes in legislation and industry standards affecting its activities and products and shall proactively take the necessary measures to ensure ongoing compliance with such requirements.
- **Authenticity of Documents and Certificates:** The Supplier warrants the accuracy and authenticity of all certificates, attestations, test and measurement reports, and declarations of conformity provided by it, and undertakes to promptly provide the supporting documentation in the event of an inspection by an authority or the customer.
- **Sanctions Compliance and Export Controls:** The Supplier shall comply with applicable international trade restrictions, embargoes, and economic sanctions lists.
- **Business Continuity:** The Supplier shall endeavor to maintain appropriate emergency and business continuity measures and plans to minimize disruptions in the event of unforeseen circumstances (e.g. machine failures, power outages, logistical obstacles, cyberattacks, or other crises) and to ensure continuous deliveries to FÉMALK Zrt.

### 2. Environmental Protection and Resource Management

FÉMALK Zrt. is committed to sustainable operations and therefore expects its suppliers to strive to minimize their environmental impact in the course of their activities. The Supplier shall fully comply with all applicable environmental laws and regulations. The Supplier undertakes to implement the following principles:

- **Emission Reduction and Energy Efficiency:** The Supplier shall, to the extent reasonably practicable, seek to measure and reduce direct and indirect greenhouse gas emissions, including Scope 3 emissions, improve energy efficiency, and increase the use of renewable energy sources.
- **Resource Efficiency:** The Supplier shall use energy-, water-, and raw material-efficient technologies throughout the entire production process.
- **Waste and Hazardous Materials Management:** The Supplier shall minimize environmental pollution, promote recycling, and ensure the safe and legally compliant handling of waste and hazardous materials.

- **Protection of Environmental Resources:** The Supplier shall protect the quality of soil, water, and air and ensure the responsible handling of chemicals.
- **Life Cycle Approach:** The Supplier undertakes to consider the full life cycle of procured products and services, minimizing the environmental impact arising from their production, transportation, use, and disposal. The Supplier shall also strive to implement an environmental management system (e.g. ISO 14001).
- **Chemical Safety and Materials Management:** The Supplier shall fully comply with all applicable legal requirements concerning conflict minerals and the REACH Regulation. In addition, the Supplier shall take all reasonable measures to substitute such materials and avoid their use wherever possible.

### 3. Business Integrity and Ethical Conduct

FÉMALK Zrt. has zero tolerance for the following unlawful activities and expects the same commitment from its suppliers:

- **Protection of Human Rights:** The Supplier shall prohibit all forms of child labor, forced labor, and human trafficking. Human Rights Due Diligence principles are expected to be taken into consideration throughout the supply chain.
- **Employee Well-being:** The Supplier is committed to fair remuneration and compliance with working time regulations. The Supplier has zero tolerance for discrimination, harassment, and physical violence. The Supplier shall ensure equal opportunities in employment and career development. Any form of discrimination is prohibited, particularly on the basis of race, gender, age, ethnic or national origin, religion or belief, disability, sexual orientation, or political or other opinion.
- **Occupational Health and Safety:** The Supplier shall provide safe, healthy, and fair working conditions for all its employees.

To this end, the Supplier shall:

- proactively prevent risks in order to avoid workplace accidents and occupational illnesses;
  - provide regular occupational health and safety training;
  - comply with all applicable occupational health and safety, health, and industry-specific laws and regulations.
- **Ethical Business Practices:** The Supplier shall take measures to prevent and combat corruption, bribery, fraud, embezzlement, and money laundering.
  - **Fair Competition:** The Supplier shall comply with applicable antitrust and competition laws and regulations.
  - **Data Protection and Confidentiality:** The Supplier shall protect confidential business information and personal data.
  - **Transparency:** The Supplier shall avoid conflicts of interest, prohibit insider trading, and refrain from any unauthorized political involvement or activities on behalf of FÉMALK.

### 4. Information Security, Cybersecurity and Ethical Whistleblowing System

FÉMALK Zrt. places particular emphasis on information security, with special regard to the stringent regulations applicable to the automotive supply chain and critical infrastructure. The Supplier undertakes to comply with the following requirements:

- **Information Security and Data Protection:** The Supplier shall implement appropriate physical, technical, and organizational measures (e.g. secure password management, access control, multi-factor authentication, and regular backups) to protect confidential information, data, designs, and prototypes received from or handled on behalf of FÉMALK Zrt. The Supplier shall ensure a level of protection that complies with applicable industry cybersecurity and data protection requirements, particularly those applicable to the automotive industry and critical infrastructure.
- **Incident Management:** The Supplier shall immediately notify FÉMALK Zrt. of any detected or suspected information security incident, cyberattack, or data breach that may affect jointly managed data, systems, or services.
- **Whistleblowing:** The Supplier acknowledges and accepts that acts endangering the integrity of FÉMALK Zrt.'s operations (such as fraud, corruption, or ethical or security violations) may and should be reported by employees of external partners and suppliers through the designated communication channels or whistleblowing system of FÉMALK Zrt. The Supplier shall encourage its own employees to engage in open and transparent communication and to report and help identify violations of applicable laws and regulations.
- **Responsible Use of Artificial Intelligence:** The Supplier shall ensure that business, technical, or intellectual property data originating from FÉMALK Zrt. is not uploaded to external, public, or unauthorized artificial intelligence (AI) tools and that AI is used in joint projects only within secure frameworks agreed upon with FÉMALK Zrt.

## 5. Responsibility in the Supply Chain

The above-mentioned expectations apply throughout the entire integrated supply chain. FÉMALK Zrt. expects its suppliers to encourage their own partners and subcontractors to adopt a similar approach, thereby ensuring that sustainability standards are upheld at every level.

## 6. Monitoring and Compliance

FÉMALK Zrt. reserves the right to verify compliance with the provisions of this Code through audits, requests for documentation, and/or the completion of supplier self-assessment questionnaires. In the event of any deviations or non-compliance, jointly developed corrective actions shall be expected in order to restore compliance.

## 7. Acceptance

By signing this document, the Supplier acknowledges that it has read and understood the provisions contained herein and accepts them, and further undertakes to comply with them and to communicate them to its subcontractors.

.....  
Date

.....  
Supplier