



# Code of Ethics

Howa-Tramico Europe

25th of July 2024

# Code of Ethics

Howa-Tramico Europe

## INTRODUCTION

At Howa Tramico Europe, we firmly believe that our success is built on strong ethical principles that guide every action we take. This Code of Ethics embodies our commitment to integrity, social responsibility, and respect for human rights in all our operations. It establishes the standards of conduct that every employee, partner, and supplier is expected to uphold, ensuring that we conduct our business in a transparent, fair, and respectful manner. By adhering to this Code, we reinforce our responsibility to our customers, employees, communities, and the environment, while supporting our mission to contribute positively to society and ensure a sustainable future.

Howa-Tramico's Code of Ethics defines the rules that must be applied to our day-to-day relations both internally and with outside parties.

The rules set out in this Code of Ethics are not exhaustive, combined with our employees' sense of responsibility, they establish the fundamental rules of business conduct and ethical guidelines applicable to all Howa-Tramico employees and partners.

These rules in no way replace any laws or regulations in force in the various countries where Howa-Tramico does business or the principles and rules arising from other internal policies and procedures applicable within the Howa-Tramico Europe Group.

Howa-Tramico Europe Group undertakes to respect and promote, through its business practices, a set of values and principles drawn from international documents and agreements relating to human rights, labor standards and the environment.

Changes within the Group combined with our customers' expectations, and new directions in Corporate Social Responsibility and sustainable development have been considered in the drafting of this Code of Ethics.

Moreover, the Code of Ethics is designed to reshape the Group's mission and cultural model to promote value creation. These resources help managers adopt an entrepreneurial mindset and act with the autonomy and authority needed to achieve performance excellence. In keeping with these objectives, the Code of Ethics served as inspiration for a new Code of Management presenting the behaviors expected of Group managers.

The Code of Ethics was initially drafted in 2018, revised in 2024. A copy of the document is provided to each new Group employee. It has been translated into the Group's main working languages and can be viewed on the Group intranet.

Each Howa-Tramico Europe Group employee and manager must comply with the Code of Ethics and ensure that it is distributed to all employees and that each employee adheres to it.

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## 1 EQUAL RIGHTS -WE RESPECT EACH OTHER

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### 1.1 RESPECT FOR HUMAN RIGHTS

Howa-Tramico Europe Group companies and their employees shall respect the laws and regulations in force in the countries in which they are based. Howa-Tramico Europe Group is committed to respecting and promoting the fundamental rights of the Universal Declaration of Human Rights, the dignity and worth of the human person, the privacy of employees and the equal rights of men and women.

### 1.2 ELIMINATION OF ALL FORMS OF FORCED LABOR

Howa-Tramico Europe Group undertakes to ensure freedom of choice in employment and to eliminate all forms of forced and compulsory labor, this considered as being the case whenever work is imposed by means of a threat (physical violence, non-payment of wages etc.). Howa-Tramico Europe Group ensures that its suppliers and partners adopt the same provisions.

### 1.3 PROHIBITION OF CHILD LABOR AND YOUNG WORKERS

Howa-Tramico Europe Group condemns and prohibits child labor and young workers.

Howa-Tramico Europe Group complies with national legislation and regulations governing child labor. In any case, it will not employ children under the age of 16, and complies with the provisions of the International Labor Organization regarding the health, safety and morality of young people aged between 15 and 18. The Howa-Tramico Europe Group ensures that its suppliers and partners adopt the same provisions.

How does this affect me?

All employees and managers are encouraged to actively participate in 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.

**“ALL TOGETHER FOR SAFETY”**

### 1.4 PROMOTION OF HEALTH AND SAFETY IN THE WORKPLACE TO ENSURE QUALITY OF WORK LIFE

Howa-Tramico Europe Group, as an employer, is committed to providing work conditions that complies with environmental, health and safety laws and regulations to keep employees healthy and not expose them to harm.

Occupational health and safety, however, depend on each and every one of us. Each collaborator must ensure that their actions do not entail or aggravate any risk for themselves or for others and must use the resources made available to them to continually enhance occupational health and safety.

Howa-Tramico Europe Group 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, HSE department or Human Resources & Legal Department.

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Howa-Tramico Europe Group undertakes to implement active policies and methods to prevent risks that may affect employee health and safety, to regularly check their correct application and measure their efficiency. In particular, the Group undertakes to ensure its managers and employees take responsibility for protecting health and preventing accidents by focusing on proactive approach in the workplace, and to ensure the design and development of its products and production facilities in such a way as to promote the best working conditions possible.

All subcontractors working on the premises of Howa-Tramico Europe Group companies shall be expected to apply these health and safety policies and to conform to all legislation in force in the relevant countries.

## 1.5 RIGHTS OF MINORITIES AND INDIGENOUS PEOPLES

Howa-Tramico Europe Group will show respect for the rights of local communities to decent living conditions, education, employment, social activities, and the right to Free, Prior, and informed Consent (FPIC) to developments that affect them and the lands on which they live, with particular consideration for the presence of vulnerable groups. Howa-Tramico Europe Group ensures that its suppliers and partners adopt the same provisions.

## 1.6 LAND, FOREST AND WATER RIGHTS AND FORCED EVICTION

Howa-Tramico Europe Group commits to the avoidance of forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters. Howa-Tramico Europe Group ensures that its suppliers and partners adopt the same provisions.

## 1.7 RESPECT FOR THE ENVIRONMENT

The group is committed to preserving the planet for future generations and undertakes to respect the international, European and national legal and regulatory obligations applicable to the environment and improving its protection.

Howa-Tramico Europe Group applies a precautionary approach to environmental issues and undertakes initiatives to promote greater environmental responsibility.

In carrying out their daily activities, Howa-Tramico Europe employees are made aware of their responsibilities towards protecting the environment, especially through the following commitments:

- Develop products and services that will reduce GHGs in our facilities and throughout the entire life cycle.

- Limit energy consumption by applying sobriety plan and aiming to achieve carbon neutrality, not only strive to identify the details of challenges in operations and materials etc. in addition to tracking GHGs emissions, but also develop and promote proposals of all possible reduction measures, including energy savings, equipment improvement, material replacement and the introduction of renewable energy under a united effort with our suppliers shared within our Sustainable Procurement charter .

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-Reduce waste and polluting products, conserve natural resources (water, land, forest, ...) and recycle materials at each step in the manufacturing process

Howa-Tramico Europe Group environmental policy is based notably on the following axes:

-Takes into account, when designing and developing products, reduce consumption of exhaustible resources and utilize recycled materials, while considering their appropriate disposal measures and recyclability. In addition, takes initiatives to recycle waste in our facilities

-Constantly assess the impact of its products and the activity of its plants on the neighboring environment (air, water, noise, traffic,) and communities with a view to making constant improvements to reduce nuisance.

## 1.8 USE OF HOWA-TRAMICO EUROPE GROUP FUNDS, SERVICES AND ASSETS

### 1.8.1 Principle

The use of Howa-Tramico's funds, services, or assets for any unlawful or improper purpose is strictly forbidden.

No individual or company shall engage in the practice of purchasing privileges or special benefits on behalf of Howa-Tramico through the payment or receipt of bribes, gratuities, or other forms of payoffs, in cash or in other benefits. Likewise, no company or individual (domestic or foreign) shall accept money or benefits in kind in infringement of any law or regulations.

### 1.8.2 Prohibition of all political contributions

Howa-Tramico makes no payments and provides no services to political parties, elected officials, or candidates for office, even when the lawful nature of such contributions is recognized pursuant to laws in countries where such payments might be made.

### 1.8.3 Prohibition of all illegal payments to government agencies or their employees

No payment may be made in the hope of obtaining favorable action from a government or administrative agency. Gifts, services, or lavish entertainment offered to government or administrative employees or officers are forbidden since they may be construed as attempts to influence government or administrative decisions in matters affecting Howa-Tramico.

### 1.8.4 Truth and accuracy of accounts, books and records

All assets, liabilities, expenses, and other transactions carried out by companies in the Howa-Tramico Group must be recorded in the companies' books and accounts which are to be kept truthfully and accurately, in accordance with the applicable accounting principles, rules, and laws.

No undisclosed funds or unrecorded assets of Howa-Tramico Group companies or subsidiaries shall be established or maintained for any reason whatsoever.

Documents pertaining to commercial or financial transactions must reflect these transactions faithfully. No payment may be approved or made with the intention or understanding that all or any part of such payment is to be used for any purpose other than that described in the

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documents supporting said payment. No false or artificial entry may be made in the books and records of Howa-Tramico or its subsidiaries for any reason whatsoever

## 1.9 DEALING WITH CUSTOMERS, SERVICE PROVIDERS AND SUPPLIERS

Our suppliers, customers, service providers, 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 Howa-Tramico Europe Group.

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 Principles as mentioned hereunder (4.2.1 ,...,. 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.

### 1.9.1 Restrictions on gifts and entertainment from customers and/or service providers

#### **Accepting gifts**

Howa-Tramico forbids the acceptance of any gift or gratuity from customers or suppliers in any form whatsoever (in particular, cash/monetary payments, merchandise, services, entertainment, or travel) valued at or more than the equivalent of one hundred (100) euros per fiscal year and per individual business partner, except in exceptional cases in accordance with Howa-Tramico internal policies.

If gifts or gratuities are received, they are to be returned immediately to the giver. When it would be discourteous to refuse or to return the gift, the employee must inform the Compliance Officer (Howa-Tramico Human Resources Manager) or the Management Director, who will determine what steps, if any, to take with regard to the gift pursuant to this Code. In all such cases, the employee must ask the customer or supplier to refrain from giving such gifts in the future.

#### **Offering gifts**

It is strictly forbidden to offer and/ or accord any cash or cash-in-kind for gratuity purposes, sponsorship deals or for other purposes to any representative of a customer or a supplier, directly or indirectly, in order to obtain a contract or any other commercial or financial benefit.

In all instances, according to gifts and/ or favors valued at the equivalent of one hundred (100) euros or more to potential or current customers or suppliers is strictly forbidden, except in exceptional cases in accordance with Howa-Tramico internal policies.

### 1.9.2 Supplier and service provider selection

The selection of suppliers or service providers for Howa-Tramico must be based on quality, need, performance and cost. During negotiations with suppliers and service providers, it is the responsibility of each Howa-Tramico employee and officer to promote the Group's best interests within legal limits, to seize the best opportunities, and to obtain the best possible business conditions, without reliance on favoritism resulting from friendship or using any discriminatory criteria forbidden by the Group Code of Ethics.



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## 1.9.3 Consultants and other service providers

Under our Purchasing procedures, agreements by and between Howa-Tramico and its agents, representatives, and consultants, or any other service provider must clearly list the actual services to be performed, the basis for fees or the price, and all other terms and conditions. All payments must be determined and paid in relation to the actual services provided. Agents, representatives, and consultants are forbidden to act on behalf of Howa-Tramico unless explicitly authorized to do so in writing by duly empowered Howa-Tramico representatives.

## 1.9.4 Prohibition of all investments in suppliers

No employee or officer may directly or indirectly invest in a supplier working with Howa-Tramico, a supplier's parent company or its subsidiaries, nor may an employee or officer lend funds to them, except for purchasing securities traded on a regulated market within the limits established by regulations in force.

## 1.9.5 Prohibition of purchasing goods or obtaining services from suppliers or customers for personal use

Employees and officers may not use their connection with Howa-Tramico to obtain the same advantages for their own personal purchases as those granted by the supplier or customer to Howa-Tramico, unless it is explicitly stated in the contract between Howa-Tramico and the supplier or Howa-Tramico and the customer.

## 1.10 FAIR COMPETITION

Howa-Tramico believes in strict compliance with the rules and laws governing competition in force in the European Union and each Country where Howa-Tramico does business. The rules and laws of fair competition forbid any written or unwritten understandings, agreements, plans, arrangements, or schemes among competitors involving price, territory, market share, and/or customers.

Howa-Tramico is committed to monitoring due conformity with these commitments by providing, through the Group's Audit Department or Legal Operation any additional information that an employee or manager may request and by promoting good knowledge of Howa-Tramico's commitments with regards to fair competition throughout the Group.

Howa-Tramico's employees and officers are therefore forbidden from entering into such agreements or understandings with Howa-Tramico's competitors. In addition, no manager may seek to obtain from an employee commercially sensitive or confidential information relating to a former employer of a Howa-Tramico employee.

No Howa-Tramico employee or manager shall seek to use commercially sensitive or confidential information obtained during a former employment during the course of employment with Howa-Tramico. In all circumstances, the exchange, or actual or attempted use within Howa-Tramico of commercially sensitive or confidential information belonging to a competitor or former employer are prohibited.

Further, it is mandatory that any employee wishing to join a professional association whose membership includes competitor representatives obtain written approval from his or her superior Human Resources Manager.

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## 1.11 CONFIDENTIALITY

### 1.11.1 Confidentiality of employees' personal data

Howa-Tramico Group companies and their employees must pay particular attention to complying with all laws and regulations relative to the protection, use and confidentiality of personal data ( RGPD,.. )

The information relative to employees' private lives, and performance assessment, promotion and salary must be kept confidential. Access to this type of information is reserved for authorized personnel only.

As a result, Howa-Tramico Group employees:

- Must not gather information about the personal life of other employees, except that required for human resources management or for other legitimate professional purposes, and solely within the limits authorized by the laws in force;
- Must ensure right of access, verification and correction of employee personal data, in accordance with the laws and regulations in force;
- Must not divulge personal information to third parties, except in exceptional cases authorized by the laws or regulations in force.

## 1.12 CONFIDENTIALITY AND PROTECTION OF GROUP ASSETS, DOCUMENTS AND DATA

Files, assets and technical data and other confidential Company information are important assets that may be critical in preserving Howa-Tramico's results and competitive edge. All these elements are the property of the Company and must be returned by the employee on termination of his or her employment contract.

The following in particular are of a confidential nature: information concerning the existence, terms and conditions of projects and commercial agreements of Howa-Tramico, Group financial and technical data, and all other sensitive data, such as that relative to production unit sales, intellectual property rights, technology, computer software or hardware used in the normal practice of its business.

It is forbidden for all Howa-Tramico Group Company employees to divulge this information to third parties without prior authorization, or to other Howa-Tramico employees without the authority to access this information.

Any use for personal purposes, directly or indirectly, of information obtained in the course of the employee's professional activity is strictly prohibited.

Any infringement of this rule may result in legal action under the applicable provisions in employment law, civil law or penal law.

All the above provisions apply in the same manner to information supplied by our clients.

Persons whose employment contract has expired or who are no longer contractually bound to the Howa-Tramico Group by an employment contract shall maintain confidentiality of all this information.

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## 1.13 LOYALTY

Howa-Tramico employees and officers must loyally perform their duties and assignments.

## 1.14 CONFLICTS OF INTEREST

A conflict of interest exists when an employee or a close relative is liable to benefit personally from a transaction involving a company in the Howa-Tramico Group, in particular with customers or suppliers.

Likewise, when an employee attempts to choose or have a company chosen, especially as a supplier, in which he or she, or a close relative has a direct or indirect financial interest.

Every Howa-Tramico employees, managers or collaborator facing a conflict of interest must declare it through the tools put at their disposal by the Group (paper declaration & email).

Some employees are more exposed to conflict-of-interest risk due to their position and therefore are required to make an annual declaration.

When in doubt, the employee must refer to his or her superior or Human Resources Manager or the Regional Compliance Officer to determine whether or not the transaction in question constitutes a conflict of interest.

## 1.15 PROTECTING HOWA-TRAMICO GROUP ASSETS

Howa-Tramico Group employees and managers are responsible for the proper use of the Group's assets and resources, including those involving intellectual property, technology, or computer hardware and documents, software, real estate, plant equipment, machinery and tools, components, raw materials and Group liquidity ("the assets").

To this end, Howa-Tramico Group employees and managers must, in particular:

- Use the assets in accordance with the rules and procedures in force in the Group and take every step to prevent unauthorized use of the assets by a third party (including family members)
- Protect all passwords and codes to prevent any unauthorized access to computer data belonging to the Howa-Tramico Group
- Refrain from the unauthorized copying of software developed by the Howa-Tramico Group, procedures, codes, manuals, presentations, training or other programs, unless authorized to so by General Management or by an expressly authorized member of the management team
- Only hold and store data in memory in strict compliance with local rules of law
- And, more generally, use the Howa-Tramico Group's SharePoint in accordance with the rules set out in the Howa-Tramico IT Policy .

### Howa-Tramico 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.

Email : [compliance@Howa-Tramico.com](mailto:compliance@Howa-Tramico.com)

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## 1.16 REPORTING INFRINGEMENTS TO THE CODE OF ETHICS

Any Group employee aware of any infringement of the rules set out in the present Code and related Howa-Tramico internal policies may bring the matter to the attention of his or her superior or the General Management:

- Through the internal reporting procedure, or
  - Through an online reporting process, in the cases set out in paragraph 5.2.
- These two methods have been designed as additional tools to ensure employees' freedom of expression. No employee may be punished, dismissed or be the subject of discriminatory measures for having reported in good faith, or for having recounted actions infringing the Code of Ethics. However, the wrongful use of these procedures exposes the perpetrator to disciplinary action or prosecution.
  - The person making the report involving conduct attributable to designated persons must, preferably, identify him or herself. His or her identity will be kept confidential.
  - These reporting procedures are additional methods made available to the employees and do not, therefore, replace the channels existing under the applicable law in each country (employee representatives, auditors and public authorities in particular).
  - Any Howa-Tramico Group employee concerned about the compliance of his or her own actions with the present Code is strongly encouraged to discuss the matter with his or her superior and/or Human Resources Manager and/or the Howa-Tramico Compliance Officer, to obtain more detailed information about the conditions and scope of application of this Code of Ethics.
  - Conduct contrary to the present code may be the subject of an inquiry solely at the discretion of the General Management.
  - Any infringement of the present Code, whatever the manner in which it is brought to light, may be sanctioned by Howa-Tramico. These sanctions may include, among others, a warning issued to the employee, or his or her dismissal, depending on the seriousness of the infringement and the applicable laws and regulations.

## 1.17 INTERNAL REPORTING PROCEDURE

Any Group employee aware of any infringement of one or more of the rules set out in the present Code and related internal policies may bring the matter to the attention of his or her superior or HR Manager or the Compliance Organization.

The referral to the superior or the HR Manager or the Compliance Organization may be made verbally or in written form ( Contact Corporate Compliance Officer \_ Email: [compliance@Howa-Tramico.com](mailto:compliance@Howa-Tramico.com) )

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Depending on the nature and importance of the facts recounted, additional investigations may be launched, an inquiry carried out or the decision taken to implement an internal audit procedure.

The person implicated must be advised of the procedure concerning him or her.

If protective measures are required, the person implicated shall be advised after such measures have been taken.

## 1.18 ONLINE REPORTING PROCESS

The scope of the online reporting process is intended for serious allegations related to violations of the Law (e.g. corruption, anti-competitive practices, harassment, accounting irregularities, etc.).

Given their importance, serious matters threatening the physical wellbeing or moral integrity of an employee may also be covered by this online reporting process (

The online reporting process leads to the matter being referred to an external organization that the Howa-Tramico Group uses for the collection of the allegations reported.

This organization will ensure compliance with the principles and rules applicable in France and in the European Union regarding the protection of data.

If the matter reported does not fall within the scope of the online reporting process, the report will be immediately destroyed.

If the matter reported does fall within the scope defined for this process and if its importance so warrants, the Compliance Organization will refer the matter to Howa-Tramico CEO.

The latter may request a member of his team to carry out an inquiry to assess the veracity and extent of the facts reported. The Group Audit Department may be requested to carry out the necessary investigations. All information having been verified shall be destroyed after a lapse of two months from the date the verification operations have been completed, unless disciplinary or legal proceedings are brought against the person implicated or the perpetrator of a wrongful report. In this case, the data shall be retained until the completion of the proceedings.

The person implicated must be advised of the procedure concerning him or her. If protective measures are required, the person implicated shall be advised after such measures have been taken.

The online reporting link is the following: [www.HowaTramico.ethicspoint.com](http://www.HowaTramico.ethicspoint.com)

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## 2 SOCIAL RESPONSIBILITY (DEVELOPMENT OF ECONOMIC AND SOCIAL DIALOGUE)

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### 2.1 PROMOTING SOCIAL DIALOG AND FREEDOM OF EXPRESSION

Howa-Tramico Europe Group undertakes to inform and consult in a timely manner the employee representatives in each legal entity and to conform to the legal obligations specific to each country.

Howa-Tramico Europe Group seeks to develop a relationship of trust at all levels of the company by inviting its employees to express themselves freely, in particular concerning the improvement of their workplace environment.

The quality of discussion and communication between each employee and his or her superior is a central component of the Group's social dialogue

### 2.2 FREEDOM OF ASSOCIATION AND RECOGNITION OF THE RIGHT TO COLLECTIVE BARGAINING

Howa-Tramico Europe Group recognizes union rights and the right of workers to form the union organization of their choice and/or to organize workers' representation in accordance with the laws and regulations in force.

Howa-Tramico Europe Group undertakes to protect union members and leaders and not to make any discrimination based on the offices held.

The Group undertakes to promote a policy of consultation and negotiation. Given its decentralized legal and managerial structure, this policy is enshrined in collective bargaining agreements signed with the individual establishments, on the one hand, and companies, on the other

### 2.3 INDUSTRIAL AND SOCIAL REDEPLOYMENT

Howa-Tramico Europe Group, due to its program-based activity, must constantly adapt to the life cycle of vehicles (launch, development and end of life), and must accompany its customers in their international growth. The Group's industrial and social redeployment constantly supports these changes.

Whenever possible, Howa-Tramico Europe Group will adopt a forward-looking approach to its industrial and social redeployment operations in order to limit the social impact.

Within this context, each of the restructuring operations will involve an in-depth industrial, economic and social dialogue as part of the strategic orientations defined by Howa-Tramico Europe Group:

- Prioritize a forward-looking approach to avoid crises
- Involve employee representatives
- Develop employability through employee empowerment
- Prioritize internal mobility
- Factor in the local environment and promote all the local solutions
- Treat employees in a just and equitable manner.

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## 3 DEVELOPMENT OF SKILLS

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### 3.1 PROMOTING DIVERSITY, EQUITY AND INCLUSION

Howa-Tramico Europe Group is convinced that pluralism, diversity, equity and inclusion are a source of wealth and a tremendous asset for creativity and for the management of the company.

Howa-Tramico Europe Group is firmly committed to providing equal opportunity in all aspects of employment or career development and prohibit discrimination or harassment, including on the basis of race, ethnicity, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, sexual orientation, gender identity or expression, age, marital status, mental or physical disability, political or philosophical opinions or trade union allegiances or any other characteristics protected by law, as well as any unwelcome physical or verbal advances.

All employees have the right to work in a healthy environment, free from any form of hostility or harassment qualified as unlawful under the regulations and practices in force in the countries where Howa-Tramico Europe Group does business.

In particular, Howa-Tramico Europe Group forbids any unlawful conduct construed as sexual or moral harassment ( verbal, physical or visual — and includes jokes or use of slang that may be uncomfortable or offensive to others ), even in the absence of any direct relationship of seniority or subordination.

Howa-Tramico Europe Group 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

Howa-Tramico Europe Group undertakes that wage payments respect the legal minimum and the guaranteed and/or conventional professional minimum and recognizes the principle of equal pay, especially between men and women for similar work and performance.

The group also gives an undertaking that the working time shall not exceed those provided for by national legislation or by applicable collective agreements, and to respect the rest periods and periodic holidays corresponding at least to the conditions set by the national legislation or by the applicable collective agreements.

Q: “I suspect a colleague is being harassed – what do I do?”

A: 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.

[Whistleblower-Signalement@Howa-Tramico.com](mailto:Whistleblower-Signalement@Howa-Tramico.com)

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## 3.2 INSERTION AND DEVELOPMENT OF TRAINING

Howa-Tramico Europe Group undertakes to promote professional training to encourage the professional insertion of young people, by fostering:

- Access to internships in the company. Howa-Tramico Europe Group shall make every effort to provide each of its employees, whatever their place of work in the world, age, gender or position, with access, throughout their career, to the necessary training to enable them to carry out their activity and to forge their own career path.
- Access to the various types of contracts available to students throughout their studies (apprenticeship contracts for instances )

## 3.3 PROFESSIONAL DEVELOPMENT AND EMPLOYABILITY

Given the specific nature of its activities and the need to capitalize on its expertise to ensure control over its project, Howa-Tramico Europe considers the internal development of its workforce's employability a priority.

Howa-Tramico Europe Group encourages each employee to participate actively in his or her professional development and undertakes to ensure equal opportunities for professional development and mobility.

Howa-Tramico Europe pays attention to make sure of internal mobility management's short- and medium-term relevance.