

Safe Demo's Code of Ethics



VALUES WITH AN INDUSTRIAL SPIRIT

A project we can all support together

This guide is intended for all Safe Demo Group employees

It can be passed on to our customers. It must be adopted by all our suppliers and service providers who undertake to comply with these principles.

SAFE DEMO SA

Route François Peyrot 12,
1218 Le Grand Saconnex (Geneva)
Switzerland

Contents:

I.	Message from the Chief Executive Officer.....	3
II.	Managing and promoting the Code.....	4
	Principles	4
	Duty to alert.....	5
III.	Our values	6
IV.	Our actions.....	7
i.	Employment	7
	Ethical recruiting	7
	Dignity.....	7
	Fair practice	7
	Non-Discrimination.....	7
	Women's rights	7
	Health & Safety.....	8
	Child labour and forced labour.....	8
	Employability - Vocational training.....	8
	Careers.....	8
	Diversity	8
	Trade union freedom and collective bargaining.....	8
	Information Technology.....	9
	Respecting privacy and personal data.....	9
ii.	Environment.....	10
	Environmental responsibility	10
	Sustainable Development	10
iii.	Products	11
	Quality	11
	Customer focus	11
	Asset protection	11
iv.	Business practises and conduct.....	12
	Free competition.....	12
	Anti-corruption	12
	Gifts and Invitations	12
	Conflicts of interest	12
	Confidentiality.....	12
	Trade in materials that fuel conflicts	13
	Trading partners.....	13
	Accuracy of accounting data, information and indicators.....	13
	Respect for intellectual and industrial property rights.....	13

I. Message from the Chief Executive Officer

Safe is an international industrial group organized into two Branches: **Safe Demo** and **Safe Metal** which carry out specific businesses and activities. It operates internationally in 9 countries and on 3 continents.

Safe Group aims to convey a positive and reassuring image in the area of safety, which is one of the common aspects of its Branches' activities. Customers associate its products with safety (covers for airbags that ensure passenger safety, high-strength machine components that withstand heavy loads...). The quality and reliability of the products reassure customers, as do the sustainability and the financial security that the Group provides to its Branches.

Safe Demo is the world's leading manufacturer of airbag covers and components for automotive industry, including plastic parts decorated with state-of-the-art technologies. Its components contribute to the safety and well-being of occupants. Safe Demo operates seven specialized plants, located all over the world - in France, Turkey, Czech Republic, Mexico, Brazil and China. Safe Demo's expertise in the field of automotive safety has been recognized for over 30 years.

Safe Group's Values go hand in hand with corporate culture and determine both the rules of good moral and professional conduct and the principles of management.

In line with the company director's Vision, the Values unite all the employees across the corporate hierarchy. Everyone should understand them, be able to identify with them and refer to them in their actions and decisions. They can only be maintained if managers set a good example.

These Values are displayed and shared and underpin the principles of management and rigour that have made the Safe Group so successful. They support each other and form a coherent whole.

Commitment is the mainstay that delivers the results allowing us to fund the investments that are needed for **Dynamism** and **Innovation**.

In return, **Dynamism** and **Innovation** are powerful factors in motivating teams, thus reinforcing their **Commitment**.

Therefore, these Values promote certain types of behaviour that in turn lead to the achievement of results.

These are human values that can be learnt, put into practice every day and passed on to others in the Group. They are the result of its history and the basis of its success. Throughout the world, our personnel and our trading partners play an active role in building Safe Demo's future based on these Values.

This is why Safe Demo gives priority to ensuring its staff and partners identify with these Values, and that they seek to put them into practice and are happy to be part of this collective industrial adventure.

II. Managing and promoting the Code

Principles

The Code of Ethics sets out the principles to which Safe Demo wishes to adhere and the actions that illustrate them. Units, employees and partners can refer to it in their everyday activities and it will help them take decisions, in line with Safe Group's Values and reputation both locally and globally.

The Code of Ethics supplements the principles and rules set out in other regulations, code and internal procedures in force within its Units. Each of Safe Demo's Units shall adopt its own policies and procedures, in addition to those stated in this Code.

Within Safe Demo, each Director shall regularly communicate the whole Code to all his/her employees and representatives. Each member of staff at Safe Demo must read, understand, comply with and apply the values set out in this Code. Certain members of management in the Safe Group Organization Manual are required to formally adhere to this Code.

Employees and managers promote this Code of Ethics more widely and among trading partners (service providers, suppliers, customers and co-contractors). The latter are required to comply with the provisions of this Code when they are working with Units of Safe Demo or on its behalf. This requirement to comply with the Code is indicated in all contracts entered into with commercial providers.

If any employees or managers are uncertain of the meaning of the provisions in this Code or are unsure of how to behave, they may consult their managers.

Duty to alert

The Group encourages dialogue, and its employees can openly express their legitimate concerns.

We ensure that any inappropriate or unethical behaviour by Group Companies, any of its employees or even a third party with whom Group Companies have a relationship is thoroughly investigated and appropriate action is taken, regardless of who is involved.

To raise such concerns, you may contact your functional or operational hierarchy. **The Safe Group's management is responsible for ensuring compliance with the Code of Ethics.**

In some countries, additional resources are also available to you, such as employee representatives.

You can also send an alert directly to alert@safe-sa.com.

The Safe Group's whistleblowing system and a practical guide are accessible from the home page of the intranet (<https://intranet.safe-industry.com/>) and on our website (<https://www.safe-demo.com>).

It is a system that allows anyone to report facts or actions that are contrary to the law, regulations and the Code of Ethics.

III. Our values

All Safe Demo's policies, including this Code, stem from our basic Values. All our actions and decisions illustrate these shared Values that serve as a reference for everybody.

DYNAMISM is the Group's core value and is expressed via:

- The development of activities and people through Growth, the Spirit of Conquest and International Expansion;
- A sense of Initiative through Autonomy, Ambition and the ability to Anticipate;
- The behaviour of managers and their teams with ongoing Communication, Openness to others and Proactivity.

INNOVATION is the key to the Group's sustainability

- Leadership in the mind of customers, based on Excellence, Creativity and Expertise;
- Mastery of Technology acquired in our businesses by ongoing development and protection of Know-how, Research and Progress in processes;
- Designing new Products and Processes by Listening to others, using our Imagination and being Realistic.

COMMITMENT

- Towards customers via Quality, Service and Costs;
- Acknowledging full Responsibility for decisions and risks taken without compromising on Ethics thanks to the Competence shown within the company and by outside providers and the priority given to the Safety of the Group's assets and People;
- Contributing to Sustainable Development by helping to Protect the Environment, by developing plans to Save Resources and ensuring Sustainability by recycling materials.

The Values we wish to promote and implement in Safe Group's everyday operations are basically human values. Everybody should be able to adhere to them naturally, or by making a personal effort, without the need for any in-house training, basically through the example set by Managers and colleagues.



IV. Our actions

i. Employment

Safe Demo and its teams pay careful attention to the conduct of the Men and Women they employ by guiding them, ensuring they are dynamic and motivated, encouraging participation and teamwork, and setting specific goals that are ambitious but achievable.

Ethical recruiting

Safe Demo is committed to applying international labour standards in the hiring of its employees, which is carried out in a fair and transparent manner with respect to human rights. In particular, it ensures that employees are not misled about the nature of the work, are not required to pay recruitment fees, are not deprived of access to their identity documents and are provided with all the necessary documentation upon recruitment in a language that is clearly understood by them, indicating their rights and responsibilities in an unequivocal manner.

Dignity

A healthy working environment contributes to the personal fulfilment and self-esteem of each member of Safe Demo. Therefore, with the help of its members of staff, Safe Demo promotes fair and ethical treatment that promotes dignity at work.

Fair practice

Safe Demo complies with the applicable laws concerning in particular remuneration and working hours. Safe Demo shall ensure that it offers fair and competitive remuneration in relation to local market practices and the situation of its employees and shall ensure compliance with the laws and regulations relating to holidays and maximum working hours.

Non-Discrimination

Safe Demo strives to employ, appoint and promote employees using objective criteria without any discrimination. Trading partners must provide working environments that are free from any form of discrimination or harassment.

Women's rights

Safe Demo is particularly committed to eliminating all forms of discrimination against Women, including providing equal employment opportunities and ensuring equal pay for equal work.

Health & Safety

Safe Demo and its units have signed an internal Safety Charter and adheres to its principles. In this Charter, "*Safe teams are determined to ensure that everyone can work under the safest possible conditions*". Group and Branch management ensure that the Safety Charter is implemented and complied with. Safety cannot be ensured by vigilance alone, but should be based on organized prevention and the operational discipline of everyone.

Safe Demo expects its trading partners to uphold safety at work and constantly strive to improve it so as to reduce and mitigate risks.

Child labour and forced labour

Safe Demo complies with national and international legislation and regulations in force prohibiting child labour and forced labour, i.e., any work or service provided by an individual for which the said individual has not volunteered. Forced overtime, retention of identity documents, as well as human trafficking are strictly prohibited within Safe Demo entities. Safe Demo's trading partners must forbid the recourse to, support for or subjection to forced labour, illegal child labour and all forms of modern slavery.

Employability - Vocational training

Safe Demo plays an active role in the in-house vocational training facilities provided, as well as in promoting access to apprentices and trainees within its units.

Careers

Safe Demo promotes and encourages the involvement of members of staff. Everybody has the opportunity to improve his or her performance, either at their own initiative, or via training programmes offered by the company. Depending on its requirements, Safe Demo intends to promote the ability of each employee to grow within the company and to fulfil his or her potential. Safe Demo wishes to attract the best professionals in its sector and keep know-how within the Group. Implementing such a policy contributes to the well-being and fulfilment of all members of staff, regardless of their location or the local legal framework.

Diversity

Safe Demo encourages diversity in all levels of their workforce and leadership within its units.

Trade union freedom and collective bargaining

Safe Demo's desire to establish a relationship of trust at every level of the company is reflected in the freedom of expression of all employees to improve their working conditions. It encourages all forms of individual and collective dialogue. It also acknowledges freedom of association and the right to a collective bargaining agreement.



Information Technology

Computers, mobile phones and other means of communication made available to Safe Demo employees and representatives must be used within an ethical legal framework, in compliance with this Code and with the Group's IT Charter.

Respecting privacy and personal data

Safe Demo acknowledges and respects all people's privacy because it is in everyone's interest to ensure the confidentiality of personal data. It only collects and processes relevant and specific information that it considers necessary and appropriate for professional purposes. It seeks to promote responsible data protection principles that ensure security in the collection, processing and conservation of this data.



ii.Environment

Safe Demo and its various units constantly strive to assert and enhance their identity and image in their relations with the environment and sustainable development.

Environmental responsibility

Protecting and improving the environment is a top priority for Safe Demo. It has implemented an Environment Management System (EMS) that complies with the ISO 14001 standard.

Since its creation, Safe Group has been involved in initiatives to preserve natural resources and it has invested in the optimization of components for customers and in production processes. Safe Group's initiatives in favour of the environment have played a key role, enabling it to anticipate its customers' requirements, become more competitive by reducing its consumption of raw materials and energy and thus retain the leading position of each of its Business Unit's in the supply of components and technical systems. Every year, it also invests in insulating its plants, and in filtering and reducing its industrial emissions.

Safe Demo's trading partners shall also comply with legislation concerning the disposal of hazardous waste, harmful substances, air emissions and water evacuation.

Sustainable Development

Safe Demo and its different Units encourage Sustainable Development and have adopted an in-house Environmental Charter.

Safe Demo constantly strives to improve its manufacturing processes by acquiring more efficient and less energy-consuming machinery. The strategy of improving industrial performance, including the reduction of scrap rates, which is a priority, also enables us to reduce the volume of waste to be recycled.

At the same time, Safe Demo is pursuing a policy of reducing the consumption of raw materials necessary for the manufacture of its components, whether through the design of the latter and the reduction of the thickness of the parts or the decorative coatings, and thus participating in the lightening of the vehicles for which they are intended and thus in the reduction of hydrocarbon consumption and CO2 emissions.

Safe Demo expects its trading partners to conduct their business in such a way as to minimize their impact on natural resources, protect the environment, and constantly monitor their environmental performance.



iii. Products

Safe Demo's long-term success and dynamism depend on its ability to analyse and understand its customers' expectations. It aims to allow its customers to benefit from its innovative spirit and leadership on an ongoing basis. In order to be present on growing markets and follow its customers, Safe Group operates on the three continents of Europe, America and Asia.

Quality

Being ISO 9001 and IATF 16949 certified, the Safe Demo branch demonstrates each year that its organisation is oriented towards satisfying the requirements of its shareholders, customers and employees, and more generally of all the interested parties identified as impacting the quality management system.

All Safe Demo's business practices and manufacturing processes are designed to achieve excellence in terms of quality, ensuring that customer expectations are met at each stage of the value chain - from R&D to production and then marketing. Excellence represents a value in corporate culture and also a discipline that drives a company's business.

The quality of its products and services reflects Safe Demo's strength and industrial heritage. The expertise in the study and the realization of tools and means of production for the plastics industry, production and decoration of safety components for the automotive industry such as airbag covers and parts for safety belts then of decorative parts for the automotive interior, represents more than 50 years of accumulated experience.

Safe Demo's products, and consequently those of its trading partners, must meet high quality standards corresponding to appropriate control and manufacturing processes. Therefore, their trading partners are also encouraged to ensure that all the products and services they supply to Safe Demo offer the highest level of quality and safety. They are required to adopt a quality management system that ensures the appropriate quality of products and total compliance with national and international legal requirements.

Customer focus

Safe Demo focuses on satisfying customers by developing products and services that differentiate the company from its competitors. In addition, Safe Demo and its teams make sure that their individual actions and decisions reflect a positive image of the Branch, thus enhancing its customers' satisfaction and securing their loyalty. Trading partners are expected to ensure their actions contribute to achieving this goal.

Asset protection

Safe Demo is committed to protecting its tangible and intangible assets. All employees should use all appropriate means to safeguard Safe Demo's tangible assets from loss, theft, damage and from any unlawful uses or purposes unrelated to its business.

Safe Demo wishes to ensure that its intangible assets containing sensitive information, like trading secrets, new products, technical documentation, patents, manufacturing secrets, know-how, the company's trade name and any other intellectual capital, are protected in a manner appropriate to their importance. Safe Demo requires its staff and trading partners to honour its intellectual property rights.



iv. Business practises and conduct

Every member of staff and every trading partner must behave in such a way as to avoid any unethical practices or any practices that could damage the international image of the company or Group.

Free competition

The ability to anticipate events, customer requirements and competitors' reactions while observing the principles of free competition: Safe Demo expects all its employees and trading partners to comply with the laws and regulations on free competition, in all the countries in which they carry out their business. It expects its staff to become aware of ethical business practices and provides its sales team with a "guide to meetings with industrial organizations". None of Safe Demo's trading partners are authorized to conclude unlawful agreements that may have the purpose or the effect of restricting competition.

Anti-corruption

Safe Demo has an anti-corruption policy that seeks to prohibit unlawful practices and payments. No preferential treatment or special illegal or improper advantages, such as the payment or receipt of bribes, will be tolerated within the company. It also expects its trading partners to fight against bribes and corruption.

Gifts and Invitations

Business gifts and gratuities are forbidden under the conditions laid down by the law. Safe Demo's employees and trading partners must comply with the rules and laws that apply in the country in which Safe Demo carries out business.

Conflicts of interest

The private interests of employees, managers, trading partners - including personal, social, financial and political interests - and the interests of Safe Demo must be kept strictly separate. In addition, all members of staff must assess whether their behaviour and/or personal situation could conflict with the interests of Safe Group or Safe Demo. If in doubt, they should consult their superiors and/or contact the following alert platform: alert@safe-sa.com.

Confidentiality

Unless authorized to do so, Safe Demo does not disclose its manufacturing secrets, know-how or any other information which is considered confidential, related to its industrial capital, whether it belongs to the company or its trading partners.

All Safe Demo employees and trading partners who are entrusted with confidential information or information belonging to Safe Demo must ensure that it remains confidential and must only use it for the purposes authorized, whether they are working for the company or whether they have stopped working for the company. Therefore, Safe Demo ensures there are checks in place to protect its interests. Trading partners who wish to obtain this confidential information must sign a confidentiality agreement in which they undertake not to disclose or make improper use of this information.

Trade in materials that fuel conflicts

Safe Demo requires its trading partners to make a strict commitment regarding the origin of the materials they supply and bans materials from countries in which an ongoing conflict is affecting the extraction and marketing of these materials. Safe Demo reserves the right to put an end to its business relations with any partner who uses these materials or who refuses to indicate the origin of these materials to Safe Demo.

Trading partners

In addition to the principles and rules stated in the other sections of the Code, all the Group's collaborators, representatives and employees in contact with trading partners must make sure that these partners are treated fairly and honestly. Moreover, the Safe Demo's purchasing strategy specifies that the Group will only work with trading partners who accept the Group's values and commitments and adhere to the principles in this Code. Safe Demo encourages ethical relations with its trading partners and makes sure these partners are treated in a loyal and fair manner. The choice of a trading partner that provides goods or services should be based on criteria related to price, quality, performance, lead-times, the ability to meet needs and their commitment to adhere to the principles in this Code.

While prospecting and negotiating contracts, all members of staff must put the company's interests first, in accordance with laws and should seek the best conditions, without giving any preferential treatment based on friendship or discriminatory criteria.

Accuracy of accounting data, information and indicators

The Group and its employees refuse any fraudulent practice, particularly through accounting and financial manipulation.

To this end, the Group's management ensures the publication of sincere, reliable and transparent financial information (financial statements, transactions or any other information).

Each employee who, in the course of his or her duties, is required to record or cause to be recorded accounting or financial data, to calculate and transmit indicators or to manage and disseminate any other form of information, undertakes to provide reliable and accurate information.

Respect for intellectual and industrial property rights

The production of counterfeit goods is illegal and is detrimental to the economic and social well-being of employees.

The Safe Group promotes respect for intellectual and industrial property rights and undertakes not to infringe the intellectual and industrial property rights of third parties, such as patents, trade secrets, trademarks and copyright.

Each Group Employee shall refrain from knowingly participating in the development, production or marketing of counterfeit products.



This Code of Ethics has been approved by the Executive Committee of Safe Demo and the Group.

A handwritten signature in black ink, appearing to read "Frédéric Schwartz", with a long horizontal line extending from the end of the signature.

Frédéric Schwartz
Group Chief Executive Officer

A handwritten signature in black ink, appearing to read "Pascal Keller", with a long horizontal line extending from the end of the signature.

Pascal Keller
Safe Demo Branch
Chief Executive Officer