

LUXIT Group Code of Conduct



Dear Colleagues,

At LUXIT Group, our reputation is built every day through the decisions we make, the way we work, and the way we treat one another.

Integrity, respect, and accountability are fundamental values that define who we are. Every employee plays an important role in maintaining the trust of our customers, suppliers, business partners, and communities.

This Code of Conduct outlines the principles and expectations that guide our actions and help us make the right decisions while conducting business. It applies to all LUXIT employees, leaders, suppliers, contractors, and representatives, regardless of their role or location.

We are committed to conducting our business responsibly, ethically, and in compliance with all applicable laws and regulations. We also expect our suppliers and business partners to share these same values and to follow responsible business practices throughout their operations.

This Code of Conduct is intended to serve as a practical guide in our daily activities and to help everyone understand the behaviors and standards expected of those who represent LUXIT.

A strong ethical culture depends on everyone's commitment. If you become aware of a situation that may not align with our values or this Code of Conduct, we encourage you to speak up and report your concerns. Speaking up allows us to address issues promptly and continue to strengthen our organization.

LUXIT provides appropriate channels for reporting concerns and is committed to handling all reports with respect, confidentiality, and fairness. No employee or business partner will face retaliation for raising a concern in good faith.

Thank you for your dedication and commitment to doing business the right way, and for helping LUXIT continue to grow as a trusted partner in the automotive industry.

Sincerely,

Stephane Védie
LUXIT Group

TABLE OF CONTENTS

1. Introduction

- Why We Have a Code of Conduct
- Our Responsibilities
- Responsibilities of Leaders and Supervisors

2. Responsibilities of Business Partners

- Providing Accurate Information to Customers
- Product Quality and Safety
- Fair Competition and Antitrust Laws
- Export, Import and Trade Compliance
- Anti-Corruption and Anti-Bribery
- Maintaining Ethical Business Relationships
- Sustainable Business Practices

3. Respect for People and Workplace

- Respecting Human Rights
- Diversity, Inclusion and Equal Opportunity

4. Protecting Company Assets and Information

- Protecting Company Assets
- Confidential Information and Data Protection
- Conflicts of Interest
- Appropriate Use of Social Media
- Accurate Records and Reporting

5. Responsibilities to Shareholders and Stakeholders

- Acting in the Best Interest of the Company
- Insider Information and Securities Trading

6. Commitment to Society and Communities

- Environmental Responsibility
- Community Engagement
- Government Requests and Legal Proceedings
- Prohibition of Criminal or Illegal and Unethical Activities

7. Speaking Up and Raising Concerns

- Reporting Concerns and Seeking Guidance
- Non-Retaliation Policy

1. INTRODUCTION

Why We Have a Code of Conduct

Our Code of Conduct establishes the principles and behaviors expected from everyone who represents LUXIT Group. It helps us act with integrity, comply with applicable laws and regulations, make responsible decisions, and build trust with our customers, business partners, communities, and one another.

The Code provides guidance when we face difficult or uncertain situations and helps ensure that our daily actions reflect our company values and our commitment to ethical business practices.

This Code applies to all LUXIT employees, leaders, contractors, and representatives, regardless of their role, position, or location.

Our Responsibilities

At LUXIT Group, we are committed to conducting our business with integrity, transparency, and respect for all applicable laws and regulations. Every employee, leader, contractor, supplier, and business partner is expected to uphold the principles of this Code, make ethical decisions, and act in a manner that positively represents LUXIT Group.

We expect everyone to understand and apply these principles in their daily work, raise concerns when potential violations are identified, and seek guidance when needed. Violations of this Code may result in appropriate disciplinary action, consistent with applicable laws and company policies.

LUXIT Group operates in multiple countries and is committed to complying with the legal requirements applicable in each country where we conduct business. When differences exist between local laws and this Code, employees must follow the requirements that provide the highest standard of compliance and integrity, to the extent permitted by applicable law.

Questions regarding compliance with this Code should be directed to the appropriate member of management, Human Resources, or Legal.

Responsibilities of Our Supervisors

At LUXIT Group, supervisors play a critical role in promoting an ethical, respectful, and compliant workplace. They are responsible for leading by example, supporting compliance with this Code, and creating an environment where employees feel comfortable raising questions or concerns.

Supervisors are expected to:

- **Lead by example:** Demonstrate integrity, accountability, and ethical behavior through their decisions and actions.

- **Promote an ethical culture:** Encourage open communication, support employees who raise concerns, and reinforce the importance of following company policies and applicable laws.
- **Know and communicate the Code of Conduct:** Understand the Code, communicate its principles to their teams, and ensure employees are aware of their responsibilities and available resources.
- **Raise and report concerns:** Take concerns seriously and promptly escalate potential ethical or compliance issues through the appropriate channels. Retaliation against anyone who raises a concern in good faith or participates in an investigation is not tolerated.

Leaders and supervisors are responsible for helping build a culture of trust, integrity, accountability, and respect throughout LUXIT Group.

2. RESPONSIBILITIES TOWARD CUSTOMERS AND BUSINESS PARTNERS

Our Customers

At LUXIT Group, our customers are at the center of everything we do. We build lasting relationships by providing accurate, honest, and timely information, delivering on our commitments, and acting with integrity in every interaction.

We are committed to earning and maintaining the trust of our customers through the quality of our products, services, performance, and business practices.

Our Products

We are committed to designing and delivering safe, reliable, and high-quality products that meet applicable legal, regulatory, and customer requirements.

Through continuous improvement, innovation, and disciplined execution, we strive to exceed expectations while supporting a more sustainable future.

Every employee has a responsibility to support product quality and safety and to promptly raise concerns regarding potential quality, safety, or regulatory issues.

Fair Competition

LUXIT Group competes fairly, ethically, and in compliance with all applicable competition and antitrust laws.

We earn business through the quality of our products and services, innovation, performance, and customer relationships, not through unfair, deceptive, or improper practices.

Employees must not engage in agreements, discussions, or activities with competitors or other parties that could improperly restrict competition or violate applicable antitrust or competition laws.

Export, Import and Trade Compliance

LUXIT Group operates globally and complies with all applicable export, import, customs, sanctions, and anti-boycott laws and regulations in every country where we conduct business.

We ensure that products, technology, software, and technical information are transferred only in accordance with applicable legal requirements. This includes obtaining required licenses and maintaining accurate customs documentation, classifications, valuations, and other required information.

We do not participate in prohibited boycotts or provide information that could violate applicable anti-boycott laws.

If you receive a request related to trade restrictions, sanctions, export controls, or boycotts, you must report it promptly to the appropriate department before taking any action.

Anti-Bribery and Anti-Corruption

At LUXIT Group, we are committed to conducting business with integrity, transparency, and in full compliance with applicable laws. We have zero tolerance for bribery, corruption, or other unethical business practices.

No employee, officer, director, or representative may directly or indirectly offer, give, promise, authorize, solicit, or accept bribes, kickbacks, improper payments, or any other undue benefit to obtain or retain business, influence a decision, or gain an unfair advantage.

Business courtesies, including gifts, meals, and hospitality, may only be offered or accepted when they are lawful, reasonable, infrequent, of modest value, and consistent with applicable laws, company policies, and LUXIT Group's ethical standards.

Maintaining Ethical Business Relationships

At LUXIT Group, we build lasting business relationships through integrity, transparency, fairness, and respect. Every employee is expected to act ethically and uphold the trust that our customers, suppliers, and business partners place in us.

We compete fairly and earn business through the quality of our people, products, services, and performance.

Confidential Information

Information about competitors and business partners must be obtained only through legal and ethical means.

We respect confidentiality and protect sensitive information entrusted to us. Employees must not seek, obtain, use, or disclose confidential information through improper or unauthorized means.

Gifts, Entertainment, and Hospitality

Business courtesies, including gifts, entertainment, meals, and hospitality, may only be offered or accepted when they are lawful, reasonable, infrequent, and appropriate to the business relationship.

They must never be intended to influence—or create the appearance of influencing—a business decision.

Employees must comply with all applicable company policies and approval requirements regarding gifts, entertainment, and hospitality.

Anti-Money Laundering

LUXIT Group prohibits money laundering and any activity that supports terrorism financing or other illegal conduct.

We conduct business only with legitimate and reputable business partners and remain alert to transactions or activities that may appear suspicious or inconsistent with normal business practices.

Any suspected suspicious activity must be promptly reported through the appropriate channels.

Sustainable Business Practices

At LUXIT Group, we are committed to conducting business responsibly and promoting sustainable practices throughout our supply chain.

We work with business partners who share our commitment to ethical, social, and environmental principles.

Purchasing decisions must follow company policies and approved processes. Suppliers are evaluated based on quality, competitiveness, reliability, and their commitment to responsible business practices.

We promote responsible sourcing and seek to avoid the use of materials associated with human rights abuses, including conflict minerals such as tin, tungsten, tantalum, and gold (3TG) originating from conflict-affected or high-risk areas.

Our business partners are expected to comply with these principles and support our commitment to sustainable and ethical operations.

3. RESPECT FOR PEOPLE AND THE WORKPLACE

Respecting Human Rights

At LUXIT Group, we respect fundamental human rights and are committed to fair labor practices, dignity, and respect for all employees.

We do not tolerate forced labor, child labor, human trafficking, or other practices that violate fundamental human rights.

Employees are expected to treat one another with professionalism, dignity, and respect.

Diversity, Inclusion, and Equal Opportunity

At LUXIT Group, we value diversity and believe every employee deserves equal opportunity, fair treatment, and respect.

Employment decisions are based on qualifications, skills, performance, experience, and legitimate business needs, without discrimination prohibited by applicable law.

We are committed to maintaining a workplace where individuals are treated fairly and respectfully and where inappropriate conduct is not tolerated.

4. PROTECTING COMPANY ASSETS AND INFORMATION

At LUXIT Group, we are responsible for protecting the Company's assets, information, and reputation.

Every employee plays an important role in ensuring that company resources are used responsibly and that confidential information is properly protected.

Protecting Company Assets

Company assets—including equipment, facilities, materials, technology, financial resources, intellectual property, and other resources—must be used responsibly and for legitimate business purposes.

Employees are expected to protect these resources from loss, misuse, damage, theft, or unauthorized use.

Confidential Information and Data Protection

LUXIT Group is committed to protecting confidential and sensitive information belonging to the Company, our customers, suppliers, employees, and business partners.

Employees must safeguard business information, technical data, financial information, personal data, intellectual property, and other confidential information.

Such information may only be accessed, used, or shared with authorized individuals for legitimate business purposes and in accordance with applicable laws and company policies.

Conflicts of Interest

Employees must act in the best interest of LUXIT Group and avoid situations where personal interests could influence—or appear to influence—business decisions.

Any actual, potential, or perceived conflict of interest must be disclosed promptly so that it can be appropriately reviewed and managed.

Appropriate Use of Social Media

Employees should use social media responsibly and ensure that their communications do not compromise LUXIT Group's reputation, confidential information, intellectual property, or relationships with customers, suppliers, business partners, or colleagues.

Employees must not represent themselves as authorized spokespersons for LUXIT Group unless specifically authorized to do so.

Accurate Records and Reporting

LUXIT Group is committed to maintaining accurate, complete, and transparent records.

All financial, operational, purchasing, quality, and business information must be accurately recorded and maintained in accordance with company policies and applicable laws and regulations.

Employees must never falsify, conceal, alter, or improperly destroy company records or information.

5. RESPONSIBILITIES TO SHAREHOLDERS AND STAKEHOLDERS

At LUXIT Group, we are committed to creating long-term value through responsible, transparent, and ethical business practices.

We recognize our responsibility to maintain the trust of our shareholders, customers, employees, suppliers, business partners, and other stakeholders.

Acting in the Best Interest of the Company

Every employee is expected to make decisions that support LUXIT Group's success, sustainability, and reputation.

We are committed to conducting business with integrity, protecting company resources, maintaining accurate records, and providing reliable and transparent information to our stakeholders.

Financial, operational, and business records must be complete, accurate, and maintained in accordance with company policies and applicable laws.

Insider Information and Securities Trading

Employees must protect confidential and non-public information related to LUXIT Group, our customers, suppliers, and business partners.

Such information must not be used for personal benefit or shared with unauthorized individuals.

Employees must comply with all applicable laws and company policies concerning the use or disclosure of material non-public information and securities trading.

6. COMMITMENT TO SOCIETY AND COMMUNITIES

At LUXIT Group, we recognize our responsibility to operate as a responsible corporate citizen.

We are committed to protecting the environment, supporting the communities where we operate, and conducting business in compliance with applicable laws and ethical standards.

Environmental Responsibility

LUXIT Group is committed to reducing the environmental impact of our operations by promoting responsible use of resources, waste reduction, energy efficiency, and compliance with applicable environmental laws and regulations.

We expect our employees and business partners to support responsible and sustainable practices.

Community Engagement

We strive to create a positive impact in the communities where we operate by acting responsibly, respecting local cultures, and supporting initiatives that contribute to social and economic development.

Employees are encouraged to contribute positively to their communities while representing LUXIT Group responsibly.

Government Requests and Legal Proceedings

LUXIT Group cooperates with government authorities and responds to legitimate official requests in a timely, accurate, and transparent manner.

Employees must ensure that information provided to government authorities is complete and truthful and must follow applicable laws and company procedures.

Any government inquiry, investigation, or legal proceeding involving LUXIT Group should be promptly referred to the appropriate management, Legal, or other designated company representative.

Prohibition of Criminal, Illegal, and Unethical Activities

LUXIT Group has zero tolerance for criminal activities, fraud, corruption, money laundering, or any conduct that violates applicable laws or our ethical principles.

Employees and business partners are expected to act with integrity, comply with applicable laws, and respect human rights in all business activities.

7. SPEAKING UP AND RAISING CONCERNS

At LUXIT Group, we are committed to maintaining a culture of integrity, transparency, accountability, and trust.

Every employee has a responsibility to report suspected violations of this Code of Conduct, company policies, or applicable laws.

Speaking up allows us to address issues promptly, protect our employees and stakeholders, and continuously strengthen our organization.

Reporting Concerns and Seeking Guidance

Employees are encouraged to seek guidance and raise concerns through appropriate channels, including their supervisor, management team, Human Resources, Legal, or other designated company resources.

All concerns will be taken seriously, reviewed promptly, and handled with respect, confidentiality, and fairness.

Investigations will be conducted objectively and appropriately, and corrective action will be taken when violations are confirmed.

Reports may be submitted anonymously where permitted by applicable law.

Information regarding reported concerns will only be shared with individuals who have a legitimate need to know in order to evaluate, investigate, and address the matter.

If you are unsure whether a situation may violate this Code or applicable law, you are encouraged to seek guidance rather than ignore the concern.

Non-Retaliation Policy

LUXIT Group does not tolerate retaliation against any employee or business partner who, in good faith, reports a concern, asks for guidance, or participates in an investigation.

Anyone who raises a concern in good faith will be treated with respect and will not be subject to retaliation for doing so.

Any act of retaliation is considered a violation of this Code of Conduct and may result in disciplinary action, consistent with applicable laws and company policies.

OUR COMMITMENT

Every person who represents LUXIT Group has a role in protecting our reputation and maintaining the trust of our customers, employees, business partners, and communities.

Doing the right thing is not simply about following rules. It is about acting with integrity, taking responsibility for our decisions, treating others with respect, and speaking up when something does not seem right.

Thank you for your commitment to these principles and for helping LUXIT Group continue to grow as a trusted partner in the automotive industry.

Stephane Védie
LUXIT Group

