

CODE OF BUSINESS CONDUCT and POLICIES

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FOREWORD BY MARINKO DOŠEN, PRESIDENT OF THE MANAGEMENT BOARD

Dear Colleagues,

It is our shared commitment to act responsibly, conscientiously, and in accordance with the core values of the AD Plastik Group. Through daily effort and consistency, we contribute to raising and maintaining high standards of business conduct, thereby strengthening the reputation and position of our company in the global market.

The AD Plastik Group **Code of Business Conduct** is not just a document—it is the foundation of our ethical actions. Each of us is expected to consistently apply it in every situation, regardless of place or context. Honesty, fairness, transparency, and mutual respect are not options but obligations we must uphold in our daily business interactions, both within the company and with external partners.

Our reputation is built on trust and integrity, and only through the responsible behavior of each individual can we continue to build and strengthen the credibility we have earned. This **Code** is our shared guide for making the right decisions, always based on the values of our company.

AD Plastik Group ambitiously strives for continuous growth, achieving outstanding financial results, and sustainable development. However, such success is possible only if we consistently adhere to our core values—excellence, responsibility, integrity, togetherness, and respect. These principles guide us securely toward achieving the highest corporate standards and sustainable development, which form the foundation of the company's future.



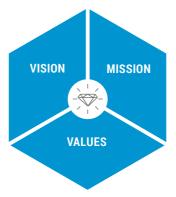
The AD Plastik Group Code of Business Conduct is binding for all of us. If you observe behaviors that are not in line with our Code and values, I encourage you to report them immediately. Your dedication and support are extremely important for maintaining the ethical standards and success of our company.

By respecting our shared values and the **Code of Business Conduct**, we ensure the continuity and perseverance on the successful path of constant progress that we strive for.

Marinko Došen President of the Management Board

OUR FOUNDATIONS

Recognisability for excellence in the development and production of automotive components and business relationships based on trust and partnership. Creating added value in the automotive market, taking care of safe and sustainable mobility, the satisfaction of all stakeholders and the preservation of the planet.



Dedication to the development and delivery of the highest quality automotive components, thereby contributing to the positive changes in safe, customized and sustainable mobility. Creating innovative solutions by understanding the needs of its customers and end users and operating in harmony with its environment.

Taking care about the sustainable future of the company, employees, community, and the planet.

EXCELLENCE

The highest standards of quality, safety and sustainability are the premise for the vision realization. Through constant training and the possibility of personal and business development as well as growth of each individual. the aim is to strive for the best way of working. Constant exploring of areas of growth and innovation is the best response to challenges, and the passion invested in products makes them better and better.

RESPONSIBILITY

Responsibility for the quality and safety of its products, for which dedication and thoroughness are basic standards. Showing our dedication by committing to the successful realization of results and creation of the added value, through a positive impact on society.

INTEGRITY

To be an example that others will gladly follow, doing what is being promoted and informing about what is being done. Relationship with all stakeholders is based on trust, open and honest communication.

TOGETHERNESS

Close cooperation and support at all levels are based on trust and taking responsibility. By sharing ideas and knowledge, respecting multiculturalism, diversity, and equality a better environment is created every day.

RESPECT

Long-term business and partnership relations with all stakeholders are based on fairness and respect.

CODE OF BUSINESS CONDUCT

The Code of Business Conduct of the AD Plastik Group contains rules aligned with corporate values, laws, regulations, and industry standards in which the company operates. This Code serves as a guide for behavior in daily business situations and applies to every employee, regardless of location, position, or job role.



Every employee is responsible for acting in accordance with the **Code** and applicable laws in every situation.

Ignorance is not an excuse for non-compliance with the rules; therefore, the **Code** should be read with special attention to ensure a complete understanding of its content. For any uncertainties, doubts, or questions, feel free to seek additional clarification, and remember that each individual is responsible for their own actions. Managers play a particularly important role in promoting ethical behavior. Their primary duty is to lead by example, ensure that employees are familiar with the **Code**, and create an environment where concerns can be reported without fear or insecurity. Managers are expected to oversee adherence to the **Code** and **company policies** among employees and to continuously strive for their consistent implementation.

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THE CODE OF BUSINESS CONDUCT ENSURES:

- High standards of business operations and sustainability
- Definition of acceptable and professional behavior
- Clear delineation of responsibilities for specific actions
- Promotion of organizational values
- Avoidance of situations where employees may be exposed to unethical or unacceptable behavior

> MECHANISMS FOR REPORTING IRREGULARITIES AND WHISTLEBLOWER PROTECTION

The AD Plastik Group actively promotes responsible behavior among all stakeholders in the value chain, including employees, suppliers, business partners, and other external stakeholders. To ensure ethical and transparent operations, secure and confidential channels are available for reporting irregularities. These channels enable employees, suppliers, and external partners to report any suspicions or violations of the **Code of Business Conduct** without fear of retaliation or discrimination.

Every employee is obligated to report cases of non-compliance with the **Code** or suspicions of its violation, as well as situations where someone might request actions that potentially breach the **Code**. Adherence to ethical standards is the obligation of each individual, and reporting suspected violations of the **Code** is a key part of that obligation. The confidentiality of reports is maximally ensured, and the company provides protection to all who report suspicions in good faith. On the other hand, deliberately and knowingly making false accusations, obstructing an investigation, or refusing to cooperate during an investigation is considered a violation of the **Code**.

Suspicions of non-compliance with the **Code** can be reported verbally, in writing, or anonymously. Verbal reports can be made directly to supervisors or the Legal Department of the AD Plastik Group. Written reports can be sent to the email address **adpkodeks@adplastik.hr**, or submitted anonymously via the **ADP Mailbox**.

Special protection is provided to individuals who report business irregularities, known as whistleblowers, as clearly defined in the **Regulation on the Procedure for Reporting Irregularities**. Whistleblowers are ensured confidentiality and maximum protection, and any attempts at retaliation against them are not tolerated. Whistleblowers can report suspicions of illegal or unethical actions through multiple available channels, either verbally or in writing. However, whistleblowers who knowingly make false accusations will be subject to disciplinary measures.

RESPONSIBILITY FOR IMPLEMENTATION

The **Code** refers to other company policies, procedures, and guidelines, and non-compliance with them may result in disciplinary actions or measures.

The Management of the AD Plastik Group ensures the availability of the **Code of Business Conduct** and the prescribed **policies** to all employees and is responsible for ensuring compliance with the established provisions to preserve the company's reputation with a high level of integrity and confidentiality.

BASIC PRINCIPLES

FAIR BUSINESS PRACTICES

The AD Plastik Group consistently adheres to all applicable legal regulations in the countries where it operates, guided by the principles of prudence, fairness, honesty, and integrity. Business ethics encompass responsibility for all aspects of operations, including sustainability, environmental protection, and social responsibility.

Every employee is required to act in accordance with the **Code of Business Conduct** and, under no circumstances, should use their business position to pursue personal interests. In order to maintain and further enhance the company's reputation in the business community, all employees are expected to act responsibly and diligently in all business activities.

Any form of bribery or corruption is strictly prohibited, and a zero-tolerance policy towards such behavior is actively promoted. Continuous efforts are made to reduce negative environmental impacts, promote energy efficiency, and support initiatives that contribute to sustainable development.

The AD Plastik Group is committed to consistently carrying out all business processes in accordance with leading industry standards (IATF 16949, ISO 14001, ISO 45001, ISO 50001, and ISO 27001), which ensure a high level of quality, environmental protection, health, and workplace safety. All employees must be thoroughly familiar with these standards and and adhere to them in every situation.

RESPONSIBILITY FOR REPUTATION

Each employee of AD Plastik Group, through their work within the organization and behavior in interactions with stakeholders, represents the company and directly contributes to its reputation. Employees are expected to adhere to the principles of professionalism, respect, and responsibility in every aspect of their work and to promote the corporate values and standards of the company in all their interactions.

It is especially important for employees to avoid situations that could potentially lead to conflicts of interest or undermine public trust in the company. In the era of digital communication, employees must be extremely careful in their behavior when using digital platforms or tools, including activities on social media.

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Every employee is an ambassador for the company and contributes to its positive perception through consistent ethical behavior and a professional approach to all business challenges.





> COMMUNICATION WITH COLLEAGUES

All employees, regardless of their position or role within the company, have the right to a work environment where their personality and dignity are respected. This primarily includes respecting different opinions, attitudes, and cultural differences, which enrich the workplace and contribute to better collaboration.

The corporate culture is shaped daily by all employees through their interactions and relationships, which should be based on respect, honesty, transparency, and tolerance. Every employee has the responsibility to encourage open and constructive communication that contributes to creating a positive and collaborative work environment.

The reliability of each employee is extremely important, which means keeping promises

and agreements, fulfilling obligations to colleagues and business partners on time, and in line with the agreed standards. Transparency in communication involves sharing relevant information in a timely and accurate manner between employees, ensuring that all team members are informed about key aspects of the business, which is crucial for making correct decisions and efficient work. Open communication also helps prevent misunderstandings, reduce ambiguities, and build strong team connections.

Each employee should be a role model in their interactions with colleagues, supporting and contributing to the creation of an encouraging and professional work environment where everyone can reach their full potential.

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> MANAGEMENT

Managers and leaders play a crucial role in shaping the work culture and guiding teams toward achieving the company's strategic goals. Through their behavior and work standards, they must set an example for other employees and earn their trust and respect. This requires consistency in adhering to the **Code of Business Conduct** and actively promoting the ethical values and standards of the company.

Leaders should always be available and ready to provide advice, support, and mentorship to their colleagues, enabling them to carry out their tasks independently and effectively. In addition to setting clear and realistic goals, managers are responsible for creating an environment in which these goals can be achieved.

Managers not only assign tasks but also actively monitor their progress and provide continuous support throughout the entire implementation process. They are responsible for ensuring the completion of tasks and addressing any issues or misunderstandings that may arise during the work. Managers and leaders must also cultivate a culture of open communication, where employees feel free to share their ideas, suggestions, or concerns without fear of judgment. This includes actively listening, resolving issues in a timely manner, and promoting teamwork and collaboration at all levels of the organization. In addition to their responsibilities toward their teams, managers are also accountable for the broader organizational success.



EMPLOYEES AND HUMAN RIGHTS

Employees are the greatest asset of the company, and respecting human rights is the foundation and obligation of everyday business operations. AD Plastik Group consistently adheres to international standards, including the Universal Declaration of Human Rights by the United Nations and the conventions of the International Labour Organization (ILO). The hiring process is based on skills, competencies, and experience, with a commitment to treating each individual with respect and consideration.

EQUALITY AND INCLUSION

Through the continuous promotion of equality and inclusivity, equal opportunities are provided for all employees, regardless of gender, age, race, ethnicity, sexual orientation, disability, or any other personal characteristic. Discrimination and harassment are strictly prohibited, and all employees are treated with respect and dignity. Diversity is encouraged, and barriers for underrepresented groups are removed, thereby ensuring fair working conditions for everyone, including dispatched workers. A culture of openness and collaboration is crucial in creating a safe and supportive work environment.

RESPECT FOR THE LAW

Respect for legal provisions regulating employee rights is an integral part of the company's responsible business practices. In cases of discrepancies between the legal regulations in the countries of operation and the **Code of Business Conduct**, the applicable laws apply. All employees are required to uphold ethical standards in their work and to act diligently and responsibly towards shareholders, suppliers, customers, partners, and colleagues.

Special attention is given to the protection of employees' personal data, which is stored in accordance with the highest standards. Access to employees' personal data is limited to authorized individuals within the company and is granted solely when there is a legitimate business need for such information.



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> INTERPERSONAL RELATIONS AND WORK ATMOSPHERE

Special attention is given to interpersonal relationships and creating a positive work atmosphere. Every employee has the right to work in an environment free from discrimination, harassment, and abuse, with relationships among colleagues based on mutual respect and dignity. Any forms of physical, verbal, or psychological violence, including sexual harassment, are strictly prohibited. Every employee has the right to equal treatment, regardless of any personal characteristic, and competencies are the fundamental criteria for hiring and promotion. A culture of trust is developed in interpersonal relationships at all levels. encouraging employees to express themselves freely and openly. This enhances communication, strengthens teamwork, and contributes to creating a positive and supportive work environment.

PROFESSIONAL DEVELOPMENT AND ADVANCEMENT

Continuous professional development of employees is actively encouraged by providing opportunities for training and growth throughout their careers, while promoting mobility within the different subsidiaries of the Group. Transparent reward systems and work in a supportive environment ensure employee motivation and offer opportunities for growth, with diversity and inclusivity recognized as key factors for success.

FAIR WORKING CONDITIONS

Salaries and compensation are aligned with the legal standards for minimum wages and overtime work in all the countries where the company operates. Additionally, employees are entitled to days off and paid annual leave, and safe working conditions are in accordance with international standards. The employment of local residents is encouraged as a contribution to community development and regional stability.





> OCCUPATIONAL HEALTH AND SAFETY

The safety and health of employees are among the company's key priorities. To protect all employees from potential workplace risks, regular checks, training, and evaluations are conducted. The company consistently applies international health and safety standards and provides employees with access to all necessary and relevant information and education that ensures safe and healthy work conditions.

FORCED LABOR AND CHILD LABOR

AD Plastik Group strictly prohibits any form of forced labor in accordance with International Labour Organization conventions No. 29 and 105. It also strictly forbids child labor at all sites of conducting business, with a commitment to respecting children's rights and preventing their exploitation.

EMPLOYEE RESPONSIBILITY

Employees of AD Plastik Group are required to behave in accordance with the company's values, adhere to internal regulations, and perform their duties conscientiously, responsibly, and professionally. Each employee is expected to approach tasks in an ethical and professional manner, contributing to the achievement of shared business goals and maintaining a positive work atmosphere. When making decisions, it is important to rely on verified facts and to assess situations objectively and independently.

Employees are expected to demonstrate proactivity and creativity in their daily work, as well as share their knowledge and experience with colleagues. Communication should be honest, impartial, and always respectful towards others. Each employee should set an example for colleagues through their work and behavior, actively contributing to building the company's reputation and its recognized status in the business community.

Employees are responsible for protecting the company's assets and interests, as well as for maintaining a professional demeanor and appropriate appearance in the workplace. The consumption of alcohol and intoxicants during working hours is strictly prohibited, and a high level of personal hygiene and tidiness is expected from each individual.

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> EMPLOYEE BEHAVIOR

Employee behavior must align with generally accepted standards of courteous conduct. This includes a polite communication style, respect for the elderly and vulnerable, offering apologies and correcting mistakes when necessary, punctuality in arriving at work, and meeting agreed deadlines. The workspace must be clean and tidy, conflicts should be avoided, and active efforts should be made to prevent arguments and negative communication such as gossip or destructive comments.

By maintaining high standards of professionalism and courteous behavior, employees contribute to the creation of a productive work environment and a positive workplace culture.

RIGHT TO ASSOCIATION

The right of employees to associate and form trade unions of their choice, or to have worker representation, is supported in compliance with the applicable laws of the countries in which such association occurs. Any form of discrimination against employees due to union membership is strictly prohibited. The company promotes a culture of dialogue with trade unions and worker representatives, ensuring respect for workers' rights.



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BUSINESS PARTNERS

To maintain and enhance successful business relationships with customers, suppliers, service providers, and other contractual parties, all employees must maintain the highest level of professionalism, particularly regarding quality, price, and reliability.

Long-term and mutually beneficial relationships with business partners are based on trust, credibility, and respect for the company's values.

AD Plastik Group operates in the global market by adhering to the highest ethical principles of market competition. Employees are required to conduct business in accordance with these principles and contribute to the quality of final products and customer success through quality work and fair competition.

Business partners are continuously encouraged to follow high standards of business conduct and adhere to the company's Code. Cooperation with business partners is based on consistency, confidentiality, and mutual respect. Partners are selected based on strictly defined criteria, and they are expected not to engage in unethical or illegal activities.

Suppliers are required to comply with the Code of Business Conduct, the Sustainable

Supplier Management Policy, and the Quality Policy of AD Plastik Group, and all company employees must be familiar with these guidelines to ensure consistent application and cooperation at the highest level.



THE COMMUNITY

AD Plastik Group actively contributes to the development of the communities in which it operates and positions itself as a responsible member of society.



Cooperation with the community is always conducted in accordance with the highest ethical standards and best practices within the industry. The goal is to promote the economic, social, and cultural progress of communities through sustainable development and education projects, the employment of local populations, and corporate social responsibility initiatives.

The term "community" refers to relationships with the local community, legitimate institutions, and government bodies in the countries where the company operates. All relationships with public and institutional entities are based on the principles of fairness, transparency, and accountability, in line with the company's values.

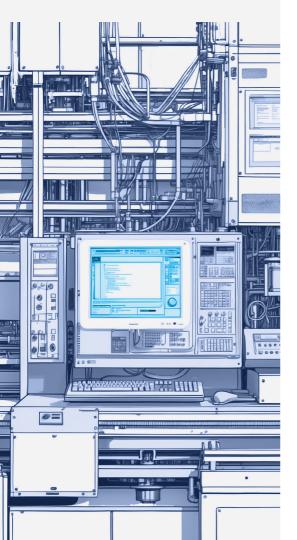
Employees of the company must consistently reflect the company's values and avoid any behavior that could jeopardize its reputation or damage relationships with the community. Accepting personal benefits while performing public duties or creating false expectations regarding the company's involvement in public events is not tolerated. Unethical or illegal actions by employees or associates are strictly prohibited, and any actions that could harm the company's reputation or the communities in which it operates will be sanctioned in accordance with internal rules and applicable laws. In all countries of operation, the company fully complies with legal regulations.

Employees' rights to personally participate in various activities outside the company, including political engagement, are respected. However, such activities do not represent the views of the company, nor does the company bear responsibility for them. Employees are not allowed to use the company's resources or premises for any political activities.

AD Plastik Group does not financially or materially support political parties but advocates for transparent public representation of interests through business and interest organizations, promoting dialogue and constructive relationships with key social participants.

ASSETS AND INFORMATION

Each employee must responsibly manage the company's assets and use them exclusively for lawful business purposes.



Assets must be protected from loss, damage, theft, embezzlement, or destruction, and employees are responsible for their preservation. In accordance with the latest industry practices, the use of modern technologies and systems for asset tracking and protection, including digital security and data management, is encouraged.

Confidential information and intellectual property are essential parts of the company's assets. Employees who have access to such data are required to ensure its protection from unauthorized access, loss, or misuse. The use of confidential information for personal purposes or sharing it with unauthorized individuals is strictly prohibited. The introduction of new data security technologies and regular employee training on information protection are key elements in safeguarding these values.

The use of the company's production capacities, technologies, or facilities for private purposes is not permitted unless explicitly authorized by the relevant authorities.

The company's financial and other reports must accurately and transparently reflect all transactions and business processes, in accordance with applicable laws, standards, and the company's principles. Any irregularities, false reporting, or concealment of data is strictly prohibited and may lead to serious consequences, including legal action.



> MEDIA, PUBLICATIONS, AND PUBLIC APPEARANCE

In communication with the media, strict rules are applied to ensure consistency and accuracy of information. All media inquiries must be forwarded to the corporate communications department, and only members of the Management Board or the head of corporate communications have the authority to make statements on behalf of the company. Other employees may speak publicly on behalf of the company only with prior approval from the corporate communications department. All media releases, statements, interviews, publications, or presentations related to the company must be approved by the corporate communications department to ensure the accuracy of information and protect the company's reputation. This practice is aligned with the latest industry standards, including digital media and social networks, with a particular focus on responsible and professional communication with the public.

AVOIDING CONFLICTS OF INTEREST

Employees of the company are obliged to always act in the best interest of the company and remain committed to its values and objectives, avoiding any situations of potential or actual conflict of interest.

A conflict of interest arises when an employee's personal interests conflict with the interests of the company, which may compromise the integrity of business decisions and jeopardize business relationships. Every employee is obligated to report potential or actual conflicts of interest to the company's legal department. Additionally, employees should disclose situations that could escalate into a conflict of interest, thus ensuring transparency and preventing harmful consequences for the company. For example, if an employee works for or has an ownership stake in another company, especially if that company operates in the same or a similar industry, they must notify their supervisor, the legal department, and the human resources department, and seek advice to avoid ambiguities or potential conflicts of interest

If an employee or a member of their family, household members, or close relatives intends to invest in partner or competitor companies, there is a potential for a conflict of interest. Therefore, every employee is required to report such situations and consult with their supervisor, the legal department, and the human resources department to avoid any ethical or legal complications.

Employees must not compete with the company, either independently or in collaboration with third parties, as this ensures trust and loyalty and guarantees that the company's interests always remain a priority.

In addition to the obligation to report conflicts of interest, employees are also expected to actively participate in creating a work environment that promotes integrity, transparency, and accountability, in line with best practices in corporate governance and ethical behavior within the industry.



COMBATING CORRUPTION

The company has zero tolerance for any form of corruption, bribery, or other unethical financial or business practices.

Corruption and bribery are serious violations that contradict the company's values and strict anti-corruption policy prescribed and aligned with international standards and laws.

All activities related to bribery are strictly prohibited, including promising, offering, or transferring anything of value to government officials or public administration employees to obtain unlawful advantages. Any employee who encounters a situation where they are offered a bribe or are asked to engage in bribery is required to report the incident immediately to their superior or the legal department.

Guidelines for reporting irregularities are clearly defined and ensure full support and protection for employees who report them. AD Plastik Group is committed to maintaining high ethical standards and encourages all stakeholders to adhere to the principles of honesty and transparency to prevent all forms of corruption within its operations.

GIFTS

Although the exchange of gifts and hosting business partners is a common business practice, it is important to maintain a professional distance to avoid creating obligations or unfair advantages. Special attention should be paid to ensure that such actions are not perceived as bribery or undue pressure. Given the cultural differences and specificities of the countries in which the company operates, it is important to understand local customs in order to avoid potential offense by rejecting gifts.

It is strictly forbidden to request or condition negotiations based on gifts, services, or privileges. Bribery and extortion are unacceptable, and every employee is obligated to immediately report any form of coercion or extortion to the legal department.

When exchanging gifts, it is important to ensure that they are legal, appropriate, and do not exceed a value of 200 euros. Gifts should also comply with the rules and laws of the other party to avoid putting the other person in an uncomfortable situation.

Receiving gifts from business partners during the bidding process or contract negotiations is prohibited, as well as receiving gifts that require something in return. Receiving gifts in cash or its equivalent is strictly prohibited in line with best practices and ethical standards.

ENVIRONMENTAL RESPONSIBILITY

AD Plastik Group implements a comprehensive approach to sustainable development in accordance with the latest standards and directives from the European Union on sustainability.

All business investments and projects must contribute to the long-term preservation of the environment and strengthening sustainability as core values of the business. Sustainable development is integrated into the company's strategic decisions in line with best practices in the automotive industry.

As a socially responsible business entity, the company recognizes the importance of its role in protecting the environment, human health, and preserving natural resources. Managing the environmental impact is an integral part of the business strategy, focused on implementing innovative and environmentally friendly technologies that reduce negative impacts.

The company strictly adheres to all applicable laws, regulations, standards, and permits related to environmental protection. The management of natural resources and energy is carried out in a rational and efficient manner, with a particular focus on reducing energy consumption and optimizing resource use. Continuous efforts are made to reduce emissions through improvements in production processes and the implementation of environmentally friendly materials. Active programs for reuse, recycling, material recovery, and safe waste disposal are being developed and implemented, all in line with the latest standards and regulations in the automotive industry. We are committed to a circular economy in order to maximize resource utilization and minimize waste, thereby contributing to sustainable business practices and reducing our ecological footprint.

For the purpose of continuous improvement, the ecological impact is monitored and evaluated by identifying regular concerns and reporting them, with ambitious goals set for reducing the negative environmental impact. Through collaboration with suppliers, partners, and the community, the company aims to create sustainable values that contribute to environmental protection and society as a whole.

The committed approach to sustainable development enables the company to meet and exceed the expectations of its stakeholders, ensuring long-term sustainability and competitiveness in the global automotive industry.



ANTI-CORRUPTION POLICY

Reputation, credibility, and business ethics are exceptionally important elements of the corporate culture of the AD Plastik Group. These values, carefully built over the years, represent valuable capital and a significant strategic advantage in the company's operations.

A zero-tolerance policy has been adopted towards all forms of bribery and corruption, and the company is committed to strictly adhering to anti-corruption standards in all countries where it operates, in line with the latest international standards and EU regulations.

Bribery and corruption are considered criminal offenses in many legal systems, and therefore, the company takes responsibility for preventing and detecting all forms of bribery and other corrupt practices.

The fight against bribery and corruption is a daily responsibility and a continuous obligation, with the adherence to the prescribed principles of this policy serving as the primary prerequisite.

PRINCIPLES

Regular education and training of employees at all levels to enhance their knowledge and understanding of risks associated with bribery and corruption, as well as their informedness of legal frameworks, recommendations for prevention, identification, and dealing with corruption risks within the company and its business environment.

- Informing employees about their obligation to report any form of conflict of interest or corrupt behavior
- Prohibition of giving, offering, promising, accepting, or aksing for any advantages or gifts as an incentive for actions that could influence a person's decisions or conduct, with the aim of obtaining or retaining commercial benefits, deal, or similar
- Prohibition of offering gifts or hospitality to government officials in exchange for any advantage, favorable treatment, or influence on decisions made by public authorities
- Prohibition of accepting gifts, hospitality, or other forms of representation in exchange for providing a service to a customer, supplier, or other business partner, or the promise of providing a service
- Prohibition of donations that do not align with the company's standards of integrity or comply with local regulations
- Adherence to all provisions of legal regulations and other binding acts related to the prohibition of receiving and giving bribes, as well as the prohibition of involvement in any corrupt business practices

ANTI-MONOPOLY POLICY

AD Plastik Group is committed to adhering to the fundamental principles of free market competition, which are essential for healthy competition and sustainable economic growth. Accordingly, any form of coordinated actions among entrepreneurs, agreements, or decisions by business associations aimed at or resulting in the distortion of market competition or the creation of a privileged position over competitors or customers is strictly prohibited.

Market competition is based on fair competition for customers through competitive pricing, high quality, and innovation, enabling choice and ensuring a dynamic and healthy market economy.

In line with the above, AD Plastik Group strictly prohibits the following activities:

- Negotiating with competitors regarding cooperation with specific customers or the establishment of sales prices
- Division of markets, customers, technologies, or locations in agreement with competitors
- Sharing confidential and privileged information with customers, suppliers, competitors, and other stakeholders
- Theft of trade secrets and patents, as well as actions that damage the reputation of competitors
- Imposing unfair sales prices and other trade conditions that do not comply with market standards

- Restricting production and technological development to the detriment of customers or the market as a whole
- Applying unequal conditions for identical transactions with different customers, thereby placing them in a disadvantageous position compared to the competition
- Conditioning the conclusion of a contract on the other contracting parties' acceptance of additional obligations that are not directly related to the subject of the contract



ENERGY MANAGEMENT POLICY

AD Plastik Group recognizes its responsibility toward the environment and the importance of efficient energy consumption. Systematic energy management is a fundamental commitment, aimed at reducing the ecological footprint and improving energy efficiency.

The Energy Management Policy reflects the company's dedication and focus towards sustainable development and continuous improvement of energy efficiency, aligning with company's mission of responsible and conscientious management of energy resources for the benefit of future generations, as well as achieving financial and energy savings.

This Policy is mandatory for all company sites, facilities, and processes.

- Compliance and strict adherence to all applicable laws and regulations and other binding requirements in the field of energy efficiency and energy consumption
- Continuous improvement and enhancement of the energy management system's effectiveness to achieve optimal results in line with the international standard ISO 50001
- Implementation of best practices and alignment of production and operational processes with the best available technologies, techniques, and industry standards to maximize energy efficiency

- Rational use of natural resources and promotion of renewable energy sources, thereby reducing the ecological footprint and contributing to the global energy transition.
- Ongoing education and training for employees at all levels to strengthen their awareness, motivation, and knowledge about the importance of efficient energy consumption
- Constant monitoring of energy management policy implementation and tracking and analyzing energy performance across all sites to identify areas for improvement

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- Active communication with all stakeholders, including employees, partners, suppliers, and the communities in which the company operates, to ensure transparency and cooperation in achieving energy efficiency goals
 - Incorporating energy efficiency assessments where economically justified—into energy procurement, machinery and equipment purchases, investments, and potential reconstructions
- Planning and ensuring necessary resources –

organizational, professional, and financial—for the effective implementation of the Policy and the achievement of set goals to ensure the sustainability of operations

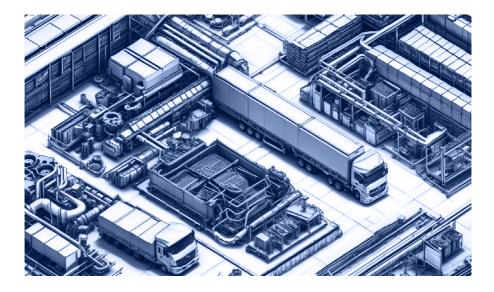
SUSTAINABLE SUPPLIER MANAGEMENT POLICY

AD Plastik Group, like the entire automotive industry, recognizes its responsibility in promoting sus-tainability throughout the entire value chain. This policy sets guidelines for the sustainable manage-ment of suppliers, aiming to minimize the negative impact on the environment, promote social responsibility, and ensure economic sustainability.

The purpose of this policy is to establish clear standards and expectations for all suppliers to ensure compliance with sustainability principles. This includes environmental protection, respect for human rights, ethical business practices, and contribution to economic development.

This policy applies to all suppliers, including primary, secondary, and tertiary suppliers, as well as all their subcontractors and business partners.

The sustainable supplier management policy represents the commitment of the automotive industry and AD Plastik Group to sustainable development and responsible value chain management. All suppliers are encouraged to collaborate and contribute to achieving sustainability goals.



> ECOLOGICAL SUSTAINABILITY

Environmental protection

- Implementation of greenhouse gas (GHG) emission reduction measures in its operations and value chain
- Development and implementation of a strategy for decarbonizing its operations and products
- Minimization of waste at its sites and promotion of reuse and recycling of materials in its operations wherever possible
- Efficient use of resources and adoption of practices that reduce environmental impact, including responsible water and chemical management

Resource management

- Development and implementation of a policy to reduce energy consumption and improve energy efficiency
- Use of renewable energy sources wherever possible and efforts to reduce dependence on fossil fuels
- Responsible use and management of water, including its quality, consumption, and wastewater management
- Reduction of noise and emissions that negatively impact air quality



Soil quality

 Prevention of soil degradation and preservation of its quality through appropriate land man-agement practices

Biodiversity and land use

 Taking measures and implementing practices that protect biodiversity and prevent deforestation and ecosystem degradation

Animal protection

 Humane treatment of animals in accordance with best practices for animal protection

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> SOCIAL RESPONSIBILITY

Labor rights

- Strict prohibition of child labor within the supply chain, with any young workers (ages 15–18) required to work under special conditions that ensure their safety and health
- Ensuring fair wages and benefits for employees in accordance with legal and industry standards
- Aligning working hours with local laws and international standards, including respect for the right to rest and days off
- Preventing any form of forced labor, modern slavery, servitude, or human trafficking

Employee rights

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- Ensuring freedom of association for employees and the right to collective bargaining without fear of retribution
- Providing a work environment free from discrimination and harassment based on gender, race, religion, or any other personal characteristics
- Special commitment to protecting women's rights and ensuring equality
- Promoting diversity, equality, and inclusion in all aspects of its operations
- Respecting the rights of minority and indigenous communities, including the right to land, culture, and resources



Health and safety

 Ensuring a safe and healthy working environment for all employees, including the implementation of preventive measures and training

Ethical employment

 Implementation of ethical employment practices, including fair working conditions and preven-tion of discrimination

Rights to land, forests, and water

 Respecting the rights of local communities to land, forests, and water resources, and prevent-ing forced evictions

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> ETHICAL BUSINESS

Anti-corruption and anti-money laundering

 Implementation of policies and procedures to prevent corruption and money laundering

Data protection

 Ensuring the protection of personal data and information security in compliance with relevant laws and standards, including maintaining accurate and complete business records

Financial responsibility

 Financially responsible and transparent business operations, adhering to all relevant laws and regulations, including maintaining accurate and complete business records

Disclosure of information

 Timely and accurate presentation of all relevant information related to business operations, including reporting on sustainability

Fair market competition

 Compliance with competition law and antitrust regulations to ensure fair market practices

Conflicts of interest

 Preventing conflicts of interest and ensuring that personal interests do not influence business decisions in any way

Counterfeit prevention

 Taking measures to prevent the production and distribution of counterfeit partsérdekében tett intézkedések

Intellectual property

 Respecting the intellectual property rights of business partners and other parties

Export controls and economic sanctions

 Compliance with all relevant laws and regulations regarding export controls and economic sanctions

Whistleblower protection

 Providing secure channels for reporting irregularities and protecting whistleblowers from retaliation

Use of private and public security forces

 Respecting human rights and acting in accordance with laws and international standards for all security forces, whether private or public



QUALITY POLICY

Comprehensive quality management and sustainable development are the fundamental business principles of AD Plastik Group. The quality policy is aligned with the requirements of the IATF 16949 standard, customer demands, legal regulations, and other relevant requirements. By continuously improving the quality management system, the company aims to achieve excellence in all aspects of its operations.

The results of quality monitoring and measurement are documented and used for further improvements, taking into account feedback from customers, employees, and other relevant stakeholders. Transparency and accountability regarding quality are key to achieving goals and ensuring long-term customer satisfaction.

Commitment to systematic quality management is reflected through the following guidelines:



IATF 16949 and Quality Management System

- Continuous fulfillment of the requirements of the IATF 16949 standard and the established quality management system
- Ongoing maintenance of the quality management system through regular processes review and improvement
- Continuous education and raising awareness among employees about the importance of quality in daily operations

> Customer Focus

- Maintaining a high level of product quality in line with agreed customer requirements and expectations, ensuring their ongoing satisfaction
- Applying methods for analyzing and gathering customer feedback to ensure continuous improvement of products and services

Improvements to the Quality Management System

- Applying an integrated approach to quality improvement through the comprehensive responsibility of all employees at all levels of the organization
- Implementing advanced quality management tools to improve processes and reduce variability



Innovation and Technological Advancement

- Actively monitoring the latest technologies, materials, and industry trends, and applying them in manufacturing processes
- Continuously investing in research and development to enable innovations that contribute to sustainability and the enhancement of product quality

Sustainability and Regulation

- Compliance with European and local sustainability regulations, with a special focus on reducing environmental impact throughout the entire product lifecycle
- Compliance with and fulfillment of applicable legal regulations, industry standards, and other requirements, consistently meeting all obligations related to product quality
- Reduction of emissions, optimization of ergy and material consumption, and commitment to improving circular economy processes
- Regular monitoring of changes in legal and regulatory frameworks to ensure the highest product quality and safety standards are met

Evaluation and Improvements

- Regular evaluation and improvement of policies and objectives to ensure alignment with the organization's vision and mission at all times
- Introduction of new technologies and approaches based on comprehensive analyses and best practices within the industry

ENVIRONMENTAL PROTECTION POLICY



AD Plastik Grupa bases its business on respecting generally accepted principles of environmental protection, adhering to the highest environmental standards in all aspects of its business and applying best practices from the automotive industry. It is dedicated to constantly improving the quality of life of the community, participating in its development and promoting sustainable practices that ensure the future of the environment and its protection.

The company's activities are aligned with international and European regulations and standards, as well as industry standards. The environmental protection policy takes into account the latest scientific research in this area and technological innovations within the automotive industry.

Continuous care and preservation of the environment are an integral part of the company's sustainability strategy, and the Environmental Protection Policy is a binding document with which all employees are familiar.

Legal compliance and standards

- Compliance with legal and mandatory requirements by implementing and complying with all relevant EU legislation and other mandatory requirements in the field of environmental protection, including those specific to the automotive industry
- Implementation of an environmental management system according to the ISO 14001 standard and continuous improvement of its effectiveness in accordance with European standards and best practices from the automotive industry
- Development and implementation of our own standards for the prevention of environmental risks and hazards, in line with the practices of leading companies in the industry

Sustainable business

- Aligning production and work processes with the best available technologies and techniques, in line with industry and environmental standards
- Using environmentally friendly raw materials and continuously engaging in improving the product life cycle, while following sustainable practices from the automotive industry

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> Resource management

- Rational use of natural resources and energy and encouraging the use of renewable energy sources, following industrial norms of energy efficiency
- Reduction, reuse and/or recycling of waste and packaging material in accordance with circular economy practices

Emissions Management

- Carbon neutrality by 2050 with significant emission reductions by 2030 and regular reporting of progress in its integrated annual reports
- Reducing emissions of pollutants into air, water and soil and preventing pollution and accidents, applying standardized technologies and practices within the industry
- Direct emissions (Scope 1) continuous reduction from plants and vehicles through optimization of production processes and application of energy-efficient technologies, in line with automotive industry practices

Indirect emissions from energy consumption (Scope 2) - continuous reduction from purchased energy, finding more environmentally friendly options with partners, using renewable sources and improving energy efficiency in its facilities, in line with industry standards and the company's sustainability strategy

- Value chain emissions (Scope 3) - monitoring and reduction in cooperation with suppliers and partners, including production, transportation and use of products, and following industry best practices
- Active implementation of business decarbonization measures with the aim of reducing the carbon footprint, in accordance with EU guidelines and best practices in the automotive industry

Specific areas

- Respecting the highest standards of animal welfare in production processes, in line with industry norms and ethical guidelines
- Preserving biodiversity, responsible land use and preventing deforestation, in line with the EU's sustainable development goals and practices in the automotive industry
- Preserving and improving soil quality through responsible land management, preventing erosion and pollution, and implementing sustainable practices

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EMPLOYEE HEALTH AND SAFETY POLICY

The permanent promotion of a sustainable working life through continuous improvements in working conditions and the reduction of the risk of occupational injuries and occupational diseases are an indispensable part of the business strategy and sustainability of the AD Plastik Group. The commitment to health preservation is manifested through the constant care for ensuring healthy and safe workplaces.

This policy represents the company's permanent commitment and the basis for creating a safe and healthy working environment for all employees and associates.

- Regular identification of hazards and assessment of health and safety risks, with the aim of eliminating or reducing them to the lowest possible level
- Application and implementation of preventive measures to prevent injuries at work and occupational diseases
- Monitoring and compliance with all legal regulations and other mandatory requirements in the field of health and safety at work
- Continuous improvement of the effectiveness of the health and safety management system in accordance with the requirements of the international standard ISO 45001

- Development and application of our own standards to prevent the occurrence of potential risks and hazards that may endanger the health and safety of employees
- Continuous harmonisation of production and work processes with the best available practices, technologies, techniques and standards in order to ensure the highest level of safety
- Regular education and training of employees at all levels and strengthening motivation, awareness and knowledge about health and safety
- Encouraging open communication with all interested parties on health and safety, including employees, unions, competent institutions and other stakeholders
- Ensuring the necessary organizational, professional and financial resources to achieve the objectives of this policy
- Continuous supervision and revision of measures to protect the health and safety of employees due to better effectiveness of their implementation
- Compliance with high health and safety standards is also the obligation of all subcontractors working on the company's premises, which includes the implementation of appropriate measures for their employees and compliance with all relevant legal regulations and internal company standards.

HUMAN RIGHTS AND ETHICAL PROTECTION POLICY

Respect for fundamental human rights and ethical employment are key elements of sustainability and social responsibility for AD Plastik Group. The company's corporate culture is based on respecting the dignity of every individual and ensuring fair and safe working conditions. This policy represents a commitment to human rights in line with best practices and an obligation toward its employees, the community, and the environment.

The policy demonstrates the company's dedication to creating a fair and safe work environment that upholds the dignity, safety, and rights of all employees. Its implementation is mandatory across all functions and activities of the company.



Dignity in the Workplace

- Creating an inclusive and supportive work environment that enables every individual to reach their full potential
- Fostering open, honest, and respectful relationships with every individual, regardless of cultural, ethnic, or individual diversity
- Encouraging unity, mutual support, and collaboration as responsibilities of every individual

Safe Work Environment

- Taking all necessary and practical measures to ensure a safe working environment at all sites
- Risk prevention, regular safety standard assessments, and continuous improvement of working conditions in accordance with best practices in the automotive industry

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> Freedom of Association

- Supporting and respecting employees' right to freely associate and organize, allowing them to make decisions without fear of retaliation, discrimination, or harassment.
- Advocating for transparent and constructive dialogue with union representatives, based on mutual respect, with the aim of creating fair, balanced, and sustainable working relationships that contribute to long-term employee satisfaction

Working Conditions and Salaries

- Respecting legal provisions regarding weekly working hours, daily, weekly, and annual leave, and International Labour Organization (ILO) conventions in all countries of operation
- Commitment to paying salaries in accordance with the laws of each country, covering basic living expenses (living wage), and enabling a dignified life for employees and their families
- Payment of adequate wages that exceed the legally mandated minimum and cover the basic needs of employees
- Respecting and promoting the principle of equal pay, regardless of gender, ethnicity, age, or other personal characteristics

Child Labor and Children's Rights

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 Explicit prohibition of employing children under the age of 15, in accordance with international standards and the International Labour Organization (ILO) conventions No. 138 and 182

- Prohibition of any form of forced labor, including work performed under threat of punishment or under conditions that violate basic human dignity
- Strict prohibition of violating children's rights, with any non-compliance being subject to the strictest penalties, including termination of cooperation with the responsible parties
- Prevention of child labor across the entire supply chain through the development and strengthening of monitoring mechanisms and the implementation of regular assessments and audits
- Promoting children's rights to education, health, and safety, supporting initiatives and programs that ensure access to quality education and healthcare for every child, as well as activities that promote their fundamental freedoms and rights
- Supporting employees who are parents in balancing work and private life by providing benefits for parents.
- Fair approach to young employees and enabling their professional development.
- Ensuring safety, responsible production, and non-toxic products that may come into contact with children
- Creating a healthy environment where children can grow and develop safely, by applying sustainable practices in production and reducing the negative environmental impact
- Regular education for employees and partners aimed at raising awareness about the importance of protecting children's rights and the harms of child labor >

> Prohibition of Human Trafficking

- Prohibition of all forms of human trafficking for any purpose, any form of forced labor, unpaid or poorly paid labor under conditions that violate basic human dignity, and the use of deceptive or misleading employment practices
- Prohibition of charging fees for employment to candidates and the confiscation of work permits or immigration documents from employees

Rights to Land, Forests, and Water

- Conducting business activities that do not violate the rights of local communities to land, forests, and water, including the obligation to obtain prior informed consent (FPIC) from local communities before undertaking any activities that may affect their resources
- Prohibition of participating in or supporting activities that could lead to the forced eviction of communities

Rights of Minorities and Indigenous Peoples

- Respect for the cultural identity, traditions, and resources of minority and indigenous communities
- Dedicated attention to these communities to ensure their protection and development

Increased Transparency and Responsibility

- Providing additional mechanisms for reporting violations of human and labor rights, with maximum protection for whistleblowers
- Ensuring access to these mechanisms for all employees, suppliers, and third parties, with the option to report transparently or anonymously



CORPORATE SECURITY POLICY

AD Plastik Group expresses its strong commitment to protecting its employees and the entire corporate assets, including its integrity, security, confidentiality, availability, as well as the legal and business interests of the organization. This policy ensures a consistent approach to corporate security across all business activities and processes.



Scope of Application

 Corporate security encompasses multiple aspects of protection, including personal, physical, technical, informational, and administrative security, all of which must be integrated into every business process to effectively protect employees, assets, and business interests from various security threats

Goals

The primary goals are to reduce the occurrence and impact of security incidents and ensure business continuity and success. This includes protecting employees, assets, and business interests from damage caused by internal or external, intentional or accidental, fraudulent, unlawful, and criminal activities By implementing preventive and corrective security measures, aligned with applicable legal regulations, contractual obligations, and the company's business requirements, the aim is to achieve these stated goals

Assessment and management of security risks

- Assessment and management of security risks form the basis for decision-making regarding necessary security measures. Security measures are applied considering their justification, functionality, cost-effectiveness, and efficiency, in line with business decisions on acceptable levels of risk
- Risk management involves the continuous evaluation of security threats and the adjustment of measures to minimize potential impacts on the business

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- > Compliance with Legal and Contractual Obligations
 - Compliance of security measures with all applicable legal regulations, international standards, contractual obligations, and best practices
 - Adherence to legal requirements related to data and information security, as well as compliance with relevant industry standards

Security Awareness and Education

- Continuously raising awareness and providing systematic training to employees on corporate security to achieve security objectives
- All employees and third parties involved in business processes should be aware of their responsibilities and obligations regarding corporate security

Integration of Security into Business Processes

The integration of corporate security into all business processes, principles of operation, and management within the company. Strict adherence to security policies and requirements is mandatory for all employees, third parties, and legal and physical entities involved in any way in the company's business processes,



DIVERSITY AND EQUAL OPPORTUNITIES POLICY

AD Plastik Group recognizes the abilities and skills of its employees as key factors for long-term bu-siness success. By respecting diversity and equal opportunities, the company actively contributes to the development of their potential, regardless of individual differences.

As signatories of the Diversity Charter, we are committed to adhering to its principles and actively participating in the EU initiative that promotes diversity. Every employee deserves respect, recogniti-on, and support in achieving their best results, and the company's mission is to ensure equal oppor-tunities for all employees and those aspiring to join.

Regardless of age, gender, race, nationality, religion, beliefs, origin, disability, pregnancy, maternity, sexual orientation, length of service, or individual differences in professional and personal experien-ces, all employees and candidates should receive equal support and encouragement to develop their personal potential and utilize their specific talents.

The company is committed to creating a work environment that fosters diversity and ensures equal opportunities for all employees. Accordingly, the following binding measures have been established:

- Creating a workplace environment where diversity and the contributions of each individual are recognized and valued
- Fostering a corporate culture where respect and the dignity of each individual are funda-mental values
- Promoting a fair and consistent approach to each individual, encouraging mutual respect
- Zero tolerance for any form of intimidation, harassment, or bullying in the workplace.
- Ensuring a workplace free from discrimination and unjust bias, where all employees feel accepted and respected
- Encouraging the reporting of all forms of discrimination to timely implement corrective ac-tions and prevent further occurrences
- Providing access to education, training, development, and career advancement for all employees, encouraging their professional and personal growth
- Promoting and supporting diversity as one of the key elements of innovation, creativity, and critical thinking, which creates a motivated and engaged work environment with high effi-ciency

ADVERTISING AND MARKET COMMUNICATION CODE



The Advertising and Market Communication Code of the AD Plastik Group defines the standards for responsible and ethical advertising, complementing legal frameworks and EU regulations, while respecting societal values. This Code governs all aspects of market communication, including advertising, promotions, and information for promotional purposes, with the aim of promoting fair, transparent, ethical, and responsible advertising and market communication.

The company recognizes the importance of social responsibility in all aspects of its operations, including communication. Therefore. all employees, suppliers, partners, and agencies involved in the creation and spreading advertising messages are obligated to adhere to this Code. Transparent and effective implementation ensures the maintenance of the highest ethical standards and public trust.

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LEGALITY

Market communication and advertising must be fully compliant with all applicable laws and regulations and must not, under any circumstances, encourage or approve their violation.

DECENCY AND HONESTY

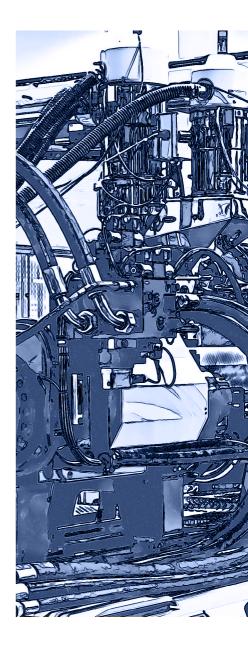
The company's market communication must be polite, sincere, and truthful, and it must not contain offensive messages toward the public. It must not exploit public trust or take advantage of their lack of experience or knowledge. Messages must be aesthetically acceptable, in line with the cultural environment's requirements, and should not irritate users with aggression or distasteful scenes, expressions, and methods, regardless of the medium used. Messages must not offend religious beliefs or any other sentiments of citizens.

TRUTHFULNESS

All claims made in public must be truthful and verifiable. In cases of unusual or unrecognizable claims, the company takes responsibility for the truthfulness of these statements. Humor and obvious exaggerations are permitted only if it is clear they are not presented as facts. Comparisons are allowed only if they do not mislead the public.

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

Market communication must not, without justifiable reasons, appeal to fear, disrespect historical monuments and events, or use motives that promote antisocial behavior, violence, smoking, excessive drinking, or any harmful habits in a way that encourages or directly approves them. To protect the environment, advertising must not promote products or activities that have a negative impact on the environment without highlighting appropriate measures to mitigate such impact.



PRIVACY

Individuals featured in advertisements or promotional materials must provide their consent for the use of their likeness, except in cases where the images involve larger groups of people, provided that these images are not offensive or compromising. In the event of a justified objection from individuals, such visual materials should be withdrawn. An exception applies to content where a documentary approach is implied.

SAFETY

Advertising must not encourage dangerous actions or disregard safety, especially when the target audience is children and young people. Advertising must promote responsible behavior and adherence to safety measures.

CHILDREN AND YOUTH

Special attention is given to advertising targeted at children and young people. Such messages must not exploit their naivety or lack of life experience, nor show them in dangerous situations without protection. The messages must promote safety and responsible behavior in traffic and everyday situations.

REFERENCES TO THIRD PARTIES AND ACCREDITATIONS

In advertising and market communication that refers to third parties or organizations representing authority in a specific field, prior consent must be obtained from them. Statements based on recognitions or test results must clearly specify the source of the data. Recognitions and awards may only be used in advertising if they are current and relevant.

GIFTS

Communication tools for sales promotion must fall within the realistic value range typical for products of that type. Products must be clearly identified as business gifts, not as items with market value that could be resold, thereby generating unjustified and untaxed profit. All promotional activities must be transparent and fair.

EMPLOYMENT

Job advertisements must clearly provide all relevant information about the working conditions to avoid suspicious offers or those that could harm candidates or society.

ADVERTISING MESSAGES

All advertising messages must be clearly identifiable as such. Messages that could confuse the reader or viewer about their nature must be clearly labeled (e.g., "advertisement," "sponsored content"). Advertising must not unfairly or subjectively attack or belittle competing products, brands, or advertisers.

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Your needs. Our drive.

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