GROUP CODE OF ETHICS

Revision	Author	Job Title	Last Update	Due Date
01	Julien GRANGE	Group CEO	30/09/2024	31/12/2026
02	Julien GRANGE	Group CEO	24/02/2026	31/12/2026

1. INTRODUCTION

PURFLUX GROUP has established this Code of Ethics in order to define, clearly and openly, the set of values in the pursuit of its objectives. Compliance with this Code is essential for the correct functioning, reliability, reputation and image of the Group: qualities that underpin the present and future success and development of our businesses.

Accordingly, the activities of PURFLUX GROUP must comply with the principles set out in this Code of Ethic

Our company recognizes the importance of ethical behavior and social responsibility in the conduct of its corporate and business affairs and undertakes to respect the legitimate interests of its stakeholders and of the community in which it operates[1].

Being a leading global supplier for the automotive industry, PURFLUX GROUP is committed to achieve excellence, innovation and performance in a sustainable manner. In the automotive sector, people and the environment are the most important resources, and thus PURFLUX GROUP endeavors to adopt an approach to business at the forefront of sustainable development in the common interest of all, present and future, stakeholders.

In this context, all of our employees and all those who work together with the businesses are requested to comply with the corporate regulations and principles set out in this Code of Ethics.

2. MISSION AND ETHICAL VISION

The main goals recognized and pursued by PURFLUX GROUP is the creation of value and profitability.

This remains underpinned by three core pillars:

1) The safety any employees joining our plants
2) Our customers satisfaction
3) The minimization of negative environmental impacts.

The main strategy is then spread into operations to meet this goal.

The PURFLUX GROUP intends to maintain and develop the relationship of trust established with its stakeholders and, therefore, to seek the best balance of interests in the pursuit of its objectives, in full compliance with current applicable legislation

[1] *Our stakeholders include our shareholders, directors, employees, consultants, customers, suppliers and business partners. In broader terms, our stakeholders also include all those individuals and groups, as well as the organizations and institutions they represent, whose interests are influenced by the direct and indirect effects of the activities of PURFLUX GROUP*

and with the principles of honesty, impartiality, reliability, loyalty, fairness, openness and good faith.

3. SCOPE OF APPLICATION

This Code of Ethics applies to PURFLUX GROUP. The principles and provisions of this Code of Ethics are binding on all directors, employees and persons who work with the Group under contract, including temporary staff. Collectively, all the above persons are referred to below as "recipients".
In particular, the members of the PURFLUX GROUP Management Team are required to refer to the principles set out in this Code when establishing objectives for plants, when:

- proposing investments,
- carrying out projects,
- taking any form of operating decision or action with regard to the businesses run by PURFLUX GROUP.

Similarly, when implementing the decisions taken by the directors of the businesses operated, managers must refer to these principles: both within the company, thus reinforcing cohesion and a spirit of mutual collaboration, and with regard to those third parties who come into contact with the PURFLUX GROUP.
Employees of the company and its external consultants, as well as its business partners and all those with a long- term contractual relationship with the Group are expected to behave in line with the provisions of the Code.

4. REFERENCE PRINCIPLES AND PROVISIONS

With the purpose of acknowledging, promoting and ensuring the respect of fundamental human rights by all the recipients, PURFLUX GROUP undertakes to comply with the principles below reported.

4.1 Fair business practices

4.1.1 Compliance with the law

PURFLUX GROUP recognizes as an essential principle that they must comply with the current applicable legislation and regulations of the countries in which they operate.

4.1.2 Honesty and fairness

Honesty is the fundamental principle for all of our company activities and a vital ingredient in the way, we run its business. All dealings with the stakeholders of Group companies are thus based on fairness, collaboration, loyalty and reciprocal respect. Under no circumstances may the pursuit of PURFLUX GROUP's interest can be used as justification for dishonest behavior.

4.1.3 Impartiality and equal opportunity

PURFLUX GROUP undertakes to avoid all discrimination based on age, sex, sexual habits, health, ethnicity, nationality, political opinions and religious creed in all decisions that affect relations with its stakeholders.

4.1.4 Respect of intellectual property rights

PURFLUX GROUP is committed to respect and protect the intellectual property rights of each individual. Thus, our company acts in compliance with both applicable international standards and local regulations of countries in which it operates.

4.1.5 Confidentiality

PURFLUX GROUP guarantees the confidentiality of the information in its possession and the compliance with regulations regarding the privacy of personal information.

All information available within our company is handled respecting confidentiality and privacy of the people concerned. In this regard, each employee must:

- acquire and process only the data needed for and directly connected with the performance of his duties;
- store such data in a way that prevents unrelated third parties from obtaining it;
- communicate and disclose the data in the context of established procedures or following authorization from the person responsible;
- determine the confidential and private nature of the information in accordance with the established procedural requirements;
- ensure that no confidentiality requirements arise as a result of relations of any type with third parties.

4.1.6 Transparency and completeness of information

PURFLUX GROUP undertakes to inform all stakeholders, with clarity and transparency, about their specific positions and performance, without favoring any interest groups or individuals. Such information will be provided by the business functions specifically responsible for this task.

4.1.7 Transparency of accounting records

PURFLUX GROUP undertakes to properly record all transactions and operations carried out, in order to make possible to verify, if necessary, the process of decision-making, authorization and performance. All transactions must have adequate supporting documentation that enables, at any time, the verification of checks on their nature and the reasons for them, and which identifies the persons who authorized, performed, recorded and checked them.

4.1.8 Fair Competition

PURFLUX GROUP sustains the principle of fair competition and refrains from any anti-competitive practices and any behavior that proves collusive or that represents abuse of a dominant position. Furthermore, our company is committed to compete in a fair and ethically justifiable way within the anti-trust framework, respecting the competition rules within the markets in which it operates.

4.1.9 Prevention of conflicts of interest

PURFLUX GROUP shares the necessity of ensuring a governance constantly characterized by the highest visibility of the decision-making procedures. To that end, the Companies consider as a necessity the greater extension of the information obligation of each Director, towards the others and the Board of Auditors, concerning every interest falling into the application of the art. 1161 of the (French) Civil Code, in order to permit to the Administrative Organ an adequate evaluation and in the mere interest of the Company.

The Management Team, and Plants' Directors shall inform the CFO & CEO about any interest or financial advantage for them or their families that may arise from operations undergoing the examination of those latters.

The Management Team, and Plants' Directors are committed to a correct and balanced corporate and managerial running of the companies subjected to direction and coordination.

PURFLUX GROUP operates avoiding situations where the people involved in transactions are, or may appear to be, in conflict with the interests of such companies. By mere and incomplete way of example, the following situations represent a conflict of interests:

- involvement – declared or undeclared – of an employee and of their collaborators and their families in the activities of suppliers, customers, competitors;
- the use of a job function to promote interests that conflict with those of the company;
- the use of information acquired by employee at work for his own advantage or for the advantage of others or, in any case, in contrast with the interests of the company;
- the performance of work of any kind (provision of services, provision of intellectual activity) for customers, suppliers, competitors and/or for third parties in conflict with the interests of the company.

4.1.10 Anti-Corruption and bribery

PURFLUX GROUP is committed to prevent any form of corruption or extortion and to oppose any act of bribery. Any plant shall not, directly or indirectly, offer, promise, give or demand cash or other any improper advantage to, from, or on behalf of a Public Official, any supplier, customer, competitor or other third parties, with the intention of corruption. Furthermore, each individual shall not accept or offer gifts, meals, or entertainment if such behavior could create the impression of improperly influencing the respective business relationship.

4.2 Corporate Governance

All plants from the group shall create the conditions for the widespread and knowledgeable participation of shareholders in the decisions that relate to them, promote the equality and completeness of information, and safeguard their interests.

The system of corporate governance adopted by Group companies complies with applicable legal requirements. It is mainly designed to:

- ensure that operations are carried out properly;
- control risk;
- ensure maximum transparency in relation to the stakeholders of the business;

- respond to the legitimate expectations of shareholders;
- avoid any type of transaction that might damage the creditors and other stakeholders.

Group companies refer to the Code of Self-Discipline for Listed Companies, in order to effectively define their own model of corporate governance.

4.3 Human Capital protection

4.3.1 Importance of the individual

PURFLUX GROUP promotes respect for the physical, cultural and psychological integrity of each individual.

The Group supports and respects human rights, in conformity with the UN's Universal Declaration of Human Rights [2] and the ILO's Declaration on Fundamental Principles and Rights at Work[3]. Working conditions that respect the dignity of individuals are guaranteed, as is the safety of the working environment. Requests or threats designed to induce persons to contravene the law or the Code of Ethics will not be tolerated, and neither will behavior that offends the moral and personal convictions of individuals.

4.3.2 Valorization of human resources

PURFLUX GROUP rewards its human resources as a key factor and recognizes the importance of establishing and maintaining employee relations based on loyalty and mutual trust. Accordingly, the management of employment and consultancy relationships is based on respect for the rights of workers and on the full recognition of their contributions, promoting their professional development and growth.

Group companies also undertake to consolidate and spread a safety culture, creating risks awareness and promoting responsible behavior among employees and consultants in order to safeguard their health and safety.

All of Group companies' employees and consultants have to act loyally with regards to the obligations arising from their employment contracts and from the provisions of this Code of Ethics, guaranteeing the services required and respecting their commitments to the Company.

[2] *The Universal Declaration of Human Rights, United Nations, 1948*

[3] *The Declaration on Fundamental Principles and Rights at Work, ILO, 1998*

4.4 External relationships

4.4.1 Responsible interaction with customers

PURFLUX GROUP enhances its relationship with customers, interacting with them with attention, courtesy and respect, in order to establish and maintain a collaborative and highly professional relationship.

In accordance with the principles of impartiality and equal opportunity, Group companies undertake not to discriminate arbitrarily between their customers, and to provide high quality goods and services, satisfying their reasonable expectations and protecting their safety and security. Group companies also undertake to communicate the truth in advertising, commercial messages and any other form of communication.

4.4.2 Responsible relations with suppliers

Purchasing procedures are designed with loyalty and impartiality to obtain the maximum competitive advantage, as well as equal opportunities for all suppliers.

Within the process of selection of suppliers and the determination of purchasing conditions, PURFLUX GROUP guarantees an objective evaluation of quality, price and ability to supply and guarantee services of the required level.

The Group is committed to promote and disseminate the principles highlighted in this Code of Ethics within the supply chain.

Specifically, employees assigned to these processes must not:

- receive any form of payment from anyone for the performance of their official duties or to contravene their official duties;
- suffer any form of pressure from parties external to the Group, or from unauthorized parties within the Group, to make decisions and/or carry out tasks related to their own jobs.

4.4.3 Responsibility towards the community

Group companies are aware of the effects of their activities on economic and social growth and on the general well-being of communities in which they operate. Therefore, the Group pays attention to achieve a balance among the interests concerned and is committed to conduct all its activities with respect for local and national communities.

The Group believes that dialog with associations is of strategic importance for the proper development of its activities and intends to cooperate with them, respecting the reciprocal interests involved.

Regarding the relations with political parties, their representatives and candidates, the Group acts in strict compliance with the applicable regulations.
Group companies view favorably and, if appropriate, provide support for social and cultural activities, including the making of grants to foundations whose activities are oriented towards the individual and improving the quality of life. Such grants must be made in strict compliance with the law and current regulations and be documented appropriately.

4.4.4 Relations with Public Administration and Supervisory Authorities

Commitments to the Public Administration and Public Institutions may only be made by the authorized and responsible business functions, in strict compliance with applicable legal and supervisory requirements. Such commitments must not compromise in any way the integrity and reputation of the Group. For this reason, it is necessary to gather and retain the documentation regarding contacts with the Public Administration.
The employees and representatives of Group companies must not promise or offer money, goods or other forms of asset to public officials, providers of Public Services or other employees of the Public Administration or other Public Institutions, with the aim to promote or obtain advantage for their interests or the interests of the Company, or even to remunerate or recognize the performance of their official duties, or to procure the performance of a deed that conflicts with their official duties.
Acts of commercial courtesy, such as gifts or forms of entertainment, or any other type of benefit (including donations), are only allowed if their value is modest and not such as to compromise the integrity and reputation of the parties, and if they cannot be interpreted by an impartial, third party observer as acts designed to obtain advantage and favors in an improper manner. In any case, such acts must always be authorized and documented appropriately.
Direct action, or action via third parties, designed to influence independence of judgement or obtain any form of advantage for the Company is forbidden.
Any worker who, directly or indirectly, receives proposals for benefits from public officials, public service providers or other employees of the Public Administration or other Public Institutions must immediately report them to the Supervisory Body, if he is an employee, or to his company contact, if he is a third party. (For more details, please refer to paragraph 5).

Group companies undertake to fully and scrupulously comply with the rules of the Authorities that regulate the markets, and to supply on a timely basis any information requested by the antitrust authorities and other regulatory bodies in the performance of their functions.

4.5 Environmental protection

PURFLUX GROUP is committed to make a positive contribution to environmental sustainability in all of its activities, bearing in mind the rights of future generations.
Strategies and operations of Group companies are based on the principles of sustainable development, ensuring that business is carried on in a way that respects the environment and public health, being in compliance with any local applicable national and international directives from legislation.

5. IMPLEMENTATION PROCEDURES

Group companies undertake to issue specific communications in order to inform recipients about the Code of Ethics.
In order to ensure that the Code of Ethics is properly understood, communications plans are devised and implemented periodically with a view to enhancing awareness of the principles and ethics set out in the Code.
In order to encourage complete application of the Code, the Group has identified a Supervisory Body that, in the context of its responsibilities under current legislation:

- constantly monitors the application of the Code of Ethics by the parties concerned, including the investigation of any reported situations;
- reports any violations of the Code;
- issues binding opinions on any changes needed to the more significant corporate procedures and policies, in order to guarantee their consistency with the Code of Ethics;
- where necessary, periodically revises the Code of Ethics;
- proposes or applies suitable sanctions in the case of violations.

Group companies establish appropriate lines of communication so that recipients can report any situations for investigation. As an alternative, all recipients may report in writing, although not anonymously, any violation or suspected violation of the Code of Ethics to the Supervisory Body, which will take appropriate action while ensuring confidentiality for the identity of the person reporting the violation, except with regard to any legal requirements.

With regard to confirmed violations of the Code of Ethics, the Supervisory Body will report the matter and any suggestions and/or sanctions considered necessary to the Executive Committee or to the Managing Director and, in particularly significant cases, to the Board of Directors.

6. SANCTIONS

Compliance with the Code of Ethics is an essential part of the contractual obligations of employees pursuant to and as a consequence of the applicable law. Violation of the Code of Ethics may constitute non-compliance with the primary obligations arising under the employment relationship or be a disciplinary matter, subject to the provisions of the articles of the applicable Workers' Statute, with all the related legal consequences, including those regarding the retention of employment, and may involve the reimbursement of any resulting damages.
Compliance with the Code is deemed to be an essential part of the contractual obligations accepted by freelance consultants and/or by those parties that have business relations with the Group. Violation of the Code of Ethics may constitute non-compliance with contractual obligations, with all the related legal consequences, including those regarding the termination of the contract and/or the engagement, and may involve the reimbursement of any resulting damages.
The Group undertakes to establish and apply sanctions, on a consistent, impartial and uniform basis, that are in proportion to the respective violations of the Code and consistent with the current regulations governing employment relationships.

7. FINAL PROVISIONS

This Code of Ethics, reflecting current corporate practice, is approved by the Management Team in the PURFLUX GROUP.
All changes and/or additions to the Code will be approved by the company board and communicated on a timely basis to the recipients.

Guyancourt, 24th February, 2026

Julien GRANGE

CEO PURFLUX GROUP