CODE OF CONDUCT

T-engineering

CONTENTS

INTRODUCTION **2**
WHY A CODE OF CONDUCT? 2
COMPANY COMMITMENTS 2
VALUES **3**
WHY DO WE HAVE COMPANY VALUES? 3
T VALUES 3
SUPPLIER/PARTNER COOPERATION **4**
PRINCIPLES AND POLICIES **5**
LAWS AND ETHICS 5
BRIBERY AND CORRUPTION 5
MONEY LAUNDERING 5
ENVIRONMENT 5
QUALITY 5
WORKING CONDITIONS AND THE WORKING ENVIRONMENT 5
Discrimination and harassment *6*
Ethical AI Usage & Employee Rights *6*
Alcohol and drug policy *6*
WORKING HOURS AND COMPENSATION 6
MODERN SLAVERY AND CHILD LABOR 6
TRADE COMPLIANCE 6
CONFLICTS OF INTEREST 6
CONFIDENTIAL INFORMATION 6
Information systems *7*
Social media *7*
Communication with the media *7*
INTELLECTUAL PROPERTY 7
PHYSICAL AND FINANCIAL PROPERTY 7
DATA PRIVACY 7
ACCOUNTING AND REPORTING 7
SOCIAL RESPONSIBILITY 7
CLIMATE ACTION & SUSTAINABILITY 8

INTRODUCTION

WHY A CODE OF CONDUCT?

The code of conduct clearly outlines what we believe as an organization and how our employees should treat each other, as well as the people they interact with as a representative of our company.

Aside from meeting legal requirements, the code of conduct also helps to create a healthy company culture and improve our organization's reputation.

The Code of Conduct does not cover all aspects of behavior. There will always be areas where we need to use our judgment as individuals.

We will inevitably be confronted with situations where we feel we do not get clear answers from this documented Code of Conduct. When this is the case, we expect employees to discuss the matter with their nearest superior or to seek advice from management.

COMPANY COMMITMENTS

T-engineering has a clear aim in terms of ethics: zero ethical breaches. For example, we do not tolerate any form of corruption, inducement, bribery, actions that limit competition, discrimination, harassment or unnecessary environmental impact.

T-engineering's management has adopted a Code of Conduct that summarizes our values and principles. T-engineering and all our employees must follow the Code of Conduct. T-engineering also requires the same from its suppliers and partners.

T-engineering management also actively promotes a strong quality culture and ethical behavior, recognizing that our shared values drive product safety and compliance, operational excellence, and customer trust.

Acts in violation of the Code of Conduct may cause damage to the company's reputation and may lead to legal actions against the company and employees.

VALUES

WHY DO WE HAVE COMPANY VALUES?

Company values help employees make informed decisions and unify the company culture. Decisions should be made with these values in mind.

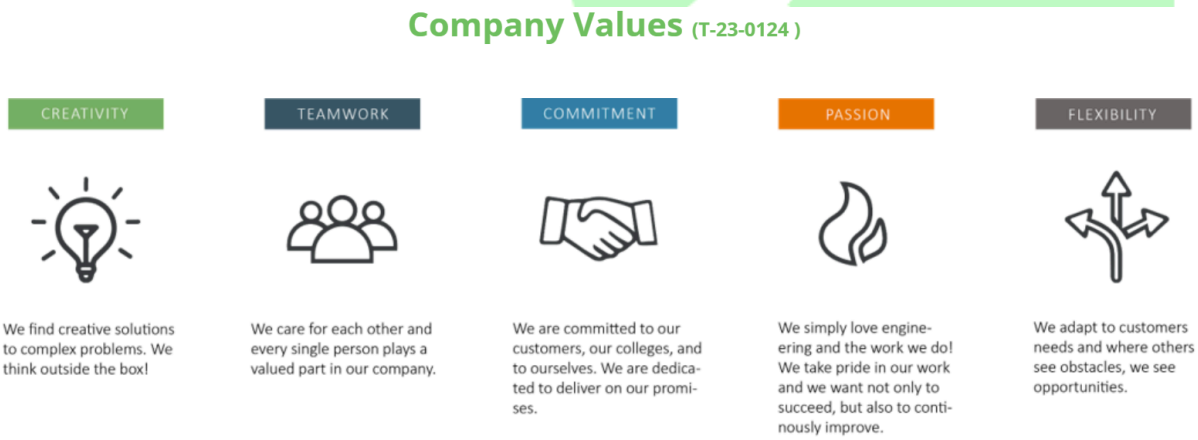
Establishing strong core values provides both internal and external advantages to the company:

- Values help companies in the decision-making processes.
- Values educate clients and potential customers about what the company is about and clarify the identity of the company.
- Values are a primary recruiting and retention tool. With the ease of researching companies, job seekers are doing their homework on the identities of the companies they are applying for and weighing whether or not our company holds the values that the job seekers consider as important.

T VALUES

At T-engineering we have established company values that reflect who we are and how we think. It sets a tone on what it means to be part of the T-engineering family. They guide and remind us of how we should act against each other and people that we meet and cooperate with.

We should be mindful of our values when conducting ourselves in our daily work.



SUPPLIER/PARTNER COOPERATION

T-engineering is committed to making sustainable, high-quality automotive products in terms of sustainability, quality, delivery, cost and features to the automotive industry.

We want to assure that we select the best suppliers based on capability, sustainability and performance

Once selected, our goal is to work with these suppliers to develop a strong, long-term, structured relationship with them.

We are committed to quality excellence and when selecting suppliers, we want to assure a customer-focused process approach and continuous improvement.

We expect our suppliers to

- **Deliver Quality & Process Control:** Maintain robust quality assurance, ensure fully conforming and on-time deliveries, and cascade quality and environmental requirements to sub-suppliers.
- **Drive Lifecycle Sustainability:** Proactively manage environmental impacts across the full product life cycle, supporting resource efficiency and circular economy practices.
- **Manage Risk & Ethics:** Evaluate supply chain risks proactively, ensure engineering competence, and maintain high ethical standards.

To ensure consistent quality through the entire supply chain, T-engineering expects suppliers to pass these requirements on to their sub-suppliers.

We also expect suppliers and partners to have a company code of conduct.

PRINCIPLES AND POLICIES

LAWS AND ETHICS

At T-engineering we respect and comply with the laws and regulations that apply in the countries where we conduct business.

In the event that these are less restrictive than our own standard, we shall always apply the T-engineering standard unless other instructions are given.

BRIBERY AND CORRUPTION

T-engineering applies zero tolerance for corruption. This means that we must not under any circumstances be engaged in, encourage or tolerate bribery through payments or other benefits with the aim of obtaining or retaining business or any other advantage.

Moderate and reasonable gifts and hospitality, which are customary in business, are normally acceptable if given for the right reason.

We shall not offer gifts or hospitality of a value or nature or under circumstances that may be seen as an attempt to improperly influence business decisions or obtain other improper advantages.

T-engineering and our suppliers must never use gifts, benefits or other prohibited compensations of any kind in our relations with customers, other suppliers, authorities or other decision-makers in order to secure or retain business.

T-engineering and our suppliers may not accept gifts, benefits or other forms of compensation from customers, other suppliers or parties that could influence the objectivity of decision-making.

As T-engineering employees, we must always be impartial and professional when dealing with others. We shall only accept gifts and hospitality offered by others if they are reasonable in relation to the business in question and if they are within the boundaries of customary business behavior.

Gifts and hospitality of high value or of unusual or unethical nature shall not be accepted.

MONEY LAUNDERING

T-engineering employees or our partners and suppliers must never accept, facilitate or otherwise support activities that are based on money laundering.

ENVIRONMENT

T-engineering shall provide environmental sustainable solutions and products to lead the development of control systems and electrification for future mobility. This requires innovative solutions and new technology. T-engineering's Environmental Policy details how we fulfill these commitments.

QUALITY

T-engineering shall provide solutions and products that satisfy customer requirements and expectations. With the experience that we have within the company we shall propose solutions that are favorable to the client with respect to the quality of their end product. T-engineering's Quality Policy details how we fulfill these commitments.

WORKING CONDITIONS AND THE WORKING ENVIRONMENT

T-engineering consciously and systematically works to create a good work environment, both physically and psycho-socially in order to achieve a safe and healthy workplace.

Our workplace is creative and stimulating and employees have the opportunity to influence their own work situation. Appropriate health and safety information and training is provided to employees, including arrangements for safe evacuations of buildings and correct handling and marking of chemicals and machinery.

By prioritizing compliance with safety requirements in planning and operations, we ensure our work environment meets applicable health and safety laws and requirements.

Discrimination and harassment

At T-engineering we do not tolerate any form of discrimination or harassment.

A good working environment entails that no employee, regardless of gender, gender identity, age, ethnicity, sexual orientation, religion/belief or disability shall be subject to discrimination or harassment.

T-engineering has a *Plan of Action against discrimination and harassment* to be applied if needed.

Ethical AI Usage & Employee Rights

T-Engineering deploys Artificial Intelligence (AI) as assistive work tools to promote productivity. In accordance with the EU AI Act (Regulation (EU) 2024/1689), AI tools shall never be used to secretly monitor employee performance, evaluate behavior, or automate employment decisions such as hiring, promotion, or termination without direct, meaningful human control.

Furthermore, the deployment or use of biometric categorization, emotion-recognition software, or not approved AI meeting recorders in workplace environments is strictly prohibited.

Alcohol and drug policy

T-engineering has an uncompromising approach to drugs. Our goal is to be a safe and drug-free workplace for all employees.

T-engineering's approach to alcohol and drugs are described in our *Alcohol and Drug Policy*.

WORKING HOURS AND COMPENSATION

T-engineering complies with applicable laws and agreements on working and resting hours and compensation and benefits.

Working hours at T-engineering are based on mutual trust between employer and employees that tasks are performed in an optimal way based on the business's demands for efficiency and quality without excessive detail management i.e. freedom with responsibility. It is the responsibility of both parties to ensure that there is a continuous dialogue about working hours, working conditions and ability to perform.

MODERN SLAVERY AND CHILD LABOR

T-engineering does not tolerate any form of modern slavery. We respect children's right to personal development and education, and we do not use child labor.

TRADE COMPLIANCE

T-engineering complies with international trade rules, by which countries regulate the movement of products, technology, software, and technical information across national borders.

CONFLICTS OF INTEREST

We as well as our suppliers and partners shall always keep personal interests apart from company business. Decisions by or for the company must never be influenced by personal preferences and relationships.

CONFIDENTIAL INFORMATION

Information about the company is internal or confidential, unless publicly released through annual reports, press releases, product descriptions, storytelling or other similar material intended for public use.

We shall not share information with others outside the company unless there is a business reason to do so.

Suppliers and partners are expected to pay particular attention to ensuring that confidential information received from T-engineering is protected and not disclosed to unauthorized parties. This is explained and

regulated through our *Non-disclosure Agreement*.

Information systems

We use information systems professionally and as a means to continuously increase efficiency in our work processes. The company's communication tools must never be used for unlawful or unethical purposes. Limited private use of company tools is acceptable if restricted to handling personal matters that do not interfere with work.

When we communicate using an information system associated with the company we always, regardless of method, represent the company.

This means that we shall act respectfully and correctly, and always be conscious of the fact that our messages may be used for purposes other than those intended.

We treat information obtained from others in the same way as we expect them to treat information received from us, and in accordance with terms applicable to its disclosure.

Social media

We encourage employees to engage with T-engineering in social media, but we must not spread any T-engineering information that is not intended for the public and we should never use social media in a way that can cause harm to T-engineering's brand or reputation.

Communication with the media

Only, by management appointed representatives from T-engineering, are authorized to speak on behalf of T-engineering in the media including any form of social media.

INTELLECTUAL PROPERTY

T-engineering's intellectual property are highly valuable assets.

T-engineering will take action to defend its intellectual property, and is committed to respecting intellectual property that belongs to others.

PHYSICAL AND FINANCIAL PROPERTY

T-engineering's assets, including financial assets, physical property, and company devices, systems and networks, are critical to our ongoing productivity and business success. We must use these assets responsibly and protect them from theft, carelessness, and waste, whether that means protecting access to company buildings, equipment, and tools or using good judgment when spending company funds.

DATA PRIVACY

We observe all applicable privacy laws when we collect, use, and share personal information about individuals**.**

T-engineering's *Integrity Policy* regulates how we collect and use and share personal data for employees, hired consultants, customers, suppliers and other stakeholders.

ACCOUNTING AND REPORTING

We report in a transparent, truthful, and timely manner in order to convey a true view of our performance. We report financial transactions in accordance with generally accepted accounting practices.

SOCIAL RESPONSIBILITY

T-engineering strives to contribute to the social development of the communities where we operate. This increases knowledge and understanding of our business and leads to valuable experiences and networking opportunities for the employees involved.

Social initiatives must be linked to the business and mainly be accomplished with the help of T-engineering employees and technology. Our contribution must always be in accordance with T-engineering's business ethics principles.

CLIMATE ACTION & SUSTAINABILITY

As part of our commitment to global sustainability and responsible automotive engineering, T-engineering regularly assesses the impact of climate change on our business continuity, supply chain, and environmental footprint. We collaborate with stakeholders to reduce carbon footprints, minimize resource consumption, and ensure compliance with evolving environmental regulations and standards.

Klas Lundgren

CEO