

Code of Conduct

MISSION

Vanpro's mission is reflected in the highest quality and efficiency levels for industrial seating assembly, acting in accordance with the highest standards of ethics and environmental and social responsibility.

Vanpro is therefore committed to entering into relations with enterprises that share the same basic principles and values.

Like its main partners, Vanpro has a business strategy in line with the ten principles promoted by the UN Global Compact, in the areas of human rights, labor practices, environmental protection and anticorruption.

In this way, under the auspices of social justice and the defense of human rights, Vanpro seeks to ensure fair and equal treatment for its workers, while prioritizing social and environmental needs and concerns in those communities where it operates.

SOCIAL JUSTICE AND THE DEFENSE OF HUMAN RIGHTS

1. Respecting the law and competition

1.1. Vanpro undertakes to conduct its activity in full compliance with current laws, and to conduct its business and partnerships with suppliers who share the same ethical and legal principles when fulfilling their obligations.

1.2. All Vanpro suppliers and employees are obliged to comply with the law at all times, never compromising its application.

1.3. Vanpro is committed to a policy of fair competition and rejects any restrictive practice of competition and does not use any non-ethical means in order to obtain advantages at the expense of competing companies.

1.4. In this sense, any plans or formal or informal agreements with competitors involving prices, market shares and/or clients are prohibited in accordance with national and European Union competition law.

2. RESPECTING FUNDAMENTAL RIGHTS

2.1. Vanpro promotes respect for the rights of its workers and carries out its business in compliance with the values enshrined in the United Nations Charter, in particular respect for human rights, women's rights, social justice, human dignity and equal rights for men and women.

2.2 Vanpro promotes the principles of diversity, equity, and inclusion, as well as promotes an environment of non-discrimination and harassment, providing that all employees must be treated equally, without any type of discrimination.

2.3. Observance of the principle of non-discrimination means rejecting all behaviors, whether verbal or written, specifically based on nationality, race or ethnicity, language, sex, sexual orientation, age, socioeconomic status, physical or mental disability or incapacity, political opinion, ideology, religion, philosophy or belief or any other distinguishing feature of the individual that could be considered to be discriminatory.

2.4. All employees thus enjoy all the rights inherent in all human beings and all the rights that are compatible with their work activity, in particular the freedom of expression, freedom of association and collective bargaining and freedom to belong to a union.

2.5. Vanpro promotes practices that entail respect, tolerance and cooperation, including the rights of minorities and Indigenous Peoples, so that all employees are entitled to a healthy work environment, free from any hostility, harassment or abuse by superiors or equivalents in the hierarchical structure.

2.6. Vanpro specifically rejects any form of moral or sexual harassment, regardless of the hierarchical or subordinate relationship existing between the people involved.

2.7. Child labor and young workers are strictly prohibited. Consequently, no minors under the age of 16 will be employed, pursuant to the law in force.

2.8. Vanpro likewise undertakes to guarantee the free choice to work and specifically rejects any form of modern slavery (i.e. slavery, servitude and forced or compulsory labour and human trafficking).

3. LABOR PRACTICES AND SOCIAL RESPONSIBILITY

3.1. All workers shall be subject to an ethical recruiting, as Vanpro ensures to carry a recruitment process based on principles of ethic, equality and legality.

3.2 The work conditions and remuneration of workers, including the provision of wages and benefits for the services provided, must be as fair as possible, in accordance with the laws in force.

3.3. Employees must not be subject to a workload greater than that established by law, in order to ensure that the working hours are fit to a personal development and respect for human dignity.

3.4. Likewise, all employees must have weekly and annual rest periods guaranteed in accordance with the law in force, without ever contravening international standards as regards workers' rights.

3.5. Professional promotion and the development of each employee's career are encouraged, free from any prejudice and/or discrimination, guaranteeing equal opportunities for all employees.

3.6. In order to guarantee respect for human rights and the provisions of this code, Vanpro provides a system for managing and supervising working conditions.

3.7. The safety of its employees is a priority for Vanpro, and appropriate training is regularly provided to encourage safe practices in all work positions.

3.8. Vanpro is committed to implementing policies for the prevention of accidents and occupational hazards in order to help minimize them.

3.9. Vanpro is responsible for ensuring the health and safety of its employees, guaranteeing them all the necessary healthcare.

3.10. Working conditions are regularly reviewed and improved to ensure a safe and healthy workplace.

4. DATA PROTECTION, DATA SECURITY AND CONFIDENTIALITY

4.1. The personal data of any employees, clients, suppliers and all agents involved are fully protected, complying with all legal requirements.

4.2. Any personal data relating to the privacy, performance evaluations, promotions and salaries of the employees must be strictly kept and processed by internal resources (workers) whose duties are functionally related to such processing (for example, finance department, human resources, general manager), with this process being limited to only those purposes indicated and the length of time needed.

4.3. Thus, the collection of information regarding the personal life of the employees is reserved to what is strictly necessary within the scope of human resource management or in relation to any other legitimate professional purposes, and exclusively within the limits imposed by law.

4.4. In accordance with the provisions of the General Data Protection Regulation, Vanpro guarantees its employers, clients and suppliers the right to access, verify and correct their personal data.

4.5. Those employees who have access to these data must not disclose them to any third parties.

4.6. It is also prohibited for any employee to directly or indirectly use for personal purposes any information obtained in the course of their professional activity.

4.7. The obligation to keep the confidentiality of this information extends to any agent that has commercial or contractual relations with Vanpro.

5. SUSTAINABILITY AND ENVIRONMENTAL PROTECTION

5.1. At Vanpro, all business decisions and practices are carried out taking into account their environmental impact, so as not to contradict or obstruct environmental policies and regulations.

5.2. Vanpro assumes responsibility for any environmental impact and for the sustainability of the facilities and production processes carried out within the scope of the business activity performed.

5.3. In its business relation with its suppliers and other partners, Vanpro establishes an obligation to comply with sustainability and environmental protection requirements.

5.4. In order to ensure the fulfillment of these requirements, Vanpro may use self-assessment questionnaires to assess the practices implemented by its suppliers, in order to verify their compatibility with Vanpro's sustainability policies.

5.5. A reduction in the level of energy consumption and the preservation of natural resources is a priority, opting for reuse and recycling whenever possible and complying with environmental protection rules in order to contribute to sustainable development.

5.6 Vanpro is committed to the principles of energy efficiency and decarbonization, mainly through a sustainable resources management as well as the implementation of a policy of waste reduction and the use of renewable energy.

5.7. Employees must be made aware of their responsibility to protect the environment and receive training in the handling of hazardous or toxic materials and substances.

5.8. Suppliers and other partners are committed to making every effort to reduce or eliminate the production of waste and to promote a rational use of energy and natural resources, implementing all necessary preservation measures both in their facilities and in their production processes.

5.9. Vanpro is especially committed to managing noise emissions, and to reducing waste, polluting products and GHG emissions as well as to play its part regarding the promotion of air quality, soil quality, biodiversity, land use and deforestation.

5.10. Vanpro ensures a regular assessment of the impact of its products and activities, constantly striving to minimize this impact over time.

6. INTEGRITY, ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING

6.1. At Vanpro, there is a firm policy of opposition to corruption in business, whether through bribes or expensive gifts, or any other disproportionate benefits or opportunities.

6.2. All Vanpro employees must avoid any situations of a conflict of interest, and the use of privileged information is likewise prohibited.

6.3. The employees must always perform their duties and tasks loyally and exclusively, when any incompatibility of duties with a second job exists.

6.4. The use of Vanpro funds, services or assets for any unlawful or illicit purpose is totally prohibited.

6.5. The practice by any individual or company of obtaining special privileges or benefits in exchange for bribes, bonuses or any other form of reward, in cash or in kind, is also prohibited.

6.6. Any employees faced with such a situation should report it as soon as possible to their superiors and/or to human resources or the corresponding outsourced company, through the following contacts:

Adient:

Tel: 0 800-225-5288 or 855-409-0184

<http://adient.ethicspoint.com>

Faurecia

Deloitte tips-offs anonymous

185 Avenue Charles de Gaulle

92524 Neuilly sur Seine Cedex

France

Email: values@ethics-line.com

6.7. Vanpro provides a complaints or whistleblowing mechanism, which is available not only to its employees but also to its suppliers throughout the logistics chain and even any potentially interested parties, and provides protection against retaliation.

6.8. At Vanpro, contributions to political parties are not allowed, so no payments or services should be provided to political parties, or to holders of or candidates for any public office.

6.9. Payments or other contributions in kind to the Administrative Authorities or their employees in order to obtain more favorable treatment by any governmental or administrative authority are also prohibited.

6.10. The same applies in relation to any disproportionate gifts or payments from customers, service providers, partners or suppliers, with this therefore also being strictly prohibited.

6.11. To ensure transparency and fairness and to ensure its financial responsibility, Vanpro is committed to keeping accurate records, books and accounts. All resources, liabilities, expenses and other transactions must be recorded in the company's books and accounts, and must be regularly updated in accordance with the applicable accounting principles, rules and laws.

7. REPORTING OF ANY BREACH OF THE CODE OF ETHICS

7.1. It is the responsibility of all employees to ensure compliance with this code.

7.2. Any breaches of the code of ethics must be reported as soon as possible. Any employee who is aware of any breach of the rules outlined in this Code must report it to a superior, to the Management, or through the contact details of the parent companies:

Adient:

Tel: 0 800-225-5288 or 855-409-0184

<http://adient.ethicspoint.com>

Faurecia

Deloitte tips-offs anonymous

185 Avenue Charles de Gaulle

92524 Neuilly sur Seine Cedex

France

Email: values@ethics-line.com

7.3. No employee will be penalized, dismissed or subjected to discriminatory measures for having revealed or reported in good faith any actions that breach the Code of Ethics. However, any improper use of these procedures will mean their perpetrator may be subject to disciplinary actions or legal proceedings.

7.4. Although the reporting employee must identify themselves, their identity will always be kept confidential.

7.5. Any employees that have doubts over whether their performance complies with this code are strongly advised to clarify them with their superiors or with Human Resources.

7.6. Any employees that breach this code will be subject to the appropriate disciplinary proceedings, including the possibility of dismissal.

7.7. Each reported breach will be duly investigated in order to obtain the most impartial and fairest penalizing consequence possible.

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Limited Company – Share Capital €498,798

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<http://www.vanpro.pt/>