

Purpose of Policy

The purpose of this policy is to confirm our full commitment to comply with the global „[Alps Alpine code of conduct](#)” attached herein and specify responsibility at European affiliates and set metrics and targets for specific topics.

1. Strive for Value
2. Love the Planet
3. Contribute to Society
4. Respect the Individual
5. Act with Integrity

Delegation of Roles and Responsibilities

The Board of Directors of Alps Alpine Co Ltd. deliberates and resolves important matters of business conduct issues, identifies causes and prevent recurrence of matters as part of business materiality. Policies are worked out and activities are advanced by the representative director.

Each European affiliate's legal representative is responsible for enforcing the group's code of conduct in their business operations. Managers are responsible for implementing this code of conduct, and all employees practice a culture of compliance.

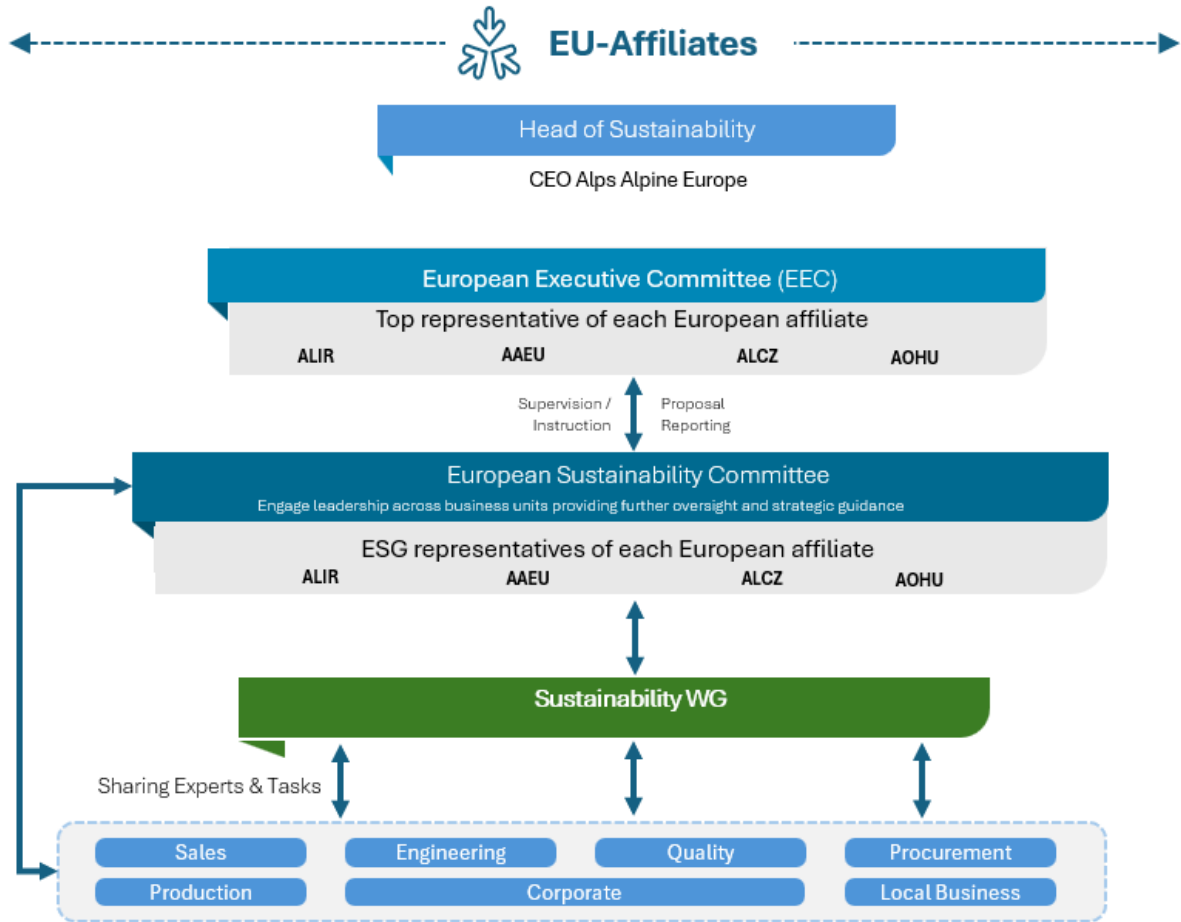
European sustainability organisation consists of 3 levels:

To ensure highest level of leadership and commitment for ESG activities in Europe, CEO of Alps Alpine Europe GmbH takes overall responsibility for sustainability.

European Executive Committee (EEC) – European affiliates (Top representatives) under the supervision of CEO take highest responsibility for consistency of the implementation at each site.

European Sustainability Committee engages leadership across all the affiliates; provides further oversight and strategic guidance.

Created:	Checked:	Approved:
Ayako tezuka	Ryoma Komuro	EEC



Glossary:

- AAEU – Alps Alpine Europe GmbH
- ALCZ - ALPS Electric Czech s.r.o.
- ALIR - Alps Electric (Ireland) Ltd
- AOHU – Alpine Electronics Manufacturing of Europe, Ltd

Scope of the Policy

This policy covers the entire Alps Alpine Group across Europe and the whole supply chain and applies to all activities associated with the business operation in compliant with our business ethics and business conduct for corporate culture, including whistle-blower protection, anti-bribery and corruption and good payment practice.

The European organisation operates in Czech, France, Germany, Hungary, Ireland, Italy, Sweden, and UK.

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Stakeholder Involvement

Continuous communication with key stakeholders is upheld, with stakeholder requirements assessments conducted annually to ensure alignment with their evolving needs and expectations. The identified key stakeholders were considered, when setting objectives and measures.

Alps Alpine sites in Europe identified the key stakeholders, who are the mother companies (Alps Alpine Co. Ltd. & FAITAL S.P.A.), workers and workers council, customers, and external providers.

Other affected stakeholders are the government organisations, legal authorities, European Union, NGOs, and local society. Based on EU level analysis, the interests of key stakeholders are considered when setting objectives and measures.

Alps Alpine sites in Europe will ensure our stakeholders receive open and transparent information about companies' sustainability performance by publishing relevant details in the sustainability section of the Company's annual report on companies' website.

According to the double materiality assessment Business conduct has become a material topic. As part of the analysis, Alps Alpine sites in Europe organisation also identified related Impacts, Risks and Opportunities.

Key Objectives and Targets

Alps Alpine sites in Europe will embrace high ethical standards in the running of our business to remain a corporate entity trusted by all stakeholders; and Alps Alpine sites in Europe will comply with international guidelines on human rights, health and safety, and employment conditions, as well as regional, national and local laws and regulations.

Especially in the following topics, we set the metrics and target as below.

- Corporate culture: Annual CSR training participation rate 100%
- Protection of whistleblower: 0 confidentiality breaches, 0 retaliation for whistleblower
- Management of relationship with suppliers including payment practice: 0 legal proceedings due to late payment, with negative result
- Corruption and bribery: 0 case of corruption and bribery

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Continuous Monitoring and Validation

Alps Alpine sites in Europe monitor the above mentioned KPI and conduct annual CSR training, and we strive for the participation rate of 100% at each European affiliates. The information and training material to be shared is always up to date with any related legal changes and make it accessible to every employee.

Additionally, at Alps Alpine Group, a self-evaluation is held once a year and an internal audit is conducted once every three years, in principle, on ethical standards in each department and subsidiary, including European affiliates, in order to strengthen internal control functions. The audits are held in accordance with the Group Code of Conduct to confirm the level of awareness of employees in regard to the Code of Conduct and the degree of receipt of compliance and CSR training throughout the Group, as well as the status of compliance with anti-corruption and bribery policies.

The European Sustainability Committee as a virtual organisation develops its strategic proposal and then consults with the HQ. Once it is confirmed that there are no contradictions with the central guidelines, European Executive Committee decides on its approval.

Reference to Third-party Standards or Initiatives

The Alps Alpine Group Code of Conduct upholds international norms such as the United Nations' Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

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Version History

Version	Content of Modification	Issue Date
1	Initial version	[15/04/2026]

Created:

Ayako tezuka

Checked:

Ryoma Komuro

Approved:

EEC