

Principles for the Prevention of Corruption for Business Partners of the SAF-HOLLAND Group



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I. Introduction

Integrity and transparency are core values of SAF-HOLLAND SE and each of its direct or indirect subsidiaries (hereinafter referred to as "SAF-HOLLAND"). Corruption and bribery contradict these values and jeopardise fair competition as well as sustainable business relationships.

To prevent this, SAF-HOLLAND has developed the following principles, which are intended to provide business partners with guidance in addition to the binding SAF-HOLLAND Code of Conduct for Suppliers/Business Partners and to ensure that cooperation is based on trust and legal compliance.

The principles are based, among other things, on international standards such as the UN Convention against Corruption (UNCAC) and the UN Global Compact.

II. Scope and purpose

These principles provide a framework of guidance for all business partners who act on behalf of SAF-HOLLAND or have a business relationship with the company. This includes, in particular, customers, suppliers, service providers, distribution partners, consultants, and other external parties who enter into a business relationship with SAF-HOLLAND.

The principles form part of the company-wide strategy for preventing corruption and strengthening compliance.

They serve to:

- identify and minimise corruption risks at an early stage,
- ensure compliance with national and international laws as well as regulatory requirements,
- guarantee transparency and fairness in all business processes,
- strengthen the trust of all stakeholders and raise awareness of this issue,
- and embed a lasting culture of integrity.

In this way, the principles not only contribute to risk minimisation, but also promote sustainable, long-term and trustworthy business relationships.

III. Definition of corruption

Corruption refers to the abuse of entrusted power for private gain or advantage.

A distinction is made between active and passive corruption:

- **Active corruption** includes actions of the advantage giver, such as bribery or the granting of improper benefits.
- **Passive corruption** concerns actions of the advantage taker, such as accepting bribes or other improper benefits.

Corruption is prohibited worldwide and is punishable by law in both national and international contexts.

Any form of granting or accepting benefits with the intention of exerting improper influence is forbidden; under the relevant legal provisions, this applies in particular to benefits that are offered, requested, promised or accepted if they are capable of improperly influencing one's own conduct or that of a business partner.

Bribes or so-called "facilitation payments" are expressly prohibited.

IV. Zero-tolerance policy

SAF-HOLLAND pursues a strict zero-tolerance policy towards corruption, bribery and improper influence. This principle applies worldwide and without exception. All forms of active or passive corruption are strictly prohibited.

Gifts, invitations or other benefits may only be provided or accepted within the scope of customary business practice and only to a minor and appropriate extent.

Even benefits that could create the appearance of an improper influence are prohibited.

This zero-tolerance policy forms a central part of the company's culture and serves to protect SAF-HOLLAND, its employees and its business partners.

V. Commitment under the SAF-HOLLAND Code of Conduct for Suppliers/ Business Partners

SAF-HOLLAND expects its business partners to consistently comply with all applicable national and international laws, regulations and fundamental ethical principles. The SAF-HOLLAND Code of Conduct for Suppliers/Business Partners, which sets binding standards for responsible conduct, is decisive in this regard. To ensure adherence to the Code of Conduct, SAF-HOLLAND reserves specific rights to request information and carry out audits.

Particularly relevant are national and international anti-corruption regulations, such as the UK Bribery Act and the US Foreign Corrupt Practices Act (FCPA).

VI. Conducting business partner checks

Careful screening of business partners is a key component of effective corruption prevention at SAF-HOLLAND.

SAF-HOLLAND's business partners are therefore subject to a thorough due-diligence process, which is continuously refined. In areas with higher risk, additional control mechanisms are applied.

In cases of doubt, SAF-HOLLAND deliberately refrains from entering into a business relationship, as compliance with legal and ethical standards always takes precedence over short-term economic benefits.

VII. Avoiding conflicts of interest

Business interests and private interests must be strictly separated.

Conflicts of interest that could influence the business relationship with SAF-HOLLAND, or could give the appearance of doing so, must always be avoided.

If conflicts of interest cannot be ruled out, they must be disclosed immediately.

VIII. Transparency and documentation

All business transactions must always be documented in a complete, accurate and traceable manner.

In particular, discounts, payments, gifts, invitations, donations and sponsorships within the scope of the business relationship must be recorded comprehensively and transparently.

IX. Immediate notification

SAF-HOLLAND expects business partners to inform the company immediately of any suspicion or confirmed case of corruption or bribery in connection with the business relationship.

X. SAF-HOLLAND Whistleblower System

The early identification of corruption risks and the implementation of appropriate measures to prevent and combat corruption and bribery are essential throughout the entire value chain.

To support this, SAF-HOLLAND has set up a whistleblower system. This system allows business partners and their employees to report violations, grievances and risks – including corruption – securely, anonymously and confidentially.

Detailed information is provided in the published procedural standards for the whistleblower system. The electronic whistleblower system and the procedural standards are accessible via the SAF-HOLLAND corporate website.

XI. Dealing with violations

Breaches of anti-corruption laws are not a trivial matter and constitute a serious violation of duty both nationally and internationally.

SAF-HOLLAND condemns any breach of applicable anti-corruption laws, regulations, principles or internal rules and treats such cases with the utmost seriousness. Violations may result in the termination of the business relationship, claims for damages and further legal action.

XII. Awareness and training

An essential part of the prevention strategy is that all applicable anti-corruption regulations, including the principles outlined above, are understood and complied with.

Business partners are required to regularly raise awareness among their employees and provide training on anti-corruption topics to ensure compliance.

In addition, third parties such as subcontractors who are indirectly involved in the contractual relationship must also be included and appropriately considered by the business partner.

SAF-HOLLAND SE
Hauptstraße 26
63856 Bessenbach
Germany
www.safholland.com