



CODE *of* CONDUCT



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INTRODUCTORY LETTER FROM OUR PRESIDENT AND CEO

Dear Superior Colleagues,

At Superior, our Values – Integrity, Teamwork, Customer Focus, Continuous Improvement and Diversity and Inclusion – are the driving force behind everything we do and they guide our interactions with customers, business partners and colleagues.

Our Code of Conduct is our company-wide commitment to uphold Superior's Values and behaviors to achieve success with the utmost integrity. The Code of Conduct describes how we operate when making decisions in support of our purpose, including speaking up when we see something that concerns us.

The Code of Conduct does not describe every difficult situation you may face. Instead, it provides overall guidance on conducting business honestly and ethically. We're relying on you to read and understand the Code. We're also relying on you to exercise good judgment.

If you have any questions regarding the Code, please reach out to the resources listed to seek advice. We also encourage you to come forward with any concerns, so they may be addressed. Superior does not tolerate retaliation against anyone asking questions or raising concerns in good faith.

Each of us is responsible for understanding the Code and adhering to it every day. By complying with this Code, we demonstrate our continued commitment to living our Values and protecting the reputation of our Company.

Thank you for your commitment to uphold integrity and ethics at Superior.



A stylized, handwritten signature in white ink, appearing to read 'Majdi Abulaban'.

Majdi Abulaban

President and Chief Executive Officer



We deliver innovative wheel solutions that enhance the value of our customers' products and stakeholders.

Through our highly engaged and talented team, we deliver industry-leading results and are recognized as the premier global supplier of innovative wheel solutions.

At Superior Industries, we place the utmost importance on acting with integrity. As a global enterprise, we set high standards of ethical behavior in accordance with the laws and rules of the countries in which we operate. These standards are derived from and built on our values.

Our Values



INTEGRITY

We conduct our business with unwavering integrity.



TEAMWORK

We build exceptional teams that collaborate to deliver extraordinary results.



CONTINUOUS IMPROVEMENT

We seek continuous improvement in everything we do.



DIVERSITY & INCLUSION

We embrace diversity and are committed to a culture of openness and respect where all people are valued.



CUSTOMER FOCUS

Our focus on customers drives our passion for quality, safety, and innovation.



Introduction

Purpose of the Code

This Code of Conduct (Code) is designed to guide you. It describes not only compliant behavior but also how to make ethical business decisions when working on behalf of Superior.

You should always be guided by the principle of doing the right thing for the right reason. Unlawful or unethical business practices never serve Superior's interests and will not be tolerated.

The Code lays the foundation for good business decisions and outlines the requirements we must follow, but it cannot — and does not — cover every potential

issue you may face. Please refer to our underlying policies for additional information if our Code does not resolve your question. And, if the right answer is still not obvious, there are plenty of resources at Superior who can help.

If you have a question or are aware of or suspect unethical or illegal conduct, you are expected, and have a duty, to report it. Consider speaking first to a manager with whom you feel comfortable, to the Legal Department, the Human Resources Department, or the Internal Audit Department.

QUESTION WHAT YOU SEE AND HEAR

Sometimes, you may question what the right thing to do is. Never hesitate to ask for assistance from the Legal Department, HR, or your manager. Think about the following or ask for assistance to help you resolve the issue:

- **Is it consistent with what we say in this Code?**
- **Does it feel illegal or against Superior's policies or procedures?**
- **Can I show support for the decision?**



Responsibilities and Expectations

The Code applies to all employees, officers, and representatives of Superior. We expect you to read the Code, understand what is expected of you, and ask questions when needed.

EACH OF US MUST:

- ✓ **Comply with all sections of the Code.**
- ✓ **Seek guidance about the Code as needed from any resources listed in the Code.**
- ✓ **Promptly report any actual or potential Code violations.**
- ✓ **Protect Superior's confidential and proprietary information.**
- ✓ **Cooperate fully with Superior's implementation of the Code, including:**
 - ✓ Completing required training and Code certification.
 - ✓ Assisting with any internal investigation or audit, if requested.
 - ✓ Responding truthfully to requests for information and disclosing all relevant information.
 - ✓ Never retaliate against anyone who makes a good-faith report about an actual or suspected Code violation.

PEOPLE IN MANAGEMENT ROLES HAVE ADDITIONAL RESPONSIBILITIES.

- ✓ **Lead by example by following the Code.**
- ✓ **Create, maintain, and promote a work environment per the Code's guidance.**
- ✓ **Take consistent and appropriate action to address actual or potential violations of the Code.**
- ✓ **Treat all information about reports and investigations as confidential.**
- ✓ **Ask for assistance from the Legal Department when needed.**

Superior is an international company. If another country's local laws, customs, or practices conflict with applicable law, company policy, or this Code, you should seek guidance from the Legal Department.

Duty to Speak Up

We are counting on you to raise concerns. We will take it seriously and keep it as confidential as possible when you tell us something. You will be treated respectfully if you raise an issue or question. We will carefully review your concern and, if warranted, investigate further.

WE ENCOURAGE YOU TO:

- Talk to your **direct manager** or another member of management within Superior
- Talk to the **Superior resources** mentioned throughout this Code
- Use the reporting form at [SuperiorEthics.com](https://www.superiorcorp.com/SuperiorEthics.com)
- Call the **Ethics Line**. See the **Resources section** on page 41 for phone numbers in your country

We will keep your report confidential to the greatest extent possible, disclosing information only to those people who need to know to help resolve the matter.

Your identity will be protected to the fullest extent if you choose to make an anonymous report. Keep in mind, however, that maintaining your anonymity may limit our Company's ability to investigate your concerns.

Superior will not tolerate retaliation for good faith reporting of actual or potential Code violations. Retaliation by anyone at the Company against someone else at Superior for making a good faith report or otherwise participating in an investigation violates the Code and will be addressed accordingly.

Updates & Waivers

The Code is updated occasionally, and you are responsible for keeping up with the changes and asking any questions about the updates. Waivers to the Code may only be granted by the General Counsel.

Violations of the Code

Raising concerns is so important that ***failing to report a violation of this Code is itself a violation of the Code.***

Code violations are serious and can result in disciplinary action — up to and including termination.

Q

Hanna, your manager, has just been notified that a report concerning her management style has been filed. She has begun asking around to find out if someone on the team filed the report. You heard she's looking for you next.

What do you do?

A

Someone trying to figure out who filed a report or to keep anyone from filing a report does not align with our values and is inappropriate behavior for a manager or anyone else at Superior. You should contact HR or the Legal Department for assistance in handling the situation.



Fostering a Respectful Workplace

Mutual Respect

Superior is committed to a culture of openness and respect—where everyone feels valued — whether they are an employee or business partner or another stakeholder. Our foundation is built on equal opportunity, equal pay, and providing a work environment that is pleasant, comfortable, and free from intimidation, hostility, and other behaviors that might interfere with work performance. We learn a lot when we listen to, appropriately challenge and support one another. A respectful workplace fosters trust.

Respect means:

- Treat one another with respect, dignity, and professionally
- Object to harassment and actions that create an offensive or intimidating environment
- Promote diversity in hiring and in other employment decisions
- Help create an environment where colleagues can contribute, develop, and fully utilize their talents

We are all responsible for keeping our workplace respectful and free from harassment. Harassment is any verbal or physical conduct that inappropriately or unreasonably interferes with work, is unwelcome or personally offensive to someone, impacts performance or creates an intimidating, hostile, or otherwise offensive work environment based on any status protected by law. Remember that harassment can be sexual, but there are other forms of harassment.

HARASSMENT IS UNACCEPTABLE AT SUPERIOR.

Examples of harassment can include:

- Unwelcome advances, leering or staring
- Inappropriate comments, jokes, emails, recordings or images
- Negative stereotyping
- Intimidation, bullying or threats
- Threatening or violent physical contact
- Asking inappropriate personal questions



Q

Ella works in marketing and has built strong relationships with Superior suppliers and their representatives. One representative that Ella works with often has started texting her recently and sending inappropriate pictures and messages. Ella is unsure of what to do since it's a significant relationship, and she doesn't want to jeopardize the business relationship.

What should she do?

A

Even though the supplier representative doesn't work for Superior, we expect our business partners and their employees to conduct themselves ethically. This includes providing a work environment free from harassment. Ella should report the situation to any channel she is comfortable with and allow Superior to handle the situation. Superior takes all reports of harassment seriously and will investigate as appropriate.

POLICY AND RESOURCES

- [Anti-Harassment and Investigation of Complaints Policy](#)
- [Resources](#)

Diversity, Equity, and Inclusion

Diversity, Equity & Inclusion enables us to build a world class organization while creating a culture of operational excellence. We draw our strength and vitality from all our employees. A workforce that celebrates and draws upon the talents of everyone provides us with a business advantage. We are committed to hiring principally and fairly and do not discriminate in hiring or other workplace practices.

That is why we value every employee as an essential contributor to our success and aim to create an environment in which employees can perform at their best. Teamwork is critical to working together, and the best solutions draw on diverse ideas and perspectives.

OUR ACTIONS INCLUDE:

- Making hiring, promotion, and disciplinary decisions based on relevant qualifications, merit, performance, and other job-related factors
- Treating everyone equally, regardless of their background, beliefs, or physical appearance
- Not making employment decisions based on **personal characteristics**
- Fostering an inclusive environment where people feel welcome.

Personal characteristics are legally protected characteristics unrelated to job performance and qualifications for hiring such as race, ethnicity, or national origin, sex, gender, or gender identity, color, religion, age, ancestry, marital status or family status, disability, veteran status, sexual orientation, or any other legally protected status.

POLICY AND RESOURCES

- [Anti-Harassment and Investigation of Complaints Policy](#)
- [Resources](#)



Safety at Work

We are committed to providing a secure, healthy, and safe working environment for everyone who visits our job sites. We follow all health and safety laws to perform our best for our co-workers. We prioritize well-being and are committed to a zero-accident and injury-free workplace. We expect to keep each other safe and secure.

Safety for all means:

- Know and follow all health and safety rules, regulations, policies, and procedures for every work area and job site
- Take precautions to protect ourselves and others from accidents and injuries
- Report unsafe or unhealthy working conditions right away
- Use specific workwear required by regulations or our policies and procedures
- Do not use tobacco, alcohol, or drugs in the workplace or job site
- Do not possess, distribute, or be under the influence of drugs in the workplace, job site, or while conducting Company business
- Never act in a threatening or violent way
- Know that firearms and weapons are not allowed in the workplace or job site

Q

Manuel works at one of the manufacturing locations and has noticed one of his fellow employees operates one of the wheel-forming machines inappropriately. It hasn't caused any trouble yet, but he worries that it could become unsafe if this continues or if we aren't paying close attention to equipment status.

What should Manuel do?

A

Superior requires a safe working environment and puts safety above all else. Manuel should report the situation to a manager or use one of the reporting channels in this Code. Superior strives to provide everyone with a safe work environment.

POLICY AND RESOURCES

 • [Resources](#)



Creating Quality Products

Quality Production

Nothing is more important than our employees' safety in making our products and the quality of our products. We always prioritize quality and safety when working with production, storage, or transportation of our products.

Quality means:

- Comply with all policies and document all product tests and inspections, consistently meet or exceed standards and comply with Company policies
- If you are involved in manufacturing our product or have contact with the equipment or materials used to produce it, you must follow all quality procedures that apply to your job
- Report any concerns about product safety immediately

An essential aspect of maintaining customer trust is holding suppliers accountable for the quality and safety of the products and services they provide to us. If you know or suspect that a supplier is not upholding its commitments to quality and safety, it is your responsibility to report the situation.

POLICY AND RESOURCES



- [Confidentiality of Proprietary Parts Data and Nondisclosure Policy](#)
- [Resources](#)

Marketing Our Products

We have a global presence and pride ourselves on truthfully marketing and promoting our products. Our trust is hard-earned, and our consistent, transparent, and truthful behaviors have earned us a reputation for global excellence in the aftermarket category and a stellar brand reputation. This is consistent with our commitment to act honestly in our business affairs. All descriptions of our products, services, and prices must be truthful and accurate.



A photograph showing two women from behind, sitting at a desk with two computer monitors. The woman on the left is wearing glasses and a dark jacket. The woman on the right is wearing a dark, patterned jacket. They are both looking at the monitors, which display web pages. The desk has a keyboard and a mouse. The background is slightly blurred, showing office equipment and a window.

Protecting Assets and Information

Company Assets

Protecting our assets is foundational to our success. We are all responsible for protecting Superior's assets from loss, damage, misuse, theft, or waste.

Protecting means:

- Know and follow all health and safety rules, regulations
- Always secure Superior assets and guard against theft or loss
- Do not use Superior assets for personal use or gain
- Do not use Superior equipment or information systems to create, store, or send content that others might find offensive
- Do not use Superior assets to view or communicate inappropriate or offensive materials, emails or images or to spread discriminating or harassing comments or material

Our actions to protect Company assets are not meant to inhibit regular business communications or prevent

employees from discussing wages, employment terms and conditions of employment or any other concerted activity protected under the National Labor Relations Act, any governmental agency, or any activity protected under the law.

Superior provides computers, cell phones, and other technology for employees to be the best at their jobs. These Company assets may sometimes be monitored to ensure the assigned resources are being used appropriately. Do not expect privacy; don't visit inappropriate websites or transmit anything inappropriate in emails or files.

Assets include Company facilities and furniture, supplies, tools, materials, time, computer equipment, applications, software and network systems, mobile devices, and confidential information.

Q

Sofia sometimes takes her laptop home to finish work over the weekend. Her son then uses it for his schoolwork – just papers and such – nothing long or inappropriate.

Is that okay?

A

Superior assets are not to be used or shared with non-Superior people, including family members. Connecting to other networks and using non-supported software on Superior devices increases the risk to the laptop and to the Superior networks overall.

POLICY AND RESOURCES

 [Resources](#)

Confidential Information and Data Protection

Confidential information is one of Superior's most valuable assets. Everyone is responsible for using appropriate data protection systems in our day-to-day work.

Confidential means we:

- Only access confidential information with specific authorization
- Only access confidential information based on a legitimate business need and need to know
- Never access for personal curiosity
- Get approval from the appropriate source before sharing outside the Company

Superior confidential information means all non-public business information that, if disclosed, would be harmful to Superior or of use to our competitors. This includes trade secrets, pricing structures, cost information, sales figures and forecasts, engineering and other technical data, production methods, techniques or know-how that is not public knowledge, financial results, new product development, customer or business partner data, and business plans and strategy.

Q

Hans recently left the company. He asks Mia, a former Superior co-worker, what Superior information he can share with his new company.

Does he have an obligation to keep confidential information to himself even though he's no longer with Superior?

A

Yes, Hans is obligated to keep the Superior information confidential. Hans can also contact the Legal Department or HR and ask questions about what is confidential, how long he needs to keep the confidence, etc. This will help him feel comfortable with what he can say or not say in his new environment. If Mia is asked about Hans's questions, she should also notify the Legal Department or HR to notify them of the request.

POLICY AND RESOURCES



- [Confidentiality of Proprietary Parts Data and Nondisclosure Policy](#)
- [Policy for Employee Nondisclosure of Superior Confidential Information](#)
- [Resources](#)

Cybersecurity and Privacy

We are all responsible for securing Superior's information systems, data, and information, which are critical to our success. This means we protect our systems and data from any activity that can cause harm to Superior, our employees, or our reputation through accidental or intentional information disclosures.

To be secure we must:

- Take reasonable steps to protect against unauthorized or accidental access, accidental disclosure, or theft of proprietary information or materials
- Physically protect your devices when they aren't in use, by storing them in secure locations
- Never install unauthorized software on Company devices or connect unauthorized hardware to Company systems
- Never give access to any computer system, software, or hardware to unauthorized persons

PROTECT SUPERIOR SYSTEMS AND COMPANY DATA BY:

- Watching for emails from senders you do not know or addresses that look suspicious
- Notifying IT immediately if you suspect an information security incident has occurred
- Only using Superior storage systems and software
- Maintaining strong passwords and not sharing them
- Never clicking on links or open attachments from senders you do not know
- Never opening Superior data on personal devices or computers that have not been secured by Superior IT

Q

Karolina received an email from a supplier representative with another company's price sheet attached – because the rep thought they were sending it to that company.

What should she do, and who should she tell?

A

While this is a mistake by the supplier representative, report the incident to your manager immediately and to the Legal Team. Do not open the file. The Legal Team and policies will guide you and your manager on the next steps.

POLICY AND RESOURCES



- [Global Integrity Policy](#)
- [Resources](#)

Personal Information

We protect one another by diligently safeguarding one another's personal information. This includes our employees, customers, and business partners and the information about our relationships with them.

Before collecting any personal information, make sure it is necessary for the task at hand. When we collect data, we collect the minimum amount of data necessary, ensure there are protection and safeguards in all personal information in our control, restrict its use to the specific purpose for which it was collected, and share it only with people who have appropriate authorization and a need to know.

Intellectual Property

Superior's intellectual property is a valuable and essential company asset. Intellectual property is critical to our success; we must always protect and properly use this important intellectual property.

Superior intellectual property may be protected by:

- Patents, copyrights, trademarks, or trade secrets
- Knowing that intellectual property exists in many forms and how to protect it

We also must respect the copyrights, trademarks, and license agreements of *others* when dealing with printed or electronic materials, software, or other media content. Be careful when working with business partners with their intellectual property and ours.

Q

While at a social event, Frank overheard his manager talking with a friend outside of work about a potential new product that Superior is considering manufacturing. The manager was bragging about being asked his opinion on some of the product specifications and provided details that seemed sensitive. Should Frank report the conversation? Frank is concerned he will not be considered a team player if he reports the conversation and that his manager will know who reported it, as there was no one else from Superior at the event.

What should Frank do?

A

Any potential disclosure of Superior intellectual property is a concern and should be reported by Frank. It is not up to Frank to know if the concern is valid; it is only that Frank knows he should report the concern in good faith and let the process decide what happens next.





Competing with Integrity

Conflicts of Interest and Corporate Opportunities

We make business decisions in the best interest of Superior. Our decisions are never for personal gain for ourselves or biased in any way.

Avoiding conflicts means we:

- Are proactive when there may be a conflict of interest, including disclosing the actual or potential conflict of interest to your supervisor
- Never take an opportunity for personal gain that we learn about at work if the opportunity could benefit Superior
- Avoid activities that could interfere — or even appear to interfere with the interests of Superior

A **conflict of interest** is an action or inaction that creates, or appears to create, a conflict between personal interests and the best interests of Superior. Some examples include:

- You or a family member having a financial interest in a customer or competitor that is more than 5% of a publicly traded security
- Serving on an industry-related advisory council, trade association, vendor related organization or similar group

- Participating on a board of directors, acting as an executive officer, or in an advisory role for any company or organization (paid or unpaid) other than Superior
- You or a family member acting as an employee, consultant, officer, or director of a supplier, vendor, business partner or competitor
- Competing with Superior in any way (e.g., development of a competing product)
- Having a relative having a direct or indirect personal or financial interest in any business interest that is under consideration by Superior
- Making hiring decisions about any person with whom you have a pre-existing personal relationship
- Having an outstanding loan from Superior, or from any supplier, vendor, or contractor of Superior
- You or a family member holds a government position, or otherwise serve on municipal or legislative board or agency

It is not a violation of the code to have a conflict of interest, but failing to disclose it is always a violation. Conflicts of interest can often be managed, but they must be known to work together to find the appropriate solution.

Q

One of our vendors asked Liam to do some side work for them. It would be at night and on the weekends, and Liam would be paid hourly. So, it is not salary, not a high-ranking position at all. It seems this would be okay – it's not on Superior time.

Is this okay?

A

It is a conflict of interest to work for a vendor, as it can be difficult to distinguish between the vendor's interest and that of Superior. If any other company approaches you to work for them, discuss the situation with your manager, HR, or the Legal Department.

POLICY AND RESOURCES

- [Global Integrity Policy](#)
- [Resources](#)

Gifts and Entertainment

Giving and receiving gifts is a long-standing way to build relationships with business partners. However, if not handled correctly, the exchange of gifts can become a conflict of interest or a step in poor business decisions.

When dealing with items of value we:

- Only accept or give gifts if they are freely given, serve a business purpose, infrequent and are appropriate for the purpose
- Never request gifts or entertainment
- Do not accept cash or cash equivalents like gift cards
- Never give a gift or entertainment with the expectation of receiving something in return
- Do not accept anything that exceeds commonly accepted business practices or violates laws or regulations

Some gifts and entertainment are acceptable in the course of business, such as meals or refreshments

before, during, or after a business meeting, or infrequent business related invitations to engage in activities such as sporting events, cultural activities or a dinner, when accompanied by a representative of the supplier, vendor or business partner.

Before giving a gift or entertainment, it's essential to understand the policies of the recipient's organization. Do not put others in the position of violating or not knowing their policies.

Even the appearance of accepting an improper gift or entertainment can create risk for Superior. Never accept something if it could obligate you or improperly influence decisions you make for Superior.

Q

Jakub isn't sure if he can accept a gift card for coffee from a vendor.

Can he?

A

The gift card is a cash or cash equivalent gift, which is not allowed. Even though a gift card for coffee is a small amount, Superior does not allow this kind of gift. If Jakub were to have a cup of coffee with the vendor before, during or after a meeting it would be permissible.

POLICY AND RESOURCES

- [Global Integrity Policy](#)
- [Resources](#)

Insider Trading

We cannot trade on or share material non-public information about Superior or our business partners. Insider trading happens when people use inside information to gain an unfair advantage when trading securities. When we learn confidential information about Superior and our business partners, we don't act on that information.

Safeguarding securities information means we:

- Understand when we have material non-public information about Superior, or our trusted business partners
- Do not buy or sell Superior securities based on material non-public information and do not share that information with anyone else
- Do not buy or sell any securities of a company when you have inside information about that company
- Complete the **Permission to Trade Company Securities form** when appropriate

Examples of **material non-public information** include:

- Confidential strategic planning
- Financial results
- Information about acquisitions or mergers
- Key contracts
- Pending or potential litigation
- Stock splits or dividends
- Changes in senior management



Q

Margarette works in Finance and regularly sees confidential information about Superior and our business partners. Her brother is planning for retirement, and she wants to help him by giving him some discrete information that he can use to make long-term investments.

Can she give him information that he won't gain from immediately?

A

This is considered tipping and is illegal. Even though Margarette's brother wouldn't make money from the tip until the future, she cannot share material non-public information. If she does, she and her brother would both be liable for violating insider trading laws.

POLICY AND RESOURCES



- [Insider Trading Policy](#)
- [Resources](#)



Communicating with Honesty and Transparency

Business and Financial Records

We are responsible for having complete, fair, accurate, timely and understandable business and financial records. We retain and secure them to ensure the integrity of what we say about our business.

Honest communication means we:

- Record all assets, liabilities, revenues, and expenses accurately and timely
- Follow all internal and external control procedures
- Report any erroneous or misleading entries that we may identify while doing our job
- Encourage others to report any improper accounting or financial misstatements
- Comply with the laws, rules, and regulations that govern our financial accounting and reporting
- Never make false or misleading entries in our books and records
- Never establish unsupported reserves or accruals

If you notice any irregularity or an instance of fraud or misrepresentation, you should immediately report your concern.

A business record is any document, regardless of format, which records a business dealing or provides evidence of a business transaction. This includes financial reports, contracts, invoices, time sheets, travel and expense reports, and receipts.

Some employees in finance positions have heightened responsibilities. They must ensure Superior's financial information disclosed in public communications and filings with the Securities and Exchange Commission ("SEC") is complete, fair, accurate, timely, and understandable.

POLICY AND RESOURCES



- [Public Disclosure Policy](#)
- [Resources](#)



Public Communications

Communications to audiences inside and outside of Superior require a specialized understanding of the company and the media environment. Only Superior designated spokespersons should speak on our behalf.

Communication with integrity means:

- Referring media or public requests for information to Corporate Communications
- Referring analysts or investor inquiries to Investor Relations
- Referring legal requests to the Legal Department
- Only speaking publicly for Superior if we are a designated spokesperson
- Avoid giving the appearance that you speak for Superior

Social Media

It is important to use good judgment on social media sites, especially as millions of people can see, share, and comment on anything posted by or about us.

Public engagement on social media means:

- Be fair and courteous to fellow employees, customers, and suppliers, and never post anything that could be considered malicious, obscene, harassing, defamatory, or discriminatory
- Avoid giving the appearance that you speak for Superior
- Do not post confidential information about Superior, our business partners, or our customers
- Do not share content on sites that includes images of production, security, and or personal use of company resources
- Respect and follow the guidelines of the social media site you are posting on

Q

We are getting ready to release a new product, and Camila has amazing pictures showing the manufacturing process which she posted to her social media account with lots of likes and comments.

Is that okay?

A

Taking pictures of the manufacturing process is not allowed, nor is posting pictures from manufacturing sites to personal social media accounts. It is normal to want to share exciting news about the company. Be sure to share only public information approved for posting by the Corporate Communications Team.

POLICY AND RESOURCES



- [Social Media Policy](#)
- [Resources](#)

A man with dark hair, smiling, wearing a maroon button-down shirt. He is standing in front of a blurred background that appears to be an airport or a modern building with large windows and curved architectural elements.

Conducting Business with External Parties

Fair Competition and Antitrust

We are an industry leader based on the quality of our people and our product; we protect that quality by competing fairly and transparently. We compete hard but always within the letter and spirit of the laws wherever and whenever we conduct business.

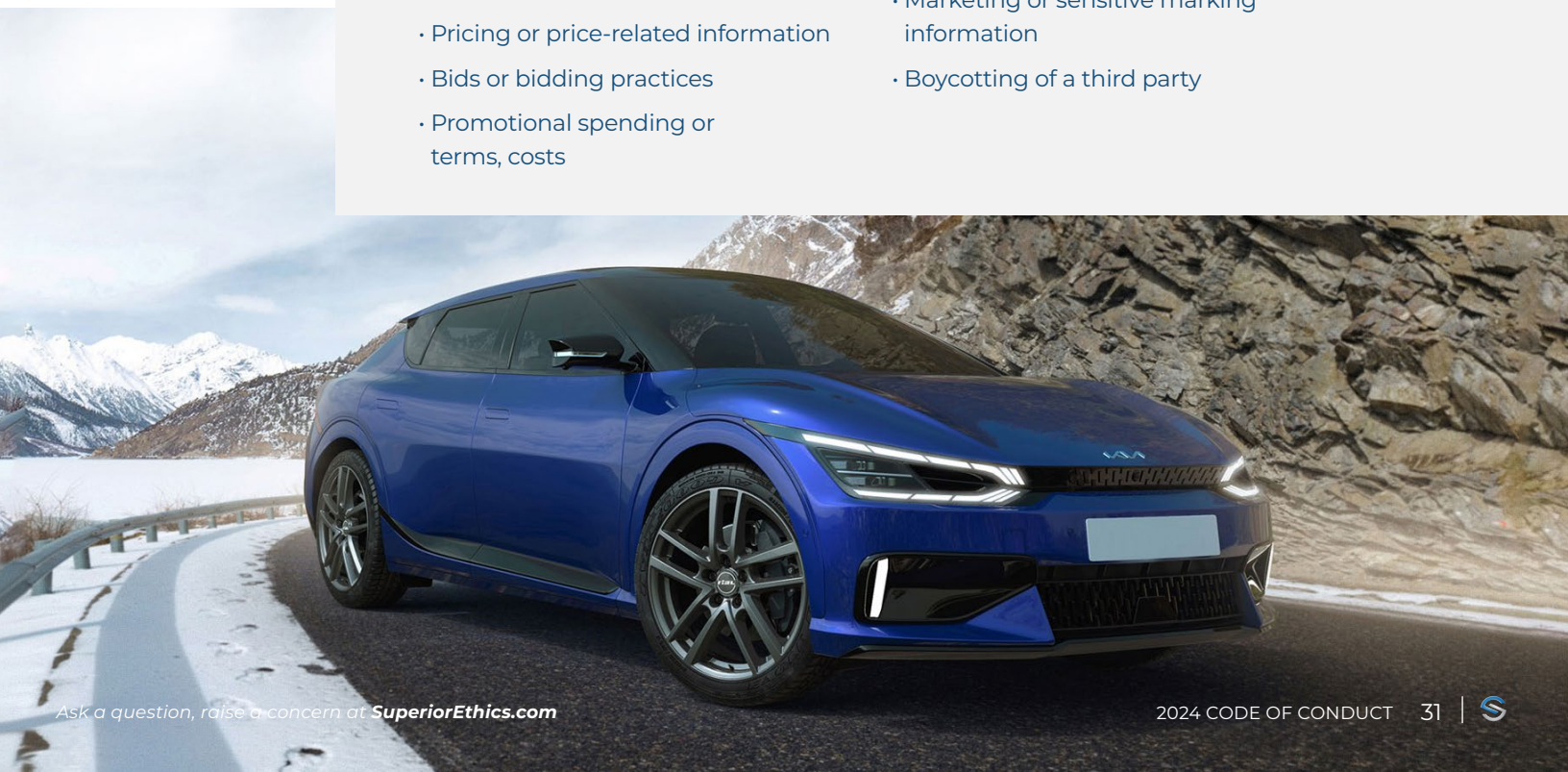
Antitrust laws are complex and compliance requirements can vary depending on circumstances and the countries we conduct business with. These laws are designed to preserve competition by prohibiting agreements and practices that restrain trade. We compete fairly because it is good for business and the right way to behave.

Ethical business means we must:

- Comply with all applicable competition and antitrust laws
- Provide only truthful and honest information about Superior products
- Never misrepresent the facts to gain a competitive advantage
- Never disparage competitors or their products
- Do not force clients to buy one product to get another product
- Not misrepresent or make leading or false claims (positive or negative) about our products or those of our competitors
- Not make agreements restricting competition, including agreements between competitors about pricing, terms of sale, or customer practices
- Always ask for guidance from the Legal Department when there is a question or concern

NEVER DISCUSS OR AGREE TO ANY OF THESE WITH COMPETITORS OR CUSTOMERS:

- Dividing or allocating markets, territories, or customers
- Customer lists
- Pricing or price-related information
- Bids or bidding practices
- Promotional spending or terms, costs
- Product supplies
- Supplier or supply chain information
- Marketing or sensitive marketing information
- Boycotting of a third party



Q

Felix attended a trade conference and met many people in the industry. All was going well until he ran into a friend who now works for a competitor. His friend had a few drinks and talked about how they should secretly compare “notes,” and both win with their companies.

What should Felix do?

A

Felix should make a “noisy exit” from the conversation. It’s crucial that Felix not be viewed as having talked about this proposal in any way. It’s damaging to Felix, Superior, and the industry when these conversations take place. Felix can protect himself and Superior by telling his friend the conversation is inappropriate and leaving the conversation immediately. Felix should also report the issue *immediately* to the Legal Department for guidance. Quickly addressing these types of issues is essential to resolving problems.

POLICY AND RESOURCES

- [Global Integrity Policy](#)
- [Resources](#)

Bribery and Corruption

We are a solid and ethical business; we do not tolerate bribes or any corruption in our business or from our business partners. We do not participate in behavior that gives even the appearance of bribery or corrupt activities or results in inaccurate books and records.

We comply with applicable anti-bribery and anti-corruption laws in the U.S. and everywhere we do business. These laws also apply to individuals and companies that do business on our behalf.

Conducting ethical business means we:

- Comply with all applicable laws against bribery or corruption
- Record all transactions promptly and correctly and never try to conceal a bribe by documenting it falsely
- Immediately report any attempt, offer, promise, or request for a bribe
- Understand that bribes are not just the exchange of money but can be in the form of gifts, entertainment, sponsorships, donations and even job offers
- Perform comprehensive due diligence on third parties Superior does business with, and monitor their actions to make sure they comply with our policies
- Never pay, or offer to pay, agree to pay, promise to pay, or authorize another to pay a bribe in connection with our business
- Never demand, solicit, or receive a bribe

A bribe is any item of value given with the intent to improperly influence an act or decision or secure improper business advantage, induce any person to do or withhold an act in violation of their lawful duties, and/or induce a person to misuse their influence to obtain or retain business.

AN ITEM OF VALUE IS ANYTHING THAT MIGHT HAVE SOME VALUE TO THE PERSON RECEIVING IT, WHICH CAN INCLUDE:

- Cash or cash equivalents (e.g., gift cards)
- Gifts or travel
- Jobs
- Board positions
- Entertainment
- Discounts or favors
- Political or charitable donations

When working with government officials, you must take extra care and be aware of who may be considered a government official or affiliate. Please consult with the Legal Department as the laws are complex and the consequences for violating them are severe both for you and Superior.

We never make “**facilitation payments**,” that is a payment that is made to rush a process along that is in the normal course of business, such as processing a payment faster, or moving an approval ahead of others in the same queue.

POLICY AND RESOURCES

- [Global Integrity Policy](#)
- [Resources](#)

Q

Lina works in a department at Superior that offers internships to students and individuals. Recently, there has been talk of an individual receiving an internship spot related to “someone who works in the government” in one of the countries where we do business.

Is this right?

A

Internships should never be used as an exchange for consideration or business, it would be a violation and is against our values and policies. It is not up to you to determine whether the person should receive an internship; it is only up to you to report the concern. Use the hotline to report or contact the Legal Department to discuss your concerns.



International Trade Compliance

We follow all applicable international trade laws. Any violation of sanctions, import, export or other trade control can lead to fines, debarment and or a loss of import or export privileges, all of which could make it difficult for Superior to do business.

In international business we:

- Always accurately document our import and export compliance
- Review and comply with all licensing requirements
- Conduct appropriate sanctions and compliance screening of third parties seeking to do business with Superior
- Ask the Legal Department if there are any questions or concerns
- Never export to embargoed countries or destinations or to parties who may divert shipments to those places
- Do not proceed with any transaction that could potentially violate import or export regulations or laws, including sanctions and embargoes

It is important to understand we are all responsible for global transactions that could be subject to U.S. trade controls or the trade controls of other countries.

Government Inquiries

We are a regulated business, and as such, occasionally, there may be times when we are asked to assist in a government inquiry.

If a government official visits you in an investigative inquiry, be professional and cooperative, but request the presence of legal counsel or call the Legal Department as soon as possible.

If it's not an emergency, consult legal before:

- Agreeing to participate in an interview
- Permitting an official to search any of our locations
- Answering any questions about Superior's business
- Producing any documents
- Responding to any requests in connection with any litigation or investigation



Supporting Our Communities

Community Support

Our values and ethical standards guide our behavior in making a positive difference in our communities.

We support communities by:

- Knowing that we are free to make personal charitable contributions, and that occasionally there will be Company-sponsored charitable drives that you may participate in
- Supporting communities through personal action and good works
- Knowing that any personal contributions do not translate to an expectation that Superior will gain in any way

Political Activities

Participating in the political process is an important part of citizenship within the communities we operate in. When Superior employees engage in political processes it is important to follow the law and keep personal political activity and views separate from Superior's.

In our political activities we do not:

- Require or request a Superior supplier or vendor make a political contribution of any kind
- Use Superior funds, facilities, or influence to support personal causes
- Engage in partisan political activities at work
- Let political activities interfere with work responsibilities or give the appearance of a conflict of interest

POLICY AND RESOURCES

- [Global Integrity Policy](#)
- [Resources](#)

Q

Ana's manager just asked her who she's supporting in the next election and hinted that she should be supporting the manager's candidate. When she didn't react positively, the manager laughed it off as if it was a joke. Ana felt awkward and didn't take it as a joke.

What should she do?

A

No one at Superior should ever ask you to support a particular candidate, nor vote a particular way in an election. If you are ever pressured or asked about political activities, please reach out to HR or the Legal Department for assistance.



Environmental Protection

We are committed to protecting the environment where we live and work by meeting or exceeding the environmental laws and standards that apply to us. Our environmental policy is based on internationally recognized standards and every Superior site must follow the guidelines.

Protection means we must:

- Continually assess and strive to improve our processes to reduce and prevent emissions and waste in our operations
- Follow all applicable environmental laws, rules, and regulations
- Safely handle and transport raw materials, products, and waste
- Ensure every site is ISO 14001 certified
- Immediately report any concerns

Daily small actions impact the environment, community, and business. Watching for ways to improve our processes can make a difference. Superior is proud of our ESG activities and goals. We pursue initiatives to reduce water usage at facilities. We continue to take action to reduce our carbon footprint and greenhouse gas emissions. We strive to achieve material efficiency and reduction initiatives for the raw materials used to produce our products.

POLICY AND RESOURCES



- [ESG Report](#)
- [Environmental Laboratory Testing – Shared Services Laboratory Procedure](#)
- [Environmental Management System Manual](#)
- [Resources](#)

Human Rights and Human Trafficking

We know that human rights are fundamental rights, and we conduct our business in a socially responsible manner.

We support our communities by:

- Respecting employee rights to freedom of association and collective bargaining
- Respecting employee rights
- Reporting any concerns, we see or hear of in our business, or that of our business partners
- Never tolerating forced or child labor or abusive disciplinary action practices in any part of our business or that of our business partners
- Never using Superior resources for activities that would facilitate the trafficking of persons

We expect our business partners in our supply chain to hold high standards of human rights.

Q

Antoni saw an online article about one of our customers that suggested their stance on human rights does not align with Superior.

Who should he share this article with?

A

Antoni should bring the article to the attention of the Legal Department right away. The Legal department will be able to assign the appropriate resources to determine whether the customer's values align with ours.

POLICY AND RESOURCES

 [Resources](#)



Global Labor Practices

Superior is proud of our commitment to always treat our employees with respect and integrity. No matter where you work or in what capacity, Superior has adopted specific principles that respect employees' right to freedom of association, being safe at work, working in a healthy environment, and being protected from harassment and discrimination, and principles that prohibit the employment of child or forced labor. We believe in our values and consider our employees our most valuable asset.

Resources

This Code of Conduct (Code) is designed to guide you, and while we've tried to anticipate questions you may have, we cannot cover them all. We encourage you to contact the following resources with any questions and concerns you may have.

Internal Audit: InternalAudit@supind.com

Legal: Legal@supind.com

Head of Health, Safety Environment and Energy: +49 2392 80639-285

Report your concern:

- Use the reporting form at [SuperiorEthics.com](https://www.superiorethics.com)
- Call the Ethics Line at:
 - **United States:** 1-855-208-3106
 - **Germany:** 0-800-225-5288; after hearing the tone, enter PIN: 855-208-3106
 - **Mexico:** 001-855-477-0442
 - **Poland:** 00-800-151-0260