



Global Whistleblowing Policy

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I. Introduction

Superior Industries places great emphasis on operating with integrity in the marketplace. Our Code of Conduct outlines our expectations for employees, directors and officers to do the right thing under all circumstances and to conduct themselves and our business in accordance with all applicable laws and policies. Our Code of Conduct also applies to our business partners, including consultants, agents and suppliers and any other person acting on behalf of Superior Industries.

II. Purpose

Superior Industries is committed to an environment with open and honest communication. We want our employees and business partners to feel comfortable approaching management whenever they believe violations of law, policies or standards have occurred.

This Whistleblowing Policy aims to remind all parties of the critical role each individual plays in identifying and eliminating wrongdoing. It empowers us to react swiftly and effectively to misconduct, helping to prevent, detect, and respond to potential violations of company regulations or applicable laws. The policy provides clear guidance on the channels available for raising concerns. Reporters who file in good faith will be protected from retaliation.

III. Scope

A. Who can report

This policy applies to all employees and individuals connected with the company including contractors, former or potential employees, and their relatives or dependents, in countries where the Company conducts business. Third parties such as business partners, customers, suppliers, consultants, auditors, or other individuals may also report concerns.

B. What can be reported

Whistleblowing concerns may include, but are not limited to:

- Breaches of legal or regulatory obligations
- Non-compliance with respectful workplace principles or labor law including discrimination based on 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
- Major safety hazards
- Misuse or theft of company assets, which include: company's facilities and furniture, supplies, tools, materials, time, computer equipment, applications, software and network systems, mobile devices, and confidential information and any other company-owned properties and resources.
- Information security concerns
- Non-disclosed conflict of interest
- Anti-competitive practices
- Fraud, bribery, corruption or money-laundering
- Environmental harm

- Human rights violations such as signs of modern slavery, forced labor, child labor or human trafficking related to our operations or operations of our business partner
- Any other serious ethical misconduct
- Concealment of any of the above

Please note that personal work-related issues, such as pay, workload, or conflicts with colleagues, are not covered by this policy. These types of concerns should be discussed directly with your line manager or HR representative.

IV. How to report a concern

When you observe some behavior that you believe violates our Code of Conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. In that case, reports may be filed anonymously and, in accordance with our Code of Conduct, employees are protected from retaliation for concerns reported in good faith.

There are several ways in which you may report or disclose any issue or misbehavior:

1. Complete the online form at: [EthicsPoint - Superior Industries](#)
2. Call the Ethics Hotline at:
 - United States: 1-855-208-3106
 - Germany: 0-800-180-7071
 - Mexico: 001-800-266-0293
 - Poland: (0)-800-005-678

The above resources are available at all times, free of charge, in local languages.

V. Confidentiality and security

Although we encourage our employees and business partners to identify themselves, comments also can be submitted on an anonymous basis, and EthicsPoint will maintain anonymity throughout the process. 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. 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 violations. Any act or threat of retaliation will itself be considered a serious violation of our Code of Conduct.

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

VI. Ethics hotline and web EthicsPoint reporting process

The Ethics reporting process is designed to be a dialogue-based mechanism focused on reaching ethical solutions. The investigation process encourages communication with the reporter to ensure all relevant factors are carefully considered. Reporters are asked to provide additional information and engage with the Compliance Team throughout the various stages of the process to ensure appropriate conclusions.

Regardless of how a report is submitted, Superior Industries ensures that all reports are given prioritized attention and confidentiality is maintained. Concerns are carefully reviewed and, if warranted, assigned for investigation.

Ethics reporting process

1. When a complaint is received via phone or web through EthicsPoint, Compliance Team¹ receives an email alert about the new case or information. If a Compliance Team member is implicated, access is restricted to the implicated person and the remaining Compliance Team members receive the email alert.
2. Within one business day, the compliance team determines the investigation strategy. If a senior executive is implicated, the Compliance Team assesses whether the claim is frivolous. If it is not, the General Counsel notifies the CEO and/or CFO (unless implicated) within 48 hours². If the claim is deemed frivolous, the notification occurs during the next quarterly call.
3. The Senior Paralegal posts a reply to the reporter within EthicsPoint, confirming receipt and asking for more information if needed. The case is then assigned to an investigator. The reporter does not see all of the information posted in EthicsPoint. For example, they cannot see who is assigned to investigate or any of the findings. The reporter will only see the information and attachments they submit, and any responses to/from the Compliance Team.
4. The investigator (Human Resources, Internal Audit, Legal or third party) performs the investigation and documents the results using standardized compliance templates.
5. The Compliance Team reviews the investigation report. If there are questions or follow-up needed, the team clarifies questions and performs additional procedures.
6. Once the investigation is complete, the Senior Paralegal closes the case and submits a closing note to the reporter via the EthicsPoint system, indicating that appropriate action has been taken and the matter is closed, but due to the confidential nature of the matter, findings cannot be shared.
7. The Senior Paralegal prepares a compliance report and presentation, including all Accounting- and Auditing-related cases, summarizing case data and investigation outcomes, for the General Counsel and Chief Human Resources Officer to review.
8. The compliance materials are presented to the Executive Team.
9. Questions and follow-up assignments are assigned as needed.

Superior recognizes that whistleblowing reports can serve as valuable sources of insight into systemic issues or areas for improvement. To that end, we are committed to the regular review and analysis of reported cases to identify patterns, root causes, and opportunities to enhance our internal policies, procedures, and practices. This approach ensures the organization remains proactive in addressing concerns and continuously strengthens its culture of integrity and accountability.

¹ Compliance Team: General Counsel and Chief Human Resources Officer, and Senior Paralegal

² CEO and CFO (unless implicated) will receive periodic investigation updates related to auditing and accounting matters, or any other matter deemed significant in nature

VII. Good faith disclosure

Superior will not tolerate reports submitted in bad faith, which includes but is not limited to malicious, frivolous, or abusive, deliberately inaccurate, or misleading reporting. The above non-retaliation commitment does not apply to bad faith reports.

VIII. Final notes

The Senior Leadership Team oversees this Policy and ensures it is reviewed at least every five years, or sooner if there are changes to the business that affect material environmental, social, or governance risks, or if a control gap is identified. Employees, suppliers, customers and any other stakeholders with questions, suggestions for improvement, implementation or other feedback on this Global Whistleblowing Policy can reach out to Superior management by contacting Human Resources at USHumanResources@SupInd.com or the Legal Department legal@SupInd.com

To ensure external transparency and accountability, Superior will publish the total number and nature of whistleblowing reports received during the year in its annual Sustainability Report.

Employees are encouraged to read this policy in conjunction with Superior's Code of Conduct.

The policy is available in all local languages and is also accessible to external stakeholders via the Company website. To support ongoing awareness and understanding, the Company may invite officers, senior management, and employees to participate in training sessions on the policy's application.

DOCUMENT HISTORY

Version 1	September 2026	First release
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