

A magnifying glass and tweezers are shown on a technical drawing, symbolizing precision and quality control.

# QUALITY, SAFETY & ENVIRONMENT MANUAL







## STRUCTURE

OF THE SUBSIDIARIES AND HOLDINGS  
OF EFI AUTOMOTIVE GROUP AS OF DECEMBER 31, 2023

### ELECTRICFIL S.A.

Société anonyme (public limited company) with a Board of Directors and Supervisory Board – Share Capital €10,304,752 – Trade and companies register (RCS) LYON 393 061 882 – French business sector ID (NAF): 6420 Z – 131 rue de Créqui, 69006 LYON – Turnover: €3.61 million  
1 people

Chair of the Supervisory Board: Patrick Thollin – Chief Executive Officer: Béatrice Schmidt

### ELECTRICFIL AUTOMOTIVE

Simplified joint-stock company (SAS) – Capital €4,117,000 – RCS Bourg en Bresse 323 438 515 – NAF: 2651 B – 77, Allée des Grandes Combes, 01708 MIRIBEL Cedex France – Turnover: €162.42 million – 626 people  
CEO: Electricfil SA, represented by Béatrice Schmidt

## EUROPE

### Electricfil Automotive

77 Allée des Grandes Combes  
ZI. Ouest Beynost  
01708 MIRIBEL CEDEX

### Germany Office

EFI Automotive  
Fichtenbergstrasse 3  
D – 71083 Herrenberg

### Electricfil Service

Simplified joint-stock company (SAS)  
Capital €3 691 106  
1 rue de l'Industrie,  
Parc d'activité du Rongeant  
52300 JOINVILLE – France  
RCS Chaumont 313 349 144 – NAF : 2931 Z  
Turnover: €18,05 million – 77 people  
Présidente : Electricfil S.A.,  
représentée by Béatrice SCHMIDT  
Director: Pierre-Loïc COLLIN

### Electricfil Ünifil Otomotiv

Capital TRY 12 250 000  
Founded in 1996 – ISTANBUL – Turkey  
Turnover: €36,85 million – 304 people  
CEO: Béatrice SCHMIDT

### EFI Lighting

SAS – Capital € 2 857 142  
Founded in 2015 – BEYNOST – France  
RCS Bourg-en-Bresse 810 063 602  
Turnover: €0,59 million  
Chair: Electricfil S.A.

### Electricfil Española

Capital €177,480  
Founded in 1989 – MADRID – Spain  
Turnover: €1,04 million  
Chair : Gérard THOLLIN

### Créative Mécatronique

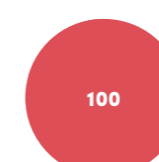
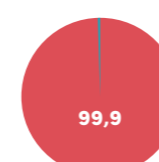
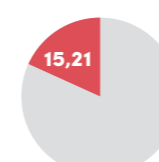
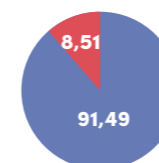
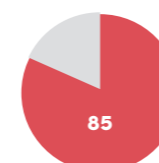
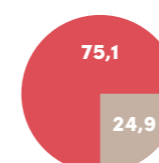
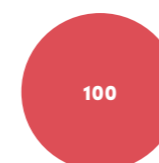
SAS (SJS) – Capital €35,380  
63500 ISSOIRE – France  
RCS Clermont-Ferrand 520 613 803  
Turnover: €1,24 million  
Chair: Patrice GOURBET

### Akéo Plus

SAS – Capital €337 298  
Founded in 2012  
01500 CHÂTEAU-GAILLARD – France  
RCS Bourg-en-Bresse 491 538 716  
Turnover: €0,81 million – 16 people  
CEO: Electricfil S.A.  
représentée by Béatrice SCHMIDT

### SCI LA OUTARDE

Capital €10,000 €  
Founded in 2021  
01500 CHÂTEAU-GAILLARD – France  
RCS Bourg-en-Bresse 751 668 278  
Turnover: €0,14 million  
Manager: Electricfil S.A.



### EFI INVENT

SAS – Capital €250 000  
Founded in 2023 – BEYNOST – France  
RCS Bourg-en-Bresse 953 291 242  
Chair: ELECTRICFIL S.A.,  
représentée by Béatrice SCHMIDT

### AXANDUS

SAS – Capital €100 000  
Founded in 2023 – BEYNOST – France  
RCS Bourg-en-Bresse 980 952 626  
Chair: EFI INVENT

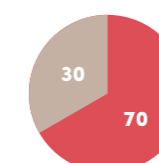
### EFechARGE

SAS – Capital 2 000 €  
Founded in 2023 – BEYNOST – France  
RCS Bourg-en-Bresse 980 276 745  
Chair : EFI INVENT

## ASIA

### EFI Automotive Accessories Systems (WUHAN) Co. Ltd

Capital CNY 51 332 870  
Founded in 2004 – WUHAN – Hubei, Chine  
Turnover €367,36 million – 346 people  
CEO: Béatrice SCHMIDT  
General Manager : Eric LEMAIRE



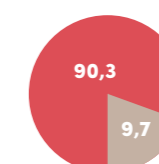
### SHANGHAI OFFICE

Yangpu District,  
No. 398 Huoshan Road  
Guangda Anshi Center  
T2801 Building 2, Room 801, Shanghai

## THE AMERICAS

### ELECTRICFIL CORPORATION

Capital US\$ 17 384 263,27  
Founded in 1996  
NOVI (Michigan) – USA  
Turnover €29,26 million – 126 personnes  
CEO: Béatrice SCHMIDT  
Vice President – General Manager :  
Louis VAQUERO

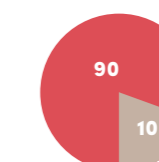


### Alabama Facility

18831 Carters Circle  
ELKMONT – AL 35620 – USA

### Electricfil de Mexico

Capital MXN 223,000,000  
Founded in 2015  
GUADALAJARA – JALISCO – MEXICO  
Turnover €2,29 million  
CEO: Béatrice SCHMIDT



### Workforce: number of employees end of 2023 (including temporary staff)

- Percentage of participation in the capital of the subsidiary **ELECTRICFIL S.A.**
- Percentage of participation in the capital of the subsidiary **ELECTRICFIL Automotive**
- Percentage of participation in the capital of the subsidiary **ELECTRICFIL SERVICE**
- Percentage of participation in the capital of the subsidiary **EFI INVENT**
- Percentage of participation in the capital of the subsidiary of employees

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As CEO of the EFI Automotive Group, my aim is to provide our customers with top quality products and services while respecting the Environment at our production sites. To do so, I have decided to implement this IATF 16949 Quality & ISO 14001 Environment System.

The Quality Systems - Environment Management Manual and associated procedures describe the operation of the EFI Automotive Group.

In addition, to ensure the functional safety of electrical / electronic systems in motor vehicles, I have chosen to apply the ISO 26262 standard within the Group.

Responsibility for the application of this manual has been officially delegated to the Group Quality Director.

I urge all the company's employees to adhere to the measures described in this document as rigorously as possible. This manual is intended as a methodological guide geared towards improving the EFI Automotive Group's overall performance.

I am also committed to verifying that the Quality & Environment Management System is applied correctly and successfully, through Management Reviews, and to supplying the necessary resources for its implementation.

Béatrice SCHMIDT  
Chief Executive Officer

Verified by **Louis VAQUERO**  
Executive Vice-President - Chief  
Operating & Strategic Transformation  
Officer



Approved by **Béatrice SCHMIDT**  
Chief Executive Officer






# EFI AUTOMOTIVE SITES AND THEIR ACTIVITIES

## EFI AUTOMOTIVE IS THE NEW GRAPHIC IDENTITY COMMON TO ALL OF THE GROUP'S SUBSIDIARIES AND THE NEW COMMERCIAL NAME OF THE EFI AUTOMOTIVE GROUP



### KEY FIGURES (2023)

- 231,7 millions euros in figures consolidated business
- 335 engineers and technicians, Technopole and subsidiaries
- 1,524 employees spread over three geographical areas
- 9 % of the annual turnover allocated to Research and Development



Beynost, France

#### Electricfil Automotive, EFI, France (Beynost, Ain)

- Headquarters of the EFI Automotive Group
- Gives the general guidelines in terms of strategy for the Group and management of the quality system and Environment
- Group's main research, development and innovation center
- Technical and commercial industrial site for the products of the EFI automotive Group for the Europe zone
- Commercial office in Paris
- Sales offices in Germany dedicated to the German market (post Office - linked to EFI France (Beynost) headcount)

#### EFI Lighting, France (Beynost, Ain)

Joint Venture with Brochier Technologies, designs, and manufactures complete lighting units compliant with the automotive market

#### Dudullu, Turkey



#### Electricfil ünifil otomotiv, EUFI, Turkey (Dudullu)

- Industrial site for the Group's competitive-cost productions (LCC) for the Europe zone





**Elkmont, USA**

**Electricfil Corporation,**  
EFC, United States

- Elkmont, Alabama : Industrial, technical and commercial site for EFI Automotive Group products sold in the Americas zone
- Novi, Michigan : Technical sales office dedicated to the American market

**Château - Gaillard, France**



- Akéo Plus - Safety Conseils,** France (Château - Gaillard)
- Industrial and technical site for Akéo Plus and Safety Conseils
  - Development and innovation center for Akéo Plus and Safety Conseils  
(Out of scope of certification)

**Joinville, France**



- Electricfil Service,** EFIS, France (Joinville)
- Industrial and technical site for the aftermarket
  - Distribution activities for alternative markets

- Créative Mécatronique,** France (Issoire)
- Office of studies. Participates in the development of ignition coils for the aftermarket. (Out of scope of certification)

**Wuhan, Hubeï, China**



- EFI Automotive Accessories Systems,** EFAS, China (Wuhan)
- Industrial, technical and commercial site for EFI Automotive Group products sold in Asia



# DEVELOPING EMBEDDED SMART MODULES FOR TOMORROW'S VEHICLES

A company that designs and manufactures

specialized electrical and electronic equipment

for e-mobility, driving dynamics, engine and transmission efficiency



High-level expertise in the vital functions that improve the efficiency of engines and transmissions and reduce CO<sub>2</sub> and polluting emissions;

Extensive know-how in the development of mechatronic solutions integrating sensors and actuators;

Multi-technology competencies to identify and adapt solutions to your needs;

The necessary industrial capacity to propose solutions that are robust, reliable and competitive;

Long-standing partnerships with many manufacturers, enhancing our capacity to innovate;

An avant-garde position in automotive innovation: "Thinking tomorrow today" (energy savings, reduced CO<sub>2</sub> emissions, etc.).

## STRATEGIC APPLICATION AREAS, FOR THE MAJOR CHALLENGES OF THE AUTOMOTIVE INDUSTRY

### TRANSMISSION EFFICIENCY

Sensors



Speed sensor



Speed and temperature sensor



Mechatronics module (Multi-technologies for DCT)



Park pawl sensor



Clutch position sensor

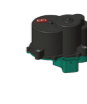


Neutral gear sensor



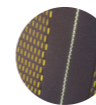
Transmission range sensor

Actuators

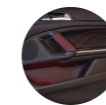


Park lock actuator

### LIGHTING SOLUTIONS



Light guide



Light panel



Internal starry sky

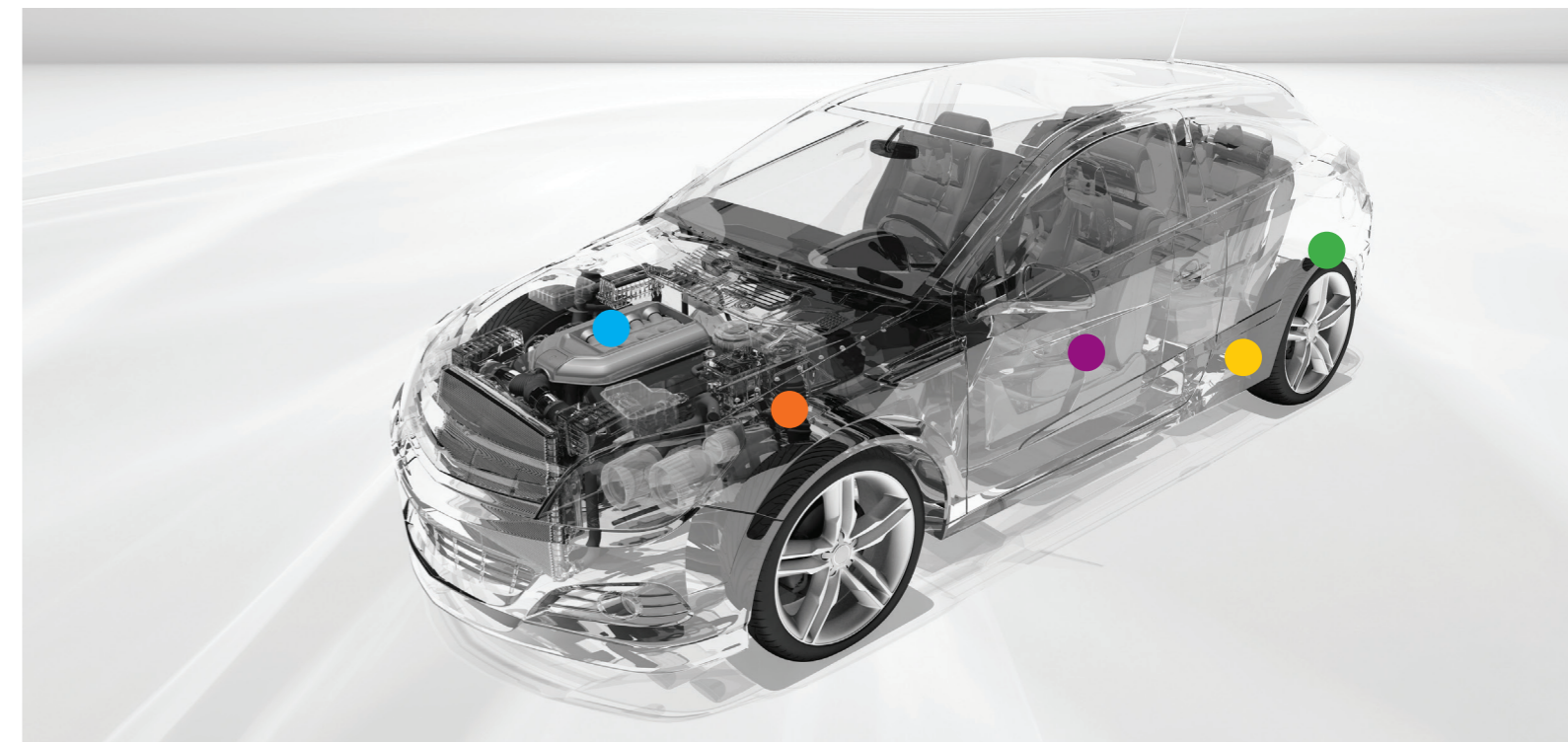
### VEHICLE DYNAMICS



Brake pedal sensor



Vehicle height sensor



### ENGINE EFFICIENCY

Sensors



Camshaft sensor



Crankshaft sensor



Magnetic target wheel

Actuators



Actuator for thermal management

Solenoids



Diesel injection actuators

### E-MOBILITY

Sensors



Inductive through-shaft position sensor



Inductive end-of-shaft position sensor



Magnetic position sensor



Sensor bearing



Magnetic end of shaft position sensor



# EFI AUTOMOTIVE GROUP, PARTNER OF MAJOR AUTOMAKERS AND SUPPLIERS WORLDWIDE

The EFI Automotive Group confirms its position as a Tier1-supplier of the automotive market, with more than 50 % of its sales directly with auto manufacturers, as original equipment and replacement.

## OEM



## TIERS 1 SUPPLIERS



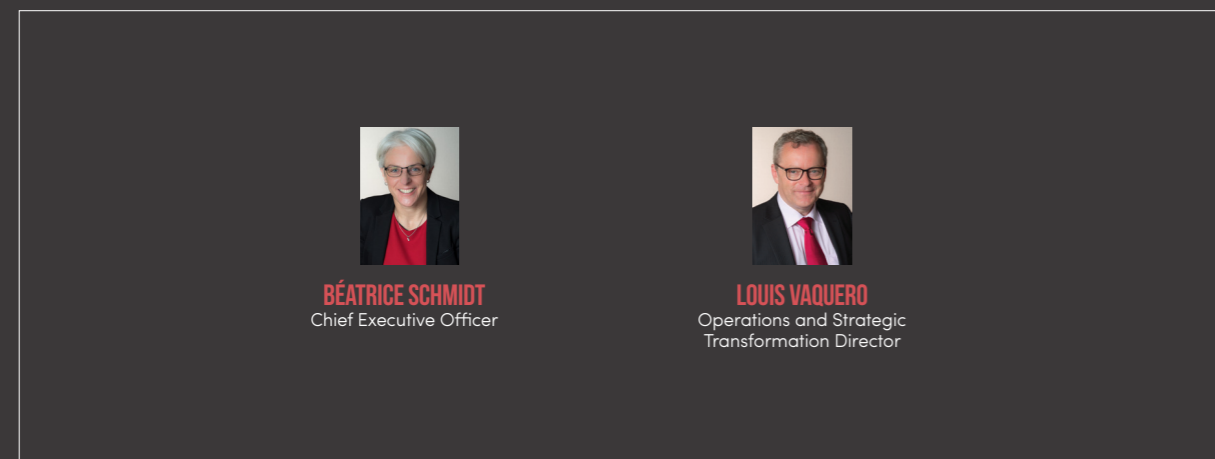
OUR GOVERNANCE

# LEGAL STRUCTURE OF THE GROUP'S LEADERSHIP COMMITTEES

## SUPERVISORY BOARD



## BOARD OF DIRECTORS



## COMEX



Governance of the Group is structured around the Supervisory Board, the Board of Directors and the Subsidiary Boards, which together make up the legal steering body of the Group. The Board of Directors is the Group's governing body. The Board decides upon, and ensures the implementation of, the strategy and direction of all of the Group's activities, and also oversees the Group's operations management, with support from the expertise and experience of COMEX members. At the same time, it must report

to the Supervisory Board on its management. The Supervisory Board's role is to oversee and check the lawfulness and appropriateness of the decisions taken by the Board of Directors, and how they are carried out. They can also act in the decision-making process, and in the monitoring of certain areas such as loans, investments, purchasing/selling of assets. The Board of each subsidiary is the legal steering body representing EFI locally. Its

responsibility is to ensure the operational deployment of the strategy and decisions taken by the Board of Directors and COMEX (management of the business plan, management of field issues, multi-year budget, etc.). COMEX is the Group's Executive Committee. It is responsible for the overall management and operational control of the strategy approved by the Board of Directors. It controls the development of the Group and ensures its smooth operation.

## OUR CSR GOVERNANCE

The CSR committee implemented in 2021 comprises the following functions:

- GENERAL MANAGEMENT
- BUSINESS OPERATIONS
- PURCHASING
- R&D
- HUMAN RESOURCES
- LAW AND COMPLIANCE
- INTERNAL COMMUNICATIONS

It meets on a monthly basis, and its objective is to validate and monitor the Group's CSR actions. The CSR committee relies on specialist functional departments to implement action points: legal department, HR department, purchasing department, etc.



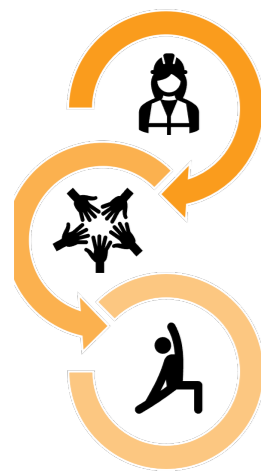


# 1. EFI AUTOMOTIVE GROUP POLICY

Within EFI Group through six values, we are determined to provide the best support and maintain continuous improvement to our stakeholders. While realizing all business activities, corporate sustainability put in the first place; as a "responsible" and diversified company; from top to bottom everyone has responsibility towards each other, our customers, and all road users.

Our commitment is to be sustainable for Quality, Environment and Safety/Security aspects including, security of people, functional safety, product cybersecurity, information security, Human rights and Labour standards and being Responsible company which are all managed within regulations, requirements and needs of stakeholders.

## 1.1 OUR COMMITMENT TO PROVIDE HEALTH AND SAFETY TO OUR EMPLOYEES



At EFI Automotive Group, we are committed to ensuring the highest standards of health and safety for our employees. Our commitment encompasses various measures to create a safe, healthy, and supportive work environment.

**Maintain the ideal working atmosphere** and for every individual and ensure mental, physical and social well-being of all internal and external stakeholders.

**Ensure safe work conditions**, to prevent the traumas and work

diseases link to our risks and activities.

**Comply with applicable laws and regulations** not only for sites and customers but also for all affected regions by our activities and products.

**Improve safety and ergonomics** of workplaces, production areas and machines for all locations and ensure continuity by regular controls and measurements.

**Be prepared for emergencies situations** (fire, chemical spills etc.) and natural disasters (earthquake, flood etc.) to reduce the impact in each subsidiary.

**Include all people** and (if exist) workers' representatives within subsidiaries for management of safety activities.

**Proactively identify and address potential risks to prevent incidents and accidents.** We aim to detect and manage hazardous situations as early as possible through continuous monitoring and reporting. We manage all occurred incidents to prevent further risks.

**Ensure safe handling, storage, and disposal of chemical substances** to protect the health and safety of our employees and the environment. All personnel are trained to follow strict procedures when working with chemicals. Compliance with all relevant regulations is mandatory,

**Provide personal protective equipment** to ensuring the safety and well-being of all employees, contractors, and visitors. We commit to maintaining a safe work environment by adhering to all relevant safety regulations, providing comprehensive training, and ensuring the availability and proper use of Personal Protective Equipment (PPE)

## 1.2 OUR COMMITMENT TO PROTECT THE ENVIRONMENT



At EFI Automotive Group, we are committed to conducting our business in an environmentally responsible manner. We recognize the importance of protecting our planet for future generations and strive to minimize our environmental impact through continuous improvement and sustainable practices.

Our commitments include:

- **Decarbonization:** We are dedicated to reducing our carbon footprint by implementing energy-efficient technologies, sourcing renewable energy, and promoting practices that lower greenhouse gas emissions.

- **Prevent and Reduce Pollution:** We pledge to prevent and reduce pollution, not only in the context of our activities but also from the broader perspective of our products.

- **Water Quality and Consumption Management:** We will manage water resources responsibly by monitoring and improving water quality, optimizing water consumption, and implementing measures to prevent water pollution.

- **Air Quality:** We are committed to maintaining and improving air quality by minimizing emissions from our operations.

- **Manage Natural Resources:** We commit to managing natural resources and our raw materials responsibly. This includes optimizing resource use, ensuring proper waste disposal, and promoting reduction, reuse, and recycling practices across all our operations.

- **Responsible Chemical Management:** We commit to managing chemicals responsibly by minimizing the use of hazardous substances, ensuring safe handling and disposal, and seeking safer alternatives. We will comply with all relevant regulations.

- **Reuse and Recycling:** We will prioritize the reuse and recycling of materials in our operations to reduce waste and conserve natural resources. This includes implementing recycling programs, designing products for longevity and recyclability, and encouraging a circular economy approach.

- **Soil Quality:** We will take measures to preserve and improve soil quality in the areas surrounding our industrial operations. This includes preventing soil contamination by managing chemical spills and waste properly.

- **Noise Emissions:** We will work to reduce noise emissions from our operations to minimize the impact on local communities and wildlife.

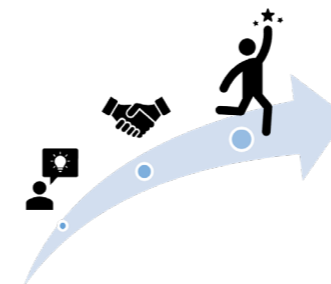
- **Continuous Improvement:** We are committed to continuous improvement in our environmental performance. We will set measurable goals, track our progress, and report transparently on our achievements and areas for development.

- **Stakeholder Engagement:** We will engage with our stakeholders, including employees, customers, suppliers, and the community, to promote environmental awareness and collaborate on sustainable initiatives.

- **Compliance:** We will comply with all applicable environmental laws and regulations and strive to exceed compliance requirements through proactive environmental management.

By adhering to these commitments, EFI Automotive Group aims to lead by example in the pursuit of environmental sustainability and the protection of our planet.

## 1.3 OUR COMMITMENT TO RESPECT QUALITY STANDARDS



**Provide the best quality, service and support** to our customers, through their specific requirements with innovative and reliable solutions with our strong culture of service. Develop processes and parts within regulations and needs, achieving targets set internally or externally to **reach operational excellence and "0" defect.**

**Remain focused** and continue to develop to build together the company of tomorrow through a solid "Quality" culture.

## 1.4 OUR COMMITMENT TO RESPECT FUNCTIONAL SAFETY AND PRODUCT CYBERSECURITY

- **Making functional safety** and Product cybersecurity one's **priority**,

- **Setting** an organization, a shared culture and safety an **expertise** by all employees and manager of the EFI Automotive Group

- **Promoting safety-security risks** prevention and management,

- **Instating the C.A.T.S (Cyber Aspice Tisax Safety) committee**, group of experts promoting quality and safety-security culture, facilitating communication and speeding decision-making,

- **Involving all the company's processes** with functional safety-security and product cybersecurity consideration.

- **Raising all our employee's awareness** and training in safety-security risks according to their level of involvement,

- **Ensuring skills** are in line with the required responsibilities,

- **Providing suitable tools**,

- Endorsing a **proactive attitude** to detect and treat quality and safety-security risks

## 1.5 OUR COMMITMENT TO RESPECT INFORMATION SECURITY STANDARDS



In aspect of Information Security, EFI Automotive Group ensures the information is protected throughout its lifecycle. We do so by:

**Defining and applying a security strategy, policies and guidelines** that comply with laws, regulations, standards and best practices.

**Implementing a continuous security risk management**, aligned and proportionate with the strategic objectives of EFI Automotive Group.

**Protecting sensitive information** with enhanced security measures.

**Ensuring business continuity** by proactively limiting the impact of a security breach.

Managing information security, in continuous improvement, through an Information Security Management System.

## 1.6 OUR COMMITMENT TO RESPECT HUMAN RIGHTS AND LABOUR STANDARDS

The Group's companies, along with their employees, undertake to comply with and promote international law relating to human rights.

**Child Labor and Young Workers** EFI Automotive is committed to eradicating child labor and protecting young workers. We strictly adhere to local laws and international conventions, notably the International Labour Organization (ILO) Conventions on Minimum Age (No. 138) and the Worst Forms of Child Labor (No. 182). We implement rigorous mechanisms to verify the age of workers and are committed to providing safe and appropriate working conditions for young workers in all our subsidiaries.

**Wages and Benefits** EFI Automotive ensures that all employees in all our subsidiaries receive fair wages, compliant with or exceeding local minimum wage laws. In addition to base salaries, we offer various social benefits such as paid leave, health insurance, and retirement plans. We believe these benefits contribute to the financial stability and well-being of our employees and their families.

**Working Hours** We strictly comply with local and international regulations regarding working hours. EFI Automotive is committed to not exceeding maximum allowable working hours and providing adequate rest periods in all its subsidiaries. Overtime is always voluntary and properly compensated according to prevailing laws. We regularly monitor working hours to prevent any work overload.

**Modern Slavery** EFI Automotive prohibits all forms of modern slavery, including forced labor, servitude, and human trafficking. We implement actions to detect and eliminate these practices within our organization and supply chain, regardless of the country in which we operate.

**Ethical Recruitment** Our recruitment processes are transparent, fair, and free from discrimination. EFI Automotive does not require any payment from job applicants and ensures that all recruitment respects the fundamental rights of candidates.

**Freedom of Association and Collective Bargaining** EFI Automotive recognizes and respects the right of its employees to form and join unions of their choice and to engage in collective bargaining. We promote constructive

social dialogue and ensure an environment where employees can freely express their concerns in all our subsidiaries. We are committed to working collaboratively with union representatives to resolve issues and improve working conditions.

**Non-Discrimination** EFI Automotive is committed to providing an inclusive work environment free from any form of discrimination in recruitment, working practices or conditions, including with regards to remuneration, benefits, advancement, discipline, redundancy or retirement. We uphold the principles of equal opportunity and treat all employees and candidates without distinction of race, gender, age, disability, religion, sexual orientation, nationality, social or ethnic origin, marital status, political opinions, or any other characteristic protected by law. We have implemented procedures to prevent and address any form of discrimination and harassment within our organization, across all our subsidiaries.

**Harassment** EFI Automotive treats each employee with dignity and respect and don't use corporal punishment or threats of violence or other forms of physical, sexual, psychological, or verbal harassment, bad treatment or intimidation.

**Women's Rights** EFI Automotive actively promotes gender equality and supports women's rights within the organization. This includes equal pay, access to career opportunities, and specific measures to protect against violence and sexual harassment. We encourage women's career progression and are committed to creating a safe and respectful work environment in all our subsidiaries.

**Diversity, Equity, and Inclusion** We value diversity and are committed to creating an inclusive environment where each individual is respected and valued. EFI Automotive promotes equity in all its practices and strives to represent the diversity of society within its workforce.

**Use of Private or Public Security Forces** When employing security forces, EFI Automotive ensures that they respect human rights and act in accordance with national and international laws. We prioritize engagement with security forces trained in ethical standards and non-violent law enforcement practices.

At EFI Automotive, we believe our success relies on our commitment to ethical and responsible practices. This charter guides our actions and reflects our dedication to being a responsible corporate citizen on a global scale. Our subsidiaries in Turkey, China, the United States, and France all adhere to these principles, ensuring a consistent and universal application of our values and commitments.

## 1.7 OUR COMMITMENT TO BE A RESPONSIBLE COMPANY

At EFI Automotive Group, we are dedicated to upholding the highest standards of responsibility, integrity, and ethical conduct in all aspects of our business. Our commitment is reflected through various guidelines and procedures designed to ensure compliance, fairness, and transparency.

**EFI Automotive Group Compliance Guide:** This guide is designed to help EFI Automotive Group employees comply with anti-corruption rules applicable to each legal entity within the Group. We provide annual training to ensure our employees are well-informed and adhere to these regulations.

**Whistle-Blowing and Alert Report Procedure:** This aims to reinforce our ethical and corporate approach. It extends each employee's channel of expression, allowing everyone to play a role in risk prevention, including issues related to discrimination, harassment, conflicts of interest, and breaches of human rights. This procedure enables employees to obtain information, seek advice, and exercise their right to report irregularities confidentially.

**Anti-Money Laundering:** We must not tolerate, permit, or engage in embezzlement, money laundering, extortion, bribery, or other forms of corruption in our transactions with any government official, manager, or private sector individual.

**Fair Competition:** We must behave fairly in conducting our business to guarantee effective competition, essential for the proper functioning of the economy and market stability. To this end, we must comply with all applicable laws and regulations regarding anti-competitive and restrictive practices.

**Responsible sourcing of Raw Material:** We are committed to responsible sourcing, adhering to international regulations such as the Conflict Minerals Reporting Template (CMRT), Extended Minerals Reporting Template (EMRT), REACH, PFAS, PRT. By following these standards, we ensure ethical supply chains and protect human health and the environment.

**Counterfeit Parts:** EFI Automotive Group is committed to preventing the use of counterfeit parts in our products and supply chain. We require our suppliers to ensure the authenticity and quality of all parts used.

**Export Controls and Economic Sanctions:** We adhere to all applicable export control laws and economic sanctions. Our suppliers must ensure compliance with these regulations to avoid any illegal transactions.

**Intellectual Property:** We respect and protect intellectual property rights. Our suppliers must ensure that they do not infringe upon the intellectual property of others and comply with all relevant laws.

**Information Security:** Protecting information security is a top priority. We implement a continuous security risk management system.

**Personal Data Principles:** We are committed to respecting and protecting personal data privacy. Our practices comply with relevant data protection laws, ensuring the secure and lawful processing of personal data.

**Confidentiality:** We maintain strict confidentiality of all sensitive information related to our business operations, employees, and partners.

EFI Automotive promotes social responsibility amongst its suppliers by asking them to commit to a CSR approach by signing a **Supplier Code of Conduct**.

EFI Automotive Group is committed to continuous improvement in our ethical practices and compliance measures. We believe that by upholding these principles, we can foster a responsible and sustainable business environment for all our stakeholders.



## 2. OUR VOCATION

To imagine and realize tomorrow's mobility solutions with success and responsibility. EFI has the ability to listen to and anticipate market expectations in order to provide ever more innovative solutions.

It is an open and harmonious ecosystem, which includes employees, customers, suppliers, partners and the regions in which we operate. Finally, EFI Automotive is a responsible industrial project, which aims to provide value over the long term and promote the fulfillment of all.

## 3. OUR VISION

We aim to become a mobility solutions provider, rather than an automotive component supplier. We are working to develop our business to remain independent, while capitalizing on our identity as a responsible and agile industrialist.

We want to succeed in our repositioning through decarbonized mobility innovations and our technological platforms.

We want to grow our organization and develop talent to improve our overall performance and our customer experience.

## 4. OUR MISSION

We are experts in the design and manufacture of sensors and actuators.

Across the Group, we are driven by the quest for excellence and the desire to offer innovative solutions adapted to the needs of the market and a proximity service.

It is through our employees' skills, creativity and involvement that we have become a privileged supplier for leading manufacturers and outfitters.

Thanks to our effective production tool and our technological development and research centers located on several continents, we have been a recognized actor in the automotive industry for more than 85 years.

We continue to develop in this same spirit and to build together the company of tomorrow.

## 5. OUR FOUNDING PRINCIPLE

### SUBSIDIARITY

BEING EFI-minded means putting the greater good of EFI above individual or local interests.

It means working to develop the autonomy of people and organizations. It means entrusting action to the lowest level of competent authority. It means helping without reducing responsibility and accepting help without disengaging.



## 6. OUR VALUES

### ENTREPRENEURIAL SPIRIT

We are proud to be a part of the EFI Automotive Group. We work together to serve our customers to ensure the Group's long-term future and with our entrepreneurial passion, we are moving forwards to build our future together. Above all, we encourage interest in serving our community. This way, each employee enables the Group to benefit from their skills and experience and contributes to the development of the Group. We encourage initiatives aimed at improving our overall performance.



### AGILITY / FLEXIBILITY

We work very closely with our customers. We listen carefully to their specific needs in order to provide them with reliable and innovative solutions as quickly as possible and at the best price. We are moving towards a decompartmentalized and fluid organizational structure which simplifies processes and accelerates decision-making. This gives us the flexibility necessary to adapt to a rapidly evolving market.



### SINCERITY

Internally, as with our suppliers and customers, we work within a relationship of communication, trust and with sincerity to find the most appropriate solutions quickly together. This enables us to form strong and lasting partnerships. We always aim to look at situations as objectively as possible. We go beyond a theoretical approach and work together in a spirit of mutual trust and openness.



### FOCUS

We work together to decide on the main Group objectives and retain a shared vision with regards to their effective implementation. Furthermore, we focus our efforts on creating value for customers and our community.



### RESPECT

EFI Automotive employees are one of the company's greatest resources. Together with our diversity of languages and cultures, we form a rich and varied community and whilst respecting our differences, we share a common goal. We wish to make our community stronger by supporting each employee through training and skill development. At each level of the business, we respect the work of our employees and listen carefully to their ideas and suggestions. We stand in solidarity and help each other by means of positive feedback or constructive criticism to strive for excellence together. Whilst we allow room for errors, we also expect each employee to recognize their mistakes, correct them in a responsible manner and accept them in order to progress, excel and thus enable the entire organization to progress.



### RESPONSIBILITY

At each level of the organization, each employee acts responsibly in their role and contributes to the long-term development of the Group. We therefore encourage individuals to take responsibility and act according to the principle of subsidiarity (autonomy, duty to help and support). EFI Automotive is a responsible company and in, each of our locations, we comply with current standards, human rights and local legislation. We act in an ethical manner and with integrity, whilst respecting the environment.



# 7. SCOPE OF APPLICATION OF THE QSE MANAGEMENT SYSTEM

The purpose of this manual is to present the EFI Automotive Group and its activities, as well as the quality, safety and environmental management system in place.

The requirements of this manual apply to the EFI Automotive Group for a company that designs and manufactures specialized electrical and electronic equipment for e-mobility, driving dynamics, engine and transmission efficiency (sensors and modules mechatronics, injection actuators and ignition systems), for the automobile. The requirements attached to these processes are not applicable:

- repair process – as per functionality of part, it is not possible to conduct any repair process (§ 8.7.1.5 IATF).
- post-delivery activities process – since EFI final products

cannot be used as service part and non-functional without assembly medium. (§8.5.5 IATF).

The QEMS has been set up to describe the processes applying in the Group in order to:

- Determine and include in our QSE management system the requirements of our customers in order to meet the needs of their needs. On this base, the Customers Specific Requirements are analysed and taken into account by all the processes on sites and at a Group level;
- Act as a responsible company in social matters and environmental protection;
- Meet the regulatory requirements and the provisions of ISO 9001, IATF 16949 and ISO 14001.



In our procedure PRO 16451, "Management review, site interactions, process review", a matrix displays the interactions between each site, and another matrix shows the contributions of each of the processes on the Group's sites.

In SPEC 16241 a matrix presents how the requirements of the ISO 9001, IATF 16949 and ISO 14001 standards are taken into account in our organization.

Fields of application of the standards within the Group

Sites	Standard				
	ISO 9001	IATF 16949	ISO 14001	ISO 27001	TISAX
<b>EFI</b>	X	X	X	X	X
<b>EFIS</b>	X		X		
<b>EUFI</b>	X	X	X		
<b>EFC</b>	X	X	X		
<b>EFDM</b>	X	X	X		
<b>EFEC</b>	X	X	X		

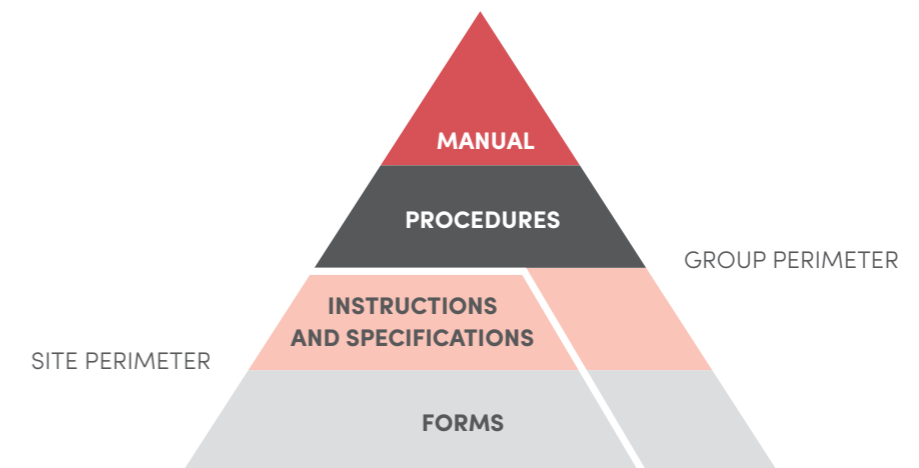
# 8. DESCRIPTION OF THE QUALITY, SAFETY AND ENVIRONMENT MANAGEMENT SYSTEM

Our company's position on corporate social responsibility is described in SPEC 16854 CSR REPORT. The following pages provide a general mapping of the Processes and a description of the processes implemented in the framework of the ESQMS.

## 8.1 THE STRUCTURE OF THE DOCUMENTATION OF THE QUALITY, SAFETY AND ENVIRONMENT MANAGEMENT SYSTEM

The rules for the development and management of all system documents are defined in procedure 12774 « Control of documents and records relating to quality, safety and the environment. »

To ensure its operation, the ESQMS relies on data presented in various internal documents. The documentation is structured in 4 levels represented by the pyramid below. All of these documents must be applied to all the Group's sites (depending on the applicable repository).



## 8.2 CONTENTS OF THE VARIOUS DOCUMENTS MAKING UP THE DOCUMENTATION PYRAMID

- Quality, Safety and Environmental Systems Management Manual: describes the quality, safety and environmental management system in accordance with the established policy and objectives.
- Procedure: Describes et formalizes the activities to set up to carry out the process.
- Internal specification: Formulates internal requirements that can be used externally, like the suppliers specifications, internal specifications, general business conditions, etc.
- Instruction: Technical extension of procedure, that describes precisely what has to be done to carry out an activity.
- Form: Support document in which there are spaces to be filled. Used as a support for records.



### 8.3 ORGANISATION OF PROCESSES

The activities developed and implemented by the EFI Automotive Group are organized into 3 types of processes:

- The M1 Management Process helps define its strategy, implementation and management.
- Realization Processes R1, R2, R3 contribute directly to the design, production and marketing of products.
- The S1, S2, S3 and Support Processes, which contribute to the success of the Realization Processes.

#### Operational Governance :

This Group system is based on a central management system, which is based on the Group's policy and strategy. By this methodology, the strategy is ensured with the implementation of the link between the strategic axes and the set targets.

Each site defines their annual targets and implements it through their annual implementation plan after approval by the Group. Management and escalation routines both on-site and all the way up to top management are put in place to monitor action plans and whether targets are being met, and to oversee priority and resource management.

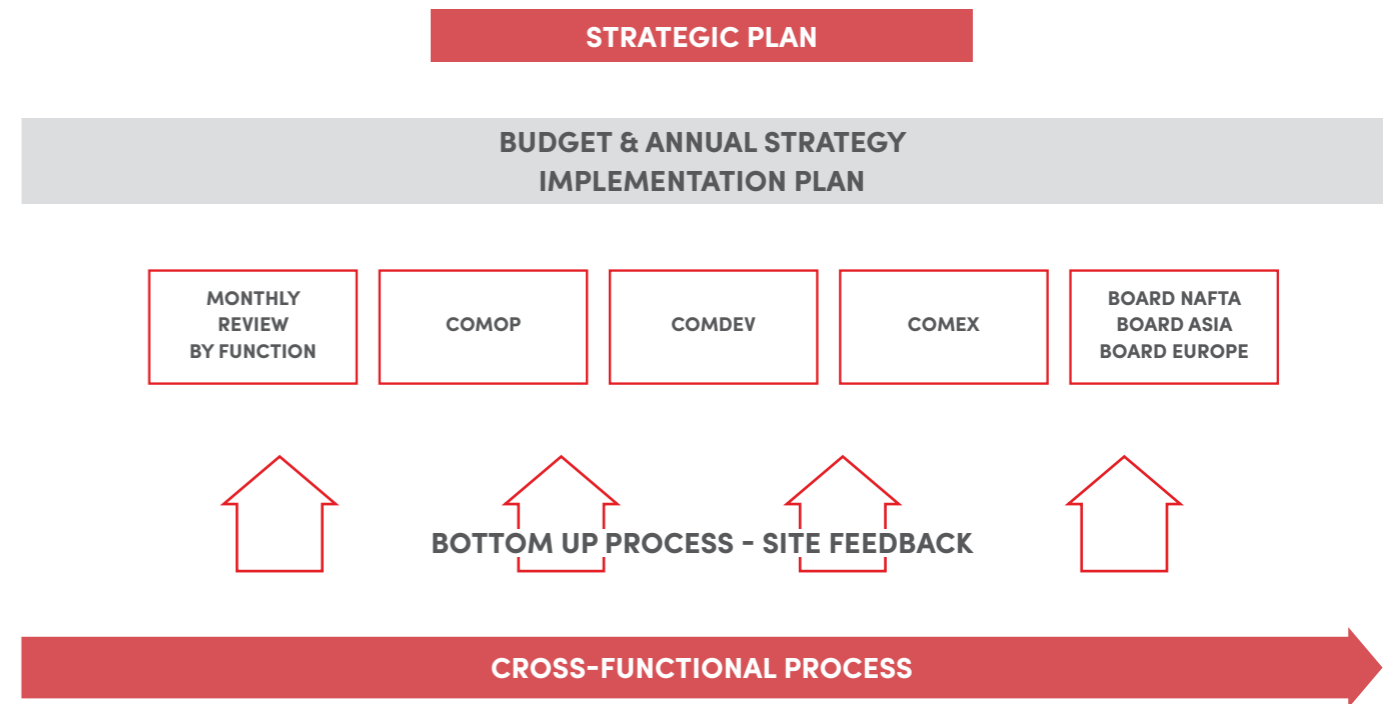
To accomplish this, the coordination process has been implemented, based on the organization through different reviews per zone :

- Realization Review by Function
- Reconciliation Corporate (COMOP, COMDEV)
- Executive Review Group (COMEX, BOARD)

The effectiveness of the monitoring is based on a management loops system :

- From the daily activities of management loops are defined by adopting frequencies and a level of management that is appropriate for the hierarchy in the principle of subsidiarity.

The actors are defined at each level, and for each management loop.



At the same time, there is a cross-functional organisation by process ensures consistency throughout the Group.

- Group Process Owner: The Owner is the "Head" of one or more Processes. He ensures that the objectives are met with the appropriate resources. He organizes and leads process reviews, and based on factual information (process results), approves the improvement actions to be implemented. He reports the obtained results to Management and

defines the performance indicators of the process according to the Strategy. It is up to each Group Owner to appoint in each subsidiary, the process driver who will be at the controls of the process for which he is responsible.

- Site Process Leader (Local Owners): The Site Process Leader ensures daily coordination of the process that the owner entrusted to him. He participates in process reviews (analyses malfunctions, reports to the Owner, implements improvement plans

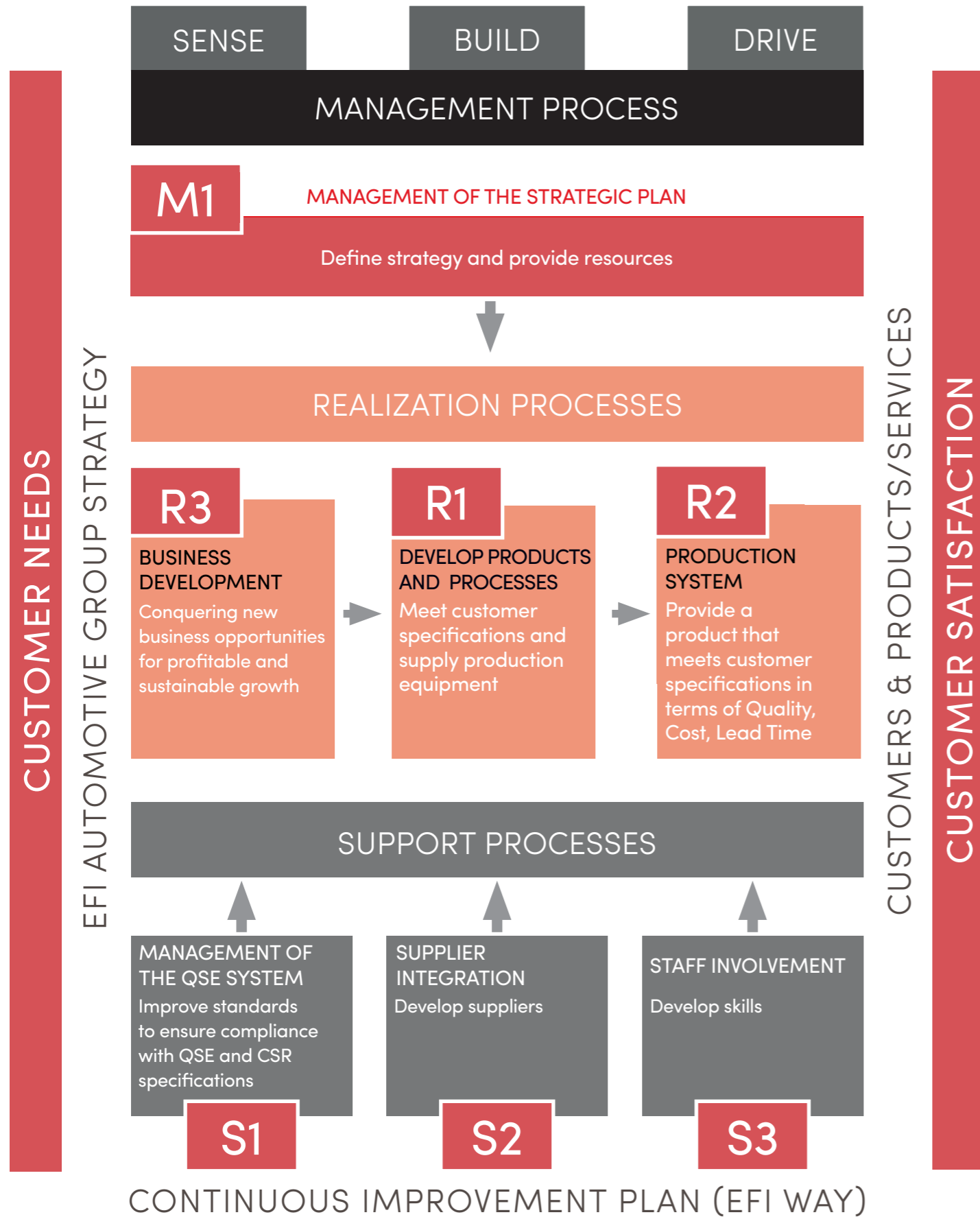
on-site). Site Process Leader comes under the functional (if not hierarchical) responsibility of the owner.

The management of the effectiveness of quality processes is evaluated annually in the Group process reviews, and reporting to Top Management is carried out through a Site Management review, and then expanded through a Group Management review (PRO 16451 "Management review, site interactions, process review").

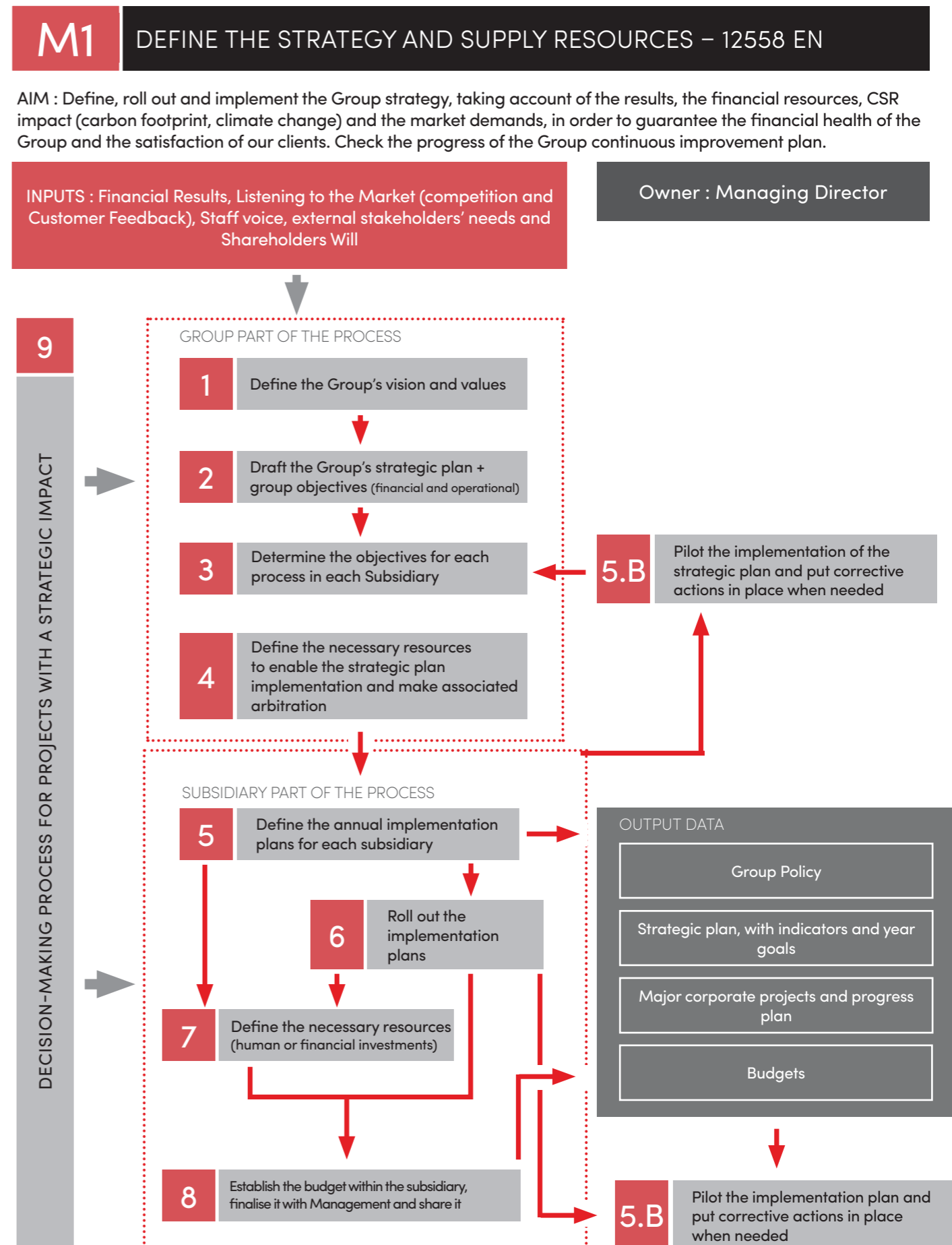


## 8.4 PROCESS MAPPING

Mapping applicable to all sites in the Group excluding EFI Lighting and EFIS which have their own cartography.



## 8.5 PROCESSES DESCRIPTION



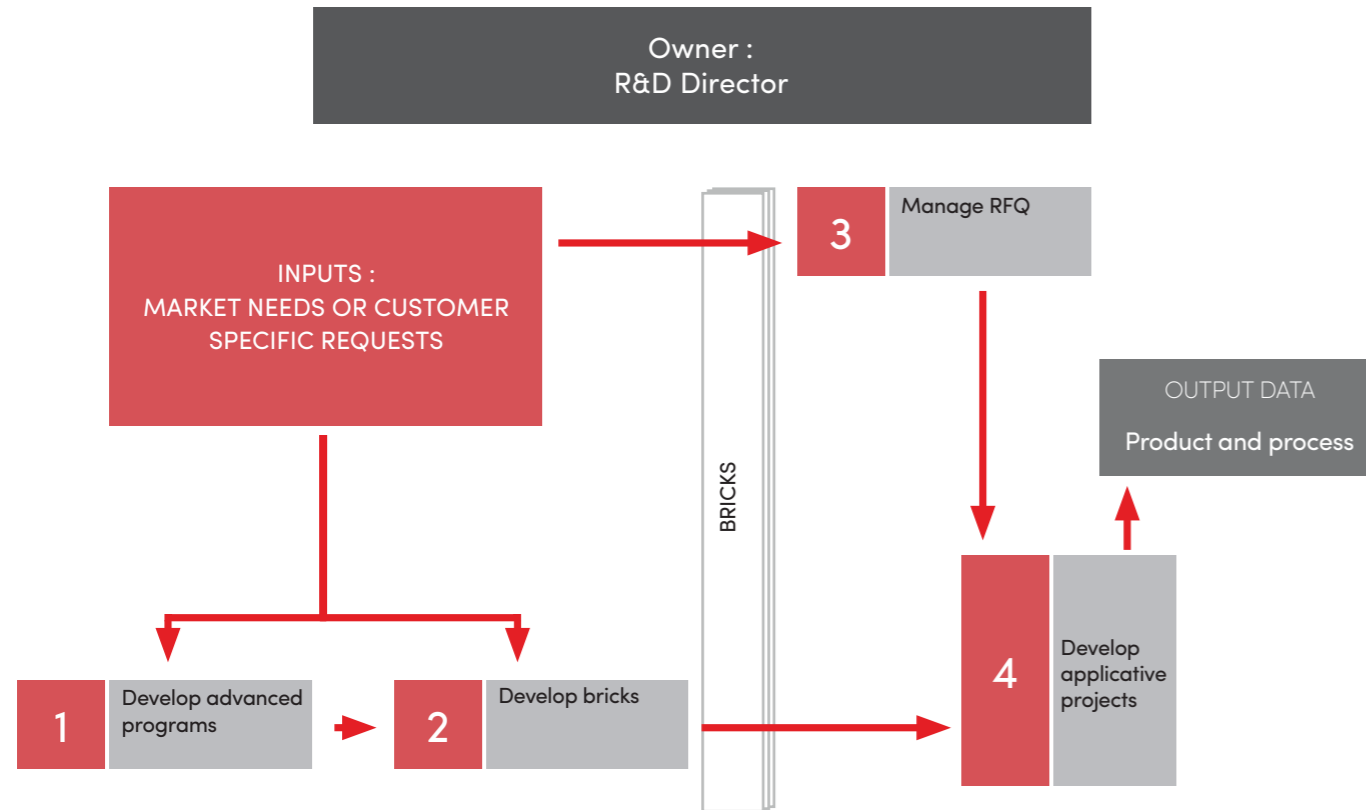


# R1

## ANSWER TO THE CUSTOMER SPECIFICATIONS AND SUPPLY PRODUCTION EQUIPMENTS – 02981EN

Aim : Develop profitable new projects (products and process), complying with the cost, lead time, and quality customer specifications.

Based on the market need specified by the marketing department, specify, develop and validate a profitable technological component (product or process) that can be used in applicative projects.

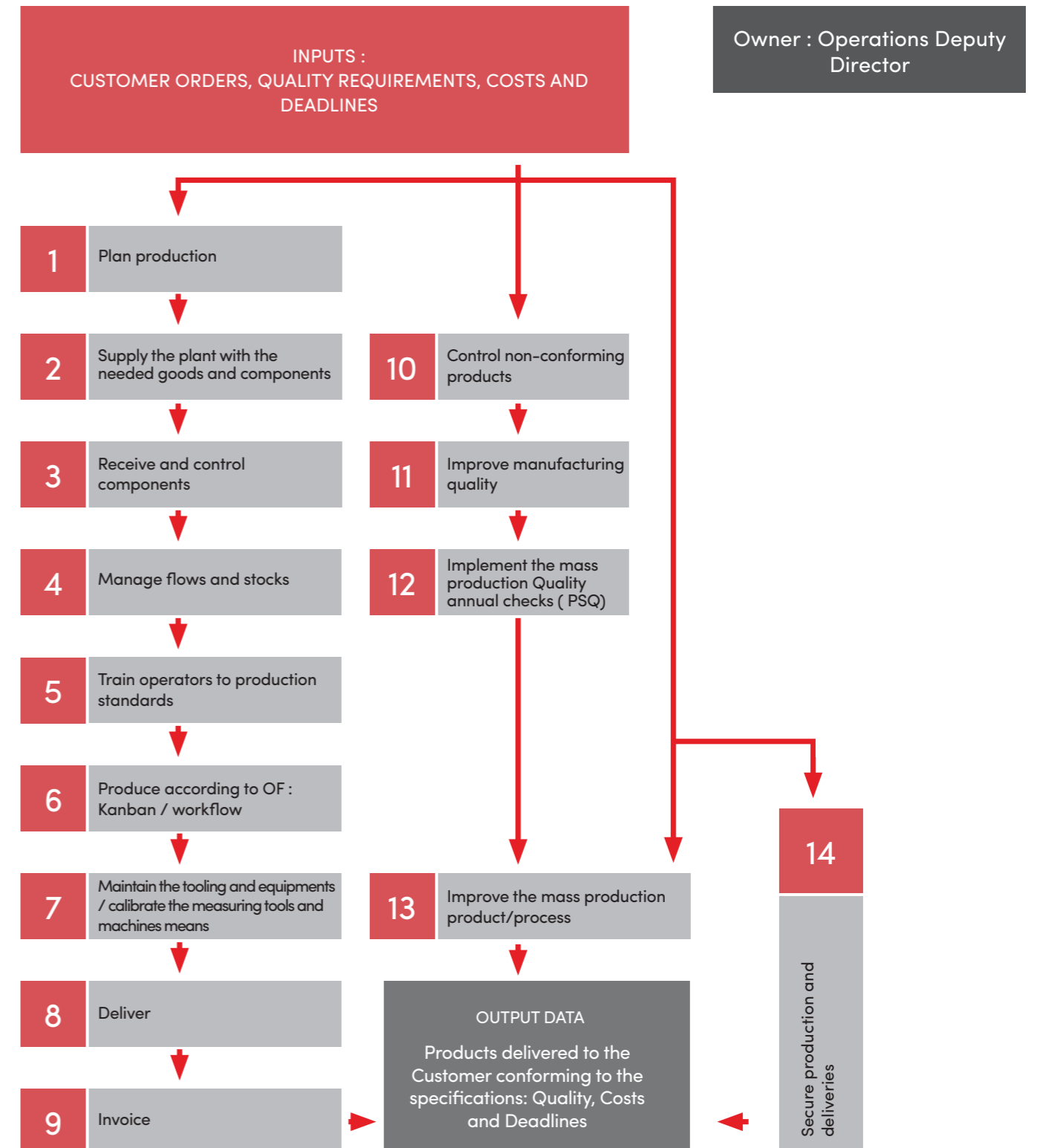


# R2

## SUPPLY A PRODUCT CONFORM TO THE CUSTOMER SPECIFICATIONS IN QUALITY, COST, DELAY – 03015EN

AIM : In compliance with our Quality, Health, Safety and Environment requirements:

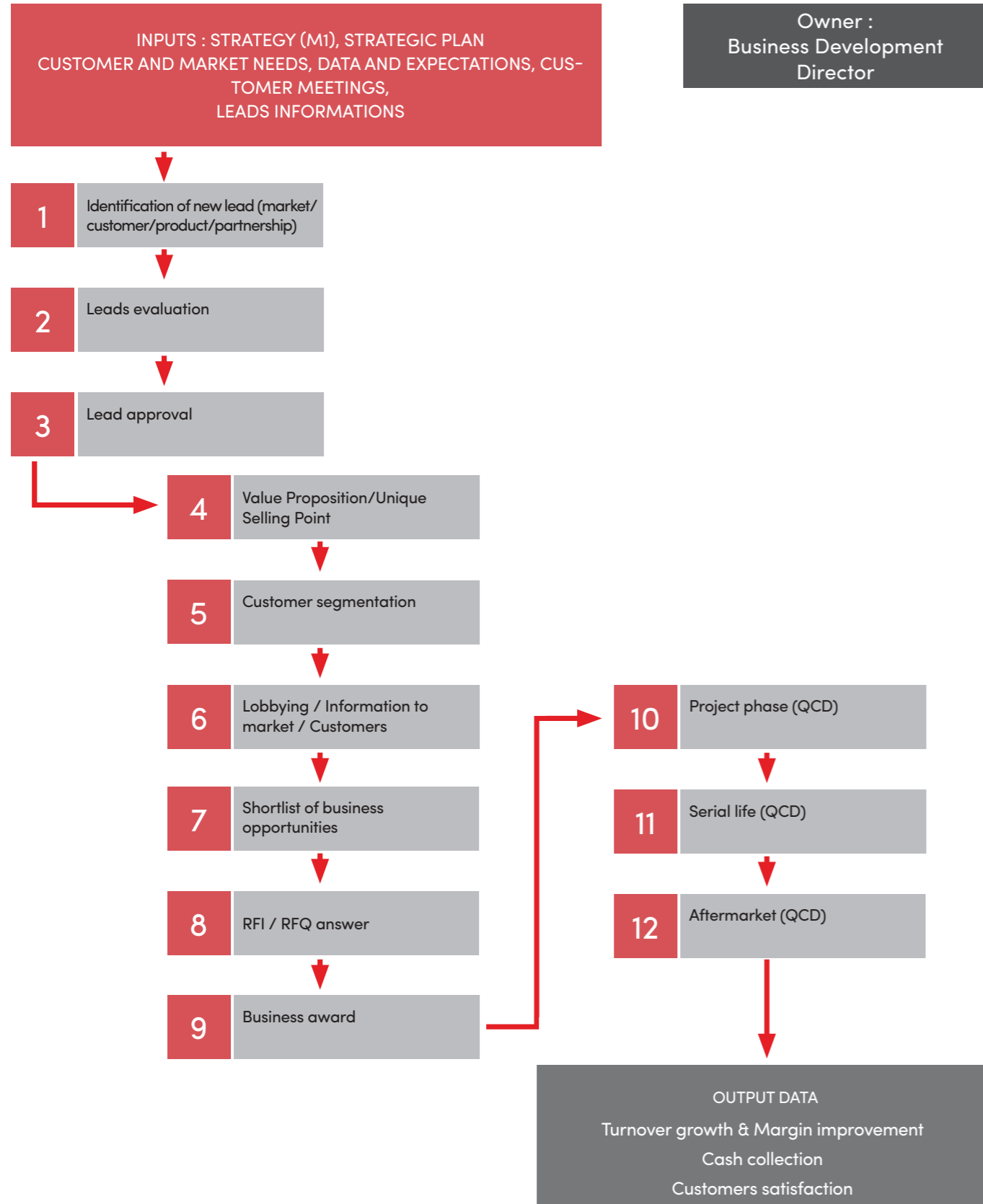
- Deploy all our skills to manufacture and deliver EFI Automotive products on time, in order to obtain a high level of satisfaction of our customers.
- To be rigorous in the respect of instructions and standards, in order to reach a high level of quality and safety.
- Continually improve and optimize our performance in terms of responsiveness, productivity, competitiveness. Improve and use rationally and optimally our material resources and the skills of our teams, in order to contribute to the financial health of the Group.



# R3

## CONQUER NEW BUSINESS OPPORTUNITIES FOR A PROFITABLE AND SUSTAINABLE GROWTH – 03016EN

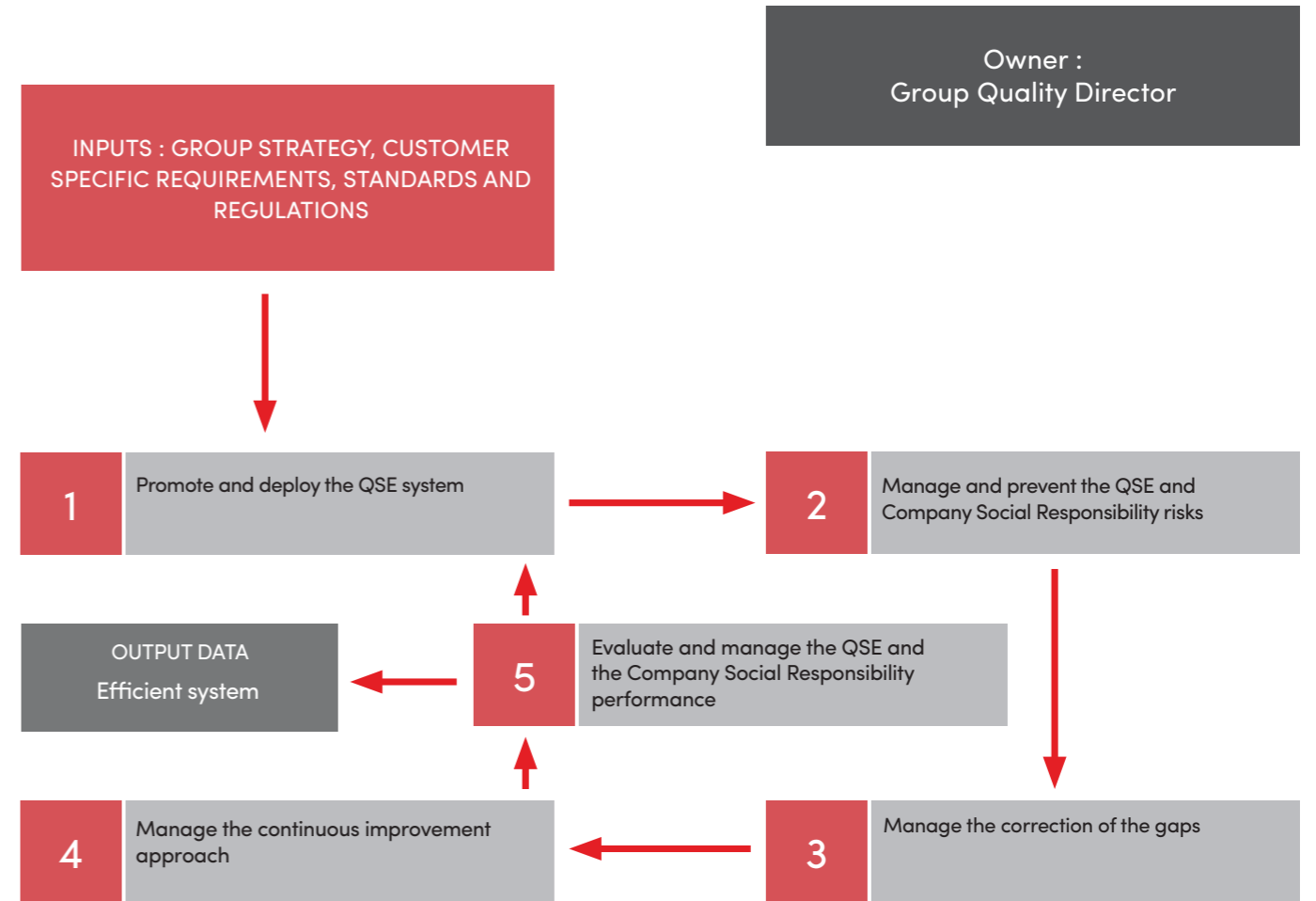
AIM : Define the Group's Development strategy, propose new growth potentials, taking into account market evolution, customer needs, competitors and new technology availability, as well as potential partnerships. Provide customers with the appropriate solutions and level of service and thus create satisfaction and loyalty, to achieve expected Group profitable growth increase.



# S1

## IMPROVE STANDARDS TO ENSURE COMPLIANCE TO THE QSE/CSR SPECIFICATIONS – 12722EN

AIM: Ensure compliance of EFI Automotive in the Quality, Safety and Environment areas according to the international standards. Develop a continuous improvement approach in order to comply with the QSE policy, the customers requirements and the stakeholders needs. Deploy a risk analysis culture.



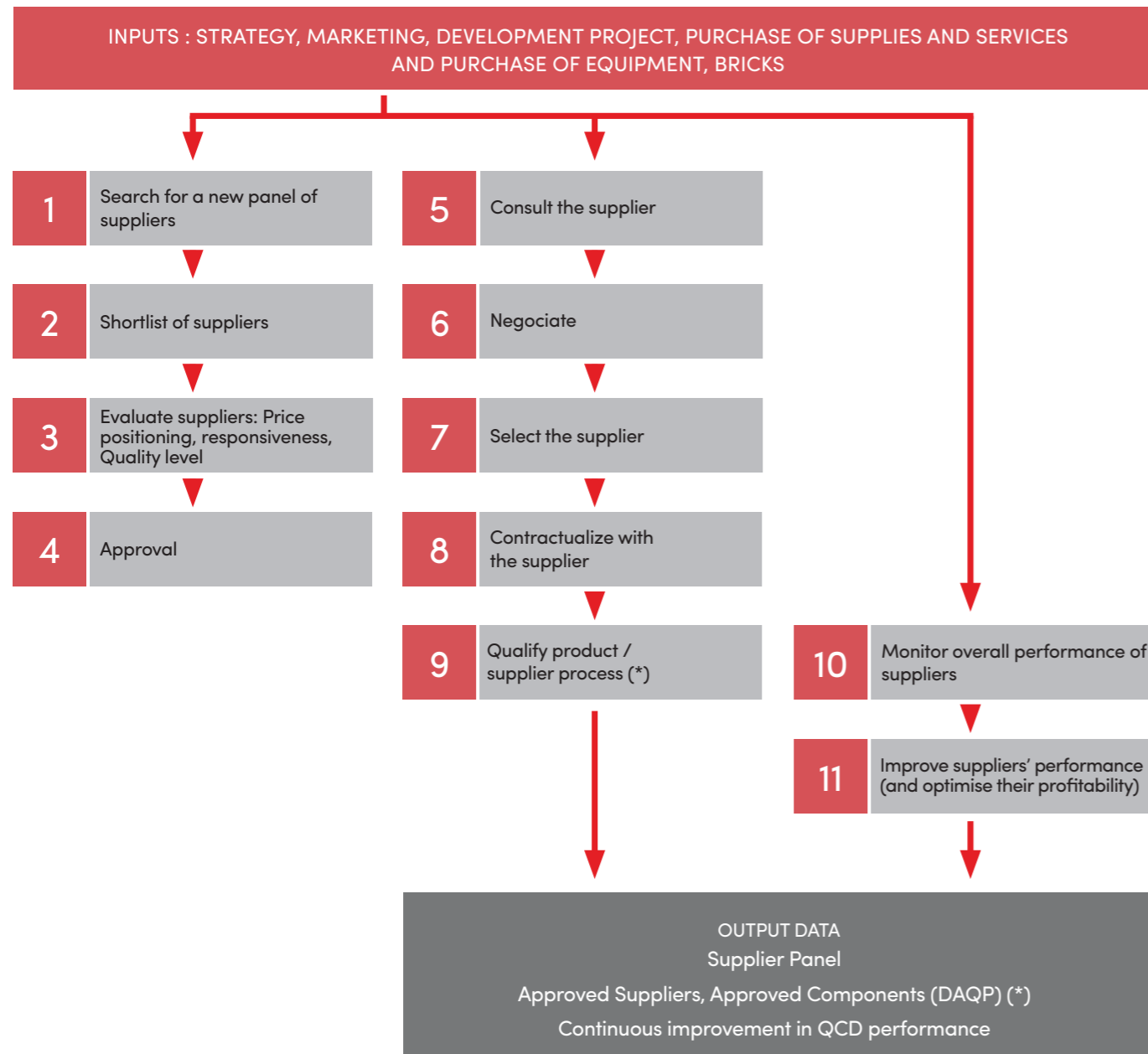


# S2

## DEVELOP SUPPLIERS – 03019EN

AIM : Select the suppliers who can provide the Group with the components, supplies, services and equipment necessary for our activity, on time, with a quality level in line with requirements and under the best possible economic conditions.

Owner :  
Group  
Purchasing and  
Supply Chain  
Director



(\*) =N/A Non Production Purchasing

# S3

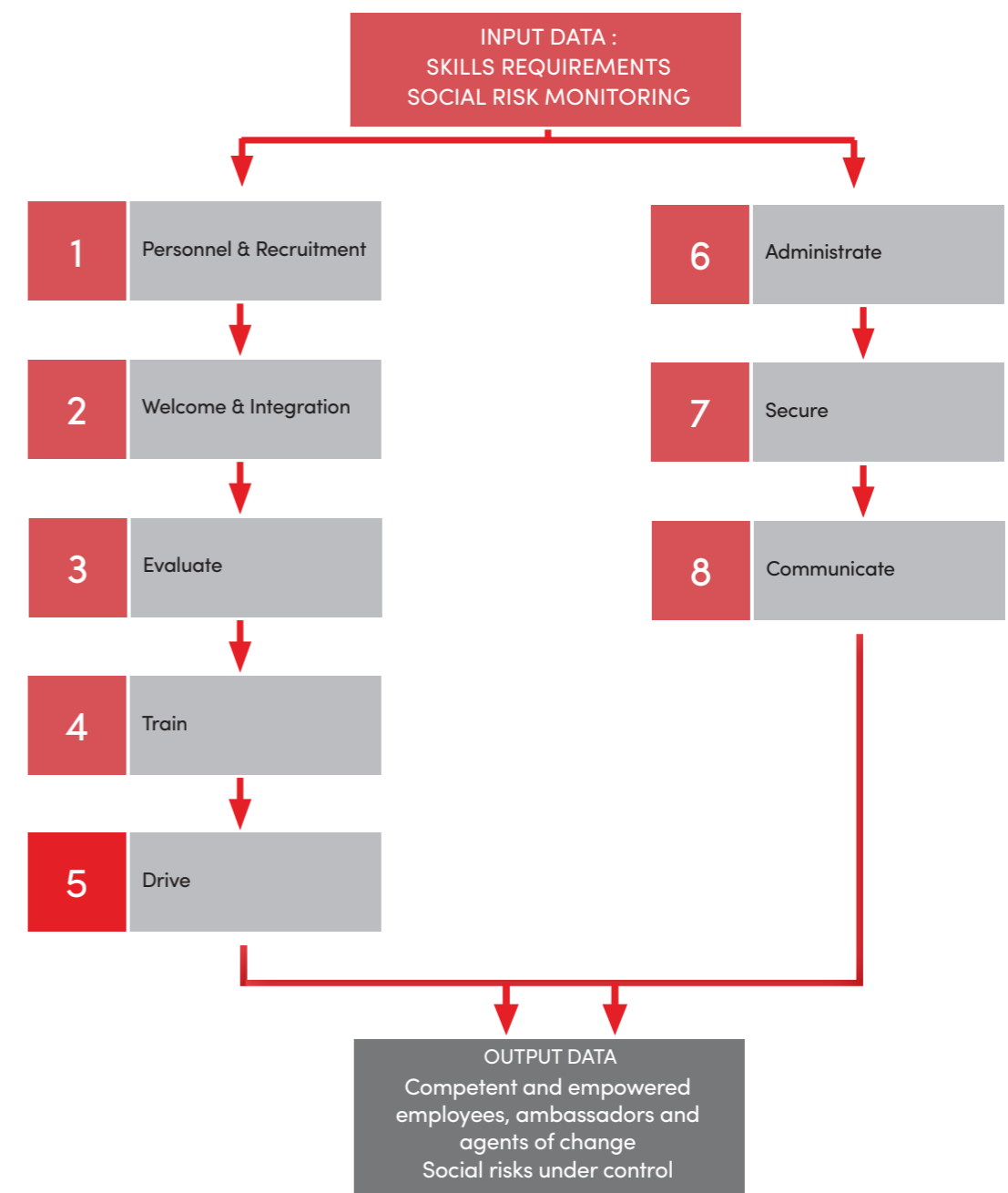
## MANAGE HUMAN RESOURCES – 03018EN

AIM : Support all stakeholders of economic and human performance of EFI Automotive Group: managers, employees, teams and processes; with the best practices and standards for :

- Competence and talent alignment with strategy
- Motivation and Commitment
- Administration flows management
- Internal communication, employees' expression and knowledge management

Owner :  
HR Director

All of this based upon a strong compliance to international and local labor laws and Group Values and Principles of Action.



# 9. LIST OF DOCUMENTS CONSTITUTING THE MANUAL QUALITY SAFETY ENVIRONMENT

RÉFÉRENCE	TITLE
PRO 12774EN	CONTROL OF DOCUMENTS AND RECORDINGS RELATED TO QUALITY, SAFETY & ENVIRONMENT
PRO 16451EN	MANAGEMENT REVIEW, SITE INTERACTION, PROCESS REVIEW
INS 16864EN	CSR MATRIX ANALYSIS
FORM 16865EN	MATRIX FOR THE ANALYSIS OF SPECIFIC CUSTOMER REQUIREMENTS
SPEC 16241EN	MATRIX FOR TAKING INTO ACCOUNT THE REQUIREMENTS OF STANDARDS
SPEC 16854EN	CSR REPORT
SPEC 17462EN	EFI AUTOMOTIVE GROUP POLICY
SPEC 17464EN	EFI AUTOMOTIVE MISSION, VISION AND VALUES

# 10. CHANGE HISTORY

VERSION	DATED	TYPE OF MODIFICATION
19.0	July 2017	<ul style="list-style-type: none"> <li>- UPDATE KEY FIGURES</li> <li>- GROUP ORGANIZATION CHART</li> <li>- CREATION OF THE CSR CHARTER THAT INCORPORATES THE REQUIREMENTS OF PAGES 10, 11, 12 AND 13 OF THE PREVIOUS VERSION</li> <li>- UPDATE OF THE AREA OF APPLICATION</li> <li>- UPDATE PROCESS INDICATORS</li> </ul>
20.0	July 2018	<ul style="list-style-type: none"> <li>- UPDATE KEY FIGURES</li> <li>- UPDATE GROUP FLOWCHART</li> <li>- UPDATE PROCESS INDICATORS</li> </ul>
21.0	July 2019	<ul style="list-style-type: none"> <li>- UPDATE KEY FIGURES</li> <li>- UPDATE GROUP FLOWCHART</li> <li>- UPDATE PROCESS INDICATORS</li> </ul>
22.0	September 2020	<ul style="list-style-type: none"> <li>- UPDATE KEY FIGURES</li> <li>- UPDATE GROUP FLOWCHART</li> <li>- UPDATE PROCESS CARTOGRAPHY AND PROCESS INDICATORS</li> </ul>
23.0	January 2021	<ul style="list-style-type: none"> <li>- CORRECTION OF INCONSISTENCIES BETWEEN THE MANUAL AND ID SHEETS</li> </ul>
24.0	January 2021	<ul style="list-style-type: none"> <li>- UPDATE OF THE SCOPE OF APPLICATION OF THE QSE MANAGEMENT SYSTEM</li> </ul>
25.0	December 2022	<ul style="list-style-type: none"> <li>- UPDATE KEY FIGURES</li> <li>- UPDATE GROUP FLOWCHART</li> <li>- UPDATE PROCESS INDICATORS</li> <li>- ADDITION OF SECTIONS 4 TO 8</li> </ul>
26.0	December 2022	<ul style="list-style-type: none"> <li>- KEY FIGURES UPDATE</li> <li>- UPDATE CHINESE SUBSIDIARY NAME</li> <li>- UPDATE LEGAL ORGANIZATION</li> <li>- UPDATE S3 PROCESS VS ID SHEET</li> </ul>
27.0	September 2024	<ul style="list-style-type: none"> <li>- KEY FIGURES UPDATE</li> <li>- UPDATE EFC SALES OFFICE ADDRESS</li> <li>- UPDATE ROUTINES</li> <li>- UPDATE M1, S1 PROCESS VS ID SHEET</li> <li>- UPDATE POLICY</li> </ul>



**ELECTRICFIL AUTOMOTIVE**

77, allée des Grandes Combes  
ZI Ouest Beynost  
F – 01708 Miribel Cedex  
Tel. +33 (0)4 72 01 34 34

**EFI AUTOMOTIVE**

15 rue du Château  
92250 La Garenne-Colombes  
(Paris) – France  
Tel. +33 (0)1 57 68 83 39

**ELECTRICFIL SERVICE**

1 rue de l'Industrie  
Parc d'Activités du Rongéant  
F – 52300 Joinville  
Tel. +33 (0)3 25 94 01 86

**AKÉO PLUS / SAFETY CONSEILS**

769, Rue de la Outarde  
F – 01500 Château-Gaillard  
Tel. +33 (0)4 74 35 60 72

**EFI AUTOMOTIVE**

**Fichtenbergstrasse 3**  
D – 71083 Herrenberg  
Tel. +49 171 352 1344

**ELECTRICFIL ÜNIFIL  
OTOMOTIV**

Dudullu Organize Sanayi  
Bölgesi  
3, Cadde N° 11  
34776 Y. Dudullu, Istanbul,  
Turkey  
Tel. +90 (0)216 528 1800

**ELECTRICFIL CORPORATION  
NORTH AMERICAN  
HEADQUARTERS**

18831 Carters Circle  
Elkmont, AL 35620, USA  
Tel. +1 256 732 4044

**ELECTRICFIL CORPORATION  
APPLICATIONS**

**DEVELOPMENT CENTER**  
39555 Orchard Hill Place Suite  
600, Novi, MI 48170, USA  
Tel. +1 734 425 2774

**EFI AUTOMOTIVE  
ACCESSORIES SYSTEMS  
(WUHAN) CO. LTD**

Wuhan Economic & Tech.  
Development Zone,  
No.60, South Quanli Road,  
Wuhan, 430056 Hubei, China  
Tel. +86 27 842 949 43 & 4931

**SHANGHAI OFFICE**

Room 201, Building B, Jiuxing  
Hongqiao Business Center,  
Minhang District, Shanghai



contact@efiautomotive.com – Tel.: +33 4 72 01 34 34

77 Allée des Grandes Combes – ZI Ouest Beynost  
F – 01708 Miribel Cedex – FRANCE

EFIAUTOMOTIVE.COM