



## **EDAG** CODE OF **CONDUCT**

**EDAG** – Compliance Management System  
Based on our values.



# PREFACE BY THE EXECUTIVE MANAGEMENT

Dear Colleagues,

EDAG is one of the world's leading independent engineering service providers for the international automotive industry. In this exciting, yet sensitive arena, and in addition to our technical expertise and convincing quality, we also aim to cultivate a corporate culture that is characterised by values such as integrity, discretion, reliability and fair dealings with our business partners. EDAG's reputation in the business world is one of our most valuable assets. Our reputation is determined by the behaviour, actions and conduct of each and every one of us. It is therefore a matter of great importance to us that we combine our business activities with ethical principles, and that, at all times, we act in a manner that adheres to the rules without any ifs or buts. We can achieve this if each of us knows the rules of conduct, guidelines and ethical principles, and works responsibly to ensure that they are complied with throughout the company. Our business partners, stockholders, employees and the public trust our integrity.

We have anchored our principles for compliant behaviour in this EDAG-Code of Conduct. It serves as a guideline, orientation aid and advisor, so that even in critical situations we always know how to respond appropriately and in compliance with the rules.

The Executive Management and the Board of Directors will do everything in their power to meet our high standards for responsibility and uncompromisingly lawful conduct. We expect the same from every manager and every employee, no matter what business unit they work in, or where in the world they work for EDAG. We can only assure long-term corporate success for ourselves if each and every one of us lives the EDAG values and sticks to the rules.

The Executive Management of EDAG Engineering Group AG

March 2023



Cosimo De Carlo  
CEO



Holger Merz  
CFO

[\*In diesem Dokument wird aus Gründen der besseren Lesbarkeit das generische Maskulinum verwendet. Weibliche und anderweitige Geschlechteridentitäten werden dabei ausdrücklich mitgemeint, soweit es für die Aussage erforderlich ist.]

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## PRELIMINARY REMARK

We are aware of the fact that legal and cultural requirements differ throughout the global market. This Code of Conduct sets important rules and standards that serve as the measure for our business activities worldwide.

It is an essential part of our corporate policy that we comply with internationally recognized sets of rules, including those relating to the observance of human rights and the protection of our environment, as well as the extensive technical standards.

The EDAG-Code of Conduct stipulates that each and every employee, manager, managing director and member of the Executive Management at EDAG Engineering Group AG shall be responsible for his own behaviour and honest conduct. For EDAG, this Code of Conduct is a company guideline for compliant conduct in the day-to-day work routine.

## SCOPE OF APPLICATION

The EDAG-Code of Conduct applies to EDAG Engineering Group AG and all of its subsidiaries, including minority interests in companies in which control is exercised by a company in the EDAG-Group (hereinafter „EDAG“ or „EDAG-Group“). It also applies to all employees in these legal entities, irrespective of position, function or level of employment, and for all members of any of the corporate bodies of these entities.

Should local requirements call for amendments, the Compliance Department can amend this EDAG-Code of Conduct.

**We follow the principles of our Code of Conduct in order to make the right decisions and master complex situations.**

## OUR CORPORATE POLICY

### Responsibility for our actions and behaviour

Our business activity is based on the EDAG-value system, which is characterised by trust, reliability, fairness and transparency. With this corporate culture, we set standards for our conduct as a leading engineering company in the international automotive industry.

We act with integrity and comply with both the statutory regulations and the ethical principles at all times and in all countries in which we operate. We take personal responsibility for all of our actions and behaviour, and in all matters that affect EDAG, always act to the best of our knowledge and belief.

We work together in a manner that is respectful and creates value. This is how we prove ourselves in a highly dynamic environment.

Pleasure in and through our success is what drives us. Our corporate culture is characterised by our willingness to be open-minded and to learn from each other. We treat each other responsibly; this enables us to recognise common interests, understand the achievements of colleagues from cultures that are foreign to us, and work together constructively. We work together in trust. Trust is the prerequisite for the ability to communicate with each other openly and honestly.

Our corporate culture of trust and respect allows all employees individual space for development. For us, it goes without saying that men and women have equal rights.

Each of us learns something new every day – and that is the way it should be. We learn from new knowledge, from new experiences and new views, and also from the mistakes we make. There will be setbacks – we want to learn from them.

**Every employee is required to respect the reputation of EDAG, to preserve it and promote it.**

**We are open-minded and learn from each other.**

**We promote respectful collaboration.**



### Compliance with laws, regulations and in-house rules

As an internationally active corporate group, we are aware of the responsibility we bear for our global actions. We comply with legal, social and environmental rules and standards worldwide, and at all levels act in accordance with our in-house business ethics principles. We review the effects our business conduct can have on human rights and what influence we can exercise so that these rights are always protected.

We are committed to the support of the principles of the UN Global Compact\*, and expect all business partners and all companies in our supply chain to likewise be guided by these principles.

Our in-house rules, standards and instructions help us to comply with laws and regulatory requirements\*\*. Our managers ensure that all employees know the legal obligations that are relevant for them. Moreover, every employee must continuously keep himself informed of and comply with the applicable EDAG-guidelines, processes and procedures, and whatever statutory regulations are relevant in his field of activity. Each one of us makes an important contribution towards protecting the EDAG-Group and its companies from penal measures and any significant potential loss of reputation..

**Applicable law is always the binding framework for the diverse business activities of the EDAG Group.**

**We protect ourselves and our company by adhering to our values, principles of conduct, guidelines and work instructions.**

[\*The world's largest initiative for responsible corporate governance for a sustainable world economy. Companies undertake to comply with minimum social and ecological standards.]

[\*\*We are aware of the fact that unlawful behaviour can not only harm EDAG's reputation, but also entail fines for EDAG, and sanctions under criminal law for the employees responsible.]



## OUR SOCIAL RESPONSIBILITY

We combine innovative mobility technology with sustainable business activities.

### Human rights

As a member of society and an internationally active company, we take our responsibility to uphold human rights seriously. We therefore reject child labour and any form of forced labour, modern slavery and human trafficking. Employment relationships with our employees are always based on voluntariness and can be terminated at one's own will and with due notice.

We respect, protect and promote worldwide the requirements and expectations of the international community, which are set out in the United Nations Universal Declaration of Human Rights and the European Convention on Human Rights. These are an essential part of the EDAG-value system.

EDAG respects the human rights of indigenous peoples and other local communities that may be affected by EDAG's business activities. For example, we are committed to preserving natural habitats as far as we can by, among other things, countering deforestation, including forced evictions in connection with construction and conversion of natural ecosystems in our own business environment as well as in our supply chains.

If the prohibition of torture and cruel, inhuman or degrading treatment is violated when using private or public security forces, the assignment must be terminated immediately.

### Sustainability

We are aware of the great challenges arising from the problems of our time, such as climate change and the increasing scarcity of resources. Consequently, we take equal account of social, economic and ecological aspects in our business activities. In the development of ecological, efficient and forward-looking mobility systems, we take on responsibility towards our environment. By achieving a balance between our economic interests and ecological requirements, we therefore contribute to the well-being of the society, of which we are part.

In our annual sustainability report, we disclose our measures and targets to reduce the consumption of energy and resources and to curb harmful emissions from our business activities.

We work sustainably.





### Product conformity and safety

The quality of our products and services is a decisive factor in our success. Our principle is that no health, safety and environmental risks or hazards whatsoever should occur through the use of our services. Our services correspond to the respective state of the art and are developed in compliance with both statutory regulations and other official and regulatory requirements and technical standards. To meet this high standard, we comply with our in-house development processes and quality processes at all times. These processes also help to identify counterfeit parts and materials, and to prevent the distribution of such parts and materials. When we identify deviations, we notify the competent authorities, clarify the technical risks and ensure that the necessary measures are implemented.

We undertake to carry out all necessary measures in our area of responsibility, to always meet the high technical requirements and quality standards.

If needed, we involve EDAG's authorised QM-Representative.

### Environmental protection and use of resources

We are dedicated to the Paris Climate Agreement and are fully committed to environmental and climate protection in all areas of our daily work. Therefore, we always use the available resources responsibly and efficiently.

This is achieved through continuous improvement of the technologies used, constant adaptation of our processes, the quality of our services and products with regard to their environmental compatibility, and the greatest possible reduction in the consumption of energy, water, raw materials and supplies.

Our EDAG-environmental management system (according to ISO 14001) contributes significantly to the fulfilment of these obligations as well as the compliance with applicable environmental laws and international standards, including existing land, forest and water rights, and sets high internal standards for this, which we take into account in our daily work. Due to the holistic approach of our environmental management, we not only promote environmental awareness among our employees, but also involve our business partners in our environmental protection measures whenever possible.

Energy, in whatever form, is a limited commodity and at the same time essential for securing our business operations. Therefore, we are committed to taking energy-reducing measures at all times in order to achieve efficient use of energy sources and thus keep consumption as low as possible. We ensure high energy efficiency in the procurement of energy-related products and services. The EDAG-energy management system, whose specifications we follow, helps us to meet our energy-saving targets.

**We ensure technical compliance.**



**With our behaviour, we contribute towards the achievement of our high goals for environmental protection.**



**We comply with all applicable export and import laws, including but not limited to sanctions, embargoes and other laws, regulations, government decrees or directives.**

**We support worthy causes with donations and other earmarked grants, and deal with them transparently.**

Our goal is to ensure the optimal use of energy and resources in all our business activities, to reduce energy consumption and our greenhouse gas emissions in the long term, and thus to minimise the impact of our business activities on the environment in the long term.

### **Export and import regulations**

With our services, we aim to drive and implement technological progress for society. At the same time, one of our top priorities is to ensure that our developments and products do not fall into the wrong hands and end up being used against human welfare. We therefore conscientiously comply with applicable regulations concerning embargoes, trade restrictions and financial restrictions as well as all relevant regulations of customs and foreign trade laws for the import and export of goods, services or technologies. We do not deliver EDAG-products, software or technology to countries on which trade sanctions have been imposed.

### **Prohibition on money laundering and the financing of terrorism**

We are aware of the fact that financial crime and fraud threaten our company. We support the national and international measures for combatting money laundering and the financing of terrorism. In accordance with the EDAG-value system, we only maintain relationships with reputable business partners whose business activities are in line with statutory regulations and whose financial resources are of legitimate origin.

We support neither the unlawful legalisation of money acquired illegally, nor the financing of terrorist offences. We consistently obey the applicable laws, and the EDAG-guidelines for combatting money laundering.

We carefully check the identity of any business partners with whom we collaborate. If there are indications of suspicious behaviour on the part of business partners, we immediately inform the EDAG-Anti-Money Laundering Officer or the Compliance department.

### **Handling of donations and sponsoring**

We are aware of our social responsibility, and make donations and are involved in sponsoring activities to promote educational, cultural, social and humanitarian interests. When we donate or sponsor, we comply with applicable laws and regulations. Our donations are always of a voluntary nature, and we do not demand or expect anything in return. All donations must be transparent. Among other things, this means that the identity of the recipient and the planned use of the donation must be known.

We support worthy causes with donations and other earmarked grants, and deal with them transparently.

At the same time, we use our activities in the promotion of education, science, the arts and culture as a means of strengthening the public's perception of EDAG, and therefore of helping to achieve our corporate objectives. When donating and sponsoring, we ensure that the procedure is transparent and all documentation is complete.

Our commitment to social welfare is focused on educational and funded projects. We carefully observe and analyse social developments and seek dialogue with politicians, society and our stakeholders. For example, we are involved in various projects for the education of young people. Not only do we cooperate with various universities, we are also a member of several sponsoring associations.

All sponsoring activities must be transparent, documented in the form of a written contract, intended for a legitimate business purpose, and commensurate with the consideration offered by the organiser.



The sponsoring of any events harmful to EDAG's reputation is categorically prohibited.

Donations may not be granted or sponsoring activities carried out without the prior approval of the Executive Management

### Cooperation with authorities and holders of public office

Our contacts with public officials and holders of public office are based strictly on law and order\*, and on the relevant EDAG-in-house regulations concerning dealings with public officials and persons in similar positions.

We do not make any payments whatsoever to public officials in order to influence official acts or decisions made by public law bodies.

Government agencies and other public authorities strictly monitor compliance with legal and regulatory requirements. We are cooperative and support government agency investigations within the framework of the applicable requirements.

### Finance and capital market

EDAG ensures that bookkeeping and accounting are carried out at all times in accordance with all applicable regulations and rules for proper accounting and in compliance with the relevant tax laws. We have nothing to hide. That is why we always present a true and fair view of the course of business, our assets and the financial and tax situation of the company.

EDAG always complies with financial reporting requirements and ensures that reporting is complete, accurate and timely.

Each employee contributes, as far as this is part of his area of responsibility, to ensuring that we at EDAG are able to comply with tax law requirements without restriction at all times. In order to ensure this, significant potential tax risks must be regularly analysed and concrete measures to minimise these risks must be ensured. We involve internal as well as – if necessary – external tax experts in the assessment processes.

As a listed company, EDAG publishes company-related, price-relevant information about its business and new developments, taking into account all relevant statutory information, disclosure and publication obligations.

### Social dialogue and public relations

We are close to what moves people and what is socially relevant. Through our activities, we have an active influence, while at the same time we are influenced by sociopolitical developments. We are open to new ideas and the people that have them. We seek a constructive dialogue with organisations and institutions.

We take an active part, and transparently point out what goals we are pursuing and what we have achieved so far. We are involved in a number of initiatives with industrial or topical relevance.

We value the dialogue within these memberships, and also controversial discussions and the opportunity to change perspectives.

[\*When dealing with public officials or holders of public office, governments, government agencies and other public institutions, special legal conditions apply, and even individual violations can have severe consequences for EDAG]



**We express our opinions;  
we inform and communicate  
openly and transparently.**

[\*This confidential information includes in particular details of the organisation and establishment of a company, other business concerns, information on production, research and development procedures, technical innovations, figures from internal reporting, and results of research and test series]

**We comply with existing non-disclosure agreements entered into with our business partners.**

**We know that protecting business information depends on our conduct.**

## OUR RESPONSIBILITY IN DEALINGS WITH BUSINESS PARTNERS

### Information security and confidentiality

Protection of business secrets and other information („confidential information“)\* is vital in order to safeguard the interests and success of the EDAG Group. We are responsible for ensuring that all confidential information obtained in the course of our business activities is adequately protected, and not abused or disclosed to unauthorised third parties.

We know that protecting business information depends on our conduct.

Our business partners depend on our reliability and confidentiality when we are handling any information not intended for the public with which they have entrusted us. Our customers and business partners can rely on us to handle confidential information in a responsible manner, both during our working relationship and after it has come to an end.

We are aware of the fact that confidential information is a valuable asset for us and our business partners, and that any improper use or unauthorised disclosure can result in far-reaching consequences, even sanctions under criminal law.

We comply with existing non-disclosure agreements entered into with our business partners. We comply fully with the confidentiality agreements entered into with our business partners, and with the applicable law for the protection of business secrets.

Every employee is obliged to ensure the protection of confidential information and our know-how in his area of responsibility.





We choose our suppliers and contractors carefully, and review our existing business relationships on a regular basis.

### Responsibility in the supply chain

For our business activities, we require raw materials, packaging materials, technical products, components and services from reliable suppliers. We work in partnership with our suppliers. Our guidelines for ethical business conduct extend beyond the physical boundaries of our company facilities. We also require the same lawful and fair conduct from our suppliers. To this end, we have compiled the standards we require of our suppliers with regard to working conditions, health and safety, human rights, the environment and business ethics in our EDAG-Supplier Code of Conduct.

We expect compliance with these EDAG-Group procurement principles, and implementation of the same social and legal standards that we implement in our company. We do not tolerate any malpractice, for instance corruption, unfair competition, violation of environmental regulations or abusive working conditions. We rigorously investigate violations.

### Fair competition

For us, competition means inspiring customers with ideas, innovations and high-quality products, and in this way winning over the market. This is fair competition. We are committed to precisely the same principles in all the countries in which we operate. Every employee is required to comply with the rules of fair competition.

If competition becomes strenuous, that's OK for us. This spurs us on to achieve our objectives with our services, competencies and innovations. In this regard, we always comply with the competition laws protecting free and fair competition for the benefit of all market participants.

We categorically reject anti-competitive arrangements and other unacceptable agreements\* with other market participants. This also applies to entering into arrangements aimed at influencing the market with other market participants.

We want to collaborate with business partners who support fair competition as we do, and act accordingly.

We want to assert ourselves on the market with our services and innovations.

[\*Exchanging information that lends itself to influencing market behaviour with competitors is not permitted.

Such information includes, for example, information concerning prices, capacities, sales, calls for bids, profit margins, or costs.]

**We categorically reject any type of corruption or other undue influence.**

**We take active steps against corruption and attempted corruption.**

[\*Impermissible payments or gratuities:

These include, for instance, cash payments or payments to illicit bank accounts, high-value personal gifts or inappropriate invitations and the granting of other advantages, such as free-of-charge private services.]

### **Combatting corruption**

We stand for honest business activities in which the companies with the best products and services prevail in the market. We therefore categorically reject any type of corruption or undue influence.

Corrupt conduct results in decisions that are not made on the basis of objective reasons, and it impairs our professional power of judgement and independence. We are aware of the fact that acts of corruption can not only harm EDAG's reputation, but also entail fines for EDAG, and sanctions under criminal law for the employees responsible.

We do not make any inappropriate offers to business partners in an attempt to influence their decision in our favour. If we are requested to make illicit payments in order to be awarded a purchase order, we take active steps against such procedures. We ensure that we are awarded orders entirely on the strength of our quotations. Accordingly, we reject any unfair preferential treatment by business partners that is either intended to or might influence us.

Any form of gratuity\* to business partners, for instance small gifts of negligible value or invitations to business dinners or lunches, is only permitted if the gratuity is in line with the applicable laws and EDAG's in-house guidelines, and cannot give the appearance of dishonest conduct.

We never use our professional position to demand or obtain private advantages. This does not include the acceptance of occasional gifts of token value or invitations to business meals or, within reasonable limits, to events with a business connection, provided that local customs and EDAG-guidelines are still respected. All gifts, invitations to eat out or to events that exceed these limits must be refused.

When assessing and deciding whether a gift can be considered appropriate, our orientation is the current appropriate tax-free amount of EUR 35.00 per calendar year.

Public officials are under special scrutiny. We never directly or indirectly influence public officials with illicit payments, in order to bring about a decision in favour of EDAG. When dealing with public officials, we take particular care to ensure that applicable laws and the EDAG guidelines are complied with.

We take active steps against corruption and attempted corruption.



We are aware of the fact that corruption can cause long-term damage to EDAG's reputation, and that any violation of anti-corruption laws can lead to the invalidity of contracts, sanctions and fines under criminal law. If a possible case of corruption is suspected, instead of closing our eyes to the situation, we report it, so that the action can be reviewed by our competent authorities.

We carefully select our business partners, and ensure that they also obey applicable law and support us in combatting corruption.

### **Licensing and copyright**

Our technical know-how and the intellectual property of our customers and other business partners are important company values. Any unauthorised disclosure or other unlawful use can result in extensive damage and legal consequences. We therefore protect our own company's know-how and acknowledge the intellectual property of third parties. We inform ourselves of applicable license agreements with our business partners, and of the statutory provisions for the protection of intellectual property, and comply with these agreements and provisions.

**We always comply with applicable licensing and copyright laws.**



**We avoid all actions and activities that could result in a conflict of interest or loyalty.**

[\* Insider information is defined as information that is not public, and that can have an influence on the share price, for example: unexpected changes in profit, mergers and acquisitions, significant innovations.]

**We do not use insider information for our advantage, nor do we disclose it to third parties.**

## OUR CONDUCT IN THE EVENT OF CONFLICTS OF INTEREST

### Conflicts of interest

Our private interests and personal considerations in no way influence our judgement when it comes to acting in the best interests of EDAG. For this reason, we avoid all activities and situations that could lead to a conflict between our personal interests and the business interests of EDAG.

EDAG respects the right of employees to engage in activities outside of work that are of a private nature and in no way conflict with, or have a negative effect on EDAG. We do not maintain any external business or financial interests or relationships – be they direct or indirect – which either conflict with the interests of EDAG or could have an adverse effect on our ability to carry out in full the obligations set out in our employment contract.

We will not, when managing our our own affairs, exploit our professional position at EDAG. In this regard, „our own affairs“ also means acting on behalf of or in the interest of related persons, such as life partners, family members or close friends.

Particularly in our contact with business partners with whom we are in long-standing contractual relationships, we are scrupulous in keeping professional responsibilities and private interests apart. Objectivity and neutrality are not impaired by personal relationships that have developed as a result of working together for many years.

We inform our supervisors immediately if personal interests that could affect the way in which we carry out our professional tasks arise.

### Securities transactions with EDAG-shares (insider rules)

As EDAG is a listed company, we, the employees, are subject to statutory regulations for securities transactions. We must treat any unpublished information that may be regarded as material for an investment decision with the utmost confidentiality, and we must not use such information to conduct securities transactions.

We do not use insider information for our advantage, nor do we disclose it to third parties.

Consequently, the following applies: we treat any information which may have an influence on the share price of our company and is not public knowledge with absolute confidentiality, and do not disclose it without authorisation – not even to close associates or family members.

We undertake never to make use of insider information\* for our own securities transactions, or pass on such information to third parties.





# OUR RESPONSIBILITY IN THE WORKPLACE

## Trust-based collaboration

The way we work together is characterised by mutual trust, respect and appreciation. We treat each other as partners and colleagues. Adherence with this rule is the basis of a good working atmosphere, and this is critical for the satisfaction and performance of our employees. We ourselves ensure an atmosphere that allows honest communication. We constructively exchange different ideas and views, and thus establish an inspiring and motivating work environment. .

## Anti-discrimination and equal treatment

The diversity of our employees is our strength. We want to utilise this potential to pursue new, innovative and creative paths and to find solutions with our individual capabilities and talents. We can only achieve equal opportunity by not excluding anyone. The following therefore applies to each and every one of us: we do not tolerate any discrimination or harassment on account of gender, cultural or national origin (ethnic affiliation), citizenship, religion or belief, physical or mental disability, age, sexual orientation, or other characteristics protected by law.

We actively promote diversity within our sphere of influence and identify vulnerable groups among our employees in order to avoid unequal treatment and discrimination of any kind, both in recruitment and in ongoing employment.

We consider the principles of equal opportunity and equal treatment as important cornerstones for dealing with each other fairly, openly and without prejudice. The selection, hiring and promotion of our employees are based solely on their qualifications, performance, capabilities and other qualities relating to the demands of their particular workplace.

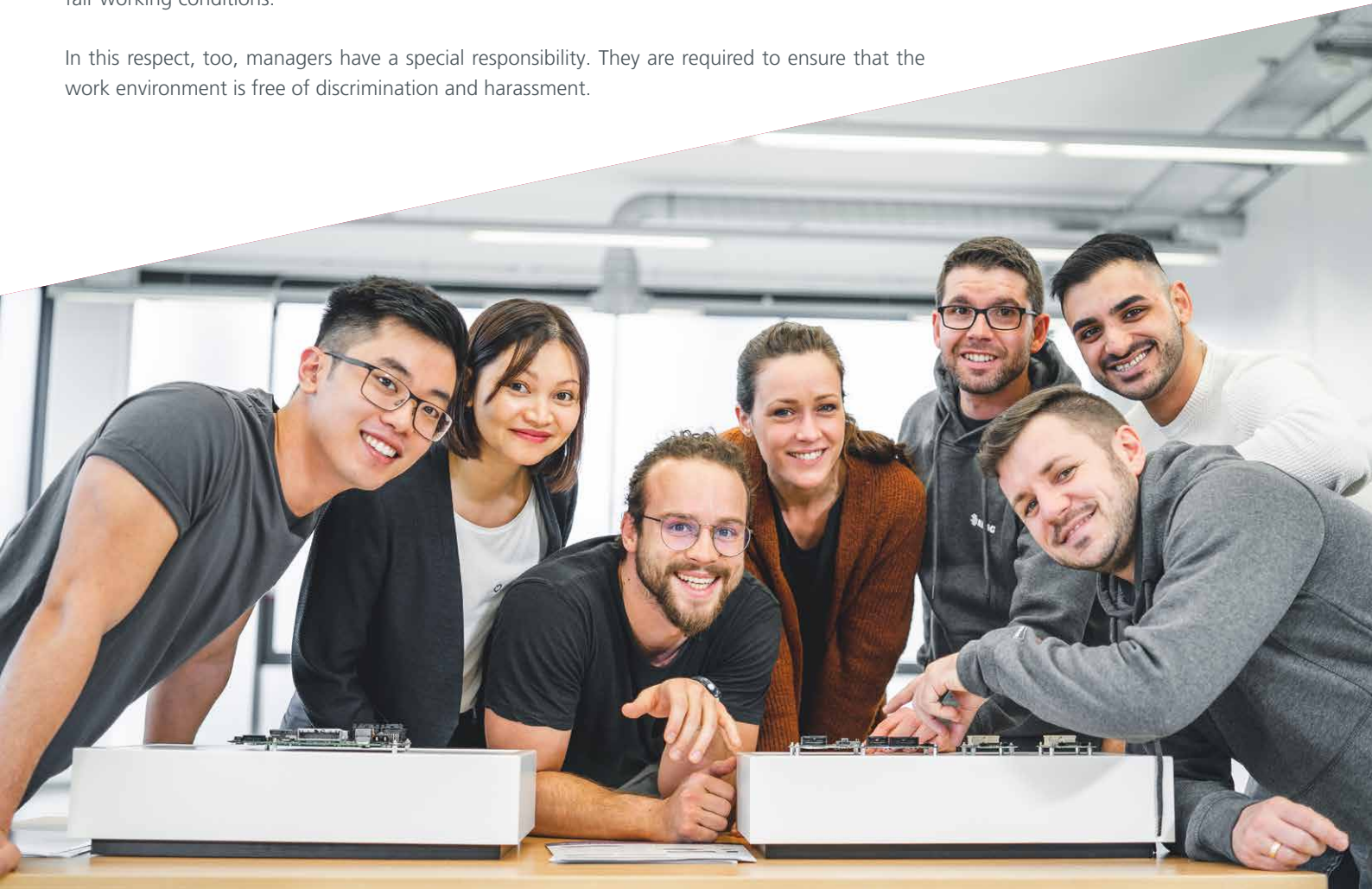
In the course of equal opportunities, we are fully committed to the equal treatment of women and men.

We consistently follow the principle of pay equity and offer our employees attractive social benefits and fair working conditions.

In this respect, too, managers have a special responsibility. They are required to ensure that the work environment is free of discrimination and harassment.

**We treat each other  
with respect.**

**We are committed  
to diversity and  
equal opportunity.**



**We comply with our technical and organisational security rules, in this way ensuring that personal data is secure in our company.**

**We regard our applicable safety guidelines as protective measures, and therefore adhere scrupulously to requirements.**

**We handle the company property provided by EDAG with care.**

### **Data privacy and IT security**

The protection of personal data is an important concern for us. We protect the private sphere of the individual and undertake to handle any personal data entrusted to us with due care. Personal information is only collected, processed or used in agreement with applicable statutory regulations. At all times, we use this data for the permissible purposes only, and with due consideration to the rights of the owner of the data. We reject all measures that are in conflict with the principles cited above, such as illegal phone or video recordings, or spying on private information.

We comply with our technical and organisational security rules, in this way ensuring that personal data is secure in our company.

If necessary, we involve the EDAG's authorised Data Protection Officer.

We comply with the applicable laws and regulations, and all EDAG principles and guidelines for data privacy and IT security, to ensure that personal rights and the private sphere are protected. We are aware of the fact that failure to comply with the IT security and protection measures can have severe consequences.

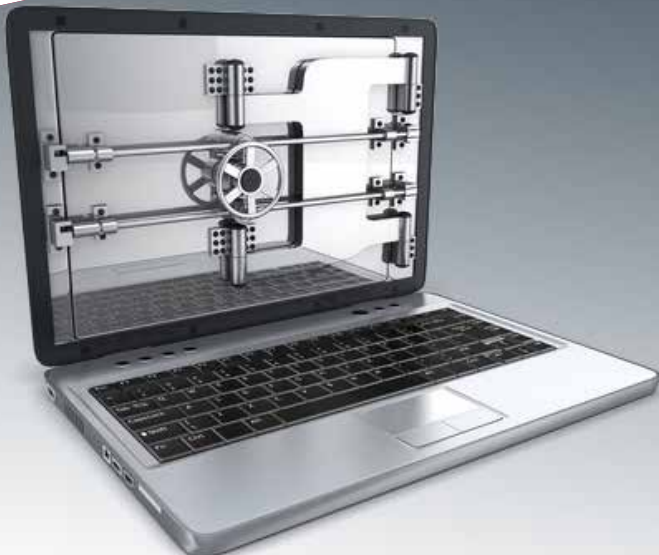
### **Occupational health and safety**

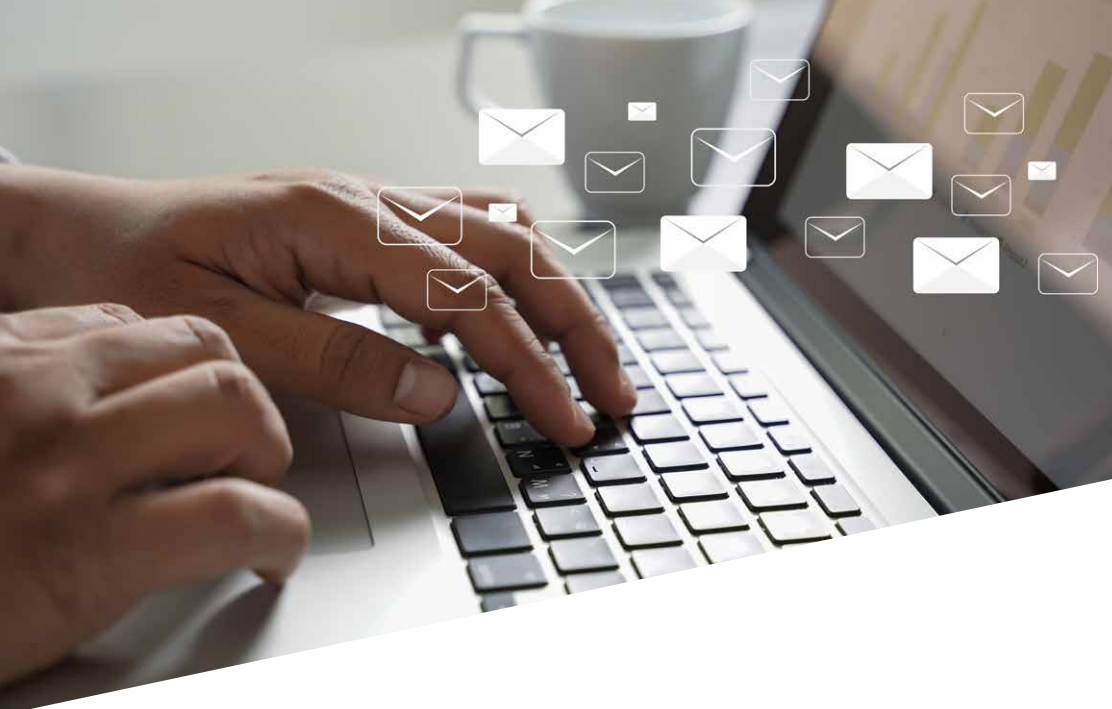
All of us want to live and work safely and in good health – for ourselves, for our families and for the EDAG Group. For us, health is more than the absence of illness, and we all ensure that each and every one of us has a safe work environment. Our aim is to operate equipment and processes in such a way that neither our co-workers nor the environment are endangered. The creation and maintenance of a safe working environment and thus the avoidance of hazards to safety and health have top priority at EDAG.

We therefore undertake to take measures to ensure safety and health protection, to comply with relevant regulations and work instructions, and to use any protective equipment required by law. Every employee must pay constant attention to occupational health and safety. An important contribution to this is made by our company health management, which supports employees in their health-conscious behaviour. With a variety of activities, company health management is an important part of our corporate culture.

We openly address safety concerns and inform colleagues, supervisors, and the safety officers on site.

We will only achieve our goals together if our employees can reconcile work and family life. Therefore, we observe the respective applicable national legislation on working hours and thus ensure the necessary balance with professional activities. If there are no legal requirements or minimum standards, the international standard of the International Labour Organisation (ILO) is the binding benchmark for us.





### Employee representation

We respect the rights of our employees to safeguard their interests through employee representatives and to engage in collective bargaining. The management and the executives therefore maintain an open and trusting cooperation and constructive dialogue with the workers' representatives.

Formation, joining and membership of a trade union or workers' representation must not lead to discrimination or other unjustified measures.

We see workers' representatives as partners in achieving our corporate goals with the involvement of workers' interests. Therefore, we ensure that trade unions and employee representatives are free to operate at all times in accordance with the law of the place of employment. The employee representatives are involved in decisions that are subject to co-determination.

### Using company property

We handle the company property provided by EDAG\*, with due care and a sense of responsibility. Unless otherwise stipulated in the EDAG in-house guidelines, company property is used exclusively for the purpose of carrying out our business activities.

### Shared success

We are ready to perform and are always looking for new ways of performing our work even more effectively. We frequently question exactly what it was that made an order or an incident attract attention, stand out, or go well. We constantly analyse our procedures with the aim of implementing even greater improvements– this attitude is a characteristic of our company.

We create a climate that gives us room for development. We want an error culture in which we are allowed to learn from our mistakes.

We recognise our diverse capabilities and utilise them. Our corporate culture is characterised by our willingness to be open-minded and always adapt to the dynamic requirements caused by the changing times.

Our managers encourage an open dialogue, they work side-by-side with their employees in an advisory and support capacity. Employees can turn to their supervisors or the Executive Management with confidence, even when critical circumstances are involved.

**All of us together  
contribute to the success  
of the EDAG Group.**

[\*Company property belonging to EDAG includes physical property, such as products manufactured by EDAG, production and office equipment, tools, systems and vehicles, and intangible assets, such as know-how and intellectual property.]

Every EDAG Group employee is responsible for ensuring that our principles are implemented in our day-to-day business.

## OUR RESPONSIBILITY IN THE PUBLIC ARENA

EDAG's reputation is essentially characterised by the conduct, actions, and behaviour of each and every one of us. Therefore, in the public arena we are particularly mindful and always communicate responsibly – this also applies to our communications on social media, on business trips or at other public locations.

We comply strictly with the technical access controls on our IT-systems and our mobile communication devices, and prevent unauthorised persons from obtaining any access to the information on these IT systems and communication devices.

In private dialogue with political or social organisations, we make it clear that we are acting as private persons and are not making any statements on behalf of the EDAG Group.

If we make any public statements concerning EDAG, we make it clear that we are stating our personal opinion and not the opinion of the EDAG-Group. This applies in particular to our private communications on social media.

We leave any communications to the public on behalf of EDAG using any type media whatsoever to the EDAG-Communications Department.

## COMPLIANCE WITH THE EDAG-CODE OF CONDUCT

We review our actions in the light of the principles cited above, and base our conduct on them accordingly. We are aware of the fact that there is a possibility of our violating applicable laws if we fail to comply with this code of conduct.

The Management of the EDAG Group actively promotes the worldwide communication of our Code of Conduct, and ensures its implementation. Our managers have a special responsibility to inform their employees of the contents and significance of our Code of Conduct, and on their own initiative, must regularly verify compliance with our Code of Conduct and applicable law. Managers assist employees in acting lawfully and in compliance with the regulations at all times.

Managers and employees who violate our company principles and Code of Conduct can expect to face consequences – these may even go as far as termination of their employment contract. This strict treatment applies regardless of whether a person is striving for personal profit or is acting supposedly for the benefit of EDAG.

The rules set out in the EDAG Code of Conduct do not cover every problem that may occur, but instead provide binding principles to serve as guidelines for employees in their day-to-day work. Should the EDAG Group have adopted concrete guidelines, directives or regulations for certain circumstances, then these shall be binding.

### Obtain advice early on

If there are questions concerning the use of the EDAG-Code of Conduct, or if in a specific case an EDAG-employee is unsure of the correct conduct, various information sources and contact persons are available to provide assistance. The first person an employee should contact is his direct supervisor; this also applies if uncertainties arise in conjunction with compliant conduct.

We familiarise ourselves with the contents of the EDAG Code of Conduct and act in accordance with it.

In addition, any employee with questions and problems involving specific subject matter can contact the Legal Department, the HR Department, the authorised corporate division or EDAG's Central Compliance Department. The areas of responsibility of the individual departments, and their contact data can be found on the EDAG-intranet. In addition, you can send an email with any compliance-relevant questions to [compliance@edag.com](mailto:compliance@edag.com)

The EDAG Intranet provides additional information, for instance with regard to applicable EDAG-guidelines, associated processes, work procedures and other Group-wide requirements, to supplement these general rules of behaviour of the Code of Conduct for special topics.

### Reporting violations of rules

If there are substantiated and concrete indications of potential violations of rules, due to either a violation of statutory regulations or a failure to comply with in-house EDAG guidelines, we forward this information to our supervisors or the Compliance Department.

The competent authorities at EDAG ensure that information indicating the possible violation of rules is carefully followed up, and will respond appropriately in compliance with labour-law and co-determination law requirements. In this regard, EDAG undertakes to protect both the informants and the affected parties.

The link below provides our employees, business partners and stakeholders with an electronic notification system that enables them to report (anonymously if desired) potential rule violations to the Compliance Department by means of a secured online portal. In this process, maximum security and data privacy standards guarantee that the informant's identity is protected.

<https://edag.integrityline.org/>

Every notification will be taken seriously. It gives us the opportunity to investigate the matter free of conflicts of interest, and to either disprove the suspicion or prevent negative consequences for the company in good time. We follow up every notification and take any remedial measures necessary. Within this process, we will not tolerate any disadvantages to persons notifying us in good faith.

**We point out any mistakes quite honestly, in this way helping to improve our performance and avert any possible damage to the EDAG Group.**

**Nobody acting in good faith will be at a disadvantage for drawing attention to possible violations.**

Moreover, the Compliance Department is available at any time for any compliance-relevant matter, and can be contacted using the details shown below:

**Compliance Department:**  
0049 611-7375 202,  
[compliance@edag.com](mailto:compliance@edag.com)





# EDAG CODE OF CONDUCT



**EDAG –  
Compliance Management System  
Based on our values**

Copyright 2023  
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Schlossgasse 2  
CH – 9320 Arbon  
For all subsidiaries  
Status: March 2023