



CODE OF CONDUCT



Nov 2023

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GEDIA Automotive Group



CODE OF CONDUCT

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FOREWORD

Dear Employees,

our behavior codex describes which values connect us and how we want to work together – today and in the future.

It gives us a clear way, which has to be taken, in order to secure our company success sustainably. Based on the central thought “every part is a part of me” we are only able to achieve this goal together. With regard to that our values trust, willingness to change and responsibility have a big role. We commit ourselves to behave legal and ethically right at all times.

The given code of conduct concludes all of our important basic rules and principles in one document, which are binding for us now as well as in the future. It provides an orientation framework and is valid for all of us in the same way – for the Executive Board, the leaders and for every individual employee.

It is the claim to ourselves and it is the promise to the outside world for a responsible behavior towards business partners and the public, but also in dealing with each other within our company. Together we are responsible for the reputation of our company. Misbehavior of individual persons might cause enormous damage. Therefore we ask you, dear employees, to carefully read through this code of conduct and all other compliance guidelines and please use this as a signpost for our daily behavior.

I. SCOPE OF VALIDITY

This code of conduct applies to all companies, managers and employees of the GEDIA-Group. The GEDIA-Group (hereinafter “GEDIA”) comprises all companies that are associated with GEDIA Gebrüder Dingerkus GmbH under company law.

Besides this code of conduct, all of the further directives of GEDIA referred to in this document always also apply. All regulations in this code of conduct are binding. Deviations from the regulations in this code of conduct are only permitted following prior approval by the of GEDIA management.

II. GENERAL PRINCIPLES BEHIND OUR ACTION

Infringements against laws and other binding regulations and against internal policies can result in consequences under employment law, civil law and criminal law for the acting employees of GEDIA. For the GEDIA companies, such infringements can lead to significant fines, exclusions from calls for tenders, official sanctions, damage claims from customers or competitors, and severe damage to reputation. Such risks and damage can have a lasting effect on the profitability and survivability of the affected companies and the entire GEDIA-Group. Ultimately, corresponding behaviours thus jeopardise the jobs of all employees of GEDIA. Administrative enquiries, internal investigations and



negative press reports due to infringements against applicable law or other rules also cause a lasting impairment to business operations.

Beyond the observance of laws and other rules, GEDIA expects its employees to display lawful, honest and loyal behavior in their business activities and in all situations associated with these activities.

III. IMPORTANT INDIVIDUAL REGULATION

1. Combatting corruption and money laundering

Corruption prevents progress and innovation, distorts competition and can severely damage GEDIA. This is why GEDIA objects to and combats all forms of corruption.

It is prohibited to influence decisions by granting benefits of any kind. This applies with regard to both public officials and employees of other companies and other establishments in Germany and abroad.

Corrupt behavior is often directly linked to the granting of contributions from business partners and to business partners (invitations, gifts, donations, etc.). This situation is thus subject to special requirements. These can be found in the **anti-corruption directive**.

Money laundering is understood to be the introduction of illegally earned money or illegally acquired assets into the legal financial and economic cycle. GEDIA combats any form of money laundering and takes precautions so as not to be implicated in money laundering situations.

2. Fair competition and procurement

Fair and free competition is subject to the protection of national and international competition and anti-trust laws. Infringements against competition and anti-trust law are prosecuted worldwide by anti-trust and law enforcement authorities and can lead to sanctions amounting to several millions that threaten the existence of the company and exclusions from calls for tenders for participating companies and to significant sanctions for managers and employees.

GEDIA wants to impress customers and the market through the quality of its services and offer these at competitive prices. We are committed to fair competition and reject inadmissible anti-competitive agreements.

GEDIA maintains various business relationships with suppliers and service providers. These relationships put GEDIA in a position to offer its own services at a competitive price. GEDIA thus chooses suppliers and service providers carefully exclusively according to their capability and reliability.



Detailed regulations for the behavior of GEDIA in competition can be found in the **competition directive**.

3. Prevention of conflicts of interest

GEDIA is dependent on the services of its employees in everyday business. Successful business activities are thus only possible when the employees act within the spirit of GEDIA. GEDIA trusts that all employees make their decisions exclusively on the basis of objective criteria and do not allow themselves to be influenced by personal interests and relationships when making business decisions.

If, on an individual basis, conflicts of interest between the personal interests of employees and the interests of GEDIA nevertheless arise, these must be disclosed by those affected to their superiors. The respective superior investigates the conflicts of interest and decides on how to handle these, if necessary while involving the GEDIA management.

4. Fair employment

GEDIA commits to fair employment conditions and combats undeclared work and other illegal employment of employees. Illegal employment conditions can jeopardize legal jobs and prevent the creation of new legal jobs.

The protection of children is part of a key anchor of international human rights. GEDIA commits to these fundamental rights and rejects all forms of child labour.

The employees of GEDIA can only provide the services required from them in a safe working environment. Every employee of GEDIA is thus obliged to abide by the regulations for occupational health and safety.

5. Protection of company assets and confidential information

The company assets of GEDIA are used to achieve the business objectives of GEDIA. They may exclusively be used for operational purposes; use for external purposes is expressly prohibited. GEDIA expects its employees to handle company assets with care and in the interests of GEDIA. Every employee is responsible for ensuring that company assets are not damaged, misused or wasted.

GEDIA possesses valuable know-how and extensive operational and business secrets. This knowledge is the basis of our business success and so the protection of this is particularly in the company's interests. Confidential information may not be misused by employees for their own use or illegally passed on to third parties.



GEDIA acknowledges the intellectual property of competitors and business partners without reservation. Every employee is obliged to keep expertise and business or operational secrets from third parties confidential and only to use them within the framework of their business-related disclosure.

6. Data protection and data security

Special legal regulations exist to protect personal data. GEDIA commits, without restriction, to the observance of these regulations. Personal data of all kinds must therefore be protected carefully from unauthorised access and misuse.

Information technology (IT) and electronic data processing (EDP) are an essential part of everyday working life at GEDIA. However, they harbour a variety of risks. GEDIA takes these risks very seriously in its own interests and in the interests of its business partners and combats corresponding weaknesses immediately upon becoming aware of them. The employees of GEDIA are obliged to familiarise themselves with the applicable IT/EDP regulations and take into account the requirements contained in them.

7. Equal opportunities, equal treatment and mutual respect

We acknowledge the principles of respectful, fair and loyal conduct towards each other. In particular, the principles of equal opportunities, equal treatment and mutual respect play a primary role in this. All employees are offered equal opportunities at GEDIA upon being hired and as part of their further employment. GEDIA rejects all kinds of discrimination and takes steps against this. No one may be discriminated against or harassed due to his background, gender, sexual orientation, religion or ideology, disability or age. Instead, we expect our employees to treat each other in a tolerant, polite and respectful manner and to thus contribute to a productive and pleasant working environment.

8. Conduct towards business partners

GEDIA works with its business partners trustfully and on a business foundation that is fair for both sides. GEDIA also expects law-abiding and honest conduct from its business partners. Within our supply chain, we require the observance of our applicable standards, which are summarized in the **directive on the involvement of suppliers, subcontractors, sales consultants and other third parties ("third-party policy")**.

In particular, suppliers, subcontractors, sales consultants and other third parties of GEDIA are obliged to acknowledge the **code of conduct for subcontractors and suppliers and other contractual partners of GEDIA** and abide by the regulations set down in this.



IV. COMPLIANCE-ORGANISATION

1. Compliance-Responsibility

Compliance is a task for the entire GEDIA-Group that is to be undertaken equally by managers and employees alike. Besides acting as role models, managers have the special task of ensuring that all employees in their field of responsibility are aware of this code of conduct and the associated compliance directives and that these are also abided by.

2. Compliance reports

If there are signs at GEDIA of an infringement against this code of conduct or the associated compliance directives of GEDIA, we expect all employees to submit a corresponding report to their superiors or the responsible managing directors of GEDIA.

3. Cases of doubt

For cases of doubt with regard to this code of conduct, the associated Group directives and specific circumstances, the respective superior or the responsible managing directors are available as contact persons.

4. Clarification of suspicious compliance cases

GEDIA clarifies all suspicious compliance cases in an impartial manner. If necessary, GEDIA works with the authorities or third parties in this respect. If required, the responsible works councils are involved in the respective investigations in good time.

5. Training

GEDIA provides training measures and information events on the content of this code of conduct and the associated compliance directives at regular intervals.

6. Inspection/revision

GEDIA checks the observance of this code of conduct and the associated compliance directives using suitable assessments, with external support where required.



V. CONTACT PERSON

All employees are requested to report suspicious cases they observe.

The early reporting of suspected cases helps GEDIA to recognize possible damage and to minimize it through appropriate countermeasures. All employees are required to protect the whistleblower from possible disadvantages that could arise from a legitimate report. GEDIA will also work to ensure that the reporting person does not suffer any disadvantages. If an employee reports himself, this will be taken into account in possible personnel measures in his favor.

The report can be sent to the management or to the external whistleblower office that is bound to secrecy towards GEDIA:

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RA Carsten Sieg
Martinstraße 4, 57462 Olpe
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For more detailed information on how to deal with suspected cases, please refer to the document: Reporting suspect cases (Whistleblower – Regulation, Document No. 0917).

VI. LAST UPDATED

November 2023