



e-systems

# Code of Conduct

## Dear colleagues,

Following the inception of the e-systems group of companies, all our business units have meanwhile been combined to create one of the strongest product portfolios in the industry. Our intention is to set out our most important principles in a single document in order to protect our employees and the group member companies by acting with honesty and integrity and to maintain the trust of our customers and business associates as the key foundation of our actions.

This Code of Conduct constitutes the value-based foundation of our daily actions and thus creates a binding framework that applies in full to all employees. It does not contain any new regulations, but illustrates the standards we live up to in our conduct both internally and externally, and is thus an assurance of responsible behaviour towards all stakeholders. Let us follow and consolidate the generally applicable and already deliberately lived values together, so that we can continue to act as a reliable, congenial, strong and trustworthy partner for our customers on the market in the future.

## Preamble

The trust of our customers, business associates, authorities, the public and other social stakeholders in the responsible and proper conduct of our employees plays a major role for our group of companies and forms the basis of long-term entrepreneurial activity. We consider our corporate culture to be a critical factor for success. In order to maintain and further reinforce the existing trust in our actions, we are constantly working to achieve the best possible results. This is only possible through the performance of our employees. The e-systems group of companies (consisting of the companies take-e-way GmbH, trade-e-bility GmbH and get-e-right GmbH) is aware that, in addition to professional skills, social and ethical competences are also essential for this and expects all employees to comply with applicable legislation and guidelines. The Code of

Conduct defines the standard for law-abiding and ethical responsible behaviour in all business activities. It also helps to identify and respond appropriately to misconduct and grievances. In order to ensure compliance with the relevant principles, we assess potential partners carefully and apply the same standards to the selection of our partners as we do to ourselves.

## Our values

Our corporate culture illustrates what the group of companies stands for today and also in the future - at the centre of our responsible actions is doing business according to ethical principles, whereby a respectful and appreciative exchange at eye level as well as a high degree of personal responsibility sustainably drive us forward. The principles of our value-driven corporate culture are as follows:

- We treat each other openly, with trust and respect.
- We encourage ourselves to think unconventionally.
- We are aware of the importance of climate protection. We would like to make a contribution and are embarking on our path to climate neutrality through environmentally friendly business practices.
- Contradiction is our incentive to find the best solutions.
- We want to constantly improve.

By focusing on these principles, the interests of employees, customers and partners can be conscientiously represented. We stand up for this in our daily work and are determined that the open corporate culture in particular will continue to enable us to develop dynamically and grow with new challenges.

## Social responsibility

We aspire to fulfil our social responsibility and contribute to sustainable development that is ecologically compatible, socially just and economically efficient.



Employee safety and health is of immense importance to the group of companies. The valid regulations and guidelines for occupational safety and health protection therefore constitute an integral element of all operational processes. All employees are required to comply with the applicable regulations and to support each other in fulfilling their responsibilities. In addition, various prevention and health promotion measures are offered to foster employee health, performance and satisfaction. Special attention in this regard is placed on the promotion, training and advanced training of employees as well as on taking into account their individual needs in the context between work and private life.

Discrimination of any kind will not be tolerated. We strongly oppose uncooperative treatment of staff, colleagues and outsiders. Equal opportunities and equal treatment of the individual serve as the basis of fair, unbiased and open interaction. We promote respectful and appreciative exchange as well as diversity and tolerance. We are convinced that this corporate culture opens up new perspectives that will enable us to achieve the maximum in competitiveness and innovation.

We see the observance of human rights and social standards as well as the prohibition of child, forced and compulsory labour as a non-negotiable principle for every aspect of human coexistence and behaviour. We consider the disregard of these values and rights as an act of inhumanity and do not tolerate this in any way. This also applies in particular to cooperation with business associates at home and abroad.

#### **Sustainability and responsibility for the environment**

The aim of our responsible work and actions is to set an example, particularly in the areas of sustainability and environmental responsibility. Following the introduction of an ISO 14001-certified environmental management system and an internal sustainability management system, concrete goals and measures have been taken to reduce or avoid environmental impacts in all business areas, as published in our climate protection report. In order to make the success of selected measures traceable and measurable, the CO<sub>2</sub> emissions of our group of companies are regularly calculated and direct as well as indirect emissions from purchased energy are compensated. Our long-term goal is to continuously reduce the carbon footprint and consequently also the necessary compensation measures. The group of companies thus fulfils its ethical and entrepreneurial duty and expects the same from its partners and subcontractors.

Integrating sustainability and environmental responsibility into our services is mandatory for all employees and can influence our customers' sense of responsibility in an exemplary fashion. Compliance with all environmental regulations and laws is checked and evaluated regularly and with great care.

#### **Fair and free competition**

Compliance with the Cartel Act aims to secure and maintain fair and free competition in the interest of all market participants and thus forms the basis of trust and success for all market actors. Agreements and concerted practices between competitors that lead to the prevention, restriction or distortion of competition are prohibited. Abuse of a dominant position is likewise prohibited. We are aware that anti-competitive behaviour can have a negative impact on the reputation of our group of companies and can result in fines and penalties. As one of the leading providers of product compliance and other services, we are committed against any manipulation of the market and act in our entrepreneurial activity exclusively on the basis of the laws of the market economy and free competition.

The framework conditions for economic activity are influenced by society and legislation. Through our activities in various associations, we want our interests as well as those of our customers to be taken into account in political decision-making processes. Within the scope of political advocacy, we attach great importance to openness, traceability and accountability. The involvement of the public as well as neutrality in dealing with political parties and interest groups are a matter of course for us. Undue influence on politics, legislation and the formation of public opinion is not permitted.

#### **Corruption, money laundering and proper record keeping**

Corruption, bribery and the granting of advantages will not be tolerated. No employee may exploit the business connections of the group of companies for his or her own benefit or to the detriment of our customers and partners. This also means that employees do not grant or accept any unauthorised private benefits in business dealings that are likely to influence a sound and informed decision. Employees to whom such offers are made are obliged (irrespective of the kind or manner of the offer) to report this immediately to their supervisor. The acceptance or granting of such advantages will be consistently and tangibly punished and will lead to the immediate discharge of the person(s) concerned. Gifts or invitations from customers,





business associates or external third parties may not be accepted, distributed or passed on as a matter of principle. Exceptions apply only to customary promotional gifts and/or gifts that conform to the custom or courtesy of the country concerned. In the event of any uncertainty about behaviour or handling, please consult your supervisor.

We comply with the legal obligations against money laundering and terrorist financing and pursue the goal of entering into business activities only with those partners whose business activities are in compliance with the legal regulations in force. For this reason, the identity of customers, business associates and external third parties is carefully checked.

The legal framework conditions of due and proper accounting are complied with. Clarity and transparency are indispensable for us. Our financial statements are prepared in accordance with applicable accounting standards, validated by an external auditor and published in good time.

#### **Intellectual property, data protection and electronic data processing**

The e-systems group of companies offers one of the strongest product portfolios in the industry and thus has extensive knowledge in the areas of extended product responsibility and product compliance. This knowledge constitutes the basis of our success in business. All employees are required to protect the companies' intellectual property from attack or loss. Confidentiality must also be maintained with regard to company and business secrets and other internal matters. This applies accordingly to the non-publicly accessible information about contractual partners and customers. The confidentiality obligation continues to apply beyond the termination of the employment relationship. It must also be refrained from impairing the reputation and value of the group or its member companies as a brand and service provider through corresponding actions or statements. We fully respect and protect the intellectual property of others.

The protection of personal, confidential and sensitive data of all parties as well as compliance with the applicable data protection regulations are a matter of course for us. The collection, storage, processing and other use of personal data requires the consent of the data subject under a contractual or other legal regulation. It is equally important to us to protect the sensitive and confidential data of our partners. We take all reasonable steps within the scope of due diligence in corporate governance to protect

the personal data we use from access and unlawful use by unauthorised persons. Our business associates are also obliged to ensure the protection of all personal data.

The electronic processing of data is a fundamental element of our daily routine work. Improper handling of data can have a negative impact on a company's success in business. In order to prevent possible risks (for example, the loss, damage or misuse of data as well as the impairment of data processing by malware), we invest large sums each year in the security, current status and expansion of our IT infrastructure and keep our systems state-of-the-art in accordance with applied industry standards. Our employees receive regular training on the current status of cyber attack scenarios, our IT security architecture and the applicable IT security regulations. IT security enjoys a high priority, which is why there are clear instructions and rules of conduct on the use of hardware and software.

#### **Validity and implementation**

This Code of Conduct applies in full scale and effect to all parts of the e-systems group of companies. Additional guidelines for individual areas apply without restriction in tandem with the Code of Conduct. Each and every employee is required to integrate this Code of Conduct into his or her daily work and to adhere to these basic rules. Failure to comply with the Code of Conduct may result in action under labour law for all employees concerned. In the event of questions, uncertainties or suspicion of violations, the supervisor or the management is to be directly informed via the communication channels provided, also anonymously via the reporting system of LegalTegrity GmbH ([whistleblower system \[take-e-way.de\]](https://www.take-e-way.de)). Whistleblowers make a key contribution to the detection and punishment of wrongdoing. The protection of these persons in the professional environment is highly relevant to us.

Moreover, we expect our business associates and subcontractors to comply with the values and standards above to the maximum extent operationally possible. If an own code of conduct or a comparable set of rules exist, please send us the document for review.