

ADS-TEC Energy

Group Policy

CODE OF CONDUCT



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Preamble

ADS-TEC Energy's vision is to accelerate the transition to an all-electric world. ADS-TEC Energy is committed to responsible business practices everywhere that it conducts business. We are committed to continuously improving our performance in social, environmental and financial domains. In order for the company to live up to this responsibility, we have laid down defined rules of direction and conduct in the form of a Code of Conduct (CoC).

This Code of Conduct is applicable to all directors, officers, employees, and suppliers, in other words, anyone working for or on behalf of ADS-TEC Energy. This Code is based on the United Nations Global Compact principles for responsible business.

1 Basic understanding of responsible business practices

This CoC details a common basic level of the responsible business practices of ADS-TEC Energy. This means that ADS-TEC Energy assumes responsibility by considering the consequences of its business decisions and actions in economic, technological as well as social and ecological terms and by achieving an appropriate balance of interests. ADS-TEC Energy also voluntarily contributes to the well-being and sustainable development of global society in all markets where it conducts business. In doing so, we orient ourselves toward high ethical values and principles, in particular on integrity and respect for human dignity.

2 Scope of application

This CoC applies to all branches and business units of ADS-TEC Energy worldwide. Without a doubt, it is applicable to all directors, officers, employees, and suppliers, in other words, anyone working for or on behalf of ADS-TEC Energy.

ADS-TEC Energy promotes compliance with the contents of this Code of Conduct also with its suppliers and in the wider value chain.

3 Compliance with the law

ADS-TEC Energy complies with all applicable laws and any other relevant legal provisions of the countries in which it operates. Our Code of Conduct Requirements apply globally and may exceed legal requirements in different markets.

4 Integrity and Organizational Governance

ADS-TEC Energy bases its actions on recognized ethical values and principles, in particular integrity, respect for human dignity, openness and non-discrimination of religion, belief, gender or any other forms of diversity.

5 Anti-corruption

ADS-TEC Energy rejects corruption and bribery (within the meaning of the corresponding UN Convention¹). We promote transparency, integrity and responsible leadership and control in the company and we work against corruption in all its forms, including extortion and bribery.

6 Fair Competition

ADS-TEC Energy follows clean and recognized business practices and fair competition. In the competition, we focus on professional behavior and quality-oriented work. With the supervisory authorities, we maintain a partnership and strive to have trusting relationships.

7 Consumer interests

As far as consumer interests are concerned, ADS-TEC Energy adheres to consumer protection regulations as well as to appropriate sales, marketing and information practices. Particularly vulnerable groups (e.g., protection of minors) enjoy special attention.

8 Communication

ADS-TEC Energy communicates openly and dialogue-oriented about the requirements of this CoC and about its implementation vis-à-vis employees, customers, suppliers and other stakeholder groups. Documents are dutifully created, not unfairly changed or destroyed and stored properly. Trade secrets and business information of the partners are treated sensitively and confidentially.

9 Human rights

ADS-TEC Energy committed to respect the protection and promotion of internationally recognized human rights, and we work to ensure that we are not complicit in human rights abuses. It complies with human rights in accordance with the UN Charter of Human Rights², in particular the following:

9.1 Privacy

We take active measures to protect the privacy of employees as well as customer information.

9.2 Health and safety

Safeguarding health and safety at work, in particular ensuring a safe and health-promoting working environment in order to avoid accidents and injuries.

9.3 Harassment

Protect employees from corporal punishment and from physical, written, sexual, psychological or verbal harassment or abuse. We do not allow bullying or intimidation.

9.4 Freedom of expression

Protection and granting of the right to freedom of opinion and expression.

9.5 Working conditions

ads-tec complies with the following ILO core labour standards³:

9.5.1 Children's work

The prohibition of child labour, i.e. the employment of persons under 15 years of age, provided that local legislation does not set higher age limits and provided that no exceptions are permitted. ⁴

9.5.2 Forced labour

The prohibition of all forms of forced and compulsory labour including human trafficking, child labor and forced marriage. ⁵

9.5.3 Fair Remuneration

The labour standards with regard to remuneration, in particular with regard to the level of remuneration in accordance with the applicable laws and regulations. ⁶

9.5.4 Workers' rights

Respect for the right of workers to freedom of association, freedom of assembly and collective bargaining, insofar as this is legally permissible and possible in the respective country. ⁷

9.5.5 Prohibition of discrimination

ADS-TEC Energy practices a discrimination-free treatment of all employees and partners in all aspects of our business ⁸

9.5.6 Working hours

ADS-TEC Energy complies with the labor standards with regard to the maximum permissible working time.

9.6 Environmental protection

ADS-TEC Energy complies with the regulations and standards for environmental protection and acts in an environmentally conscious manner at all locations. We take a precautionary approach to environmental management which is further described in our Sustainability Policy. We take responsibility for dealing with natural resources in accordance with the principles of the Rio-Declaration. ⁹

10 How to report violations or concerns

Anyone concerned with possible violations to this code can first talk to their manager, or can contact Compliance@ADS-TEC-energy.com, or report via the encrypted whistleblower system. The company will investigate all reported possible Code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances.

11 Civic engagement

ADS-TEC Energy contributes to the social and economic development of the country and region in which it operates and promotes the corresponding voluntary activities of its employees.

12 Implementation and enforcement

ADS-TEC Energy makes all appropriate and reasonable efforts to continuously implement and apply the principles and values described in this CoC.

¹ United Nations Convention against Corruption of 2003, in force since 2005

² Universal Declaration of Human Rights, UN Resolution 217 A (III) of 1948

³ ILO = International Labour Organization

⁴ ILO Convention No. 138 of 1973 and ILO Convention No. 182 of 1999

⁵ ILO Convention No. 29 of 1930 and ILO Convention No. 105 of 1957

⁶ ILO Convention No. 100 of 1951

⁷ ILO Convention No. 87 of 1948 and ILO Convention No. 98 of 1949

⁸ ILO Convention No. 111 of 1958

⁹ The 27 principles of the Rio Declaration on Environment and Development of 1992 as a result of the United Nations Conference on Environment and Development in Rio de Janeiro