

Code of conduct

EuroQ Group code of conduct



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MANAGEMENT FOREWORD

As a global partner of the automotive industry, EuroQ contributes to environmentally compatible, safe and convenient mobility through reliable and innovative solutions in the areas of quality assurance, vehicle rework and vehicle electronics. Since its foundation in 2008 by Marcus Scholz and Christof Zuber, EuroQ not only stands for exceptional service, but also for the values of a proprietor-run family company. Together with our staff, we have cemented these in our mission statement. We see our observance of the law, adherence to internal regulations and respect for fundamental ethical values at all times and in all places (compliance) as the basis of our economic success. We embrace our social responsibility to our employees, business partners and the community and our duty to preserve the environment and protect natural resources. This way, we not only want to make a contribution to the sustainable development of our company and the community, but also achieve and maintain the trust of all of our employees and business partners. This code of conduct summarises the most important principles of our corporate activities. It offers our employees a guideline in their daily transactions with colleagues, suppliers, customers and competitors and supports them in dealing with legal and ethical issues. It is the essential duty of every employee to read and understand this code of conduct and actively implement it in their daily work. We are all responsible for upholding compliance and integrity in everything we do. In order to meet the many local and global requirements, EuroQ has implemented a global compliance organisation, which all employees are encouraged to actively support.

Emden, March 2023



Marcus Scholz
Proprietor



Christof Zuber
Proprietor

I. GENERAL PRINCIPLES OF BUSINESS

1 THE EUROQ SELF-IMAGE

An inherent part of our self-image is putting people at the forefront of everything we do. As part of this, we pay close attention to the strict legal conformity of our actions whilst also upholding ethical principles. Observing and protecting human rights are of paramount importance to EuroQ. We embrace our social and environmental responsibilities.

1.1 VALUE ORIENTATION AND COMPLIANCE

Our defined values of trust, respect and tolerance act as a guiding beacon, showing us the way in which we want to treat our colleagues and customers. They provide an ethical framework for our social and business conduct. We expect all EuroQ employees to conduct themselves with legal and ethical integrity – which forms the very basis of our culture of trust – and to align their actions with the principles of this code of conduct. Strict observance of all national and international legislation that applies to our business activities is of utmost importance to us. This also applies to voluntary commitments and internal company guidelines.

1.2 BAN ON FORCED AND CHILD LABOUR, RESPECT FOR WORKERS' RIGHTS, BAN ON DISCRIMINATION

EuroQ is committed to the principles specified in the ILO Declaration on Fundamental Principles and Rights at Work: EuroQ prohibits any form of forced, slave or child labour. We are committed to the implementation of effective systems and controls to ensure that no form of slavery or human trafficking takes place in our company. We confirm that we do not employ anyone who does not meet the minimum age specified in the ILO Convention no. 138. EuroQ recognises workers' freedom of association and right to collective bargaining. As part of our global business, we enjoy successful collaboration with people from a wide range of countries and cultures. We make no distinction based on ethnic, national or social background, gender, skin colour, age, language, disability, religious, political or other convictions and sexual identity. We embrace diversity. We do not tolerate discrimination or harassment based on these characteristics. We also demand and

monitor observance of these human rights from our business partners and throughout the entire supply chain.

1.3 SUSTAINABLE DEVELOPMENT BY EMBRACING ENVIRONMENTAL AND SOCIAL RESPONSIBILITY

In keeping with our “Quality Centre of Excellence” philosophy, EuroQ places particular importance on the needs of people today and in the future as well as the preservation of an intact environment for future generations. In light of this, our code of conduct is also intended to serve as the cornerstone of the sustainable development of our company. As a partner of the automotive industry, we use our innovative solutions to contribute to more environmentally friendly, convenient and safer mobility. Our commitment to people and the environment is therefore a key component of our business model. We help our customers to reduce the environmental and climate impact of vehicles, placing particular focus on the conservation of resources and the recycling of raw materials. We implement a variety of measures to actively fulfil our social responsibility – in particular towards our employees, business partners and the community.

1.4 STANDARDS

Conventions and the recommendations of national and international organisations such as the United Nations Universal Declaration of Human Rights, the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises serve as key guidelines for EuroQ.

2 THE CODE OF CONDUCT AS A BINDING DOCUMENT

This code of conduct cements the basic principles of the EuroQ self-image. It serves as a guideline for all members of the management board, employees and EuroQ workers worldwide and is binding for all.

2.1 ORIENTATION GUIDE

This code of conduct bundles the main principles for legally compliant and morally and ethically correct conduct in both business activities and interactions with colleagues. It serves as an orientation guide during daily work and aims to support and promote correct, virtuous and responsible conduct.

2.2 COMMITMENT AND RESPONSIBILITY

It is the duty of every manager to clearly inform the employees under their supervision of the application and contents of the code of conduct and to ensure their unconditional compliance with all provisions. EuroQ will also offer training courses and practical support to assist all employees with the implementation of the code. Failure to follow the code may lead to significant economic damage and a considerable loss of reputation for EuroQ and therefore endanger the sustainable development of the company. The management board will therefore not tolerate any violation of the principles of this code of conduct. Every employee must therefore assume responsibility for compliance with all laws, rules and conduct standards relevant to them. In case of a culpable violation, they must expect disciplinary measures and the assertion of claims for damages, irrespective of any official proceedings against them. The provisions of this code of conduct represent a minimum standard. This code of conduct will not limit any stricter regulations that may be introduced as a binding standard. This code is intended as an internal conduct guideline and cannot be used as grounds for any claims by third parties.

2.3 SUPPLEMENTATION BY GUIDELINES

The code is substantiated and supplemented by internal guidelines in specific areas. All guidelines must be congruent with this code. The code is part of the EuroQ employee manual.

II. CONDUCT IN BUSINESS TRANSACTIONS

1 REQUIREMENT OF FAIR COMPETITION, PROHIBITION OF CARTELS

Free, unrestricted and fair competition is a fundamental principle of the market economy and lies at the heart of our corporate culture. We support all endeavours to promote a free market and open competition worldwide. It is our business policy to focus exclusively on our service performance, customer focus and the quality of our innovative products in competition with others. We do not tolerate any conduct on the part of our employees that is contrary to nationally and internationally applicable rules of fair competition and cartel regulations.

1.1 PROHIBITED BUSINESS TRANSACTIONS

Any anti-competitive conduct, in particular conduct that is relevant under cartel law, is not permitted. For example, the following actions are prohibited:

- + Discussions and agreements with competitors on sensitive competitive information such as prices, price components or technical developments, for example as part of trade fairs or at association events, or the transfer of such information to third parties
- + Sharing customers, markets, territories or projects with competitors
- + A non-compete agreement with competitors or bid rigging in tenders
- + The binding fixation of sales prices of authorised dealers
- + Unlawful exploitation of a dominant market position
- + Unfairly favouring or hindering suppliers in competing for contracts

1.2 LEGAL DEPARTMENT INVOLVEMENT

As it can be difficult to assess issues relevant to competition law, the central legal department should always be contacted concerning such matters.

2. PROHIBITION OF CORRUPTION

We compete for contracts using the innovation, quality and price of our products and services. Our relationship with public and elected officials is characterised by respect and compliance with the law. Any form of corruption is strictly prohibited.

2.1 BLACKMAIL, BRIBERY AND EXTORTION

Within the scope of their position within the company, no employee of EuroQ may demand, accept, procure or even agree to promises of advantages to which there is no legally enforceable claim for themselves or third parties from business partners, their employees, intermediaries or any other persons ("bribery in business transactions"). Similarly, EuroQ does not tolerate any unlawful offering or granting of benefits to business partners, their employees, public officials or mandate holders, intermediaries or any other persons in connection with the procurement, awarding, approval, execution or payment of orders within or outside of official procedures or other relationships with public authorities. It is irrelevant whether this takes place directly or indirectly, for instance through intermediaries or relatives ("bribery in business transactions"). Particular caution must be exercised when dealing with elected officials, civil servants, employees of public authorities or other public institutions with regard to the granting of advantages ("bribery of public officials", "granting of advantages").

It is prohibited to threaten commercial disadvantages or disadvantages of any other nature with the aim of personal gain.

2.2 HOSPITALITY, INVITATIONS, GIFTS

Even giving the impression of corrupt behaviour must be avoided. Therefore, when dealing with business partners of EuroQ, any donations must be critically reviewed, in particular:

- + Disproportionate entertainment expenses
- + Unusual, disproportionate invitations or those not directly related to a business visit
- + Monetary, cash-equivalent or material gifts. Detailed provisions and relevant amount limits are specified in the EuroQ hospitality and gifts policy in the employee manual.

2.3 ADVISERS AND INTERMEDIARIES

Agreements with advisers, representatives or other intermediaries may only be made in writing. Fees, commission and other remuneration must be in reasonable proportion to the demonstrably provided service. These are to be based on customary rates of remuneration. Arrangements that could be used to circumvent internal regulations or grant or obtain impermissible advantages are prohibited.

3 DONATIONS AND SPONSORING

EuroQ embraces its social responsibility and makes donations to social projects= in the areas of science, culture, education and sport as part of its sustainability strategy. Donations and sponsorships must be pledged in strict accordance with the applicable legislation.

3.1 DONATIONS

Donations are voluntary contributions for which EuroQ does not expect or receive anything in return. Insofar as they are permitted, they must have a local relevance. They must not give the impression of exerting influence or be capable of damaging the reputation of EuroQ or its employees. They must not be misused for the purposes of corruption. Donations to political parties, party-like organisations, mandate and office holders and candidates for mandates or offices are not permitted.

3.2 SPONSORING

Sponsorships are benefits that are paid in return. They must be subject to a sponsorship contract and must be related to the core business of EuroQ or its locations.

4 COMPLIANCE WITH TAX LAW, EXPORT CONTROL REGULATIONS AND MONEY LAUNDERING BANS

Strict compliance with national and international tax regulations, trade legislation and money laundering bans is imperative.

4.1 TAXES

EuroQ is committed to complying with all national and international tax and customs laws and requirements in the countries in which we are active. We renounce any form of inadmissible circumvention of such requirements and abuse of process.

4.2 EXPORT CONTROL AND CUSTOMS

We respect all national and international regulations that restrict or prohibit the import, export or domestic trade of goods, technologies or services. We comply with foreign trade law, customs regulations and any resulting approval procedures.

4.3 MONEY LAUNDERING

EuroQ supports the international fight against money laundering and takes its legal obligations very seriously.

5 SELECTION OF BUSINESS PARTNERS

Business partners are selected carefully based on objective criteria. Business partners are required to comply with EuroQ's general principles of business.

5.1 SELECTION PROCESS

EuroQ selects its business partners (e.g. suppliers, service providers, sales representatives, distributors, project partners, advisers) exclusively on the basis of their offers, which are evaluated using previously defined, objective criteria. Subjective preferential treatment or discrimination is prohibited.

5.2 BUSINESS PARTNER CODE OF CONDUCT

EuroQ expects its partners all over the world to respect the principles stipulated in the business partner code of conduct, such as respect for people and the environment, strict compliance with the law, prohibition of corruption and integrity in competition, and to act accordingly in their business activities. This can be done through a contractual commitment to our business partner code of conduct or by providing proof of a previously audited code of conduct with similar business principles. Further details are regulated by the EuroQ business partner code of conduct.

6 DOCUMENTATION AND REPORTING

Business transactions must be correctly documented and reported. All business transactions to be documented in accordance with internal or external regulations at EuroQ must be recorded accurately, comprehensively, promptly and in the designated place. Documentation should be electronic and must be stored in accordance with legal and internal requirements and timeframes. All employees must provide truthful and complete verbal and written reports within the specified framework.

III. EMPLOYEES AND MANAGEMENT CULTURE

1 MANAGEMENT CULTURE

The sustainable success of a company is particularly dependent on reliable and dedicated employees. EuroQ is deeply aware of its significant responsibility towards its employees. The management culture at EuroQ is based on our common values, trust, respect, tolerance, nurturing performance and personal responsibility and the fair treatment of each other. We firmly believe that innovation is always the product of people who dedicate commitment, intelligence and passion to their task and who think outside the box. Therefore, we give our employees space and opportunities to assume personal responsibility both individually and as part of a team in order to contribute creativity and realise their potential. We embrace flat hierarchies. We promote the professional and personal development of all EuroQ employees, invest in staff qualification and place utmost importance on the reconciliation of work and private life. Performance and commitment are rewarded with special support and appreciation. We nurture the open-minded and fair treatment of each other. Problems, conflicts and undesirable developments can be openly discussed by our employees. Our managers should actively contribute to the implementation of these principles and set an example through excellent personal conduct. They should always treat employees with respect and responsibility and have a sympathetic ear for their concerns.

2 FAIR WORKING CONDITIONS AND OCCUPATIONAL SAFETY

EuroQ stands for fair working conditions and high occupational safety standards.

2.1 WORKING ENVIRONMENT

We place utmost importance on ensuring that our employees all over the world work under appropriate conditions with regulated working hours in accordance with the respective legal conditions. We offer fair remuneration and comply with the requirements of labour law. We respect the lawful representation of workers' interests.

2.2 HEALTH AND SAFETY

The health of our employees and the safety of our workplaces are of paramount importance to us. EuroQ adheres to all relevant regulations on health protection, occupational safety and fire and environmental protection (HSE). We strive to operate our facilities and processes throughout the company in accordance with applicable regulations and to exclude risks to the health and safety of our employees.

3 AVOIDANCE OF CONFLICTS OF INTEREST

EuroQ places importance on ensuring that employees do not have conflicts of interest or loyalty with the company.

3.1 POLICY

Any potential personal conflicts of an employee with the interests of EuroQ must be immediately reported to the respective HR department. Special attention should be paid to the cases outlined below.

3.2 EMPLOYEES AS COMPETITORS OF EUROQ

EuroQ employees are not permitted to operate a company in direct or indirect competition with EuroQ, directly or indirectly participate in a competing company or act on behalf of such a company. Only participation in a listed company in competition with EuroQ as a small shareholder is exempt from this ban. If a person close to the employee (close relative, spouse, partner) is connected to a competitor in such a way, the relevant HR department must be notified in order to carry out a comprehensive assessment of any conflicts of interest.

3.3 EMPLOYEES AS BUSINESS PARTNERS OF EUROQ

If an employee operates, participates in or carries out tasks for a company with which the EuroQ Group has a business relationship, they must report this and receive approval from the responsible compliance officer. Due to potential conflicts of interest, such a business relationship between a person close to the employee and EuroQ must also be reported to the responsible HR department.

3.4 PRIVATE CONTRACTS FROM EMPLOYEES TO BUSINESS PARTNERS OF EUROQ

No employee may enter into any private contracts with EuroQ suppliers or service providers if this could grant them unlawful advantages.

3.5 SOCIAL COMMITMENT OF EMPLOYEES

EuroQ values the social, civic or charitable commitment of its employees. However, this must always be carried out in such a way that excludes a conflict with the interests of EuroQ.

4 CONFIDENTIALITY, DATA PROTECTION AND INFORMATION SECURITY

At EuroQ, all dealings with business information are subject to the principle of confidentiality. EuroQ is committed to ensuring the security and protection of sensitive and personal data.

4.1 SECRECY REGARDING TRADE SECRETS

Every employee in the EuroQ Group is bound by the duty of confidentiality towards third parties concerning the internal affairs of EuroQ, unless such affairs have been lawfully published or made accessible to third parties beforehand. This applies in particular to all types of company and trade secrets as well as personal data. The private use of information obtained through company business is prohibited. The duty of confidentiality continues after termination of the employment relationship.

4.2 PERSONAL DATA PROTECTION

EuroQ places utmost importance on upholding personal rights and data protection. This includes the correct treatment of personal data pertaining to employees, customers and business partners. Every EuroQ employee is obliged to consistently comply with the relevant data protection regulations and internal guidelines when collecting, processing and using data.

4.3 SECURE INFORMATION EXCHANGE

Our business activities require the global electronic exchange of information. EuroQ is aware of the risks involved. Protecting information and ensuring the security of the exchange of information are of paramount importance to EuroQ in all business transactions. Business data must be secured and protected against unauthorised access by third parties through the use of high-tech and organisational security standards. Further details are regulated by the EuroQ IT security regulation.

5 CAREFUL TREATMENT OF COMPANY PROPERTY

The company property of EuroQ must be protected.

EuroQ expects all employees to treat all tangible and intangible company assets that form the basis of business carefully and appropriately. In addition to real estate and business equipment, this also includes operating materials, products, financial resources, information systems, software and industrial property rights (e.g. patents, trademarks, designs). Damage must be reported. The removal or private use of company property is prohibited unless express permission has been given. Statutory violations may be prosecuted under criminal and civil law and may have consequences under labour law.

IV. IMPLEMENTATION OF THE CODE OF CONDUCT

1 COMPLIANCE

The principles and values defined in this code of conduct form the basis of the continued economically, socially and ecologically sustainable development of the EuroQ Group. They serve to minimise and control business risks. They also solidify the responsibility of EuroQ for people and the environment (compliance). EuroQ expects all employees to implement and comply with this code. To assist employees, EuroQ has introduced a compliance organisation.

1.1 RESPONSIBILITY OF ALL EMPLOYEES FOR COMPLIANCE

Every employee of EuroQ is responsible for complying with all applicable legislation and regulations, acting with integrity in their business activities and knowing and adhering to this code. Violations of the law and regulations not only endanger the sustainable economic success of EuroQ, but also threaten the social existence of our employees and are therefore never in the company's interests. As a result, any such infringements will not be tolerated by the company management and will be sanctioned accordingly.

1.2 SUPPORTING COMPLIANCE ORGANISATION

The compliance organisation coordinates all compliance activities of the EuroQ Group and supports employees in the control of compliance risks through information, advice and training. It is headed by the compliance officer. This is the contact person for all matters concerning compliance.

2 REPORTING VIOLATIONS OF THE LAW

Every employee may report violations of regulations or the law to the responsible compliance officer without suffering any disadvantage as a result. EuroQ treats all compliance-relevant information confidentially. The identity of anyone reporting such violations will be protected and only disclosed with express prior consent. Reports can be sent to compliancееuroq@simon-schubert.net