

CODE OF CONDUCT OF AVL DiTEST - Cadolzburg

Preamble

AVL DiTEST GmbH, ("AVL DiTEST") located at Schwadermühlstraße 4, 90556 Cadolzburg, Germany, is a company that provides first-class products and services based on the highest quality and innovation. AVL DiTEST's business is built on the following core values:

- Pioneering spirit
- Customer focus
- Problem-solving skills
- Responsibility and
- Independence.

AVL DiTEST supports and respects the protection of internationally recognised human rights and endeavours to comply with all applicable laws and regulations. AVL DiTEST does not tolerate any unlawful or unethical behaviour on the part of its employees.

For AVL DiTEST, respect for internationally recognised human rights is the foundation of all its business relationships. AVL DiTEST is committed to respecting the rights of its employees and treating them in line with the principles of the international community. AVL DiTEST is opposed to any use of child, forced and compulsory labour, as well as any form of modern slavery and human trafficking.

The remuneration and benefits of AVL DiTEST employees shall at least comply with the applicable minimum requirements prescribed by law or agreed between the respective interest groups.

AVL DiTEST shall guarantee that the working hours comply with the respective national legal requirements or the minimum standards of the respective national economic sectors.

The fundamental right of all employees to form and join trade unions and employee representative bodies is recognised.

This Code of Conduct is binding for the employees of the AVL DiTEST Group. AVL DiTEST is committed to the principles of integrity, honesty and fairness in all relationships both inside and outside the company. The management of AVL DiTEST fully supports the principles outlined in this Code of Conduct and expects the company's employees to comply with all the provisions it contains. The future success of AVL DiTEST depends significantly on all employees adhering to this Code of Conduct. Any non-compliance could cause financial damages to AVL DiTEST and cause lasting harm to the company's reputation. Compliance with the Code of Conduct is intended to eliminate or reduce any potential risk to the company itself and to individuals.

Employees are encouraged to contribute to the creation of a team-oriented working environment characterised by a willingness to perform, mutual respect (no exploitation of dependency relationships) and non-discrimination.

Any violation of this Code of Conduct and its underlying principles may result in appropriate disciplinary action under applicable labour law.

1. General behaviour of employees

AVL DiTEST expects professional behaviour from its employees. Existing laws (such as, in particular, laws against corruption, copyright laws, data protection laws, criminal laws, environmental laws, laws against unfair competition and restraints of competition, export laws, tax laws, anti-discrimination laws) must be complied with and behaviour that could be construed as non-compliance with laws must be avoided. Employees must always ensure that AVL DiTEST's reputation is preserved and that the company's public image is protected from any damage.

2. Product integrity

The aim is to guarantee and maintain the highest possible level of trust and customer satisfaction with the AVL DiTEST brand. Compliance with relevant regulations and directives, particularly with regard to product safety, product liability and guarantees, is a matter of course in this context.

3. Data protection and confidentiality

Compliance with data protection regulations is important to AVL DiTEST. All employees who deal with personal data must comply with the locally applicable laws.

Personal data refers directly or indirectly to natural persons and in some legal systems also to legal persons. This includes not only the names, addresses and social security numbers of our employees and clients, but also photographs, videos and voice recordings. For the handling of special personal data, such as criminal data or other sensitive data (such as health data), in principle more stringent provisions apply.

The following principles apply as general guidance for the handling of personal data: Personal data (i) must be used appropriately and in accordance with the law; (ii) must be collected only for specific, clearly defined and legitimate purposes and must not be processed in a way incompatible with those purposes; (iii) its use must be essential for the purpose for which it is used and the extent of the use must be proportionate to the purpose for which it is used; (iv) personal data must be used in such a way that the results are accurate having regard to the purpose for which it is used. It shall be updated as necessary; (v) it shall be kept in a form which allows the identification of the data subject, where this is necessary for the purpose for which it is to be used.

AVL DiTEST is committed to obtaining authoritative information directly from those concerned and to using only reputable and reliable sources to obtain additional data. In any case, the obligations to inform those concerned by the data processing must be observed.

When using personal data, appropriate training, organisational and technical security measures shall be taken to ensure data security.

AVL DiTEST respects the rights of those concerned by data processing, such as the right of access, viewing and deletion.

Personal data, business secrets and confidential information of all kinds concerning AVL DiTEST must be kept secret. For this reason, employees are required to comply strictly with the confidentiality provisions in their employment contract. Information that is not public knowledge may not be disclosed to third parties. This duty of confidentiality on the part of the employees shall also apply after termination of the employment relationship with AVL DiTEST.

This also includes AVL DiTEST's technical, technological and business expertise.

4. Illegal payments and bribery

AVL DiTEST is committed to the principles of integrity, honesty and fairness. Employees must not engage in corrupt or dishonest acts. This principle applies globally. Misconduct can cause AVL DiTEST serious financial damages and cause lasting harm to the company's reputation. In most countries where AVL DiTEST has business relations, corrupt practices in the respective country itself as well as such practices abroad will also result in criminal convictions for the person involved and very high fines for the company.

As a general guideline, the following principles apply:

- Our employees must comply with applicable local anti-corruption laws when conducting business. Our employees may not offer or grant any benefits of value to business partners in order to influence business decisions, nor may they request or accept such benefits. Special care must be taken when dealing with representatives of public authorities, because in most countries local law has different provisions for representatives of public authorities and other (private) third parties.
- If third parties are involved, information about their reputation must be obtained and contractual agreements must be made which also oblige these third parties to comply with the law.
- Benefits must be acquired and paid for in accordance with the law and according to their value. Payments may only be made upon presentation of an adequate, conclusive and meaningful description of the service rendered.

5. Fair competition

The success of AVL DiTEST depends greatly on its employees not engaging in any behaviour that restricts fair competition and on their compliance with all applicable competition and antitrust laws and other laws against unfair competition. Laws against restrictions of competition serve to ensure healthy competition in a fair and reasonable

business climate. These regulations usually apply to the distribution of products as well as to the distribution of services. Violations of this may cause AVL DiTEST considerable damage.

In order to promote a fair business environment and to protect AVL DiTEST, employees are required to observe local guidelines. AVL DiTEST sees itself as a dynamic and fair participant in competition and respects the applicable laws against unfair competition.

In this context, the following guidelines must be observed:

- In general, laws against unfair competition prohibit dishonest business practices that are likely to cause harm to consumers, competitors or other market participants. Antitrust laws, for example, prohibit agreements between companies that could lead to the obstruction of competition. Among the most serious violations of antitrust laws are agreements that restrict independent judgements and decisions in business matters. These include price-fixing, production and procurement cartels, as well as agreements to control product quality or to share markets by customers, territories, products and procurements. AVL DiTEST does not enter into any such agreements with competitors, as these are almost always illegal.
- At AVL DiTEST, we are aware of the value of proprietary expertise and protect it very carefully. We recognise the intellectual property of business partners and other third parties. We treat all information from our business partners and other third parties with care and do not pass it on without authorisation. In particular, we are mindful of information concerning technical expertise, patents, trade secrets and business secrets.
- The intellectual property rights of third parties (patents, trademarks and copyrights) are to be respected; infringements of these rights are to be avoided. Employees may not access or use the business or trade secrets of third parties without authorisation. AVL DiTEST makes every effort to minimise the risk of counterfeit materials or components being used in our products. If any counterfeits are identified, AVL DiTEST shall hold them under lock and key and inform the customer and the competent law enforcement authority.

6. International trade

The applicable regulations and restrictions relating to international trade, including the export and import regulations of the country in question at the time, must always be observed. This is especially true for countries that are under a trade embargo. In the case of international deliveries or orders, AVL DiTEST must check whether the foreign business partner is subject to a trade prohibition due to relevant foreign trade regulations.

7. Funds and other assets of AVL DiTEST

Employees who have any form of access to AVL DiTEST funds are required to follow the procedures outlined in the AVL DiTEST Procedures regarding record keeping,

handling and safeguarding of funds. AVL DiTEST has strict policies in place to prevent fraud and dishonesty.

The funds and all other assets of AVL DiTEST shall be used exclusively for the company's commercial purposes and not for personal use, unless expressly agreed otherwise.

8. Conflicts of interest

AVL DiTEST expects its employees to fulfil their duties conscientiously, honestly and for the benefit of AVL DiTEST. Employees are not permitted to use their position or the knowledge acquired through employment at AVL DiTEST to gain unauthorised advantages for themselves or third parties.

Staff members must avoid any potential conflicts of interest. This is particularly true in relation to personal considerations that could interfere with independent decision-making about what is in the best interests of AVL DiTEST or how best to pursue those interests.

Working for suppliers, customers or competitors of AVL DiTEST or providing services on their behalf is not permitted.

Employees must disclose financial interests in companies that have a contractual relationship with AVL DiTEST (e.g., supply of goods and/or provision of services for AVL DiTEST) if this could actually or apparently influence their decisions in the performance of their duties on behalf of AVL DiTEST.

Any situation that constitutes or gives rise to a conflict of interest must be reported immediately to the respective supervisor. With regard to secondary employment, employees must comply with the relevant rules of their employment contracts or the locally applicable legal provisions.

9. Communication

Communication between AVL DiTEST employees and customers, suppliers, authorities, the public and other bodies within AVL DiTEST must be complete, correct and timely. In doing so, personal and business communications must each be clearly identifiable as such. The use of the company's own identifying marks, stationery, equipment and devices for personal or political purposes is not permitted. AVL DiTEST employees are particularly encouraged to be mindful of the information they share via social media such as Facebook, Twitter and LinkedIn.

Relations or contacts with the media and press, to the extent that they concern AVL DiTEST, must be coordinated with the person or department responsible for public relations.

Employees are not permitted to comment publicly on any subject on behalf of AVL DiTEST without express instructions to do so. When interacting with people external to the company, including representatives of public authorities, care must be taken to

ensure that AVL is presented in a way that is consistent with its mission and values. Employees must refrain from actions that could damage AVL DiTEST's good reputation or that of third parties, companies or authorities.

10. Records

The maintenance of correct and reliable records is necessary for the fulfilment of AVL DiTEST's legal and financial obligations and for the management of the company. All business transactions must be recorded in AVL DiTEST's books and records in a complete, correct and timely manner. The employees responsible for accounting and documentation are obliged to fully account for and document all assets and liabilities of the company, applying due diligence. Employees are not permitted to make or contribute to inaccurate records or communications, such as false expense reports, incorrect attendance, production and financial reports, and misleading advertising and marketing.

11. Equality and sexual harassment

The recruitment of and interaction with AVL DiTEST employees is free of discrimination with regard to gender, race, religion, age, disability, sexual orientation, nationality, political conviction, trade union membership, social origin or ethnic affiliation. AVL DiTEST opposes all forms of discrimination and harassment. No employees may be discriminated against, e.g., on the grounds of ethnic origin, skin colour, gender, religion, nationality, sexual orientation, social origin, age, physical or mental limitations, marital status, pregnancy, membership of a trade union or political views, to the extent that these views are based on democratic principles and tolerance towards those with different opinions. AVL DiTEST is committed to a harassment-free work environment.

AVL DiTEST employees are also required to avoid any form of discrimination in their interactions with colleagues. Sexual harassment or behaviour that could be construed as such must be avoided. This includes, but is not limited to, using inappropriate language, keeping or placing inappropriate materials in the work area or accessing such materials by computer.

The dignity of the human being and respect for his or her individual personality are of utmost importance to us. We are committed to the principles of respectful, fair and loyal treatment of each other. All employees are offered the same opportunities during recruitment and in their further personal development in the company. We expect all employees to contribute to a productive working environment by treating each other with tolerance, courtesy and consideration.

12. Health and safety

AVL DiTEST is committed to protecting the health and safety of its employees and to complying with all applicable health and safety regulations.

13. Environment

AVL DiTEST products, services and processes are designed to ensure that energy and raw materials are used efficiently and that waste and residual materials are minimised throughout the life cycle of the products. AVL DiTEST does not use materials and processes that pose a risk to the environment and human health, provided that suitable alternatives are available.

AVL DiTEST regularly reviews and monitors the company's environmental performance record and produces reports on a regular basis, with particular attention paid to assessing potential risks of existing and future products, services and processes.

AVL DiTEST employees are encouraged to fully support the company in this regard.

14. Liability and reporting obligations

AVL DiTEST expects its employees to strictly adhere to this Code of Conduct. Violations of the Code of Conduct may result in disciplinary action under applicable labour law.

Employees must

- familiarise themselves in detail with the regulations and guidelines relating to their own role;
- behave in accordance with the rules in this Code of Conduct;
- fully support employees who report violations of this Code of Conduct;
- cooperate fully with investigations into violations of this Code of Conduct.

In addition, employees should make suggestions for improvements to the application of this Code of Conduct if its implementation in practice faces difficulties. Possible violations of the Code of Conduct or serious breaches of rules on binding obligations can be reported anonymously or by stating the relevant name. Our procedure is based on the confidential and professional handling of tips. Through a fair and transparent process, our company, those involved and whistleblowers will be protected. This applies equally to internal and external leads.

Employees are expected to report any violations of this Code of Conduct to their supervisor.

Instead of contacting their superior(s), employees may also report this at any time to the Managing Director on their own or, if desired, in the presence of a trusted person. In addition, there is the option of informing the Group Compliance Officer directly (see the organisational chart of the AVL Group of Companies) if employees have a good reason for not contacting their superiors or the Managing Director.

AVL DiTEST guarantees employees who comply with this Code of Conduct and, in particular, report violations of it or who are unjustifiably accused of a violation, full protection against any negative consequences resulting from the report.

Employees who act as supervisors are particularly responsible for supporting this Code of Conduct.

15. Help and information

Employees who require help or are uncertain about the application or interpretation of this Code of Conduct, its underlying general principles or a particular legal provision should speak to their line manager. Employees who need legal assistance should contact their supervisor and ask for support. Instead of their supervisor, the employee may also contact the Managing Director. In addition, employees have the option of contacting the Group Compliance Officer directly if they have a good reason not to speak to their supervisor or the Managing Director. In addition to the contacts mentioned above, you may also contact the workers' representatives.

Gadolzburg, June 2023

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09:00
AVL DiTEST GmbH, Germany

DI (FH) Ralf Kerssenfischer
Managing Director DE