



Code of Conduct

One World. One Family. One KAYSER

INTRODUCTION

KAYSER is a group of companies that operates in various sectors on a global scale. Responsible and lawful conduct is one of our basic prerequisites for our corporate success.

We recognize our social and public responsibility and have set the goal to operate as a social employer all over the world.

This code of conduct aims to ensure the compliance with the diverse legal standards inside the KAYSER group and to create a work environment that distinguishes itself by its integrity, respect, and a fair and responsible conduct. The code applies globally as a rule of conduct for all employees and companies of the KAYSER group, including directors, managers, each representative of KAYSER, as well as persons that are functionally equivalent to employees. The KAYSER group also expects the compliance with this code of conduct from all its business partners.

The code of conduct defines basic values with global validity, action policies, and behavioral standards that shall guide the business conduct of the KAYSER group. It does not describe each individual law and each internal guideline or rule that the KAYSER group applies since they shall furthermore apply beside the code of conduct. KAYSER reserves the right to adjust or cancel the code of conduct at any time.

The acting of all employees is subject to the code of conduct. Each contract partner, director, manager and employee of the KAYSER group is required to inform him or herself about the content of the code of conduct, the legal requirements applying to his or her area of responsibility inside the company, and the internal guidelines. In cases of doubt, a legal advice from the responsible supervisor, the legal department or the managing director shall always be obtained.

KAYSER Group Management



Explained quickly:

What is a code of conduct?

A Code of Conduct is a collection of rules and principles that describes how we want to work and interact with each other. It helps to create a respectful, fair, and safe working environment for everyone.

What does compliance mean?

"Conduct in accordance with applicable law" – this is one of the more official translations of compliance. But compliance means more than that; it refers to the level of adherence to rules. Those who are compliant not only comply with the law and standards, but also with the guidelines and value system of the KAYSER organization. Adherence to these rules is essential, especially in our daily business activities.

Non-compliance can have serious consequences for individuals, but also for the entire KAYSER Group in general. Compliance is therefore a key requirement for the long-term and sustainable success of our company.



KAYSER CORPORATE CULTURE

How do our "We" phrases relate to the Code of Conduct?

Our "we" phrases express what is important to us at KAYSER: cooperation, responsibility, mutual support, and the shared desire to find the best solutions. They reflect our attitude—for example, in statements such as "WE TREAT EACH OTHER RESPECTFULLY, HONESTLY AND FAIRLY." or "WE ARE JOINTLY RESPONSIBLE FOR DEALING WITH MISTAKES AND THEIR CONSEQUENCES."

The Code of Conduct builds on this culture and makes it binding. It translates our values and We -phrases into concrete rules and expectations—for example, with regard to fair working conditions, respectful treatment, product safety, environmental protection, compliance, and the prevention of corruption. In this way, our shared self-image becomes a reliable framework for responsible action—for each individual and for us as a company.



**One World.
One Family.
One KAYSER.**

Our Corporate Culture



WE TREAT EACH OTHER
RESPECTFULLY, HONESTLY
AND FAIRLY.



WE ARE JOINTLY
RESPONSIBLE
FOR DEALING WITH MISTAKES
AND THEIR CONSEQUENCES.



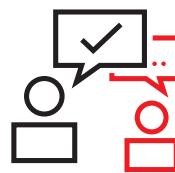
WE ACHIEVE
THE BEST RESULTS
BY WORKING
COLLABORATIVELY TO FIND
SOLUTIONS.



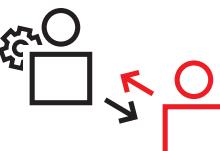
WE SUPPORT EACH OTHER
IN ORDER
TO AVOID MISTAKES.



"WE" INCLUDES ALL KAYSER
STAFF MEMBERS,
IRRESPECTIVE OF COUNTRY,
POSITION AND HIERARCHY.



WE KEEP
OUR PROMISES.



WE SUPPORT EACH OTHER
ACROSS DISCIPLINES.



WE LOOK FOR
THE BEST SOLUTION FOR
KAYSER.



WE EACH GO THE EXTRA MILE
FOR MUTUAL SUCCESS.

LAW-ABIDANCE AND RESPONSIBILITY

The compliance with all applicable laws and other legal directives and export controls or economic sanctions, including the internal guidelines, as well as concluded agreements, provide an indispensable basis for the KAYSER group conduct. All KAYSER group employees are obligated to comply with the laws, directives, and internal guidelines that apply in their work environment. Violations of laws, internal regulations, contracts, or against the code of conduct will not be tolerated and will have disciplinary and, where appropriate, legal consequences.

The KAYSER group-managing directors have the particular responsibility to ensure the information of each KAYSER group employee worldwide about the code of conduct. The directors and managers have to ensure furthermore a careful and continuing control of the compliance with legal provisions, internal guidelines, or this code of conduct, as well as its implementation in corporate practices. However, it does not release employees from their own responsibility. Each individual employee has to take responsibility for his or her personal behavior.



What does law-abidance behavior and responsibility mean in everyday life?

Law-abidance means:

I inform myself about applicable regulations and comply with them.

Responsibility in this context means:
I personally contribute to ensuring that KAYSER acts in a compliant and trustworthy manner.

Example from daily business:

An employee orders materials from abroad. In doing so, they have to check whether export restrictions or sanctions apply to the destination country. Failure to comply with this regulation can have legal consequences for the individual and the company.

FAIR BUSINESS RELATIONS

The business policy of the KAYSER group is based on fair competition. The KAYSER group rejects unfair competitive practices. Relations with all business partners shall be based exclusively on objective criteria, especially on quality, reliability, competitive prices, as well as the compliance with ecological and social standards and the principles of proper corporate governance. We expect such requirements to be applicable for our suppliers along the supply chain.

Prices or conditions agreements and agreements on market-sharing with competitors and business partners are prohibited. Inadmissible conduct under antitrust law must not take place. It must be refrained without exceptions from violations against competitive directives as they meet under no circumstances the KAYSER group interests. Always obtain a legal consult from the responsible manager or the legal department in doubtful cases.



How do we practice fair business relations at KAYSER?

Fair business relations means:

We do not allow ourselves to be influenced and make decisions transparently and objectively.

Responsibility in this context means:
We protect the integrity of our company—even when it gets uncomfortable.

Example from daily business:

An employee working in purchasing receives a gift from a long-standing supplier and an offer to "settle something under the table" for future orders. The employee declines, reports the incident, and makes it clear that decisions at KAYSER are based on objective criteria such as quality, price, and reliability—not on personal advantages.



FAIR WORKING CONDITIONS, RESPECTFUL INTERACTION WITH OTHERS

The corporate success of the KAYSER group depends on your employees. The KAYSER group assumes responsibility for its employees and endeavors to offer them an attractive work environment with fair working conditions. The KAYSER group acts according to the internationally recognized human rights, work and social standards, and complies strictly with the laws applying to its business operations. It thus follows the compliance with all applying work security directives to guarantee the safety of all employees at work.

The KAYSER Group respects the right of all employees to freedom of association and complies with applicable laws and agreements regarding working hours, rest periods and collective bargaining arrangements, women's rights, diversity, equity and inclusion, the rights of minorities and indigenous peoples.

Our recruiting follows ethical standards. The interaction with others is characterized by appreciation, mutual understanding, respect and fairness. This excludes all forms of discrimination. We do support land, forest and water rights and object forced eviction and the use of private and public security forces. Each manager sets an example with his or her behavior and has to guarantee a work environment free of discrimination and harassment.

What do fair working conditions and respectful treatment of one another mean?

The KAYSER Group wants all employees to be able to work safely. To this end, we ensure fair working conditions, comply with laws, and protect the rights of everyone—regardless of where they work or what position they hold. We pay attention to breaks, working hours, and fair pay. No one should be disadvantaged or treated badly. Managers have a special responsibility: they set a good example and ensure that everyone behaves respectfully and fairly.

Fair working conditions mean:
Safety, fair rules, and protection for everyone.

Respectful interaction means:
Concerns and reports are taken seriously—no one is disadvantaged or overlooked.



BAN OF CHILD LABOR, SLAVERY, FORCED LABOR AND HUMAN TRAFFICKING

We respect children's right to personal development and education, which is why in no phase of the business process in the KAYSER Group may use child labor. KAYSER adheres to the recommendations of the ILO conventions on the minimum age for employment or work with children. This minimum age should not be less than the age at which compulsory education ends and in any case not less than 15 years.

The KAYSER Group does not tolerate any forms of modern slavery, including forced labor, exploitation, compulsory labor or human trafficking. No employee may be forced to work, directly or indirectly, by violence and/or intimidation. Employees may only be employed if they have volunteered for employment.

What does "no child labor or forced labor" mean?

No child labor means:
Children should learn, not work.

No forced labor means:
Work must be voluntary, without pressure or fear.

Example from daily business:
A supplier offers low-priced products that are suspected of having been manufactured using child labor. KAYSER rejects the offer and carefully checks the origin of the products. Only suppliers who can demonstrate fair working conditions are considered.

PRODUCT QUALITY, PRODUCT SECURITY AND ENVIRONMENTAL PROTECTION

The KAYSER group develops and produces innovative and high-quality products for its customers. All KAYSER products are manufactured in strict compliance with our quality requirements. The product security has high priority in this connection. We achieve top product security due to a consequent zero-defects-strategy, fighting against counterfeit parts, safeguarding intellectual property and an active quality management system.

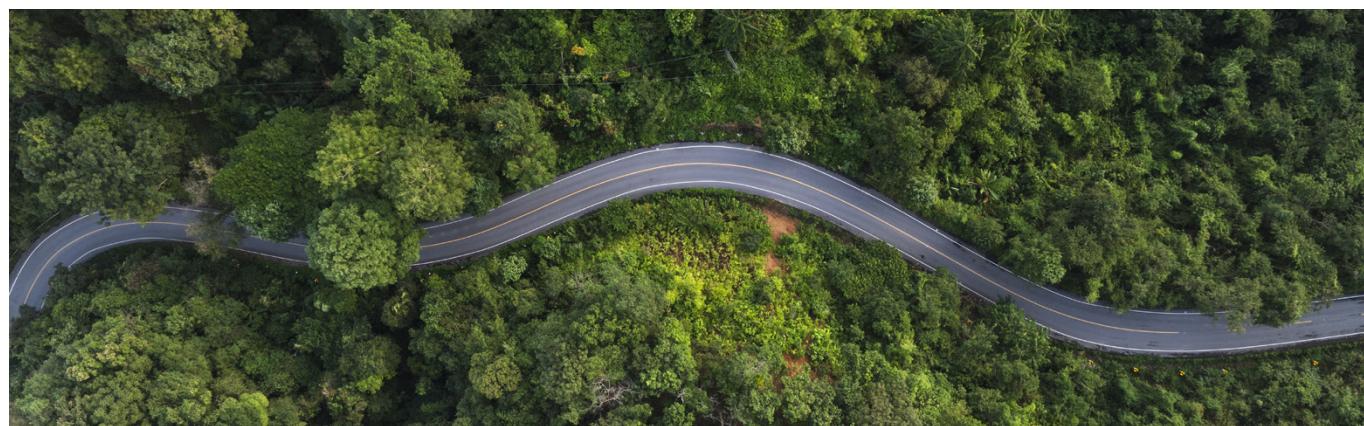
The KAYSER group operates responsible and sustainable and bears the responsibility for complying with environmental laws. Environmental directives are important during the entire value chain, the KAYSER group aims to minimize its environmental impact. This applies for the energy use, air quality, soil quality, water quality, consumption and management, decarbonization, waste reduction, reuse and recycling, biodiversity, land use and deforestation and the protection of natural environments and the avoidance of emissions including noise emissions, also for animal welfare. The usage of renewable energies as well as the green house gas (GHG) emissions reporting should be implemented along the entire value chain.

What do product quality and environmental protection mean?

Product quality means:
We only deliver products that are safe and tested.

Environmental protection means:
We consider nature at every step – and act sustainably.

Example from daily business: An employee discovers that a component does not meet quality standards and reports the error immediately so that the product is not shipped. At the same time, the team investigates how the error occurred—and improves the process.



CONFLICT OF INTERESTS

The employees must avoid situation where personal interests conflict with the interests of KAYSER. The conflict of interests exists when the personal interests conflict with the interests of KAYSER what may result in a conflict of loyalties. The KAYSER group interests shall always have priority. Each conflict of interests shall be disclosed to the supervisor or Compliance Officer to find an appropriate solution.

How can conflicts of interest be avoided?

Example from daily business:

An employee has to decide which service provider will be awarded a contract. One of the providers is a good friend. To avoid a conflict of interest, the employee informs their manager. Together, they decide how to make a fair and neutral selection.



INTERNATIONAL TRADE

The legal provisions applying to its products and services for the international commercial trade are binding for the KAYSER group. KAYSER therefore respects all foreign trade, tax, and customs laws of countries where the KAYSER group conducts business. The KAYSER group companies comply with all export and import bans and official provisions on building permission that apply due to national or international laws.

How should I behave in international trade?

Example from daily business:

An employee wants to deliver a product to a country that is currently subject to an export ban. Before executing the order, she checks the applicable regulations and consults the legal department. The export is stopped—KAYSER complies with international rules.



CORRUPTION AVOIDANCE

The KAYSER group is convinced of the quality of its products and the performance of its employees and decidedly rejects each prohibited granting or acceptance of advantage from or to its business partner(s) or public servants. Regarding the national and international KAYSER group operations, no personal advantage must be promised or granted to both bodies and employees of other companies and officials in return for preferential treatment. The employees and bodies of the KAYSER group are not corruptible and do not make profits from their occupation – except their salary paid by the company.

How should I respond to attempts at bribery?

Example from daily business:

The person responsible at a public authority who is supposed to grant approval for a project suggests that the approval could be processed more quickly if a “small thank-you” payment is made. The employee refuses and informs the legal department—because such payments are illegal and constitute bribery.



LOYAL AND TRANSPARENT REPORTING

Loyal and transparent reporting is indispensable for the KAYSER group both inside the Group and towards the public. All KAYSER group bodies and employees are therefore obligated to conscientious, complete, loyal, and timely reporting. Bodies and employees of the KAYSER group shall comply with the same principles if they must report to third parties. We show financial responsibility by accurate records and disclosing relevant information. This is indispensable for the KAYSER group's credibility in commercial and social environments.



What can loyal and transparent reporting mean?

Transparent reporting means:

We pass on information honestly and completely.

Responsibility in this context means:
We openly correct mistakes so that trust remains intact.

Example from daily business:

An employee prepares a monthly report for a department or even a customer. He notices that there is an error in the figures from the previous week. Instead of ignoring the error, he corrects the information and informs the manager about the change. This ensures that the reporting remains accurate and traceable.

FOUR-EYES-PRINCIPLE AND COMPLETE DOCUMENTATION

The KAYSER group adheres to the rules of the Four-Eyes-Principle in important and legally significant decision-making. A single person must not make important decisions or execute critical activities alone. Complete documentation of all work steps and process-related controls is the basis of the KAYSER group's consistently high work quality standard.



What do the four-eyes-principle and documentation mean?

Four-eyes-principle mean:

We make important decisions together.

Documentation means:

We record everything in writing for clarity and quality.

Example from daily business:

An employee is supposed to approve a large order. She checks the documents but does not approve the order on her own. A colleague checks the information and confirms the decision. At the same time, everything is recorded in writing—who checked and decided what.



CONFIDENTIALITY

The knowledge and information acquired inside the KAYSER group are key elements of the commercial success. All employees and bodies of the KAYSER group are obligated to keep corporate and business secrets in confidence, as well as other confidential information, which has been acquired accomplishing their functions. Such information must be protected from access and forwarding to third parties. The obligation to confidentiality shall continue in effect after termination of the employment relationship.

Why is confidentiality important?

Confidential information ensures our success and the trust of our partners. Those who handle internal knowledge with care protect the company and themselves.

Example from daily business:

An employee learns details about new product developments in the course of a project. This information must not be shared with anyone outside the project or outside the KAYSER Group—even after the end of the employment relationship. This is the only way we can protect our knowledge and our success.

DATA PROTECTION SECURITY

KAYSER respects the personal rights of its employees. Privacy protection, integrity, and the security of all business data must be observed when using personal data in business transactions. Personal and all business data must be protected through suitable technical measures from access by unauthorized persons. Employees who work with personal data are supported by the corporate data security officer and receive professional legal advice.

Why is data protection important?

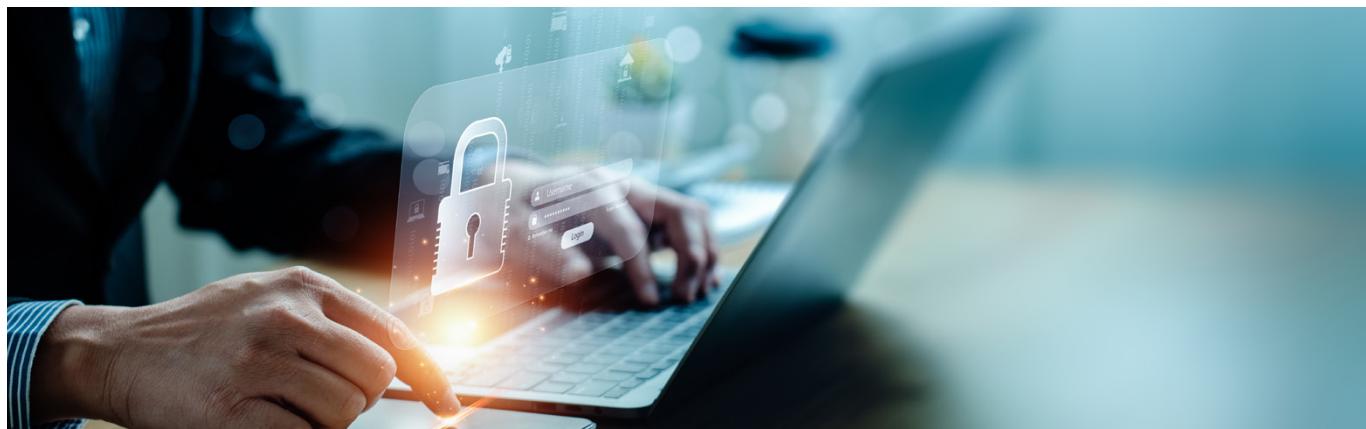
Protecting personal and business data builds trust and prevents misuse. This is how we safeguard the rights of all parties involved and fulfill our responsibility as a company.

Data protection means:

We protect personal and business data from unauthorized access.

Example from daily business:

An employee processes customer data for an offer. She only stores the data in protected systems and does not pass it on. The data protection officer is available to answer any questions.



CORPORATE PROPERTY

Each employee must handle the corporate property with care and protect KAYSER group assets against loss, damage, theft, abuse, and unauthorized use. The corporate property also includes immaterial values such as in-house knowledge, intellectual property right, copyright-protected works, and know-how.

What does responsible handling of company property mean?

Company property means:

We treat everything that belongs to the company—whether equipment, knowledge, or ideas—with care and respect.

Example from daily business:

An employee uses a company cell phone for work purposes. She protects it from theft, returns it when she leaves the company, and takes care not to store confidential information on private devices.

REPORTS BY EMPLOYEES

All employees may report issues, legal doubts, suggestions or complaints in association with subjects of the code of conduct, especially violations of the same, to the responsible supervisor or the legal department. Notifications and messages are treated in confidence if desired by the employees.

What does reporting concerns or violations mean?

Reporting means:

If something is unclear or not working properly, we let someone know – either openly or confidentially.

Example from daily business:

An employee notices that a colleague is seriously violating the rules of the code of conduct. The employee talks to their manager or the legal department about it. If the employee wishes, the report remains confidential.



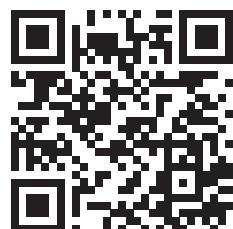
KAYSER INTEGRITY LINE

A confidential way to report non-compliance

The KAYSER Integrity Line is a whistleblower system available to all employees and external partners for reporting violations of our Code of Conduct or legal regulations. This includes reports of bribery, corruption, fraud, harassment, or discrimination.

The system is available around the clock and offers the option of submitting reports anonymously. All reports are treated as strictly confidential. However, it is important not to make false accusations—knowingly providing false information is not permitted.

The KAYSER Integrity Line can be reached at:
<https://kaysergroup.integrityline.app/>



Reporting information correctly!

Concrete and detailed information is the key to a good and successful investigation. When submitting information, please answer the following five questions:

- Who?
- What?
- When?
- How?
- Where?

As a person reporting information, you should ensure that your report can also be understood by people who are not familiar with the subject matter. It is helpful if you are available for further questions.



**BECAUSE INTEGRITY IS
IMPORTANT TO US!**

Whistleblower system for compliance with our
Code of Conduct and legal regulations

fast

easy

anonymous



A. KAYSER AUTOMOTIVE SYSTEMS GmbH

Hullerser Landstraße 43
D-37574 Einbeck

+ 49 5561 7902-0
info@kayser-automotive.com