

7.1.1 Code of Conduct

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## 1. Introduction

### To whom does the Code of Conduct apply?

This Code of Conduct is a voluntary commitment to ethically sound conduct. It describes the principles that form the basis for our decisions and actions.

The Code of Conduct is intended to help employees and managers alike to apply the principles of C-P-S Holding GmbH & Co. KG, and to act accordingly now and in the future. This Code of Conduct applies throughout the entire company, that means also for the subsidiaries C-P-S Professionals GmbH, C-P-S Dr. Böckmann s.r.o., C-P-S Automotive L.P., C-P-S / SimPlan (China) Co. Ltd.. We expect the compliance to the present Code of Conduct from our suppliers equally.

### How to implement the Code of Conduct?

The Code of Conduct is intended to help our staff make the right decisions regarding legal and ethical issues in their everyday work. Of course, it is not possible to anticipate all situations that may arise. Furthermore, the scope of the Code of Conduct is not sufficient to cover all existing rules and guidelines. Every employee should therefore take every opportunity to find out about applicable rules and guidelines. Of course, we are aware that laws and guidelines are often not easy to understand. It is therefore not always easy to assess whether a behavior is ethically correct and in compliance with the law in every respect.

Any employee can get into a situation in the daily work routine where moral, legal or ethical problems arise. The following questions can help you make the right decision:

- Is the decision in line with the principles of our company?
- Am I sure that the decision is in conformance with the law and does not violate legal requirements?
- Am I sure that I am acting morally, legally and ethically correctly with my decision - in the interest of the company, but also in line with my personal standards?
- How would I feel if a newspaper reported on my decision the next day?

If there are still uncertainties, you should not be afraid to inform your supervisor in order to discuss the further course of action together. In addition, the HR department is available to you as a contact.

### Conduct in the business environment

We are committed to acting as a law-abiding and socially responsible company. We conduct our business in accordance with ethical and social business standards and always strive for excellence in our products and services, and in our relationships with customers and business partners.

## 2. Compliance with laws and guidelines, taking cultural values into account

We are committed to observe and comply with applicable laws and regulations. Of course, this commitment also applies to relevant guidelines and directives as well as recognized value standards of the cultures and countries in which we operate.

## 3. Employees as representatives of our company

We are aware that our actions and behavior are perceived in our function as representatives of the company. Through our work and our behavior we contribute to the positive perception and support the economic success of the company. We all have the task of observing the Code of Conduct, conveying its principles into the company

and ensuring compliance with them through our conduct. Executives have an additional responsibility in this respect: they are a role model for their employees, support them in concerns and uncertainties regarding compliance with legal requirements, and help them to behave ethically at all times.

#### **4. Performance reliability and quality**

We are aware that the assurance of quality as well as the safety and reliability of our services are the basis of our success - and thus are a key corporate principle. We implement the necessary improvements meticulously and sustainably. We always act in accordance with recognized quality management systems. We aim to meet the requirements for high quality of our customers at all times. This demands the commitment of every single employee. We understand quality as a dynamic process of continuous improvement of all quality-related services.

Every single employee can contribute to constantly improving the quality of our services and keeping our word. This applies in particular to those employees who are entrusted with the conception, production and marketing of the services.

Any spare-time employment is subject to the written approval of the personnel department and must not be in conflict or direct competition with C-P-S Holding GmbH Co KG.

#### **5. Fair competition and antitrust law**

We follow the rules of fair competition for the benefit of all market participants. Our company is committed to securing and maintaining free and undistorted competition. This principle is central to the antitrust laws that are in force worldwide and is therefore binding for us.

In order to protect ourselves and the company from the consequences of a violation of the legal provisions, all forms of conduct that conflict with antitrust law are prohibited. These are in particular:

- coordination and agreements with competitors regarding prices; conditions; allocation of markets, customers or territories, capacity or service restrictions
- exchanges of sensitive information with competitors, such as regarding prices, price changes, profit margins, discounts and sales.

#### **6. Ban on corruption**

We do not tolerate any form of corruption. The unlawful granting of benefits to third parties - such as public officials or employees of private companies - is prohibited within the company. The prohibition of corruption applies without restriction, i.e. regardless of to whom, where in the world and for what reason such benefits are granted.

Anti-corruption laws are in force worldwide and must be observed by all our companies, employees, agents and representatives. Violations of these laws can constitute serious crimes and cause considerable damage to both individuals and the company. The prohibition of corruption also means that personal advantages in connection with business activities may not be demanded, accepted, offered or granted.

Experience has shown that especially in connection with gifts or favors, issues arise time and again in everyday work. You can find out how to deal correctly with invitations or gifts in section 11 of this Code of Conduct.

Protect yourself from unintentionally committing a criminal offence by re-reading the Compliance Policy in case of doubt or by contacting your supervisor or the management. Examples of this would be a possible confrontation with a case of corruption or questions about other legalities regarding benefits, payments and financial agreements.

## **7. Health and safety at work**

We have an obligation to all employees to provide safe and healthy working conditions and to develop these continuously. Compliance with our high standards in the area of occupational safety is regularly monitored. In addition, occupational safety training courses are held regularly.

Occupational health and safety is a high priority for us. Safety risks are systematically eliminated. We aim to provide a safe and healthy working environment at all times. We observe the laws, regulations, recommendations and ordinances governing working hours and occupational health and safety and offer fair remuneration.

Every single employee can contribute to making the working environment safe. The following rules of conduct should be self-evident:

- Comply with the guidelines regarding health and safety at work.
- Take care that nobody can get into danger.
- Act consciously and carefully to avoid situations that could compromise safety. If a dangerous situation cannot be avoided: ensure that the issue is resolved promptly and that colleagues are informed accordingly.
- Report all incidents that compromise safety to your supervisor and the management.

## **8. Diversity and equal opportunities**

As an international company we represent diversity, tolerance and equal opportunities. Diversity is valuable for us, since the different backgrounds of our employees promotes creativity and allows us to better understand our customers worldwide.

Direct or indirect discrimination must therefore be excluded in all decisions and in all areas of the company. This applies regardless of gender, age, race, skin color, religion, ideology, gender orientation or disability. Neither may cultural, ethnic or national origin nor political and philosophical views play a role.

Each employee can contribute to the success of the company by respecting its diversity. A fact-oriented, cordial and fair interaction with each other should be as natural as cooperation in a spirit of trust.

## **9. Care in handling data**

We ensure that current information and communication technology is used properly. Personal rights and data of our customers, contract partners and employees enjoy the highest possible protection. Data collection, data storage and data processing are carried out in accordance with the applicable laws. We comply with current reporting obligations to national supervisory authorities and regulatory bodies.

## **10. Social media**

Our company is represented and active in the social media. We share news via LinkedIn, Xing and Facebook several times a week. C-P-S Group expands the attention and reach for potential job applicants but also employees and customers. The company adheres to the guidelines of the GDPR for every publication.

## **11. Dealing with conflicts of interest, gifts and invitations**

We are aware that decisions in connection with our professional activities must not be influenced by private interests or personal relationships. Therefore situations in which conflicts of interest may arise should be avoided.

The correct way to deal with potential conflicts is to disclose all facts in full. Only absolute transparency can protect against damage to the company and to the employees concerned, particularly in connection with gifts and invitations. The gifting of high-value presents, money and financial benefits to employees and representatives of other companies is strictly prohibited. Only in exceptional cases may low-value presents be gifted, provided that they are appropriate, and no consideration is expected in return. Such gifts should be marked with the respective brand logo.

In practically all legal systems, gifts and invitations for and to public officials are particularly sensitive and therefore generally prohibited.

Do not accept gifts or inappropriate invitations from a business partner. The only exceptions are low-value gifts such as advertising and giveaway items or appropriate gifts of a representative nature. Gifts and invitations directed to a private address may neither be granted nor accepted.

Gifts and invitations may give the impression that the giver or inviting party expects benefits from them. Even this can harm both your own reputation and that of the company.

To protect yourself against this, you should always discuss questionable cases with your supervisor. For details on how to handle invitations and gifts and guidance on what is "appropriate", please refer to the Anti-Corruption Policy.

## **12. Care in dealing with accounting and financial documents**

We are aware that care in the handling financial documents is of the utmost importance for our company. We therefore adhere to our obligation to ensure that national and international accounting rules are observed. The company's accounting is carried out externally and internally identically in accordance with the International Financial Reporting Standards. Our financial documents are the basis for the management of the business. They accurately and promptly reflect the course of business and the relevant facts to stakeholders.

- Use the standardized processes and ensure compliance with accounting regulations.
- Look after your documents carefully and ensure that they are stored in compliance with the law and regulations.
- Collaborate with internal and external auditors.

## **13. Handling confidential information and protection of intellectual property**

We are aware that intellectual property is a valuable asset and the basis for the success of our company. It is therefore important to protect this information. Intellectual property includes brand strategy, brand design,

brand management and brand innovation as well as details of customers and suppliers in addition to other trade secrets.

Every employee should help to protect this information. Confidential information concerning the company must be kept confidential. This means that it must not be disclosed to unauthorized persons - including family and friends.

Protect records and files from unauthorized access. Passwords should be selected according to security guidelines, changed at regular intervals and not shared with others. Make sure that no third party can access data when you are not at your desk. Conduct conversations with confidential content in such a way that unauthorized third parties can't gain knowledge of it. This applies in particular to telephone conversations via telephone loudspeakers and video conferences. Use confidential information exclusively for business purposes.

#### **14. International trade agreements and sanctions**

Governments and international organizations may impose temporary restrictions such as embargoes or economic sanctions affecting certain business transactions that apply to countries or individuals. We respect international regulations and do not engage in transactions or business involving goods or technology affected by restrictions.

#### **15. Use of our company resources**

We provide all employees with company resources to achieve common goals. Only an efficient use of all resources at all levels can ensure the long-term success of the company. Waste or misuse of company resources - including working hours - damages our operational and financial performance and so impacts all of us. Every employee can contribute to this.

- Act cost-consciously and check carefully whether expenses are necessary and proportionate.
- Ensure that you handle company property with care. Protect it from damage, destruction and theft.
- Keep private use of the IT infrastructure, including e-mail, Internet access and telephones, within reasonable limits.
- Use all resources sparingly and take care to consistently expand our contribution to environmental and climate protection.

#### **16. Environmental responsibility**

We comply with the laws and regulations relating to environmental protection and energy management in the respective countries / jurisdictions in which we operate. Employees are expected to observe and comply with the company's guidelines and policies on conservation of natural resources, energy and water consumption and waste management in the performance of their duties, while ensuring that suppliers and other business partners comply with environmental protection requirements. This includes, but is not limited to

- responsible waste management and disposal,
- improving air and water quality,
- responsible use of chemicals,
- the reduction of greenhouse gases and other environmentally harmful emissions,
- the conservation of non-renewable natural resources and the use of renewable energy.

### **17. Counterfeit parts**

We require our suppliers to develop, implement and maintain effective methods and processes to detect and minimize the risk of introducing counterfeit parts and materials into our supply chain. When detected, suppliers are expected to implement effective procedures to quarantine the product and inform recipients of counterfeit products.

### **18. Social commitment**

We are aware that as an international company we bear a major social obligation. For this reason, we make appropriate donations of money and goods that are intended exclusively for the support of projects in the fields of education, family and culture. Financial contributions to political parties or similar institutions as well as to individuals are not permitted.

### **19. Ban on child and forced labor**

We do not use or tolerate illegal work by children under the age of 15 or the use of forced labor.

### **20. Consequences, publication and questions**

#### Consequences of non-compliance with these principles

This Code of Conduct combines applicable legal and company regulations. The obligation to comply with the principles set out in the Code of Conduct arises either directly from the laws, company regulations, corporate guidelines and policies or as an ancillary obligation under the employment contract. Deliberate violations of the guidelines lead to consequences within the framework of the applicable regulations.

#### Whistleblowing Policy

The Whistleblowing Policy aims to prevent or detect wrongdoing and misconduct and to provide redress when it occurs. The most important aspect of the policy is to create a culture where everyone feels free to report concerns about all aspects of business ethics, human rights, safety and labour standards, environmental protection and illegal or unethical behaviour. It must be possible to report in good faith suspected improper conduct or misconduct in the company. We ensure that employees have access to open and respectful communication.

#### Preserving identity and protecting against retaliation

In the event of doubt about compliance with the above obligations and to avoid improper activity, employees must contact a direct supervisor or, if there are justifiable circumstances, the Compliance Officer(s) responsible for the company. We assure all employees who file a grievance report will be protected from threats, harassment or other adverse actions within the company. Whistleblowers do not have to fear dismissal.

Publication of the Code of Conduct

This Code of Conduct is published on the company intranet and thus made accessible to all employees at all times.

Do you have any further questions?

If you have any questions or comments in connection with this Code of Conduct and its application, you can contact your supervisor or the company management at any time.