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7.1.1 Code of Conduct

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1. General

1.1 To whom does the Code of Conduct apply?

This Code of Conduct is a voluntary commitment to ethical behaviour. It describes the principles that form the basis for our decisions and our actions. The Code of Conduct is intended to help employees, managers and suppliers alike to understand the principles of C-P-S Holding GmbH & Co. KG, to act accordingly and to preserve them for the future. The Code of Conduct applies throughout the entire company, i.e. also in 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. Similarly, we also expect our suppliers to comply with this Code of Conduct.

1.2 How the Code of Conduct is used

The Code of Conduct is intended to help you make the right decision when faced with legal or ethical questions in your daily work. Of course, it is not possible to foresee all situations that may arise. Moreover, 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 inform himself or herself about applicable rules and guidelines. Of course, we are aware that laws and guidelines are not always easy to understand. It is therefore not always easy to judge whether conduct is ethical and in compliance with the law in every respect. Every single employee may find himself or herself in a situation in everyday working life where moral, legal or ethical problems arise. Then the following questions can help you make a decision:

- Is the decision in line with the principles of our company?
- Am I convinced that the decision is legal and does not violate any legal requirements?
- Am I convinced that I am acting morally, legally and ethically right with my decision - in the sense for the company, but also according to my personal standards?
- How would I feel if a newspaper were to report on my decision the next day?

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

2. Principles

2.1 Employees as representatives of our company

We are aware that we are perceived as representatives of the company with our actions and behaviour. With our work and our behaviour 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, carrying its principles into the company and ensuring compliance with it through our behaviour. Managers have an additional responsibility in this regard: they are a role model for their employees, support them in questions and ambiguities regarding compliance with legal requirements and help them to behave ethically at all times.

2.2 Performance security and quality

We are aware that the assurance of quality as well as the safety and reliability of our services are the basis of success - and thus a central corporate principle. We implement improvements that are necessary for this thoroughly and sustainably. In doing so, we always act in compliance with recognised quality management systems. We aim to meet the high quality standards of our customers at all times. This requires the commitment

of every employee. We understand quality as a dynamic process of continuous improvement of all quality-related services.

Every single employee can contribute to the continuous improvement of the quality of our services and to keeping our promises. This applies in particular to those employees who are entrusted with the conception, creation and marketing of the services.

Secondary employment is subject to written approval from the Human Resources Department and may not be in conflict or direct competition with C-P-S Holding GmbH Co KG.

2.3 Compliance with laws and regulations taking into account cultural values

We undertake to observe and comply with applicable laws and regulations. This obligation naturally also applies to applicable guidelines and directives as well as recognised value standards of the cultural circles and countries in which we operate.

2.4 International trade agreements and sanctions

Governments and international organisations may impose temporary restrictions, such as embargoes or economic sanctions, on 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.

2.5 Handling confidential information and the protection of intellectual property

We recognise that intellectual property is a valuable asset and the basis for the success of our business. Therefore, it is important to protect this information. Intellectual property includes brand strategy, brand design, brand management and brand innovation, and details about customers and suppliers, as well as other trade secrets.

Every single employee should contribute to the protection of this information. Confidential information concerning the company must be kept secret. This means that it must not be disclosed to unauthorised persons - this includes family and friends.

Protect files and records from unauthorised access. Passwords must be selected in accordance with security requirements, changed at regular intervals and not passed on to others. Ensure that no third party can access data files when you are not at your workplace. Conduct conversations with confidential content in such a way that unauthorised third parties do not gain knowledge of them. This applies in particular to telephone conversations via telephone loudspeakers and video conferences. Only use confidential information for business purposes.

2.6 Counterfeit parts

We expect our suppliers to develop, implement and maintain effective methods and processes to detect and minimise 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.

3. Conduct towards employees

3.1 Diversity and equal opportunities

As an international company, we represent diversity, tolerance and equal opportunities. Diversity is valuable to us. This is because the diverse background 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 colour, religion, ideology, gender orientation or disability. Cultural, ethnic or national origin as well as political and philosophical convictions must also play no role.

Every single employee can contribute to success by respecting the diversity of the company. A fact-oriented, friendly and fair way of dealing with each other should be just as self-evident as a trusting cooperation.

3.2 Equal treatment and non-discrimination

Respectful and appreciative dealings characterise our interactions. Every person deserves to be treated in an appreciative, respectful and fair manner. Equal opportunities, trust, respect and consideration for others are therefore an integral part of our interaction. We do not tolerate discrimination in any way in our company, which is reflected in all personnel-related decisions. People who apply and employees are treated fairly regardless of their nationality, ethnic origin, gender, pregnancy or parenthood, marital status, age, disability, religion or belief, sexual orientation, etc. All employees have a responsibility to respect and respect the other person. All employees have a responsibility to treat each other fairly and are committed to non-discriminatory behaviour. We also expect this from all our business contacts, our clients and stakeholders.

If discriminatory behaviour is observed, this must be reported immediately to the superior or the person responsible for it.

3.3 Human rights and fair working conditions

We respect human rights and ensure fair working conditions. Respect for human rights is an integral part of our corporate culture. Respecting and protecting them is our top priority. We expect the same from our employees and third parties with whom we do business. We reject any form of exploitation, discrimination and forced labour and advocate compliance with applicable rights. Furthermore, we strictly reject any form of child labour, employment of minors (or persons not entitled to work) and modern slavery. Fair working conditions for our employees are an integral part of our daily work. In addition to the applicable national and local legal standards, these are based on the level of the national economic sectors or industries and regions.

3.4 Occupational health and safety

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 comply with 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 in the workplace.
- Conduct yourself in a prudent manner so that no one is put in danger.

- Act thoughtfully and carefully to avoid situations that could endanger safety. If a hazardous situation cannot be avoided: Ensure that the problem is rectified immediately and colleagues are informed accordingly.
- Report all incidents that endanger safety to your supervisor and the management.

4. Dealing with business contacts and third parties

4.1 Conduct in the business environment

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

4.2 Fair competition and antitrust law

We stand by 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 a central idea of the anti-trust laws that exist worldwide and is therefore obligatory for us.

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

- Coordination and agreements with competitors on prices, conditions, division of markets, customers or territories, capacity or service restrictions.
- Exchanging sensitive information with competitors, such as prices, price changes, margins, discounts and sales.

4.3 Prohibition of corruption

We do not tolerate corruption - no matter what form it takes. The unlawful granting of advantages to third parties - for example to public officials or employees of private companies - is prohibited in the company. The prohibition of corruption applies without restriction, i.e. regardless of to whom, in which part of the world and for what reason such benefits are granted.

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

Experience has shown that questions arise time and again in everyday working life, particularly in connection with gifts or favours. You can find out how to deal with invitations or gifts in this Code of Conduct under the following section.

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

4.4 Dealing with conflicts of interest, gifts and invitations

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

The proper way to deal with potential conflicts is to fully disclose all facts. Also in relation to gifts and invitations, only absolute transparency can protect against harm and the employees concerned. The granting of high-value gifts, monetary gifts and financial benefits to employees and representatives of other companies is also prohibited as a matter of principle. Only in exceptional cases may low-value gifts be granted, provided they are appropriate and no consideration is expected in return. Such gifts should bear the respective brand logo.

In virtually all jurisdictions, gifts and invitations to and for public officials are particularly sensitive and therefore generally prohibited.

As a general rule, do not accept gifts or inappropriate invitations from a business partner. The only exceptions are low-value gifts such as promotional and giveaway items and appropriate gifts of a representative nature. Gifts and invitations addressed to the private address may neither be granted nor accepted.

Gifts and invitations may create the impression that the giver or inviter expects to benefit from them. Even this appearance can damage your own reputation as well as ours.

To protect yourself from this, you should always discuss cases of doubt with your supervisor. Details on how to deal with invitations and gifts and guidance on what is "appropriate" can be found in the Anti-Corruption Policy.

4.5 Care in handling data

We ensure that modern information and communication technology is used appropriately. Personal rights and data of our customers, contractual 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 existing reporting obligations to national supervisory authorities and control bodies.

Our company is represented and active in social media. News is shared and published several times a week on LinkedIn, Xing and Facebook. C-P-S Group thus increases the attention and reach for new potential applicants as well as employees and customers. The company adheres to the guidelines of the EU-DSGVO in every publication.

4.6 Diligence in handling accounting and financial documents

We recognise that diligence in handling financial records is of paramount importance to our business. We therefore adhere to our obligation to ensure compliance with national and international accounting rules. Accounting within the company is carried out externally and internally identically in accordance with International Financial Reporting Standards. Our financial records are the basis for managing the business. They accurately and promptly reflect the course of business and the relevant facts to the stakeholders:

- Make optimal use of standardised processes, ensure compliance with accounting regulations.
- Keep your records carefully and ensure that they are stored in accordance with the law and regulations.
- Work cooperatively with internal and external auditors.

5. Environmental protection and social commitment

5.1 Use of our company resources

We make company resources available to all employees to achieve common goals. Only the efficient use of all resources at all levels can ensure the long-term success of the company. Waste or misuse of company resources - including hours of work - harms our operational and financial performance and affects us all. Every single employee can make a contribution to this.

- Be cost-conscious and consider carefully whether expenses are necessary and proportionate.
- Be careful with company property. Protect it from damage, destruction and theft.
- Limit personal use of IT infrastructure, including email, Internet access, and telephones.
- Use all resources sparingly and make sure that we consistently expand our contribution to environmental and climate protection.

5.2 Environmental responsibility

We comply with the laws and regulations related to environmental protection and energy management in the respective countries/jurisdictions in which we operate. When performing their duties, employees are expected to observe and comply with the Company's guidelines and policies on conservation of natural resources, energy and water use and waste management, while ensuring that suppliers and other business partners comply with environmental protection requirements fulfill. This applies to, among other things

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

5.3 Environmental policy

An environmental policy is an integral part of our company. For this reason, the environmental guidelines are presented to new employees as part of onboarding. All employees are familiar with the environmental guidelines and can view them on the intranet at any time.

5.4 Social commitment

Wir sind uns bewusst, dass wir als internationales Unternehmen eine große gesellschaftliche Verpflichtung haben. Deshalb gewähren wir in angemessener Form Geld- und Sachspenden, die ausschließlich für die Förderung von Projekten im Rahmen der Handlungsfelder Bildung, Familie und Kultur bestimmt sind. Finanzielle Zuwendungen an politische Parteien oder ähnliche Institutionen sowie an Einzelpersonen werden nicht gewährt.

6. Consequences, disclosure and questions

6.1 Consequences of not following the principles

This Code of Conduct combines applicable legal and company regulations. The obligation to comply with the principles listed in the Code of Conduct results either directly from the laws, company regulations, corporate guidelines and guidelines or as a secondary obligation from the employment contract. Deliberate violations of the guidelines lead to consequences within the framework of the applicable provisions.

6.2 Whistleblowing Policy

The Whistleblowing Policy aims to prevent or uncover grievances and misconduct and to provide remedial action when they occur. The most important aspect of the policy is creating a culture in which everyone feels free to report concerns about any aspect of business ethics, human rights, safety and labor standards, environmental protection and illegal or unethical behavior. A good faith report of suspected improper conduct or misconduct within the Company must be possible. We ensure that employees have access to open and respectful communication.

6.3 Grievance mechanism

Any grievances regarding violations of human rights, environmental protection or unethical business practices can be reported by email to verbesseren@c-p-s.de. The mailbox is checked monthly for complaints received, the complainant receives feedback, the complaint or the cause of the complaint is followed up and, if there is a misconduct, remedial action is taken - if desired also by consulting the complainant.

6.4 Preserving identity and protection against retaliation

In the event of doubts about the fulfillment of the above obligations and in order to avoid improper activities, the employee must contact a line manager or, in justified circumstances, the compliance officer(s) responsible for the company .

We pledge to protect any employee who submits a grievance report from threats, harassment or other adverse actions within the company. Those who provide information do not have to fear termination.

6.5 Publication of the Code of Conduct

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

6.6 Do you have any questions?

If you have any questions or comments related to this Code of Conduct and its application, you can contact your manager or the company management at any time.