



Company policy of the Bertrandt Group

Mission Statement and Code of Conduct

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We have laid the foundations. With our Mission Statement, we not only regulate how we interact within the Group, but also define the mutual understanding we have with our customers and shareholders. Engagement and trust are values that we return to and live out each day.

DIETMAR BICHLER, *Chair of the Advisory Board*

STRATEGY: COMPREHENSIVE SOLUTIONS ON SITE

Sustainable, profitable growth and excellent results are the foundations of future-proofing. Our goal is to increase our company's value sustainably and for the duration. We want to secure and extend the market share we have gained. In doing so, we always want to achieve an optimal balance between customer benefit and economic efficiency. We meet our customers' high demands through the extensive competence present in all development departments across the Bertrandt Group and along the entire product development process.

SERVICES: ADDING VALUE

Bertrandt is ready to realign its service provision to the relevant markets and customers in a sustainable, future-proof way.

As one of the leading European development specialists for cars, motorbikes, commercial vehicles, aviation, mechanical and plant engineering, electronics, energy, shipbuilding and medical technology, we have been supporting our customers' product development for over 50 years. In nearly all fields of engineering we can offer services along the entire development process, having extensive procedural experience. We render the best possible services to our customers.

EMPLOYEES: SUCCESSFUL THROUGH TEAMWORK

Our employees are the basis of our success. Our values when interacting with each other are: being a good role model, trust, fairness and appreciation. Both internally and externally. We stand for commitment to our services, our teamwork and networking. We offer the necessary space within our company for every employee to work independently and, with full consciousness of their responsibilities, yield the best possible results.

Everything we do demands respect for people and the environment. Our relationship with our customers is marked by a high level of reliability and strict confidentiality in project work. Trust is a vital building block of lasting customer relationships. An important prerequisite for successful partnerships, alongside the technical services and the extensive knowledge of our employees, is the financial stability and transparency of the company. Bertrandt is a long-term partner to its customers, shareholders and employees. We place value on profitable growth and long-term value enhancement to the benefit of our shareholders and employees.



The Bertrandt Group Code of Conduct

As one of the leading providers of development services in the mobility sector, Bertrandt AG acknowledges in the present code of conduct its responsibility towards customers, shareholders, business partners and the entire workforce within the group.

For over 50 years, we have supported manufacturers and suppliers in the international automotive and aviation industry, mechanical and plant engineering, electronics, shipbuilding, medical technology and energy in the task of product development. Our relationship with our customers is marked by a high level of reliability and strict confidentiality in project work. Trust is a vital building block of lasting customer relationships. An essential prerequisite for successful partnerships, alongside the technical services and extensive knowledge provided by our employees, is the financial stability and transparency of the company.

Our employees are the basis of our success. Openness, trust and mutual appreciation mark our daily collaboration: both internally and externally. Above-average commitment and high levels of personal initiative are par for the course, as is the readiness to gain further knowledge at any time and expand one's personal abilities to the benefit of our customers.

We carry out our business within the framework of the applicable laws and regulations and uphold the professional and ethical standards of our sector. This code of conduct collates and sets out all the existing principles governing the behaviour of all employees at the Bertrandt Group.

The principles apply equally to internal collaboration between all employees of our Group and those of our external partners, and to interactions with these partners themselves.

All Bertrandt employees are enjoined to fulfil the requirements of this code. Superiors also bear responsibility for acting as role models in every relationship, keeping a close eye on the legality of all activity carried out in the name of the Bertrandt Group and promoting our corporate culture with regard to professionalism, ethics and compliance.

COMPLIANCE

Our customers, shareholders and business partners, as well as the broader public, expect Bertrandt to demonstrate professionalism and integrity. For this reason, here at Bertrandt, take it as read that it is our task to make sure that the laws in force, our own codes of conduct and the ethical standards of our sector are upheld. These also expressly include all regulations regarding export control and economic sanctions. We make this demand not only of ourselves, but also of our business partners.

Bertrandt has put in place a Chief Compliance Officer (CCO) who reports directly to the board of Bertrandt AG. The Compliance Department led by the CCO has set up a compliance management system and is developing this further. The compliance management system pursues the strategic goal of preventing misconduct in advance, elucidating reported or suspected infringements of the rules without delay and reacting to them by means of the measures required (prevention, detection, reaction).

From the preventive point of view, a compliance guideline and a range of training offers are important components of the compliance management system. Reports of suspected cases can be made by directly contacting the Compliance Officer by telephone or email, or by using the Group's internal online whistleblower system, which guarantees anonymous reporting. When handling suspected incidents, the Compliance department acts with complete autonomy, meaning that confidentiality is ensured at all times.

Bertrandt will take no reprisals against whistleblowers who, in good conscience, report violations or grievances within the Group.

HUMAN RIGHTS

We respect human rights within the sphere of our influence and expressly commit ourselves to the abolition of all forms of forced labour, child labour and modern slavery. The minimum age for initiating an employment relationship is defined by the standards of the International Labour Organisation and specifications on the prevention of hazardous child labour. Bertrandt is committed to cultural diversity and respects the rights of ethnic and religious communities, indigenous peoples and comparable minorities, promoting a sense of togetherness marked by mutual respect.

In this, our activity respect the following international standards and declarations in particular:

- The ILO Declaration on Fundamental Principles and Rights at Work
- The OECD Guidelines for Multinational Enterprises
- The UN Guiding Principles on Business and Human Rights
- The ten principles of the UN Global Compact

EQUALITY OF OPPORTUNITIES & DIVERSITY

In our company, we develop and foster an integrated culture, understanding diversity as enrichment and enabling all employees to exploit their full potential and make the greatest possible contribution. Bertrandt advocates for equal opportunities and equality, promoting an environment of mutual respect. We commit to decisively confronting every form of discrimination, harassment or unfair disadvantage on the basis of gender, ethnic or social origin, age, skin colour, religion, familial status, sexual orientation, origin, physical or mental disability or any other characteristic that is subject to special protection under applicable legislation. This particularly applies to discrimination against employees. In addition, we commit to ethical recruiting within our applications and recruitment processes. In this, all measures and practices which promote efficiency, transparency and applicant and employee protection, while ensuring suitable recognition of abilities and qualifications, are put in place. We respect the personal dignity, personal rights and private sphere of all employees. Naturally, we also respect women's rights and expressly guarantee the right to equal remuneration, including additional benefits, and to equal treatment

for equal work and in the assessment of work quality. Bertrandt expressly respects the rights of ethnic and religious communities, indigenous peoples and comparable minorities, promoting a sense of togetherness marked by mutual respect. We treat each other with openness and honesty in a manner marked by esteem, respect and responsibility. Within its supply chain too, Bertrandt respects and promotes the rights of women, minorities and disadvantages people, also making a contribution here to diversity, equality and inclusion. To this end, we will draw up suitable agreements with our suppliers and customers.

CORRUPTION AND CONFLICTS OF INTEREST

We do not tolerate any form of corruption, extortion, bribery, the receipt or promise of unfair advantage, and in no way take part in such activities. Through high transparency in our business processes, we do not allow such practices to take root. The company endeavours to recognise any incipient conflicts of interest and counteract them through open communication and clear arguments.

FAIR COMPETITION AND INTELLECTUAL PROPERTY

We comply with national and international competition laws and do not engage in price-fixing or other actions in violation of anti-cartel law. The intellectual property of third parties is to be respected and protected.

REMUNERATION AND WORKING HOURS

We not only ensure our employees are well remunerated, we also guarantee that this remuneration for their work respects the principles of equal treatment across the workforce. We also maintain the legal regulations and sectoral standards regarding working hours, offering flexibility in many areas so that employees can balance their career and family life. Employees also have their statutory rights to claim social benefits (e.g. sick leave).

EMPLOYEES' HEALTH AND SAFETY

With consideration for the underlying legal and social conditions, we work constantly to implement preventive measures in the field of occupational health and safety and take on the obligation to protect all employees during internal Bertrandt collaboration. Occupational health and safety are embedded in our company processes, which support all individual employees towards working actively to promote their own health. They are based on the active participation of every individual.

ENVIRONMENTAL PROTECTION / ECOLOGICAL RESPONSIBILITY

We commit to protecting the environment. To this end, we promote an all-round consciousness of the environment among all employees, suppliers and service providers by involving them, as far as possible, in our activities in this regard. With the intent to develop environmentally friendly and resource-saving technologies, we consider the entire life cycle of our services and products. To avoid burdening the environment and negatively affecting it, we include consideration of local and regional environmental conditions in the planning and implementation of measures. Bertrandt complies with local, national and international environmental standards and laws. Harmful alterations to the soil, woodlands and fields, pollution of bodies of water and the air, the excessive use of water and forced clearances are avoided.

We have a particular desire to handle natural resources such as energy, water, soil and air conscientiously, which means controlling the use of raw

materials, consumables and fuel. For this reason, we monitor the effects of our environmental activities, assessing the efficiency of the measures taken to achieve environmental goals. With the implementation of our environmental management system, we commit to continuous improvement in environmental performance.

As part of our responsible use of chemicals, we reduce, as far as possible, human and environmental exposure to damaging chemicals. Chemicals must only be used sparingly in the necessary quantities. When handling these materials – in their transport, storage, use, recycling or reuse and final disposal – the necessary safety measures must be guaranteed.

DATA PROTECTION / CONFIDENTIALITY / INFORMATION SECURITY

Bertrandt AG is conscious of the diverse demands of corporate and IT security and data protection. We have organised security measures in this regard at a local and cross-Group level. In addition, we respect legal requirements: we integrate all employees, customers and business partners in this. Our fundamental principle is this: security and data protection are the task of every manager and every individual employee. In this, transparency regarding the purpose and effect of data collection and storage is important, as is sensitivity in handling data. Each of our employees thus has to handle data in accordance with the Bertrandt security requirements. We use suitable technological methods to protect the company against risks and threats, e.g. structural elements or IT security measures. Organisational and technical security standards apply to the implementation of these.

A thorough risk and accident management system secures processes initiated in emergencies or during faults, supporting secure operation and, where necessary, resumption of activities.

FREEDOM OF ASSOCIATION / COLLECTIVE BARGAINING

We respect the fundamental right of our employees, as enshrined in the constitution, to freedom of association and collective bargaining.

SAFETY CULTURE

As a development partner for the automotive industry, Bertrandt takes its responsibility for developing safety-relevant vehicle systems seriously.

Keeping every individual who handles or uses products co-developed by us safe and sound is thus a matter of particular concern to us. We achieve success in avoiding unacceptable risks for humans and society through safety-consciousness at all organisational levels. This is supported by individual training measures and optimised processes along the life cycle.

BUSINESS PROCESSES

One of Bertrandt's important tasks, with all employees and business partners, is to align itself with the current and future demands of customers. To this end, we regularly record and assess our corporate environment and internal orientation, meaning that we can react with speed to the changing demands of our customers and other relevant interested parties.

Through systematic process management, we ensure the high quality standards of our services and products. We see it as the voluntary obligation of every individual, within the scope of their activities, to continuously improve the company-wide management system and business processes, thus helping develop the range of services on offer. Here, the activity of every employee is marked both by risk-based and opportunity-focused considerations.

At fixed intervals, we reassess every supplier and customer we have, comparing them using a computer-based process to all relevant sanctions lists. If a hit is detected, we will assess the situation without delay, terminating the business relationship immediately if the results are confirmed.

We integrate all the relevant demands of our business partners within the spheres of quality and environmental management, information security, occupational health and safety and economic improvement. In this way, we create high, long-term customer benefit and support increased customer satisfaction.

We respect the intellectual property of third parties. We protect confidential information and knowledge provided by third parties, only using external knowledge if it is legally permissible or obtainable by us from publicly accessible sources.



We know the risks and potential material and intangible damage that can be caused by plagiarism, both to us and our customers, and commit to producing the results of our work solely through the use of legally compliant products and services.

Our suppliers are under similar obligations, ensuring in this way, as well as through suitable inspections, that no counterfeit components are used in the supply chain to our customers. We are thus rigorous in uncovering any abuses and reporting them to our customers.

Through a targeted information policy and active training and further education, we invest in the competence and motivation of our employees. In this way, all employees at Bertrandt are encouraged to consciously engage in business processes and contribute to our company's success. Our managers act in full cognizance of their status as role models.

We work with integrity and act impartially, maintaining confidentiality, in accordance with best practices and free from internal and external compulsion.

Management of our business processes on the basis of the Bertrandt Management Manual (BMM) takes place through the determination, continuous monitoring and assessment of performance criteria and goals. The performance capability and integrity of the management system and assurance of the planned results of our business processes are achieved through the logical introduction of required measures and subsequent success monitoring.

The company management commits to maintaining the management system, continuously developing and improving it, providing the resources necessary to do so and fulfilling the demands of the law, authorities and applicable standards.

Ehningen, 05.05.2023
The Management Board

DR. ANDREAS FINK

*Member of the Management Board
Engineering*

MICHAEL LÜCKE

*Member of the Management Board
Sales*

MARKUS RUF

*Member of the Management Board
Finance*