

CODE OF ETHICS AND CONDUCT

WE FIRMLY BELIEVE THAT A CULTURE GROUNDED IN RESPECT, HONESTY, AND INTEGRITY IS INDISPENSABLE TO OUR SUCCESS.

At Rimac, our mission is to redefine the possibilities within the technology landscape. Driven by a shared passion for innovation, an insatiable thirst for knowledge, and a commitment to making a positive impact globally, our team is dedicated to pushing the boundaries. In our pursuit of ambitious goals within the dynamic realm of technology, maintaining the highest standards of conduct and ethics is paramount to our success.

Our Code of Ethics and Conduct is a reflection of the fundamental principles that drive Rimac Technology: innovation, collaboration, boldness, humility, adaptability, entrepreneurship, enjoyment, efficiency, and commitment to delivery. These principles serve as the compass guiding our actions, shaping our culture, and defining our identity as a forward-thinking company. They form the bedrock of our achievements, and it is incumbent upon each of us to

to embody these values in every aspect of our work. We firmly believe that a culture grounded in respect, honesty, and integrity is indispensable to our success. By embodying these values in our daily interactions and decisions, we build trust with our customers, partners, and all other stakeholders. This trust serves as the cornerstone for long-lasting and mutually advantageous connections, seamlessly aligning with our commitment to reshape mobility and energy systems through the pursuit of engineering excellence.

Recognizing the dynamic pace of our industry, it's essential for us to prioritize integrity and transparency. Our commitment to ethical conduct should be the guiding force across all aspects of our operations — be it in the development of our products or in our interactions with customers and partners.

I take great pride in being part of a team that truly embodies

these values. I am confident that, collectively, we can achieve remarkable results. Let's wholeheartedly embrace this Code of Ethics and Conduct as our compass, striving consistently to embody the best versions of ourselves.



MATE RIMAC

Rimac Group Chief Executive Officer

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SECTION I: OUR CORE VALUES

AT RIMAC, OUR CORE VALUES ARE THE COMPASS THAT GUIDES OUR ACTIONS AND DEFINES OUR CORPORATE CHARACTER.

These values are the foundation of our culture, directing us toward innovation, excellence, and impactful entrepreneurship. Embodying these values is not just an expectation; it's our commitment to fostering a workplace that thrives on responsibility, creativity, and shared success. In this section, we delve into each core value that shapes our collective journey at Rimac.

WE TAKE CHARGE

At Rimac, taking charge means fostering a proactive mindset. We empower every team member to take ownership of their work, projects, and responsibilities. We embrace challenges, demonstrating leadership at all levels of our organization.

WE DRIVE AND DELIVER EXCELLENCE

Excellence is our benchmark. From conception to execution, we are committed to delivering the highest quality in our

products and services. Our pursuit of excellence fuels continuous improvement to ensure we consistently exceed expectations.

WE ARE INNOVATIVE

Innovation runs deep in our culture. Within an environment that fosters new perspectives, embraces change, and consistently challenges the norm, our commitment to innovation propels us to the forefront of technological advancement. This dedication drives us to redefine industry standards and actively shape the future.

WE ARE HUMBLE YET BOLD

Humility keeps us grounded, while boldness pushes us forward. Acknowledging our achievements with gratitude, we consistently explore opportunities for advancement. Our audacious spirit is evident in our pursuit of ambitious objectives and the courage to challenge conventional norms.

WE ARE IMPACT-DRIVEN ENTREPRENEURS

Entrepreneurship defines our approach. We tackle challenges with an entrepreneurial spirit, seizing opportunities to make a positive impact. Our solutions aren't just products; they are catalysts for transformative change in the industry and the world.

WE HAVE PASSION AND FUN

Passion fuels our work, and we believe in making it enjoyable. With enthusiasm, we tackle tasks, celebrate achievements, and maintain a work atmosphere that seamlessly blends productivity with a spirited sense of fun. Our dedication is driven by passion, ensuring our workplace stays dynamic and creatively charged.

SECTION II: RESPONSIBILITY FOR COMPLIANCE



Rimac Group d.o.o., Rimac Technology d.o.o., Rimac Technology R&D LTD. and all other entities under direct or indirect control of Rimac Group d.o.o. (each entity individually referred to as “we”, “our”, “Rimac” or the “Company”) believes that our core values are the foundation of our success, and all of our directors, officers, employees, contingent workers and all other staff must uphold these same values in their conduct of our business. This includes being truthful in our reporting and communication, both internally and externally.

We are mindful of our impact on the economy, society and environment, and we strive to be sustainable in everything we do. This requires following all relevant rules, regulations, and guidelines we set. It is the personal responsibility of every

employee and anyone else to whom our Code applies, to adhere to the standards and restrictions imposed by these rules, regulations, and guidelines in the performance of their duties for the Company.

Our executives must lead by example and promote our core values, principles, and policies outlined in our Code. They also have a responsibility to prevent and immediately take all necessary actions to stop any non-compliant behavior within our workplace.

Our commitments outlined in this Code are founded on the principles prescribed in various international treaties and documents, including:

- International Bill of Human Rights of the United Nations (UN);
- International Labour Organization’s

(ILO) Declaration on Fundamental Principles and Rights at Work and its Fundamental Conventions,

- UN’s Guiding Principles on Business and Human Rights and
- European Convention for the Protection of Human Rights and Fundamental Freedoms

Our Code outlines the policies and practices that define our culture, our approach in doing business as a firm and our relationship with the community. These policies and practices are divided into three main sections:

- People at Rimac
- Doing Business at Rimac
- Our Relationship with the Community

Our Code serves as a set of binding guidelines. It is supplemented by various internal guidelines, rulebooks, decisions, policies, and other

documents, along with various national and international statutory provisions and conventions with which we comply. We consider operating with integrity and in an ethical manner as everyone's responsibility. If you work for us, our Code applies to you, and we expect you to familiarize yourself with the core values, principles and policies of our Code and adhere to them.

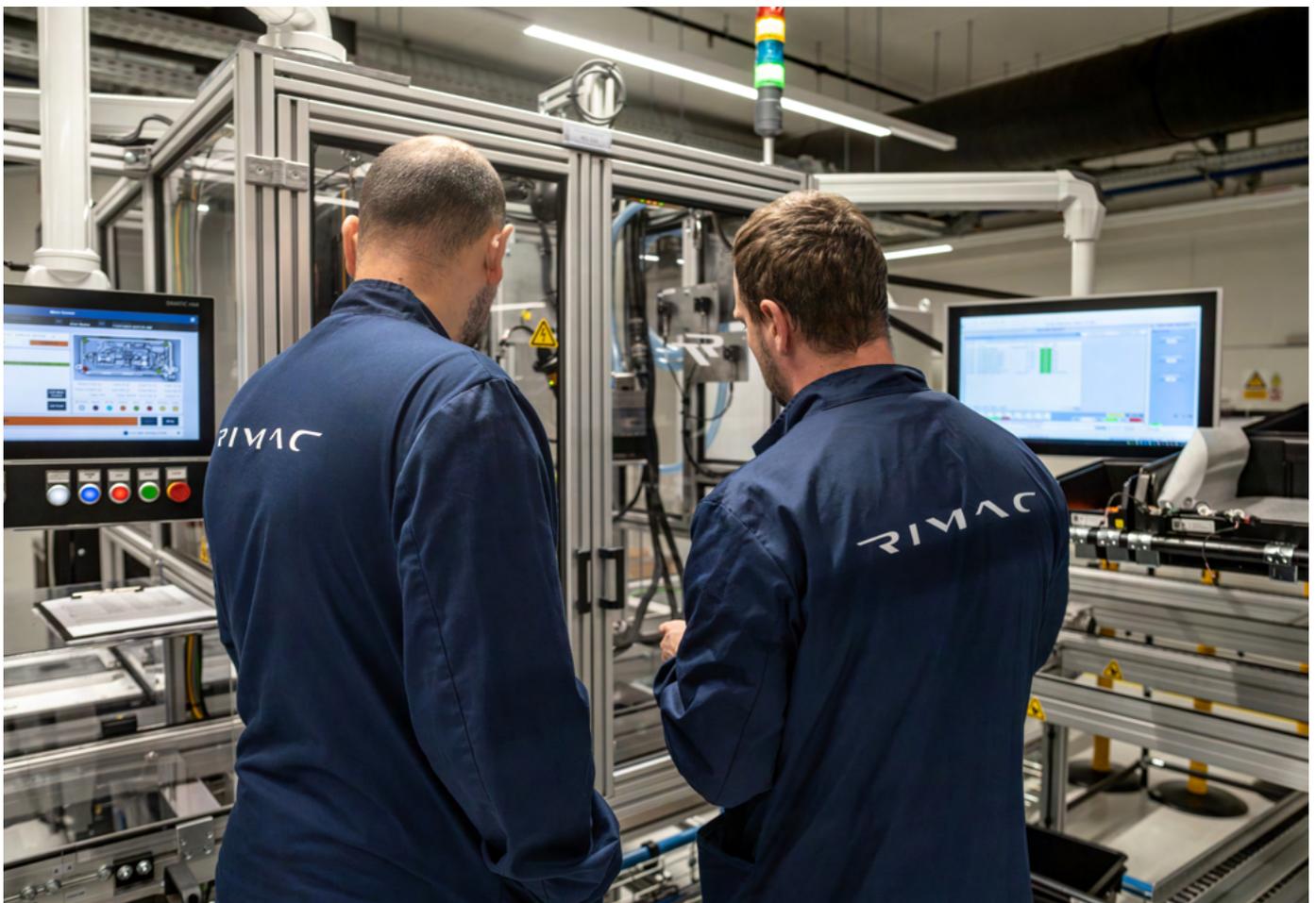
Our Code, in its entirety, specifically applies to all directors, officers, employees, contingent workers and all other

staff (hereinafter, "employees" or "you") of each Company, unless any such entity has separately confirmed in writing its decision not to be bound by our Code and has in place its own separate Code of Conduct and internal policies.

We take any breach of or non-compliance with our Code very seriously. Depending on the nature and severity of the breach or non-compliance with this Code, you may be subject to various actions, up to and including termination of your agreement with us.

Our expectations from business partners (including suppliers, contractors, and all other business partners, as well as their subcontractors) are set out in a separate Business Partner Code of Conduct.

Aside from various internal documents explicitly mentioned in this Code under Internal Resources, you are required to familiarize yourself with all other topic-related policies and other documents related to matters touched upon in this Code. Up-to-date versions of all such documents are always available on the Company's intranet SharePoint.



**SECTION III:
RAISING CONCERNS,
REPORTING ISSUES,
ACCOUNTABILITY
AND ENFORCEMENT**

WE PROMOTE ETHICAL BEHAVIOR AT ALL TIMES.

If you have concerns regarding potential unethical or unlawful behavior or suspect a potential violation of this Code, any other Company policy, law or regulation, you must raise these. In relation to a matter that is covered by specific procedures and rules, you should follow those such specific procedures and rules in raising your concern.

In particular:

- You may safely and on a strictly confidential basis use our whistleblowing system, **Speak Up**, which is designed to receive, among others, disclosures relating to the following matters:
- Bullying/discrimination/sexual harassment and assault
- Bribery/corruption;
- Policy breach/misconduct;
- Conflict of interest;
- Fraud/theft;
- Health/safety/environment;
- Antitrust;
- Money laundering;
- Other serious violations.

- You may safely and on strictly confidential basis refer to a specifically designated person within the Company who is authorized to receive and resolve dignity violation complaints in accordance with the procedure set out in the Employment Rulebook and/or mandatory provisions of applicable legislation.

If you are in any doubt as to the best course of action in a particular situation or have other concerns, you may also choose to talk to your department head/director (or your immediate supervisor if you are the department head/director). We take compliance very seriously and will review all reports and initiate investigations where necessary, regardless of the channel of escalation.

Also, regardless of the manner you decide to speak up, you are protected against any retaliation with respect to raising a concern in good faith. If you believe you have been retaliated against, this is also a breach of this Code so you should report it.

To ensure our employees fully understand our core values, principles and our Code, we provide regular training on our Code and other policies, and we hold our employees accountable for their adherence to our Code, other policies, laws and regulations.

Internal Resources:

- Employment Rulebook, accompanied by decisions on the appointment of the person authorized to receive and resolve complaints related to the protection of the dignity of employees (a separate decision is issued for each company within the group);
- Rulebook on Internal Reporting and Appointment of Facilitator, and our whistleblowing system, **Speak Up**, is accessible via the following links:
 - [Rimac Group d.o.o.](#)
 - [Rimac Technology d.o.](#)

SECTION IV: PEOPLE AT RIMAC

EQUAL OPPORTUNITY AND EQUAL TREATMENT

Equal opportunities and equal treatment are key cornerstones of a fair, unprejudiced and open approach to doing business. We encourage respectful cooperation in a spirit of partnership, diversity and tolerance in order to achieve productivity, creativity and efficiency.

We strive to offer equal opportunities for everyone. We do not discriminate or tolerate discrimination on grounds of race or ethnicity, color, religion, age, gender, national origin, ancestry, political or any other opinion, education, social status, health status, family status, age, property, trade union membership, genetic features, language, sexual orientation, gender identity, disability or any other basis prohibited by applicable laws and regulations. We embrace diversity, actively encourage inclusion and create an environment that fosters each employee's individuality. As a matter of principle, our employees are chosen, hired and supported based on their qualifications and skills.

We support the fundamental human right of women to equality, dignity, and respect. We strive to increase representation of women by creating a safe and inclusive work environment and actively addressing any barriers that may prevent them from realizing their full potential.

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ALWAYS

- Make any employment-related decisions, including recruitment, promotion, training, development or remuneration, based on merit according to skills, qualifications and capabilities;
- Make any person involved in contravention of the principles of equal opportunity and equal treatment aware of their misconduct



NEVER

- Tolerate any inequality based on any characteristics prescribed in our Code or protected by law, whether directed towards you or anyone else.

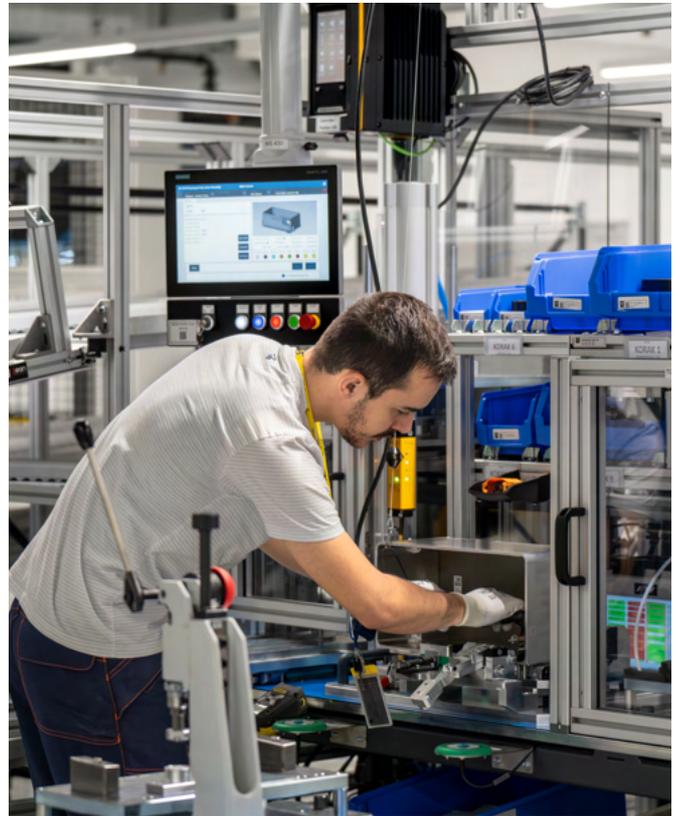
EXAMPLE SCENARIO

What if I am the only non-native speaker in my team, and my colleagues only speak in their native language, not enabling me to get clear work instructions?

- You should talk to your supervisor. It might be that your colleagues were unaware that their actions are contrary to principles of equal treatment. If your supervisor is not able or willing to immediately solve this issue, you should report this.

INTERNAL RESOURCES:

- Employment Rulebook
- Human Rights and Working Conditions Policy



DISCRIMINATION AND HARASSMENT

We prohibit discrimination or harassment of any kind. We are committed to providing a workplace free of discrimination and harassment. Examples of unacceptable conduct include derogatory comments based on a person's protected class, sexual harassment or unwelcome sexual advances. Similarly, offensive or hostile working conditions created by such harassment or discrimination will not be tolerated.

ALWAYS

- Act professionally and treat everyone with the utmost respect;
- Speak up and report if you see, hear or experience disrespectful behavior directed towards you or anyone else;
- Challenge inappropriate, exclusionary or discriminatory behavior, whether it is intentional or not.

NEVER

- Engage in any form of harassment, sexual harassment, bullying, racism (including racial harassment), or discrimination;
- Behave in a way that would be reasonably viewed as offensive, insulting, intimidating, malicious or humiliating, including making comments about someone's personal characteristics;
- Distribute, display or share any material that could reasonably offend including: pornography, racist, homophobic, transphobic, sexist or culturally inappropriate photos, videos, cartoons, social media content or any personal information that does not relate to you.

EXAMPLE SCENARIO

What if an employee of our customer is making inappropriate comments about my physique and making unwanted advances?

- We have zero tolerance for harassment, regardless of whether it comes from our own employees or employees or other personnel of our customers or business partners. If this happens, you should immediately escalate this and file a complaint through appropriate channel.

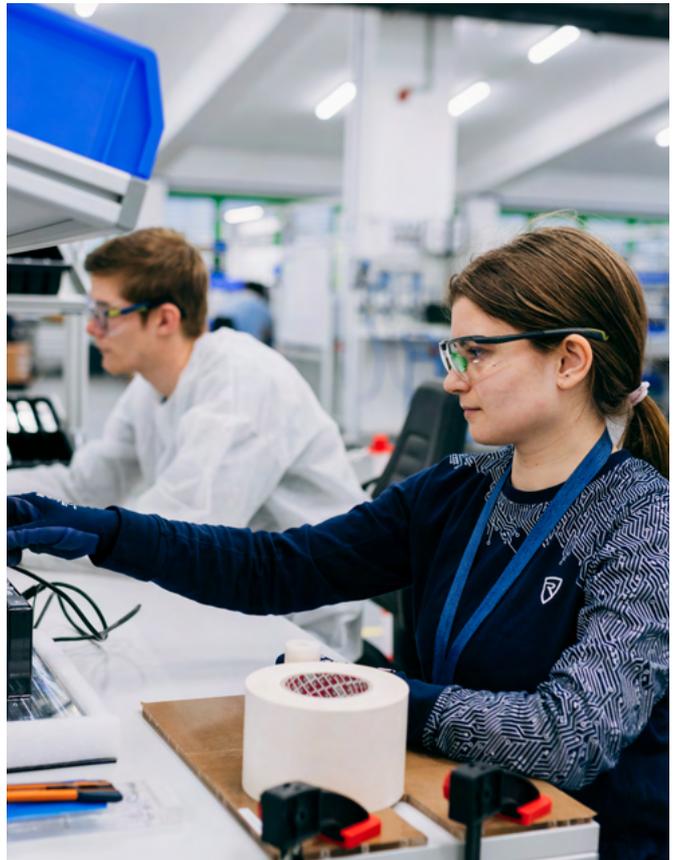
INTERNAL RESOURCES:

- Employment Rulebook
- Human Rights and Working Conditions Policy

DIVERSITY AND INCLUSION

Diversity is essential to our success as a firm: it keeps us at the edge of innovation, helps us assemble and leverage the best talent, and allows us to respond to the needs of our clients while ensuring that our people can achieve their personal and professional potential.

To cultivate a diverse workforce, we must draw on the largest possible pool of potential team members. We seek to attract and retain a diverse network of people from across the globe who bring with them a wide range of backgrounds, cultures, perspectives, and experiences. By doing so, we respect the principles of ethical recruiting. We empower people to bring their authentic selves to work by maintaining an inclusive environment that welcomes diverse perspectives and encourages collaboration so that we can excel together.



ALWAYS

- Encourage and value diversity in the workplace by embracing and promoting diverse backgrounds, cultures, perspectives and experiences;
- Foster an inclusive environment that welcomes diverse perspectives and encourages collaboration.

NEVER

- Exclude or marginalize individuals from the workplace based on their diversity.

INTERNAL RESOURCES:

- Employment Rulebook
- Human Rights and Working Conditions Policy

PERSONAL CONDUCT, COMMUNICATION, AND SOCIAL MEDIA

You should take care when presenting yourself in public settings, as well as online and in web-based forums or networking sites. You are encouraged to conduct yourself in a responsible, respectful and honest manner at all times. We understand that you may wish to create and maintain a personal presence online using various forms of social media. However, in expressing your views on sensitive topics related to public interest, business, politics, or other social matters, you should include a disclaimer that the views expressed therein are your own and do not necessarily reflect the views of the Company. You should be aware that even after a posting is deleted, certain technology may still make that content available to readers so you have to be cautious and think twice before pressing "post".

You should use only internally approved channels of communication, both for internal and external communication. In external communications,

including communication with customers and business partners, you should use your official e-mail address and cell phone number. Usage of personal e-mail addresses for business purposes is strictly forbidden and may be considered as a conflict of interest. Regardless of the means of communication, you should be clear, concise, friendly, professional, and responsive. As a Company with no tolerance for any form of discrimination, this must be reflected in our language choices, so you should use gender-inclusive language.

Other than for explicitly permitted business purposes, you are prohibited from using and/or disclosing our confidential, proprietary, sensitive, or trade secret information, any confidential information of our contractors, business partners, or any other third parties with which we do business. Harassment or mockery of our

employees, contractors, and business partners through social media will also not be tolerated. You may not provide any content to our social media sites that may be construed as political lobbying or solicitation of contributions or use the sites to link to any sites sponsored by or endorsing political candidates or parties, or to discuss political campaigns, political issues or positions on any legislation or law.

EXAMPLE SCENARIO

Am I allowed to post funny memes and GIFs through the Company's channels?

- We encourage our employees to create a comfortable and friendly work environment. Sometimes, all we need is a good laugh, so good jokes and punch lines are always welcome. Nevertheless, discrimination, harassment, or mockery is not tolerated (and is not funny), so you must refrain from inappropriate jokes. If you have even the slightest second thought about a joke you want others to hear, it probably means the joke is inappropriate.

What are some examples of gender-inclusive language?

- Instead of "Hi guys" or "Dear sirs", you should just say "dear all" or "Hello everyone". Replace the gendered words - instead of saying "a person should perform his/her work duties", opt for "a person should perform their work duties".

SECTION V: DOING BUSINESS AT RIMAC

DISCLOSURES

The information in our public communications, including in all communications, reports and documents filed with or submitted to any relevant authorities, must be full, fair, accurate, clear and timely.

To ensure we meet this standard, you (to the extent you are involved in our disclosure process) are required to maintain familiarity with the disclosure requirements, processes and procedures applicable to the Company commensurate with your duties. You are prohibited from knowingly misrepresenting, omitting or causing others to misrepresent or omit, material facts about the Company to others, including our independent auditors, governmental regulators and self-regulatory organizations.

ALWAYS

- Ensure all public communications are full, fair, accurate, timely and easy to understand;
- Commensurate with your duties, stay up to date with the disclosure requirements and processes applicable to the Company.

NEVER

- Provide false information in any public reports or documents or in any documents filed with relevant authorities;
- Allow others to misrepresent or omit material facts about the Company in public communications.

INTERNAL RESOURCES:

- Employment Rulebook

CONFLICTS OF INTEREST

A conflict of interest occurs when your private interests interfere, or appear to interfere, with the interests of the Company as a whole. For example, a conflict of interest can arise when you take actions or have personal interests that may make it difficult to perform your Company duties objectively and effectively. A conflict of interest may also arise when you, or a member of your immediate family, receives improper personal

benefits as a result of your position at the Company. This could include, but is not limited to, receiving gifts, any sort of hospitality or invitations from individuals or organizations with whom we have a business relationship. Furthermore, a conflict of interest may also arise if you take on outside activities or employment from any source other than the Company or our subsidiaries and affiliates, which may influence your performance and objectivity.

Conflicts of interest can also occur indirectly. For example, a conflict of interest may arise if you are also an executive officer, a major shareholder or you have a material interest in a company or organization doing business with the Company or that is our competitor. Indirect conflicts of interest could also arise if you develop personal or business relationships with our business partners or competitors that affect your performance and impartiality. Finally, conflicts of interest may also arise if you are in a direct or indirect reporting relationship with a family member (either immediate or extended), member of your household, or any other person with whom you are having another type of personal relationship (e.g. romantic relationship).

Each person to whom our Code applies has an obligation to conduct business in an honest and ethical manner, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships. Any situation that involves, or may reasonably be expected to involve, a conflict of interest with the Company, should be disclosed promptly to the Head of HR, and to the extent there is a procedure specifically prescribed by applicable law for certain situations, such procedure will be followed.

Please note that our Code does not attempt to describe all possible conflicts of interest that could occur.

ALWAYS

- Act and conduct business in an honest and ethical manner.

NEVER

- Engage in any conduct or activities that are inconsistent with the Company's best interests or that disrupt or impair our relationship, or may appear to disrupt or impair our relationship, with any person or entity with which we have a business or contractual relationship;
- Accept compensation, in any form, for services performed for us from any source other than the Company, our subsidiaries or affiliates;
- Take up any management or other employment position with, or have any material interest in, any firm or company that is in direct or indirect competition with the Company or our subsidiaries or affiliates.

EXAMPLE SCENARIO

Am I allowed to engage in a romantic relationship with a coworker?

- The Company does not have a dating policy, so your romantic relationship can remain private. Nevertheless, if there is a possibility that such relationship may cause a conflict of interest, you must disclose this information to the Head of HR.

PROHIBITION AGAINST BRIBERY AND CORRUPTION

Bribery and corruption are strictly prohibited, in any form or circumstance, anywhere in the world. We are committed to complying with – and expect you to comply with – all applicable anticorruption laws, including Croatia's Criminal Code and Conflict of Interest Prevention Code.

In particular, we do not tolerate any payment or receipt of bribes (whether they be cash, gifts, travel, entertainment, branded merchandise, job or internship offers, or any other benefits) or any other action or omission intended to obtain any improper advantage for our business, whether it be securing a contract, avoiding fines or penalties, obtaining a government license, gaining access to competitor information or otherwise. This applies to both direct and indirect actions (e.g., bribes through or via third parties, such as agents, consultants or others acting on our behalf) and conduct involving both government officials and private actors. For the avoidance of doubt, we also prohibit facilitation payments (i.e., payments (in cash or in kind) to a [typically low-level] government official to expedite or ensure the performance of a routine, non-discretionary administrative action).

You should refer to our Anti-Corruption and Bribery Policy and Gifts and Entertainment Policy for additional guidance that we have implemented to mitigate corruption risks related to our business, including guidance regarding gifts, meals, travel and hospitality expectations, controls with respect to third party relationships and guidelines with respect to charitable and political donations, hiring current and former government officials and anti-corruption in the merger and acquisition or joint venture context.



We take compliance with these obligations very seriously and expect you to report any violation or suspected violation of anticorruption laws or the Anti-Corruption and Bribery Policy immediately pursuant to the channels of escalation set out in Section III of this Code.

ALWAYS

- Report any red flags related to bribery or corruption to the appropriate person in accordance with channels of escalation set out in Section III of this Code;

- Refrain from accepting or making bribes or facilitation payments, regardless of their type or form.

NEVER

- Engage in or condone bribery or corruption, either directly or indirectly;
- Make payments or accept benefits with the intention of gaining any improper advantage;
- Fail to report a suspected violation of anti-corruption laws or the Anti-Corruption and Bribery Policy.

EXAMPLE SCENARIO

What if a client gives me a wristwatch as a gift for the successful completion of a project. Should I keep it?

- No, the receipt of lavish or luxurious gifts is strictly forbidden. You should respectfully decline the gift and return it to the client. Also, you should familiarize yourself with our Gifts and Entertainment Policy and take all necessary actions set forth in such policy.

What if our customer wants to buy me a plane ticket for a business meeting that is supposed to happen at the supplier's headquarters. Is this acceptable?

- It depends. If our business relationship with this supplier envisaged that the supplier should bear such costs, this is probably fine, but you should nevertheless seek approval(s) in accordance with our Gifts and Entertainment Policy.

INTERNAL RESOURCES:

- Anti-Corruption and Bribery Policy;
- Gifts and Entertainment Policy.

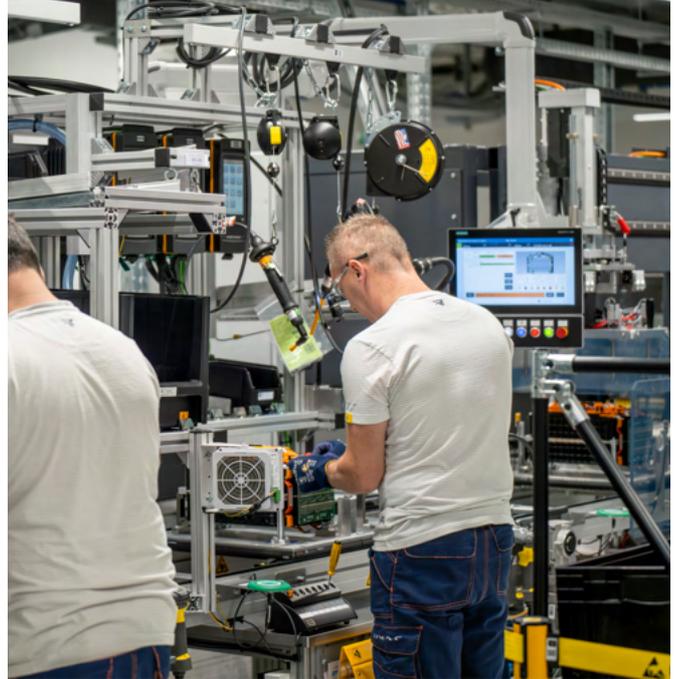
CORPORATE OPPORTUNITIES

You owe a duty to the Company to advance the legitimate interests of the Company when the opportunity to do so arises. Unless with the express prior written consent of the Management Board, you are prohibited from directly or indirectly: (a) taking personally for yourself opportunities that are discovered through the use of our property, information or positions; (b) using our property, information or positions for personal gain; or (c) competing with the Company for any business opportunity.



PROTECTION AND PROPER USE OF COMPANY ASSETS

You should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability. All of our assets should be used only for legitimate business purposes. Your obligation to protect Company assets includes our proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports.



ANTITRUST LAWS AND REGULATION



The purpose of antitrust laws is to preserve fair and open competition and a free market economy, which are goals that we fully support. You must not directly or indirectly enter into any formal or informal agreement with competitors that fixes or controls prices, divides or allocates markets, limits the production or sale of products, boycotts certain suppliers or customers, eliminates competition or otherwise unreasonably restrains trade.

WAIVERS

Before you engage in any activity that would be otherwise prohibited by our Code, you are strongly encouraged to obtain a prior written waiver from the Management Board or other appropriate officer or body.

Before a director or executive officer engages in any activity that would be otherwise prohibited by our Code, one must obtain a prior written waiver from the Supervisory Board of the Company or other appropriate officer or body. Such waiver must then be disclosed to our shareholders, along with the reasons for granting the waiver.



ACCURACY OF BUSINESS RECORDS

We firmly adhere to all relevant laws requiring accurate financial accounting and reporting. Our financial reports are timely prepared in accordance with national and international accounting standards. No entry may be made that intentionally hides or disguises the true nature of any transaction. You should therefore attempt to be as clear, concise, truthful and accurate as possible when recording any information.



COUNTERFEIT PARTS AND MATERIALS

Counterfeit parts and materials refer to parts, components, or materials that are represented as original but are in fact imitation or fake. Using or selling counterfeit parts or materials is strictly prohibited by our Company and can cause serious harm to our customers, damage our reputation and be in violation of applicable law. You must be vigilant and report any suspected counterfeit parts or materials to your immediate supervisor.

Additionally, all purchases of parts must be made from reputable and authorized suppliers. As we are open and transparent with our suppliers, we expect them to uphold to the same standards and to strictly prohibit using or selling counterfeit parts or materials.

Any supplier who provides counterfeit parts or materials will be immediately removed from our approved list of suppliers. Our commitment to providing only high-quality and genuine products to our customers is of utmost importance.

EXAMPLE SCENARIO

How can I recognize a counterfeit product?

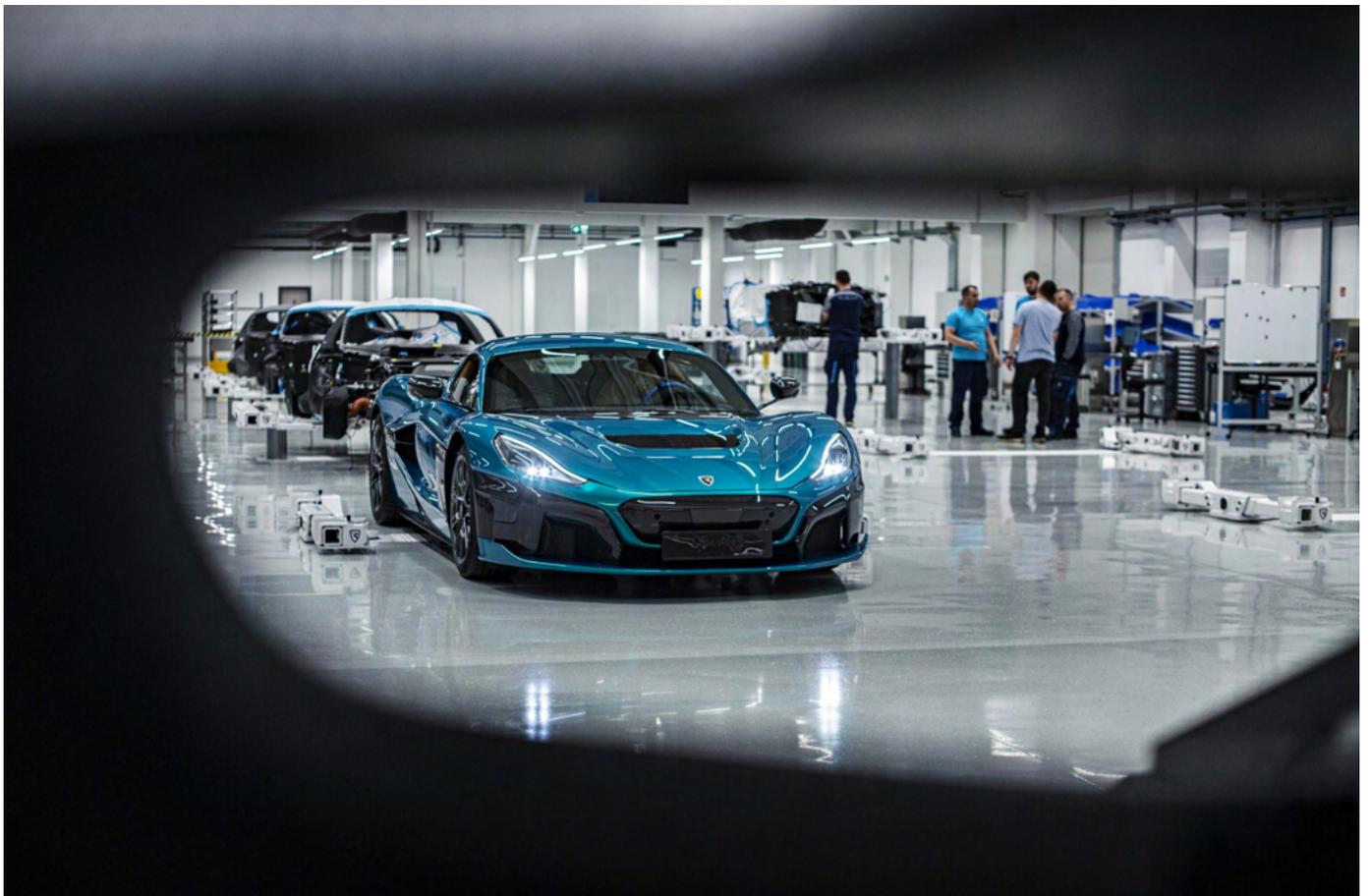
Although sometimes it can be very difficult to spot a counterfeit product, there are some visual signs to look out for:

- discrepancies in sizing;
- misspelling on the labels;
- unusual LOT numbers;
- dates in the future etc.

TAXES AND CUSTOMS

Our worldwide business dealings and expansion into new markets require adherence to various trade, tax and customs regulations. Abiding by such regulations instills confidence in customers, government entities and the public. Failure to comply could cause us significant financial and reputational harm, as well as negatively impact the employees who are responsible.

We acknowledge our obligation to comply with trade, tax and customs regulations and fully support following all applicable national and international laws.



PRODUCT CONFORMITY AND PRODUCT SAFETY

Our products and services are widely used, and we take our responsibility to prevent any potential risks, harm or damage to our customers or the environment seriously. Ensuring compliance with all relevant laws and regulations, as well as our own internal standards, is both a legal obligation and a fundamental part of our mission.



PROCUREMENT



In our business operations, we have numerous contractual obligations to a variety of suppliers and service providers. Our selection process of these partners is thorough and based on objective criteria. When procuring goods and services, the appropriate procurement departments are involved, following the established procurement guidelines.

OCCUPATIONAL SAFETY AND HEALTHCARE

We adhere to applicable laws and regulations and our own Health and Safety Policy to provide a safe work environment. We strive to improve the workplace and offer preventive healthcare and health promotion programs to maintain the health, productivity and satisfaction of our employees.

INTERNAL RESOURCES:

- Health and Safety Policy;
- Health and Safety Manual
- Health and Safety Rulebook;
- Fire protection Rulebook;
- Chemical management procedure;
- Risk Assessment

IT SECURITY

We prioritize information technology (IT) and electronic data processing (EDP) security, fully aware of the risks that technology integration poses in our daily operations. Such risks encompass, but are not limited to, disruptions from malware, data loss due to software malfunctions, and breaches from unauthorized data access. Complying with pertinent regulations, we are committed to actively safeguarding our IT and EDP systems through robust security protocols, regular audits, and continuous improvement of our cybersecurity measures.

INTERNAL RESOURCES:

- Information Security Policy;



SECURITY AND PROTECTION OF INFORMATION, KNOW-HOW AND INTELLECTUAL PROPERTY

Our intellectual property, including patented technology, trade secrets and other confidential information, is crucial to our success and we take the protection of our intellectual property seriously. Any unauthorized use, sharing or distribution of our intellectual property and confidential information could cause severe financial and reputational harm to the Company and may lead to legal consequences for the respective employee.



ALWAYS

- Limit access to confidential information to only those who need it for business purposes and have proper authorization to access such information;
- Properly dispose of confidential information when no longer needed.

NEVER

- Share confidential information with unauthorized individuals, including friends, family or personal contacts;
- Use confidential information for personal gain or for the benefit of others;
- Remove confidential information from the Company without proper authorization.

EXAMPLE SCENARIO

What if I think I might have a new invention, but I'm not sure if I'll just embarrass myself if I say it to someone?

Never underestimate your work and creativity. Whenever you think you might be onto something, you should submit your idea through the template available on the Company's intranet. Once a submission is made, our IP department will contact you, and they will instruct you on the next steps. Before they do so, refrain from discussing your idea with a larger audience (especially outside the Company), because any public disclosure might impact its patentability.

INTERNAL RESOURCES:

- Bylaws on Inventions

CONFIDENTIALITY

In carrying out our business, you may learn confidential or proprietary information about us, our customers, distributors, suppliers or joint venture partners. Confidential or proprietary information includes all non-public information relating to us as a whole, or other companies, that would be harmful to the relevant company or useful or helpful to competitors if disclosed, including financial results or prospects, information provided by a third party, trade secrets, new product or marketing plans, research and development ideas, manufacturing processes, potential acquisitions or investments or information of use to competitors or harmful to us or our customers if disclosed.

You must maintain the confidentiality of all information so entrusted to you, except when disclosure is authorized or legally mandated.

You must safeguard confidential information by keeping it secure, limiting access to only those who have a need to know in order to do their job, and avoiding discussion of confidential information in public areas such as planes, elevators, and restaurants. This prohibition includes, but is not limited to, enquiries made by the press, analysts, investors, or others. You also may not use such information for personal gain. These confidentiality obligations continue even after employment with us ends.

ALWAYS

- Keep confidential information secure and limit access to those who have a need to know;
- Avoid discussing confidential information in public areas.

NEVER

- Disclose confidential information without authorization;
- Neglect to safeguard confidential information;
- Use confidential information for personal gain.

PRIVACY AND DATA PROTECTION

The protection of personal data is of the utmost importance, and we adhere to strict data protection and privacy laws when handling personal data, including but not limited to EU General Data Protection Regulation. Generally speaking, any collection, storage, use or other processing of personal data must be done with the consent of the individual or be based on a contractual agreement or some other legal ground.

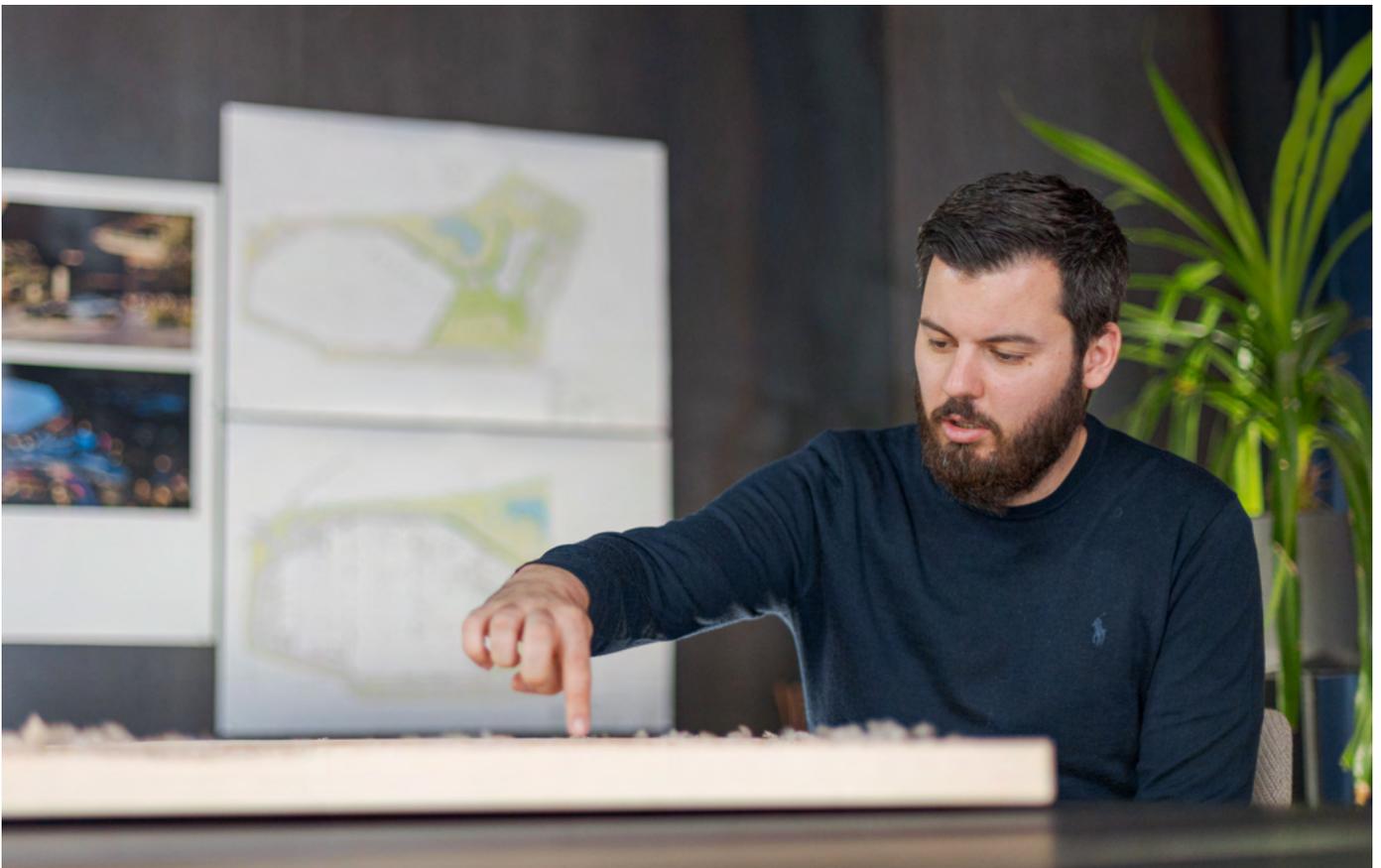
We take this responsibility seriously and protect the personal data of employees, former employees, customers, suppliers and any other individuals whose personal data we possess.

INTERNAL RESOURCES:

- Bylaws on Inventions
- Employee Data Protection Policy

FAIR DEALING

You should endeavor to deal fairly with our customers, service providers, suppliers, competitors and employees. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any unfair dealing practice. Inappropriate use of proprietary information, misusing trade secret information that was obtained without the owner's consent or inducing such disclosures by past or present employees of other companies is also prohibited.



EXPORT CONTROLS AND ECONOMIC SANCTIONS

Export controls regulate the cross-border transfer of goods and can include restrictions, approvals from authorities, monitoring measures or other requirements. This applies not only to physical goods, but also to technologies and software. Export controls can also encompass temporary cross-border transfers, such as bringing objects or technical drawings on a business trip or sending technical information via email or cloud. Additionally, conducting business with individuals or companies listed on sanctions lists is strictly forbidden, regardless of the method of delivery.

ALWAYS:

- Check the individuals or companies you are conducting business with against sanctions lists prior to engaging in any trade or financial transactions with them;
- When required to do so, obtain all necessary approvals and licenses before engaging in cross-border transfer of goods, technologies or software;
- Report any suspicious or unusual activities that may raise concerns about sanctions immediately.

NEVER

- Conduct business with individuals or companies listed on sanctions lists.

We adhere to all regulations regarding the import and export of goods, services and information. Furthermore, we are committed to adhering with all applicable government sanctions related to economic and trade activities, including sanctions from the United States, the United Kingdom, the European Union and its Member States. Provision of financial services to certain individuals, groups, or governments may be restricted under these sanctions. If you encounter any situation that raises concerns about sanctions, you should report it immediately pursuant to the channels of escalation set out in Section III of this Code.



PROHIBITION OF MONEY LAUNDERING AND TERRORISM FINANCING

Laws against money laundering and financing terrorism are prevalent globally. Money laundering involves disguising the illegal origin of funds by integrating them into the legitimate financial system. Terrorism financing is the provision of money or resources to carry out terrorist acts or support terrorist organizations. It is important to note that ignorance of the money laundering activity is not a defense, and even accidental involvement can result in severe consequences for those involved.

In case of any concerns or questions, you are encouraged to report this pursuant to the channels of escalation set out in Section III of this Code.

ALWAYS

- Follow “know-your-customer” standards in all transactions;
- Report any unusual behavior or activities that may indicate money laundering or terrorism financing;
- Reach out to Legal or Compliance department of your Company if you have any questions.

NEVER

- Participate in or turn a blind eye to any activity related to money laundering or terrorism financing;
- Use your position or access to confidential information for personal gain or to facilitate illegal activities;
- Ignore or fail to report suspicious activities, even if you believe they may be minor or insignificant.

Compliance with anti-money laundering laws and regulations is of the utmost importance, and such laws and regulations must be strictly followed.

To meet these obligations, we must follow the “know-your-customer” standards and be vigilant for and immediately report, any unusual behavior that may indicate money laundering, terrorist financing, or any activity that is illegal or lacks a legitimate business purpose.

SECTION VI: OUR RELATIONSHIP WITH THE COMMUNITY

HUMAN RIGHTS AND CHILDREN'S RIGHTS

We uphold human rights and children's rights as a cornerstone of our operations.. We strictly prohibit any form of illegal child labor, forced labor, modern slavery or human trafficking, both internally and in our dealings with third parties.

INTERNAL RESOURCES:

- Human Rights and Working Conditions Policy



ENVIRONMENTAL PROTECTION AND SUSTAINABILITY



We are committed to managing and operating our assets in a manner that is protective of human health and safety and the environment. It is our policy to comply with all applicable health, safety and environmental laws and regulations.. You are encouraged to report conditions that you perceive to be unsafe, unhealthy or hazardous to the environment, as outlined in the Environmental Policy and otherwise report any non-compliance with applicable health, safety and environmental laws and regulations.

INTERNAL RESOURCES:

- Environmental Management System Manual;
- Environmental Policy;

POLITICAL CONTRIBUTIONS AND DEALINGS WITH OFFICIALS AND HOLDERS OF POLITICAL OFFICE

You may participate in the political process as an individual on your own time. However, you must also make every effort to ensure that you do not create the impression that you speak or act on behalf of the Company with respect to political matters. We do not make contributions to any political candidate or party or to any other organization that might use those contributions for a political candidate or party. You will not receive any reimbursement from corporate funds for a personal political contribution.

You must familiarize yourself and strictly follow all laws, regulations and internal guidelines regarding interactions with public officials, politicians, government entities and other similar organizations to avoid any conflicts of interest and corruption. Any violation of these rules could result in severe consequences for the Company and potentially result in being banned from receiving public contracts.

ALWAYS

- Ensure that any individual political activities do not create an impression of speaking or acting on behalf of the Company;
- Follow all laws and regulations regarding interactions with public officials and government entities.

NEVER

- Contribute to political candidates or parties from corporate funds;
- Receive reimbursement from corporate funds for personal political contributions.

INTERNAL RESOURCES:

- Anti-Corruption and Bribery Policy.



CHARITABLE CONTRIBUTIONS

We are dedicated to contributing to the growth and well-being of the communities we serve, through charitable donations, volunteer work, partnerships with non-profit organizations and other community events. However, any charitable giving must not be used as a means of inappropriately influencing the decision-making of anyone, including public officials, clients or potential clients.

INTERNAL RESOURCES:

- Anti-Corruption and Bribery Policy.



PERSONAL INVESTMENTS



Conditions under which you may acquire, either directly or indirectly, shares in any business entity that does or seeks to do business with or is in competition with the Company will be provided for in a separate Management Board decision.

Our Code is a statement of certain fundamental principles, policies, and procedures that govern your conduct of our business. Thank you for taking the time to read and act upon our Code.