

Code of Conduct

1. Objective

Description of the DATA MODUL Code of Conduct

2. Definition

Code of Conduct, which contains guidelines on how employees should behave in a legally correct, ethical and socially responsible manner

3. Scope

All employees of the DATA MODUL group

4. Responsibility

Management Board

5. Description

INTRODUCTION FROM THE MANAGEMENT BOARD OF DATA MODUL AG

Our company's reputation has grown continuously since it has been founded in 1972. Our customers, suppliers and business partners base the trust they place in us on a reliable partnership developed over many years and the strength of a company which evolves dynamically and always seeks to improve itself. Our consistent strategic orientation is expressed in our corporate vision: "We simplify life in a connected world".

To allow this corporate vision to become reality, we regularly define new specific aims and implement them in a sustainable way. The teamwork within the company and our working relationships with customers, suppliers and business partners are based here on our set of values. The key components of the corporate philosophy of the DATA MODUL Group are based on the values "success, professionalism, innovation, passion and team spirit". Those values should not exist only on paper. They shall be lived up to. In everybody's daily work, energetically and motivated.

This set of values is an expression of the mature, unique corporate culture at DATA MODUL: "Professionalism and cooperation between people" are mutually dependent and shape the specific conduct of every single person who works in the DATA MODUL Group. Our values give rise to basic rules of conduct which we have defined in this Code of Conduct. They are globally binding upon all employees within the DATA MODUL Group.

The Code of Conduct reflects our own wish to meet our company's responsibility to the shareholders and the society and to constantly live up to the expectations of our customers, suppliers and business partners by conducting ourselves in an exemplary manner every single day.

Munich, May 2023

Management Board

1 OBJECTIVE

- › The prerequisite for doing business successfully based on our values is to comply with all voluntary measures, supervisory measures and measures prescribed by law
- › This Code of Conduct summarizes the basic rules which apply in the DATA MODUL Group concerning how to behave towards one another ethically and in accordance with the law, and also in relation to business partners, authorities and other third parties.

2 AREA OF APPLICABILITY

- › This Code of Conduct applies to all organizational units and companies in which DATA MODUL Aktiengesellschaft Produktion und Vertrieb von elektronischen Systemen (DATA MODUL AG) directly or indirectly holds shares of more than 50 % (DATA MODUL Group).
- › The Code of Conduct is binding on all employees in the DATA MODUL Group (DATA MODUL employees).
- › In the case of minority shareholdings and memberships in organizations, those DATA MODUL employees who represent the DATA MODUL Group on the respective decision-making bodies are obliged to do everything they possibly can to work toward ensuring that the basic rules laid down in this Code of Conduct are complied with.
- › In addition, DATA MODUL Group expects from their business partners to make reasonable efforts to promote compliance with this Code of Conduct and to comply with its provisions for their part.
- › This Code of Conduct sets out company internal procedures and does not imply any third-party rights.

3 CONDUCT IN CONNECTION WITH BUSINESS ACTIVITIES

3.1 COMPLYING WITH LAWS AND REGULATIONS

- › All business matters at the DATA MODUL Group must be conducted and all business processes must be designed in such a way that they comply with all applicable laws and official orders, voluntary undertakings and other regulations (subsequently referred to as “regulations”).
- › Every DATA MODUL employee is obliged to comply with the regulations. Instructions which deviate from these regulations and lead to a breach of the basic rules described here in carrying out business activity are prohibited.
- › Any breach of mandatory statutory provisions such as competition law but also of other provisions, may lead to incalculable financial loss for the company and damage to its reputation. At the same time, this may result in claims for damages against the company, the management, those in positions of responsibility and employees who are directly involved. In addition, this may also constitute disorderly or punishable conduct which may result in the relevant authorities launching a preliminary investigation.
- › In order to avoid any risks, legal advice should be sought in cases of doubt before a measure is taken which may result in a breach of the applicable law or other regulations.

3.2 PRODUCT SAFETY

- › DATA MODUL employees comply with all applicable legal product safety regulations and requirements, particularly legal requirements pertaining to the safety, labeling, and packaging of products as well as the use of dangerous substances and materials.

3.3 FAIR COMPETITION

- › The sale and distribution of our products and the procurement of material and services are subject to national and international provisions, including those of competition law.
- › If all participants in the market comply with the competition rules, this ensures equal opportunities on the market for all and is therefore essential. We expect our competitors, customers and suppliers to comply with the competition rules. They can expect the same from the DATA MODUL Group and this is also expected from all DATA MODUL employees.
- › There is therefore a ban in particular on the following:
 - › Conversations with competitors during which prices or capacities are discussed.
 - › Discussions with competitors about renouncing competition, about submitting false quotations for tenders or about the allocation of customers, areas or production programs.
 - › This also applies to informal conversations, informal discussions or types of behavior which aim to achieve or bring about one of the restraints of competition referred to above.

3.4 OFFERING AND GRANTING BENEFITS

- › Disproportionate gifts, favors, hospitality or other benefits offered by employees of the DATA MODUL Group to third parties with the aim of obtaining orders or inequitable benefits for DATA MODUL or other people are not permitted.
- › Courtesy gifts which to a certain extent are in line with the general standard practices of business are to be treated in accordance with the respective national law which applies.
- › No employee may use their position or role within the company to demand, accept or obtain personal benefits.
- › Occasional gifts of low value may be accepted. Gifts which extend beyond this and other benefits which are offered to an employee and people close to the employee should always be declined.

3.5 FOREIGN TRADE, EXPORT CHECKS AND TERRORISM CHECKS

- › All national, multinational and other foreign trade provisions must be complied with. These include customs regulations as well as commercial and production checks. All DATA MODUL employees are obliged to comply with the statutory provisions.
- › The way that transfer prices are set corresponds to the internationally recognized principles, namely being in line with the arm's length principle.
- › Potential tax evasion by business partners is prohibited.

4 CONDUCT WITH RESPECT TO THE COMPANY

4.1 CORRECT REPORTING

- › All records and reports such as accounting documents, business reports, audit reports and the like which are prepared internally or are outsourced must be correct and truthful. Any recording of data and other records must always be complete, correct, on time, and meet the system requirements.

4.2 DATA PROTECTION

- › Personal data may only be collected, processed or used within the DATA MODUL Group to the extent that this is necessary for clear and legitimate purposes. This shall also apply to the exchange of data between different organizational units and companies in the DATA MODUL Group.
- › When it comes to the quality of the data and technical safe-guards to prevent unauthorized access, a high standard needs to be ensured.
- › The use of data needs to be transparent for those affected, and their rights to receive information and be notified and if necessary their rights to oppose, block and delete data must be safeguarded.
- › The relevant national statutory rules must be complied with.

4.3 CONFIDENTIALITY

- › All information that has not been made public must be kept secret and may not be revealed to unauthorized third parties either while an employee is employed by the company or after their contract of employment comes to an end. This shall not apply if prior written consent has been provided by an authorized representative of DATA MODUL or disclosure is required by a statutory obligation, for example the obligation to testify as a witness in court proceedings. In this case, the relevant authority (senior manager) must where possible be notified in advance about such disclosure.
- › The direct or indirect use of confidential business information during and after the termination of an employee's contract of employment for personal benefit, for the benefit of third parties or to the detriment of the DATA MODUL Group is prohibited.
- › Employees of the DATA MODUL Group who possess concrete information on circumstances or facts not in the public domain, that, were they to become publicly known, would be suited to significantly influence the stock market price of financial instruments in the DATA MODUL Group may not trade in shares or other financial instruments of the DATA MODUL Group based on such insider information or pass on such information, irrespective of whether or not the insider information was disclosed intentionally or by grossly neglecting the required standard of care.
- › DATA MODUL employees are obliged to assist in preventing confidential data from being accessed by third parties.

4.4 PROTECTION OF THIRD-PARTY RIGHTS

- › Every DATA MODUL employee must respect third-party property rights; they shall not be utilized in an unauthorized way. No DATA MODUL employee shall acquire or utilize secrets from a third party without authorization.

5 BASIC SOCIAL PRINCIPLES

5.1 HUMAN RIGHTS

- › The DATA MODUL Group respects and supports the observance of internationally recognized human rights.

5.2 ANTI-DISCRIMINATION

- › In conducting their business, all DATA MODUL employees must respect the rights and the national, cultural and ethnic characteristics of every single person with whom they come into contact.
- › Business decisions should be shaped by the matter at hand and the interests of the company.
- › Equal opportunities and equal treatment, irrespective of ethnic origin, skin color, sex, religion, nationality, sexual orientation, social background or political outlook, provided that this is based on democratic principles and a tolerance of people with different opinions, are guaranteed.
- › Employees are always selected, offered a job and promoted on the basis of their qualifications and skills, provided that national law does not expressly prescribe other criteria.
- › These principles also apply if in individual countries types of behavior and business practices contrary to this Code of Conduct are tolerated.

5.3 FREE CHOICE OF EMPLOYMENT

- › The DATA MODUL Group rejects any deliberate use of forced labor, including slavery or forced labor for prisoners.

5.4 NO CHILD LABOR

- › Child labor is forbidden. The minimum age at which people can be employed in accordance with the relevant state regulations must be complied with. Their health and safety must not be compromised. Their dignity must be respected.

6 COMPLIANCE WITH THE CODE OF CONDUCT

6.1 POINTS OF CONTACT

- › Any employee of the DATA MODUL Group can notify any breach of this Code of Conduct without suffering any disadvantage as a consequence. This is not the case if employees report themselves; in this case, however, the fact that an employee has volunteered the information will count in their favor.
- › The following people are responsible for receiving any information about possible breaches of the Code of Conduct and act as points of contact for any questions concerning the basic rules contained within this Code of Conduct:
 - › The management board of the DATA MODUL AG,
 - › The managing directors of the companies in the DATA MODUL Group.
- › The points of contact are entitled and obliged to follow up relevant information they receive applying the necessary diligence in doing so and, at any time, following all legal requirements.
- › All information received is treated confidentially.
- › The person who has been contacted will take the necessary measures.

6.2 RESPONSIBILITY OF MANAGERS

- › All managers must take steps to ensure and monitor that their employees are aware of the information contained in this Code of Conduct. Managers are asked to act as role models by ensuring that their own conduct is in line with the Code of Conduct. In their area of responsibility, managers must ensure that their employees comply with these regulations and any deviations are avoided.

6.3 BREACHES AND SANCTIONS

- › Breaches of this Code of Conduct may have consequences for an employee’s contract of employment and its continued existence, and may also lead to claims for damages.

6. Accompanying documents

n/a

Document History

Version	Date <small>DD-MONTH-YYYY</small>	Changes	Editing	Approval
0A	03-MAY-2023	Update	S. Gerhard	N. Kössel
03	05-JUN-2020	Update	S. Gerhard	C. Michelbach
02	30-AUG-2019	Change of Editor (no content adjustment)	S. Gerhard	R. Zieminski
01	23.01.2018	Initial version	P. Wulf	S. Villinger

Note: The current version always contains the counter 0A. In case of changes, the initial version will get the counter 01. Following versions will be indicated by continuous/ascending counters 02, 03 etc. Example: after the initial version four changes were created. Hence the document histories 01, 02, 03 and 04 exist (version 01 being the initial version). The current 5th version will be indicated as version 0A.