



Code of Conduct



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Foreword by the Management

Dear colleagues,

As employees, we all bear responsibility – for the company, our colleagues and our stakeholders. Our responsibility is marked by integrity, fairness and a tireless commitment to driving Eucon forward.

Our Code of Conduct lays the foundation for respectful, ethical and responsible action. It is our North Star, shaping our identity and illustrating what we stand for. The Code contains clear provisions to strictly prohibit any involvement in activities that encourage or condone misconduct. We all undertake to comply with the applicable laws and regulations and to act in accordance with our corporate values and the principles of the Code of Conduct in our daily decision-making.

Open and transparent communication as well as a strong feedback culture that allows our employees to express their concerns

Cordially,
The Eucon Automotive Group Management

freely are extremely important to us. For this reason, we have set up an anonymous whistleblower system through an external company that allows our employees to raise their concerns confidentially.

Our employees are the key to the success, performance and competitiveness of Eucon. That is why we offer comprehensive initiatives in the areas of health, diversity and qualification to promote their development.

As a digital pioneer and international group of companies, it is our responsibility to deliver on this promise.



02

Our corporate principles

2.1 Objective and scope of application

This Code of Conduct comprises the fundamental rules and principles of conduct for all employees of Eucon. The objective of this Code of Conduct is to give our employees clear direction and transparency regarding the fundamental legal and ethical requirements to which they commit themselves

in their daily work. This Code is intended to help us act consciously and responsibly and to put our shared values into practice. Should special guidelines or regulations apply to certain units or companies of Eucon, these shall supplement and expand this Code of Conduct without limitation.

2.2 Our responsibility

As a group of companies operating worldwide, our decisions and actions not only impact our employees, investors, business partners and customers, but also the society and environment in which we live. We believe that business success is based not only on economic profit, but also on the conscious awareness of our social and ecological responsibility.

We live up to our responsibility by actively participating in initiatives, networks and associations. We play an active role and openly communicate our goals and measures. The dialogue within these memberships offers us

the opportunity to identify new perspectives and develop innovative solutions. We are committed to ensuring that our stakeholders also embrace and implement our principles.

By acting responsibly and setting high quality standards, we aim to achieve both economic success and at the same time make a positive contribution to society as a whole. We rely on transparency and integrity to build trust and maintain long-term relationships, thereby protecting the reputation of our brand.

2.2.1 Social and environmental

responsibility

We take responsibility for the communities we live and work in. This means actively working to reduce our carbon footprint by promoting sustainable practices. We use environmentally friendly technologies and processes to minimize our ecological footprint and conserve natural resources. Our projects and initiatives are aimed at bringing about positive changes in society and promoting the common good.

2.2.2 Responsibility towards our employees

Our employees are our most valuable asset. We promote a culture of openness, equal opportunities and personal development. By creating safe and healthy working conditions, we contribute to the satisfaction and motivation of our team. We support them in continuously developing their skills and achieving their professional goals.

2.2.3 Responsibility towards our business partners

We attach great importance to integrity and fairness in our relationships with business partners. We expect our partners to share our values and to be committed to ethical behavior and sustainability. We strive to build long-term and trusting partnerships through open communication and transparent business relations.

2.2.4 Responsibility towards our customers

Our customers are at the heart of everything we do. We make every effort to understand their needs so that we can offer innovative solutions that add real value. In doing so, we always ensure the highest quality standards and data protection. Our goal is to gain and maintain the trust of our customers by demonstrating responsibility and reliability.

2.2.5 Competitive responsibility

Fairness and respect are the hallmarks of our behavior towards our competitors as well. We are committed to healthy and transparent competition and strictly adhere to the applicable laws and regulations. We strive to develop innovative solutions and strengthen our market position in an ethical manner through fair competition.



Together We Empower
Smarter Decisions



2.3 Guided by our corporate culture

As a global company, we do business in many countries and bring together people of different nationalities and social backgrounds. Our corporate culture and values govern our daily action and create a common ethical framework for our work at Eucon.

2.3.1 Our values

At Eucon, we put our values into practice. All employees are committed to the principles of our corporate culture, which guide our daily work. Our leaders are role models who actively promote our agile and inclusive corporate culture. These six Eucon values are at the heart of how we work together:

1 We win and lose together: At Eucon, we trust each other and value fun. We have each other's back. We celebrate our wins and learn from our losses.

2 We go where the challenge is: We are courageous and see challenges as adventures. We are entrepreneurs in the company and take responsibility. A practiced culture of error supports us in this.

3 We are many: We are diverse. We share and value different perspectives and give everyone the same opportunities. Tolerance characterizes our togetherness.

4 We shape the future: We are changing our future through innovations for our customers and our society. We consciously share our resources and create sustainable processes and products.

5 We grow: We grow as individuals and as a company. Learning, personal development and the sharing of knowledge are drivers of our joint success.

6 We care: We care for each other. We live a mindful, healthy approach to ourselves and the team and show our appreciation through feedback.

2.3.2 Our leadership principles

Our leadership principles are based on our values and define specific leadership tasks. They serve as a roadmap for our managers in their daily work. These principles promote a culture of collaboration, innovation and continuous improvement:

We win and lose together: We create moments to celebrate wins and learn from failures.

We go where the challenge is: We create an environment where calculated risk-taking feels good.

We are many: We breathe diversity by giving everyone a voice and bringing them together in mixed teams.

We shape the future: We bring innovation to sustainable and economical success.

We grow: We support individual development by empowering the teams to leave the comfort zone and grow together.

We care: We appreciate everyone by sharing feedback and taking accountability for our actions.

By integrating these values and leadership principles, we ensure that a strong, coherent and ethically sound corporate culture is maintained at Eucon that guides us in our daily work and ensures our long-term success.

Values



2.4 Publication and implementation of the Code of Conduct

As part of the onboarding process, the Code of Conduct is made available to all new employees. In addition, the Code of Conduct is accessible on the Eucon intranet. Any changes and updates will also be communicated through this platform. All employees are responsible for complying with the rules

set forth in the Code of Conduct and should therefore thoroughly familiarize themselves with its contents and the measures to ensure compliance. Regular reminders and updates to the Code of Conduct will be sent out via the company email distribution list.

2.5 Reporting violations

In the event of a violation of the law or our Code of Conduct, the relevant manager, the Human Resources department or our in-house lawyer must be informed immediately in order to enable a prompt response and the appropriate measures to be taken. All reports submitted will be treated as strictly confidential and carefully examined.

In the case of justified suspicions, the necessary steps will be taken in consultation with the relevant departments or other, possibly external, experts to thoroughly investigate the matter. There will be no sanctions for

unfounded suspicions, provided that the information was given to the best of one's knowledge and belief.

In addition, an anonymous digital international reporting system is in place. The German Whistleblower Protection Act requires us to provide such a system as an internal reporting channel for violations of the law. Employees can use this system to anonymously report all types of legal violations (compliance violations). The whistleblower will not appear by name.

2.6 Consequences of non-compliance

Violations of statutory provisions or this Code of Conduct may damage the reputation of Eucon and entail far-reaching consequences such as fines or claims for damages. A violation of the Code of Conduct consti-

tutes a breach of labor law obligations and may result in civil and labor law proceedings as well as sanctions under criminal law.



03

Our responsibility as a corporate citizen and general rules of conduct

3.1 Compliance with laws and internal policies

All employees are required to comply with the applicable statutory provisions and internal policies, regardless of whether they were notified of these by the company with which they have or had an employment contract or by external partners of Eucon. This also applies to contractual obligations and voluntary commitments that Eucon has entered into. Any business aimed at cir-

cumventing statutory provisions is strictly prohibited. The primary objective is to avoid legal violations. In case of uncertainty regarding the compatibility of a planned course of action with applicable laws or the internal rules of Eucon, the matter should be discussed with the line manager, the HR department or the in-house lawyer of Eucon.

3.2 Protection of human rights

Eucon endorses the principles of the Universal Declaration of Human Rights and the United Nations Global Compact. We expect our stakeholders to share and recognize these values as well.

It goes without saying that child labor in any form is not accepted at Eucon. We also place

great value on voluntarily chosen employment relationships. Forced labor and similar practices are not tolerated at our company. We promote fair and respectful working conditions where our employees have the freedom to leave the employment relationship at any time.

3.3 Diversity and equal opportunities

“We are many” is one of our fundamental values that shapes our working environment. We value and promote different perspectives and the diversity of our team. All employees are given the same opportunities and are treated with respect, regardless of their gender, ethnic origin, religion, worldview, physical and mental ability, age or sexual orientation. Tolerance and openness are cornerstones of our corporate culture.

By signing the German Diversity Charter, we expressly commit to promoting diversity within the company and to creating a work-

ing environment free of biases. The Diversity Charter is an initiative that has been supporting diversity in companies and institutions since 2006 under the auspices of the Commissioner for the Federal Government for Migration, Refugees and Integration.

At Eucon, we firmly believe that a diverse and inclusive corporate culture not only strengthens the satisfaction and engagement of our employees, but also promotes our innovative strength and business success in the long term.



charta der vielfalt

UNTERZEICHNET

3.4 Environmental and climate protection/ sustainability

At Eucon, we act in accordance with applicable laws to minimize negative impacts on the environment. Through targeted measures, we continuously improve our environmental and climate protection efforts. Sustainability is a cornerstone of our corporate culture and we take environmental aspects into account in all our operations. In the context of our corporate value “We care”, we have developed an ESG (Environment, Social,

Governance) strategy to make our company more sustainable. We focus on areas that add noticeable value and achieve meaningful improvements, such as developing sustainable products, supporting our colleagues, our social commitment and reducing our ecological footprint. We have set up an ESG Steering Committee to achieve our ESG goals. This allows all employees to actively participate in Eucon’s sustainability management.

3.5 Donations, sponsoring and charity

Eucon makes donations and provides sponsorship responsibly to make a positive contribution to society. These grants are made in accordance with applicable laws. We mainly promote areas such as science, education,

charitable organizations, sports and cultural institutions. Donations are only made to non-profit organizations or authorized institutions and are subject to a transparent approval process.

3.6 Protecting our reputation

Our employees undertake to safeguard the reputation of Eucon and to refrain from any action that could be detrimental to the com-

panies of Eucon. We expect our employees to act with personal integrity and reliability.



04

Our responsibility towards business partners, customers and competitors

4.1 Preventing conflicts of interest

Eucon respects the personal interests and private lives of all its employees, but strives to avoid conflicts between private and business interests or the potential appearance of such. All employees shall avoid any appearance of a conflict of interest and report any potential or actual bias to their line manager and the Human Resources department. Potential conflicts of interest may arise when the personal interests of an employee conflict with Eucon's interests, in particular through secondary employment. Such conflicts could be damaging to the company.

Together, we will seek solutions that protect the company's interests. For this reason, the commencement of secondary employment requires the employer's prior consent, unless otherwise provided in the employment contract. This also applies to unpaid activities in management or supervisory bodies (such as a board of directors, advisory board, supervisory board) of other, non-affiliated companies. Our decisions are based solely on objective criteria and are not influenced by personal interests or relationships.

4.2 Fair and free competition

Eucon is bound by the principle of pursuing its business objectives by legal and ethical means and competing with lawful and fair means only. Our goal is to compete through excellence and grow our market positions. That is why Eucon is committed to complying with the applicable competition guidelines of the respective industry. All employees undertake not to enter into any

anti-competitive agreements with competitors, suppliers or customers and strictly adhere to the law and ethical principles. We only use permissible and legally compliant means to obtain information about competitors. These guidelines and principles are fundamental to fair competition and responsible business conduct at Eucon.

4.3 Fairness and openness in interactions with business partners and customers

All employees commit to the principle of fair and open interactions with our business partners and customers. Our goal is to provide our customers with the best possible service and advice to enable them to make the best decisions for themselves. We will process complaints from customers and

ex-customers quickly and fairly. Potential conflicts with the interests of customers and other business partners must be identified in good time, avoided if possible or, where this is not possible, resolved in an appropriate manner.

4.4 Prohibition of corruption

At Eucon, we strictly reject and will not tolerate any corrupt or otherwise unlawful behavior. Our employees in all countries undertake to comply with these principles, even if certain practices should be customary in some countries.

Facilitation payments are always unlawful and must not be made under any circumstances. Any request, solicitation and acceptance of personal benefits is strictly prohibited.

Invitations to events such as restaurant visits, sporting events, meals and drinks, as well as the payment of personal travel expenses, are only permitted if the total value and frequency of these invitations are appropriate and do not give rise to any expectation of consideration on the part of the recipient. In this context, the professional position of

the recipient within their company and the social appropriateness or necessity must be taken into account.

Special care must be taken when it comes to service providers of any kind, as set forth in detail in the anticorruption policy checklist.

In case of doubt as to the lawfulness of any conduct, our employees are encouraged to turn to the above-mentioned points of contact at any time.

All Eucon employees are informed about these policies and principles in an annual security briefing to emphasize the importance of compliance with and comprehension of these measures. Additionally, employees have access to these policies and regulations via the intranet.

4.5 Prohibition of money laundering, terrorist financing and fraud

Employees must ensure that Eucon is not misused for economic crimes, money laundering or illegal purposes, including terrorist financing. Existing trade and financial sanctions must be observed.

“Fraud” refers to intentional actions by employees or third parties that violate laws or

internal rules in order to gain a financial advantage for oneself or others and to harm the company (e.g. financial loss or reputational damage). In case of suspicion of such actions or questions regarding the legal situation, the respective manager must be informed without delay.

4.6 Accounting and financial reporting

Eucon undertakes to comply with the statutory provisions regarding proper accounting, financial reporting and national and international tax laws. All reports shall be truthful, complete and submitted in a timely manner.

Violations of statutory provisions for proper financial reporting and tax recording in the

countries where Eucon operates may result in significant adverse consequences. This includes strict adherence to national and international tax regulations (tax compliance).



05

Our workplace responsibility

5.1 Mutual respect and trust

We are many – this is one of our corporate values. We stand up for diversity, inclusion and equal opportunities. Our working environment is marked by respect and tolerance, and all employees have the right to respectful, fair and dignified treatment. Sexual harassment, discrimination, racism, bully-

ing, abuse of power, intimidation and other forms of harassment or unequal treatment based on national or ethnic origin, skin color, social background, health status, disability, sexual orientation, age, gender, gender identity, religion, political opinion or worldview will not be tolerated at Eucon.

5.2 Occupational health and safety

All employees shall comply with occupational health and safety regulations and undertake not to put the health and safety of colleagues and other stakeholders at risk.

At Eucon, we prioritize the protection of our employees' health and safety. Eucon undertakes to ensure occupational health and

safety protection pursuant to the applicable national regulations and the company's occupational health and safety policy. Through constant improvement of working conditions and preventive and health-promoting measures, the health, productivity and job satisfaction of our employees are maintained and promoted.

5.3 Confidentiality and data protection

At Eucon, we attach the greatest importance to confidentiality and the protection of personal data. Our employees, service providers and visitors undertake to strictly comply with data privacy and to actively contribute to reliably protecting personal data against unauthorized access. Personal data may only be collected, processed and used for clearly defined purposes and within the scope of the legitimate performance of tasks. In case of uncertainty, our company data protection officer is available to answer any questions. More details and provisions on data protection can be found in our policies and guidelines and on the intranet for our employees. In addition, all employees receive regular training on data protection and information security.

Our employees undertake to maintain confidentiality regarding all internal confidential matters of the company, except where the management has decided otherwise in general or in an individual case as part of normal business operations. This obligation shall also apply to all confidential information provided by or about our customers and business partners. Confidential information includes all data that is designated as such or is assumed not to be publicly known and that should not be published, for instance because it could be of use to competitors or,

if disclosed, could harm the company, Eucon or its business partners. This includes, in particular, business and trade secrets as well as unpublished reporting and accounting figures.

Confidential information must be protected from unauthorized access by third parties. It must be ensured that confidential information is only shared with those employees who require it to perform their duties.

The confidentiality obligation continues to apply even after the employment relationship has ended. This obligation applies in its entirety and on an ongoing basis to ensure the protection of our sensitive data.

All employees, visitors to the office premises and business partners shall be bound to this content by an individually concluded non-disclosure agreement and an agreement on compliance with data protection. This is to ensure that all parties involved understand and comply with the importance of confidentiality and data protection. In addition, all employees and visitors must be aware that violations of the provisions for the protection of personal data or business secrets may be punishable, in particular under Section 42 of the new German Federal Data Protection Act (BDSG-neu).

5.4 Compliance with insider rules

Insider information refers to specific, not yet published information about companies whose shares or other financial instruments (hereinafter referred to as “financial instruments”) are traded on the stock exchange. If publicly disclosed, this information may significantly affect the price of the shares and would be taken into account by a knowledgeable investor when making an investment decision. Insider trading, i.e. the purchase or sale of financial instruments based on such information, gives the trader an unfair advantage over other market participants and jeopardizes market fairness. That is why insider trading is illegal. Our employees must not buy or sell publicly traded

financial instruments of Eucon companies or their business partners while in possession of insider information. Furthermore, they must not disclose such information to third parties or make recommendations to third parties regarding the purchase or sale of such financial instruments. Within the company and the Group, insider information may only be passed on to other employees if such information is required for their work. Any suspicion that a piece of information may be insider information must be reported. Employees who typically or for special reasons have access to insider information about a listed company are recorded in an insider directory of the company concerned.

5.5 Security & protection of information and communication

Communication with and official statements to third parties, in particular the media and investors, are only to be made by employees who have been expressly commissioned and

authorized to do so. External inquiries are to be forwarded to the Corporate Communications department.

5.6 Proper treatment of company resources and intellectual property

Our business success has been built on the development of innovative products based on the ideas of our employees. Therefore, it is particularly important for Eucon to protect its intellectual property from improper or unlawful use by third parties.

All employees are responsible for protecting this corporate asset. Company property may only be used for legitimate business purposes and never for illegal purposes. When using company equipment and resources (including telephones, computers, the internet

and other information technology), internal company guidelines and other regulations must be observed; use for private purposes is only permissible to the extent specified in the aforementioned policies and regulations.

The legal and internal security provisions (including those concerning occupational safety, information security and data protection) that must be observed by all employees serve not least to protect company assets and ultimately to avoid liability claims.

5.7 Information security

All employees of Eucon shall be responsible for compliance with the information security requirements in their respective areas of responsibility. They shall immediately report any recognizable vulnerabilities in the company's information security in other areas of responsibility to their line managers or to the IT department of Eucon.

Employees and external persons working for Eucon who are active in the field of information technology or enter rooms where information technology is present must be obligated in writing to comply with the due diligence obligations regarding information security and data protection that Eucon expect of them pursuant to the European General Data Protection Regulation (EU-GDPR).



06

Self-test to help you make the right decision

When in doubt about whether my behavior in a concrete situation is in line with the principles of our Code of Conduct, I can ask myself the following questions:

- ① Do I respect the rights and dignity of my colleagues and our business partners in all my actions?
- ② Do I make decisions based on our corporate values and always comply with applicable laws and regulations?
- ③ Do I act with transparency and openness in situations with potential conflicts of interest to avoid misconduct?
- ④ Am I ready to stand by my decisions and take responsibility if they come to light?
- ⑤ Have I carefully weighed the possible impacts of my decisions and can I stand by them with a clear conscience?
- ⑥ Am I willing to report concerns or violations of the Code of Conduct through the anonymous whistleblower system or directly to my manager?
- ⑦ Do I actively promote open communication and a culture of feedback in my work environment?
- ⑧ Do I contribute to creating a healthy and inclusive working environment where diversity is valued and encouraged?
- ⑨ Do I regularly review my behavior to ensure it is in line with the company's ethical standards?

In case of questions or doubts, I will turn to the contact points mentioned.





ABOUT EUCON

Eucon is a digital pioneer and expert in data-driven decision making. We combine comprehensive market data and in-depth expert knowledge with modern technologies. Using data intelligence, we empower our customers to make better, faster, and more informed decisions. Vehicle manufacturers and auto-

motive suppliers rely on our solutions to define their market and competitive strategies in the aftermarket. Eucon was founded in Münster in 1997. With 250 employees in offices in Europe, North and Latin America, and Asia-Pacific we serve around 250 customers in more than 80 countries.

Eucon GmbH
eucon.com

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