



Code of Conduct



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Instructions

The left side of each page allows you to navigate through the document by clicking on the (sub-) chapters.

Languages and latest version

All available languages and their latest version can be found here.

The English version takes precedence over any translations.

01. Our values in every action

We are AUMOVIO. We are a leader in automotive electronics and the adaptive powerhouse for a safe, exciting, connected and autonomous mobility, with a customer centric approach fueling our ambitions. Our goal is to create value for a better tomorrow by staying true to our values: **Ahead of the Curve, Committed to Win, Stronger Together and Reliable – No Matter What.**

Our Code of Conduct gives us the confidence to take ownership in our daily work and bring our values to life.

We act in accordance with laws, regulations and internal policies. We also know that acting with integrity is not just about following rules. It is also about adhering to our values in every decision we make.

Doing the right thing also takes courage. Sometimes you might be faced with a situation where you feel you should say something. At AUMOVIO, we recognize those who do not turn a blind eye and speak up. Where something that is not right turns into misconduct, you are encouraged to stand up and to raise your voice. In case you are not heard, you are also encouraged to become a whistleblower.

Rest assured: AUMOVIO protects whistleblowers against retaliation. While honest mistakes can happen, deliberately not following this code or other rules cannot be tolerated.

This Code of Conduct was created by a multinational, diverse team of AUMOVIO employees from all hierarchies. It is binding for all employees, managers, executives, and members of the Executive Board of AUMOVIO and its subsidiaries worldwide.

Let us integrate our Code of Conduct into our actions and make it part of our DNA!

Sincerely,
The Executive Board



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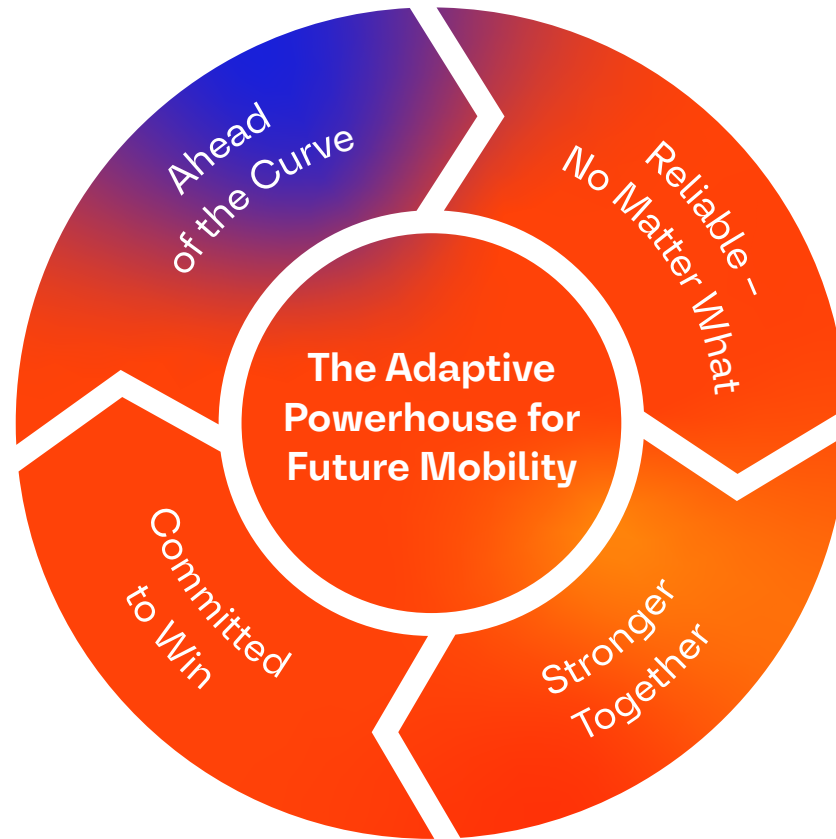
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02. Our core values (1/2)

We follow our inner compass, align our actions with our values and adhere to rules



We are Committed to Win

We are driven by a hunger for success and strive for excellence in everything we do. Acting with integrity, we deliver results and ensure future mobility through fast, efficient, and agile solutions.

At AUMOVIO we strive for excellence by relentlessly raising the bar to outperform the competition. **We deliver results** by focusing on achieving measurable, value accretive results that move us towards our goals. **And we compete with integrity** by doing the right thing and acting with integrity in every decision.

We are Ahead of the Curve

We take the initiative and embrace change with confidence. We learn continuously, encourage innovation and stay flexible to turn challenges into opportunities.

At AUMOVIO we act forward by anticipating trends, opportunities or risks early, allowing us to proactively develop solutions.

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02. Our core values (2/2)

We follow our inner compass, align our actions with our values and adhere to rules

We adapt smart by changing our approach when required and adjusting our plans quickly when needed for success. And we **learn like champions** by seeking feedback and updating skills daily to stay relevant and improve continuously.

We are Stronger Together

By fostering diversity, building trust, and collaborating effectively, we achieve shared goals and celebrate collective success.

At AUMOVIO we collaborate across boundaries and share knowledge and resources to create synergies and common solutions to the benefit of the company. **We speak with courage** by speaking up constructively, listening actively, and providing candid feedback that fuels growth. **And we utilize differences** and seek multiple perspectives to make decisions, solutions and teams stronger.

We are Reliable – no matter what

Reliability and resilience define us. We stand by our word, thrive under pressure, and take responsibility for our customers, people, and society.

At AUMOVIO we execute consistently and deliver what was committed. We build trust through reliable standards, quality and performance. **We own the outcome** by acting with integrity and transparency and by taking full responsibility for results. **We stay steady under pressure** by staying resourceful, focused, and decisive in adversity.

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02. Acting with integrity

We follow our inner compass, align our actions with our values and adhere to rules

Acting with integrity and in line with our values is our highest priority

In our daily business, we often make decisions and act in a complex environment full of uncertainties. Our Code of Conduct helps us to find the right decisions in many different situations. However, the Code of Conduct cannot explain every possible scenario in detail.

In uncertain situations, these questions can serve as a compass:

1. Have I considered all relevant facts, perspectives and circumstances?
2. Is my decision aligned with laws and AUMOVIO's values and rules?
3. Would I stand by my decision if it were made public?
4. Am I free from pressure by others to make this decision?
5. Would I make this decision if I were the one affected by it?

If we are in doubt:

We ask for help from our supervisor, Compliance, or the subject matter experts.

The following chapters provide comprehensive information on specific situations.

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02. Managing risks and opportunities

We turn risks into opportunities for growth and innovation

We identify, evaluate and manage risks with vigilance

Risks are possible events that are volatile either in terms of impact, frequency or both. Risks are difficult to predict but if they occur, they can negatively affect AUMOVIO's ability to achieve its business objectives.

We at AUMOVIO are also aware that careful risk-taking is part of creating value for us and our stakeholders. We assess potential gains and losses before making decisions, ensuring opportunities always outweigh negative outcomes.

On this foundation, we are willing to take risks – but in a responsible manner. We do not take risks that compromise long-term value for short-term opportunities. We do not take a risk if it may lead to a breach of our values, rules or law.

Why should we care?

Managing risks and opportunities ensures that we can achieve our business objectives while safeguarding long-term value. By evaluating and managing risks, we protect AUMOVIO and our stakeholders and uphold our values, rules, and law.

Find out more:

- Risk Management
- Policy Risk Management System (RMS)

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02. Speaking up

Our inner compass is the foundation of our speak up culture

We seek help and speak up when something does not seem right

We reach out to our peers and supervisors whenever we need help. We address issues early on to prevent harm for AUMOVIO and our stakeholders. We learn and improve through our experiences, both positive and negative.

We do not tolerate wrongdoing. Turning a blind eye is never an option.

We speak up and listen. We react immediately and appropriately.

If you see misconduct or feel you are not being listened to, you can also speak up using AUMOVIO's whistleblowing process.

You can find more information about the process and your rights in the following chapter: [“AUMOVIO protects whistleblowers”](#).

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02. AUMOVIO protects whistleblowers

AUMOVIO encourages whistleblowers, protects them from retaliation and handles reports confidentially

AUMOVIO encourages whistleblowers and ensures fair treatment

Violating our Code of Conduct or other applicable rules always harms AUMOVIO and our shared values. AUMOVIO does not tolerate misconduct and encourages you to report it. Whistleblowers are crucial in identifying and preventing misconduct. That is why AUMOVIO takes every whistleblower report seriously.

AUMOVIO supports and protects whistleblowers with an effective whistleblowing process, outlined in a dedicated whistleblowing and internal investigations rule.

AUMOVIO ensures fair treatment of all affected persons. Accused employees are presumed innocent until proven otherwise for the purpose of the investigation.

AUMOVIO handles whistleblowing reports confidentially

AUMOVIO ensures confidentiality throughout the entire process, safeguarding the identity of the whistleblower to prevent retaliation. All involved functions are trained to handle whistleblower reports with sensitivity and professionalism, ensuring whistleblowers receive the support and protection they need.

AUMOVIO protects whistleblowers from retaliation

AUMOVIO strictly prohibits employees – regardless of their level within the organization – from retaliating against whistleblowers. AUMOVIO encourages you to report any retaliation that you witness and will take necessary protective measures.

AUMOVIO does not tolerate any misuse of our Integrity Channels

Willfully and knowingly providing false or misleading information is not tolerated. The misuse of our Integrity Channels constitutes a violation of our whistleblower and internal investigation rules and will result in measures under applicable labor law and potentially further legal action.

Why should we care?

Unethical and unlawful behavior harms AUMOVIO and its stakeholders. Reporting such concerns contributes to the disclosure and prevention of misconduct.

Integrity Channels:

Integrity Platform
aumovio.integrityline.app

Integrity Email
whistleblowing@aumovio.integrityline.com

Integrity Hotline
Phone (internationally accessible)
+49 30 99 25 71 46 or local
numbers and PIN: 1091



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03. Safeguarding diversity

Our success is based on respecting our diversity

We know that diversity adds value

We support diversity in our daily work. We value different backgrounds, skills, perspectives and identities. Diversity is fundamental to our success. By embracing diversity, we approach topics more holistically and continue to innovate and create value. Diversity enriches us, makes us more resilient and encourages us to make sound decisions.

We act globally and work together to pursue sustainable value

We are a global company, and our teams work well by maintaining close ties with one another. Every individual contribution counts, and together we create sustainable value. At AUMOVIO, diversity means equal opportunities in the selection and development of our workforce, and the absence of discrimination. This applies to our employees, business partners and stakeholders alike.

We understand that differences are key to success

Diversity in all its forms – including demographic diversity – is critical for business success and is highly valued. By actively listening and forming meaningful connections, we foster psychological safety, a shared purpose and a sense of belonging. These are prerequisites for innovation and are important drivers of employee commitment and loyalty.

Why should we care?

Equal opportunity and diversity are catalysts for innovation. It is the diverse perspectives, characteristics, experiences, and cultures of our employees that help make our company innovative and thus enable us to realize our full potential. Only through heterogeneous teams can we meet the diverse expectations of our customers and global markets. Valuing and safeguarding diversity allows us to continuously develop and stay relevant in an ever-evolving and complex world.

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03. Prevention of discrimination and harassment

Our success is based on how well we treat each other

We foster an inclusive work culture

We perform at our best if we feel safe, respected and valued in a culture that promotes diversity, inclusion, and belonging where success is determined by individual merit, talent and achievement.

We commit to cultivating a work environment free from any form of unlawful discrimination, whether based on age, sex, race, skin color, ethnicity, nationality, sexual orientation, gender identity, disability, religious beliefs, political views, social background, or any other characteristic protected by applicable law.

We take responsibility for our actions and behaviors. Our professional relationships must be grounded in dignity and mutual respect. Accordingly, we do not tolerate any form of harassment, whether physical, psychological, sexual, or economic that causes, or has the potential to cause, harm. Together, we create

spaces where everyone can thrive and make meaningful contributions, and where everyone has the opportunity to succeed.

We speak up when witnessing discrimination or harassment

We address disrespectful and non-inclusive behavior that comes to our attention. We encourage a speak-up culture and take every concern as an opportunity to improve. Silence in the face of discrimination or harassment contributes to injustice. Speaking up in good faith empowers change and ensures a safe and respectful environment for all.

Why should we care?

Discrimination at work stifles opportunities, wasting the human talent needed for economic progress, and accentuates social tensions and inequalities. A workplace free from unlawful discrimination and harassment empowers every individual to contribute their best.

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03. Collaboration with employee representatives

Our success is based on how well we treat each other

AUMOVIO considers employee representatives as close partners

At AUMOVIO, every worker has a right to freedom of association and representation of her or his interests through elected representatives when and as consistent with applicable law.

Together, we at AUMOVIO foster a culture of social partnership and trust with representative bodies. We engage in meaningful dialogues with employee representatives, and employees are consulted through their representatives on issues of mutual concern.



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04. Safety and health

The safety and health of our employees are an indispensable part of our business and an integral piece of our Leadership culture.

We provide a safe and healthy place to work

People are at the core of our operations. Hence, the safety and health of our employees and all other persons who work for us or spend time on our premises are of utmost importance and an integral part of our business activities.

Our workplaces include offices, factories and other sites, also during business trips. They safeguard and foster the physical and mental well-being of our workforce and other people who work there. We uphold our high expectations by adhering to national and international standards and obligations, our values and our ESH policy.

We drive a culture of safety and health by systematically identifying and mitigating health hazards and continuously strengthening and applying our safety and health awareness.

We are all responsible for ensuring a safe and healthy workplace

We take ownership for safe and healthy working conditions. In this, supervisors act as role models and assume responsibility. We make ourselves aware of and comply with relevant rules.

We participate in training sessions to understand the safety and health procedures and follow them on the job.

We ensure both our own and our colleagues' safety and health. We look out for each other and address potential risks.

Why should we care?

Personal safety and health are fundamental to our success.

Find out more:

– [ESH policy](#)

For support on safety and health topics, please talk to your supervisor or your local ESH manager.

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04. Human rights

We uphold human and environmental rights in our operations and in the value chains in which we operate

We respect and protect human rights

At AUMOVIO, we are committed to being a responsible corporate citizen and believe in upholding human rights as per international frameworks such as the United Nations Sustainable Development Goals (SDGs) and the United Nations Global Compact (UNGC).

As a company and as individuals, we recognize our responsibility to uphold and promote human rights and ensure decent working conditions. We are committed to putting these values into action by treating everyone we work with – colleagues, employees, future employees, suppliers, customers –, with fairness, dignity, and respect. We strive to minimize any adverse impact which our business activities may give rise to, and to make a meaningful, positive contribution to sustainable social and economic progress.

Why should we care?

The dignity of every human being is inviolable and deserves respect and protection. This fundamental right should always be considered in our actions.

Respecting and promoting human rights at work isn't just a matter of compliance – it is the foundation of dignity, fairness, and sustainable success in every business.

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04. Sustainability & due diligence

We ensure and foster sustainable and ethical business practices

We balance and create economic, social and ecological value through sustainable innovation

At AUMOVIO, sustainability is at the heart of our business and is critical to our success. We are focused on creating long-term economic, social, and environmental value – we bear responsibility not only for our workplace but also for society and the environment. By critically reflecting on the effects of our work, we take into account the needs of our employees, customers, wider society and environment, in all our business activities.

We understand ourselves as part of the ongoing transformation of our industry towards a healthy ecosystem for sustainable mobility. Sustainability is a driver of our innovation, and our focus is to shape the future of mobility through innovative and sustainable solutions.

We turn change into opportunity through sustainable innovation– from production to disposal

We're dedicated to mitigate our impact on the environment by reducing resource usage and eliminating practices that harm the environment. We do this by using raw materials and energy sparingly, handling industrial waste with care and properly accounting for water usage and emissions.

We collaborate with responsible suppliers to create transparency in our value chain

By being part of a global value chain, we depend on responsible and trustworthy business partnerships. We are committed to responsible sourcing practices throughout our value chain. We commit to only work with suppliers who uphold high ethical and social responsibility standards. We offer support to our suppliers in meeting their human rights responsibilities.

We conduct appropriate due diligence assessments of suppliers

We take appropriate measures such as proper due diligence of all our suppliers following a risk-based approach.

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04. Technical compliance

We develop, manufacture and sell innovative and high-quality products that are safe and comply with technical requirements

We ensure that all our products and services meet technical requirements

We provide products and services that meet technical requirements. Technical compliance is vital to our success. We must guarantee that our products and services are safe and adhere to valid binding product requirements. This includes product safety, product conformity, product environmental compliance, product cybersecurity and privacy, and intellectual property.

We follow a systematic approach to managing technical compliance

We are responsible that our products and services are technically compliant throughout the product life cycle, from the product strategy process to end of life. We operate a technical compliance management system (tCMS) to continuously identify, assess, mitigate and report risks.

We adhere to technical compliance principles and take responsibility for our actions and decisions

We take responsibility for our actions and follow the technical rules and specifications.

We prevent technical non-compliance and quickly act in case of doubt. We promptly communicate any potential concerns of technical non-compliance to our supervisors, the technical Compliance team or via the **Integrity Channels**.

Why should we care?

We are responsible for ensuring that our products and services do not harm customers, the consumer, society, the environment and other stakeholders.

Find out more:

- **Policy Technical Compliance**
- **Manual Technical Compliance Management System**

If you need support, please contact the technical Compliance team.

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04. Tax compliance

We pay our fair share in taxes

We fulfill our tax obligations responsibly and accurately

We recognize our responsibility in paying our taxes to contribute to the communities we operate in. We accurately report all income and expenses, file tax returns promptly and pay all taxes we owe. We maintain transparent communication with tax authorities and seek professional advice when needed.

We set fair prices and follow the arm's-length-principle when dealing goods and services between AUMOVIO's entities (intercompany transactions and transfer pricing rules).

We adhere to all tax laws and regulations applicable to us.

Why should we care?

Tax compliance ensures that AUMOVIO pays its fair share to society in the form of taxes. Adhering to tax laws fosters trust and safeguards AUMOVIO's long-term success.

Find out more:

- [Tax Policy](#)
- [Transfer Pricing Rules](#)
- [Accounting within the Corporation Principles](#)



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05. Gifts and hospitality (1/2)

We conduct business in line with our values

We never offer, take or tolerate bribes

We win business and build positive and collaborative relationships only with our products, services, and in line with our values. By no means do we influence our business partners' and stakeholders' decisions, actions or obtain improper advantages through inappropriate benefits. We avoid behaviors that create even the mere appearance of undue influence.

We provide benefits to public officials only in limited exceptions

- Special attention is required when interacting with public officials, as these interactions are strictly regulated by law.
- We never unduly influence public officials directly or via others.
- We generally do not provide any gifts or hospitality to public officials or persons that have influence over public officials. Exceptions are only allowed within strict limits and are specified in our **Standard on Business Ethics**.
- We generally do not make any payments to public officials or agencies to speed up or secure a public service (facilitation payments). We only make such payments when they are scheduled fees for a transparent and standardized express service that is available to anyone.
- We always make sure that our behavior in dealings with public officials is in accordance with our rules and the recipients' internal rules as well as local laws.

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05. Gifts and hospitality (2/2)

We conduct business in line with our values

We only offer and accept appropriate gifts and hospitality

Giving or receiving gifts and hospitality may be common practice in certain business situations to maintain a good business relationship. However, there are corruption-related risks as gifts and hospitality may be perceived as inappropriate benefits to influence the recipient's decision. That is why we are always prudent when handling gifts and hospitality.

We are modest when accepting gifts and hospitality. We act transparently and are mindful of how gifts or hospitality may be perceived by others.

We are all responsible for assessing and ensuring that gifts and hospitality are appropriate and compliant with all requirements.

Questions you should ask yourself in evaluating gifts and hospitality:

- Would you feel comfortable telling your boss, colleagues, friends, or family about it?
- Would you feel comfortable reading about it in the news?
- Would you find it acceptable if a colleague of yours received the same gift?
- Would you feel pressured to return a favor?
- Would it be common in your region and situation?
- Would it be appropriate for the level of responsibility of the people involved?

Why should we care?

Corruption can cause financial loss, damage our reputation, destroy the trust of our stakeholders and business partners and harm society as a whole.

Inappropriate gifts or invitations pose a particular corruption risk. That is why we place great importance on transparency and clear rules.

Find out more:

- **Standard Business Ethics**

If you need support, please contact Compliance.

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05. Charitable donations and sponsorships

We conduct business in line with our values

We carefully select recipients of charitable donations and sponsorships

As a global company, we actively live up to our social responsibility.

We give charitable donations only to charitable non-profit causes without requesting or expecting any consideration in return, while we engage in sponsorships with third parties to promote our brand and enhance our image.

We donate or engage in sponsorships only in a transparent, ethical way that is in line with all applicable laws and internal rules.

We support the people and communities in the regions where we operate, especially for:

- social
- cultural
- educational
- environmental
- scientific
- and technological causes

We do not sponsor or give charitable donations to anyone or any organization that engages in illegal, unethical, or inappropriate activities.

Also prohibited are such contributions for religious purposes and to public officials, political parties and actors.

While individuals may receive sponsorships, charitable donations are not allowed.

Why should we care?

Donations and sponsorships can have an increased risk of undue influence. That's why we place great importance on transparency and clear rules.

Find out more:

- **Standard Business Ethics**

If you need support, please contact Compliance.

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05. Fair competition

We see free and fair competition as beneficial to society as it ensures efficient resource use, fosters innovation, provides consumer choice and drives economic growth

We do not engage in anticompetitive behavior

By adhering to all relevant antitrust laws and our internal rules, we contribute to functioning markets and safeguard AUMOVIO.

We generally limit the frequency of interactions with our competitors, in day-to-day commercial dealings, in the context of industry meetings and within trade associations. We do not agree with competitors on price fixing, market or customer allocation, restriction of production or capacity. We do not illegally limit competition otherwise or exchange competitively sensitive information.

We only enter into agreements with business partners that do not unfairly limit competition

We know that freedom to act applies to us and to our business partners. That is why we always respect antitrust rules when negotiating

exclusivity agreements. We do not impose fixed and minimum resale prices, nor do we try to otherwise influence sell-out prices. We never enter into agreements that limit competition unfairly in any other way.

We respect all market participants

In some markets, we may have a dominant position. Even if considered market-dominant, we do not abuse our position by impeding other companies from competing, especially by selling products or services below cost. We neither demand prices nor terms and conditions that exploit our suppliers or customers, nor do we discriminate against them.

Why should we care?

Antitrust violations can harm AUMOVIO due to loss of trust by our stakeholders and high fines by authorities. In some jurisdictions, employees may also face personal fines and even prison terms for antitrust violations.

Find out more:

- [Manual Antitrust](#)
- [Standard Association Activities](#)

If you need support, please contact the Legal Department.

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05. Anti-money laundering and terrorist financing

We do not participate in money laundering or terrorist financing

We contribute to legal and transparent business transactions by not engaging in money laundering or terrorist financing

We conduct our business transactions with integrity and transparency. Therefore, we avoid any involvement in money laundering or terrorist financing as this can severely damage our reputation and undermine the trust placed in us.

Money laundering is the process of making money from illegal activities appear legitimate by moving it through a series of transactions and businesses to hide its illegal origins. We take actions against money laundering as it may also contribute to terrorist financing.

We have established internal procedures to avoid money laundering and terrorist financing

We have limits on accepting and making cash payments. We neither accept from nor make payments to third parties that are not our business partners. That is why we perform a business partner due diligence check for existing business partners and before dealing with unknown parties.

Why should we care?

By preventing money laundering and terrorist financing, we contribute to the integrity and stability of the global financial system and protect AUMOVIO from related risks.

You should immediately notify Compliance if you observe anything suspicious.

Find out more:

– [Standard Anti-Money Laundering](#)

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05. Export control and sanctions

We engage in international trade and respect all relevant rules

We are vigilant about our commercial relationships

We operate on a global scale in commercial relationships with far-reaching effects.

We ensure that our actions reflect our shared commitment to ethical practices by adhering to economic sanctions and other applicable regulations on the exchange of Items (incl. goods, technology and software) and Services.

We observe international guidelines and regulations

We carefully observe applicable legislation worldwide in our business decisions.

We carefully consider the restrictions of countries and territories that we are doing business in.

We do not develop any potential businesses with dubious, sanctioned or blacklisted parties.

We uphold our commitment in our role as an importer and exporter of Items and Services.

We foster lawful relationships with our business partners

We identify sanctioned countries, companies and individuals diligently before any commercial transaction.

We communicate transparently and honestly with our customers and suppliers about our actions to comply with rules on export control and sanctions.

Why should we care?

Rules on export control and sanctions maintain global stability and peace by regulating the flow of dangerous Items, Funds and Services to sanctioned countries, companies and individuals.

By adhering to these rules, we contribute to a safer and ethically sound global business environment.

Find out more:

– **Export Control and Sanctions Rules**

If you need support, please contact the Export and Sanctions Department.

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05. Conflicts of interest

We conduct business in line with our values

We avoid conflicts between personal and professional interests

AUMOVIO respects the freedom and right of employees to engage in activities outside of their employment. We also have a duty of loyalty and a responsibility to act in the best interest of AUMOVIO within our employment relationship.

We avoid situations where our private interests and personal considerations interfere with our professional judgment and objective decision-making. Such conflicts of interest arise, when personal relationships, financial interests, or outside activities influence work-related decisions and collide with AUMOVIO's interests.

If such a situation arises, we disclose the potential conflict of interest transparently and in a timely manner, as specified in our [Standard on Business Ethics](#).

Why should we care?

Avoiding conflicts of interest ensures fair decision-making and maintains trust. When personal interests clash with professional judgment, it can lead to biased decisions, harming our reputation and performance.

By preventing conflicts of interest, we promote integrity, transparency and loyalty, which are essential for our long-term success and positive work environment.

Find out more:

– [Standard Business Ethics](#)

If you need support, please contact Compliance.

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05. Fraud, theft and embezzlement

We conduct business in line with our values

We condemn fraud, theft and embezzlement

Honesty is a fundamental pillar of our trust in each other at AUMOVIO and the baseline for the trust our business partners place in us.

Fraud in all its facets, even for the supposed good of AUMOVIO, is unacceptable, violates our values and is strictly prohibited. Such behavior, be it cheating on travel expenses, accepting bribes by suppliers, overstating revenue or other fraudulent acts, will not be tolerated.

We are responsible for the financial and other means entrusted to us in our roles. We do not use these means for interests other than those of AUMOVIO. Such actions, including taking company money or assets for personal use or any other dishonest actions, are not acceptable.

Theft is not tolerated. We value our tangible and intangible company property and use it with due care and responsibility.

Why should we care?

Fraud, theft and embezzlement undermine trust among employees, business partners and investors, which can harm business relationships and future opportunities. By preventing these unethical behaviors, we ensure a secure and trustworthy environment, promoting stability and growth.

Find out more:

– [Standard Business Ethics](#)

If you need support, please contact Compliance.

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05. Engaging with business partners

We conduct business in line with our values

We select and interact with our business partners with due care

We act based on high ethical and integrity standards in our business and expect the same from all our business partners, including suppliers, customers, vendors and intermediaries.

We therefore take all necessary measures to ensure that our business partners meet our high requirements of integrity, compliance and sustainability. This includes performing a risk-based screening process before entering business relationships with potential business partners.

We require our business partners to comply with our basic values and principles

We require our business partners to acknowledge and observe the **Business Partner Code of Conduct**, which reflects AUMOVIO's basic values and principles. Throughout the business relationship with our business partners, we do neither grant nor accept inappropriate benefits from business partners and strictly follow our internal rules and requirements.

Why should we care?

Selecting business partners carefully is crucial because it ensures shared values and ethical standards. This helps us to prevent legal issues, reputational damage and financial risks for both AUMOVIO and our business partners. By aligning with trustworthy business partners, we can maintain integrity, reliability and long-term success.

Find out more:

- **Business Partner Code of Conduct**
- **Standard Application of the Business Partner Code of Conduct (“BPCoC”)**
- **Standard Business Partner Due Diligence (BPDD)**



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06. Intellectual property and confidential information

We protect AUMOVIO's intellectual property and confidential information and respect the rights of third parties

We value and protect intellectual property and confidential information

We are a global technology innovator. Part of our business success relies on intellectual property (IP), including patents, trademarks, logos, copyrights and designs. We also make use of trade secrets, know-how and other forms of proprietary information, commonly known as confidential information.

Disclosure or non-availability of confidential information can have a significant impact on AUMOVIO. It is our responsibility to protect our intellectual property and confidential information. They are valuable intangible assets that

entitle us to protect our technical and commercial achievements and to remain competitive. We ensure that they cannot be misused by non-authorized employees or third parties.

We take every necessary action to protect confidential information

We uphold strict confidence and neither improperly use nor disclose confidential information. We strictly limit the access to such on a need-to-know basis. We classify and mark confidential information as such. We do not share confidential information with third parties unless there is a business need for AUMOVIO to do so and confidentiality can be maintained.

If we accidentally gain access to confidential information, we take the necessary action to close such data leaks and help each other in doing so. If we leave AUMOVIO, we must not take, keep, misuse or disclose the confidential information.

We respect third parties' intellectual property and confidential information

We must respect others' intellectual property just as we expect them to respect ours. As part of the research and development process, we search for existing intellectual property of others, and we act in line with existing IP regulations.

Why should we care?

Protecting intellectual property and confidential information is crucial for maintaining our competitiveness and safeguarding our innovations. By respecting and securing these assets, we ensure the continued success and integrity of our business. This commitment also extends to respecting the intellectual property and confidential information of third parties.

If you need support, please contact the Intellectual Property department.

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06. Information security and classification of information

We protect information and communicate with due care to maintain AUMOVIO's integrity and reputation

We value information as a business asset and are committed to protecting it

Our business is driven by information including data – AUMOVIO's own and that of our business partners. We classify all information based on its sensitivity and handle non-public information on a need-to-know basis. We protect relevant information and information systems to prevent cybercrimes or mitigate their consequences.

We convey information security obligations to our business partners through our **Business Partner Code of Conduct**. Accordingly, we act on our responsibility to lead by example.

We represent AUMOVIO externally in line with our values and brand reputation

We are proud of our success and our corporate culture at AUMOVIO. That is why every one of us is encouraged to promote AUMOVIO to the outside world as an employee advocate.

Using social media, we represent AUMOVIO and always uphold our values and brand reputation. We respect the confidentiality, privacy and rights of employees, business partners and other stakeholders in our external communication. We only communicate on behalf of AUMOVIO if we are authorized to do so. We never post content that could harm our reputation or violate our values and rules.

Why should we care?

The consequences of any information security incident can be extremely harmful to AUMOVIO.

Find out more:

- [Policy Information Security](#)
- [Standard Information Security Framework](#)
- [Standard Classification and Control of Information](#)
- [Standard Social Media Communications](#)
- [Policy Global Communications](#)
- [Business Partner Code of Conduct](#)

If you need support, please contact your responsible IT department.

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06. Data privacy

We understand that everyone’s right to privacy deserves our protection

We protect the personal data that we process

Our employees, customers, suppliers, business partners and other stakeholders share their personal data with AUMOVIO based on trust. We handle everyone’s personal data responsibly and ethically. Accordingly, we are committed to building and driving a culture of data protection. We set high standards for data protection across all entities.

We respect the right to privacy

We respect everyone’s right to privacy and protect their personal data with due care.

We follow all applicable data privacy laws and regulations, and we consider data protection aspects in our daily work. We take ownership of the adequate processing of personal data.

We protect personal data through technical and organizational measures

We integrate appropriate data protection principles into all our business activities. We ensure that personal data is processed in a fair and transparent manner. We implement and maintain appropriate data security practices (such as access controls) and technical and organizational measures (such as pseudonymization and encryption). With this, we protect personal data against unauthorized use or disclosure.

Why should we care?

The protection of personal data is an integral part of our integrity culture.

Find out more:

If you need support, please contact the Privacy & AI Compliance Department

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06. Artificial intelligence

We develop and deploy artificial intelligence to empower our people and products

We use artificial intelligence wherever it creates value

As a technology leader, we embrace AI as both a transformative force and a driver of innovation and growth. We see AI as a key enabler for creating smarter products, more efficient processes, and empowering our people to work in new, value-creating ways. We believe that the fast and responsible adoption of AI at scale is a decisive value proposition – enabling us to deliver sustainable competitive advantages and shape the future of our industry. We are committed to making AI accessible to everyone who matters in our company, providing people with choices, and ensuring that AI can be understood, overseen, and trusted by humans.

We build trust through Responsible AI Governance

We are mindful of the ethical challenges and legal risks related to AI and actively ensure its responsible use. Guided by our AI governance framework, we develop AI ethically, transparently, and with purpose – embedding safeguards that ensure compliance, fairness, and human well-being. In developing and training AI, we design systems that operate transparently under diverse conditions, address potential biases, and align with moral values. This fosters trust and ensures our AI acts in a responsible, trustworthy, and fair manner – unlocking its full potential for employees, customers, business partners, shareholders, and society at large, today and in the future.

Why should we care?

Ethical AI allows us to grow our business responsibly, protect our culture of integrity, and deliver sustainable value to employees, customers, partners, and society.

Find out more:

If you need support, please contact Privacy & AI Compliance.

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06. Recordkeeping and disclosure

We present AUMOVIO's corporate statements truthfully and fairly

We keep correct books and records to ensure financial integrity

We keep our books and records complete and truthful to accurately represent all transactions. We design our processes and internal controls to facilitate adequate and orderly accounting and duly follow them in preparing corporate statements.

We follow a four-eyes principle and other controls to prevent errors.

External and internal audits help us to ensure adequate recordkeeping.

We disclose our corporate statements fairly

We demonstrate transparency through fair disclosure of our corporate statements, thus effectively earning the trust of our stakeholders.

Why should we care?

Accurate recordkeeping and fair disclosure ensures financial integrity and transparency to build trust with stakeholders. It reflects our commitment to honesty and accountability. This fosters a culture of trust and reliability.

Find out more:

- [Financial Reporting Manual](#)
- [Policy Record Retention](#)

AUMOVIO's annual reports and other corporate statements are available here:

[Investor Relations News](#)

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06. Insider trading

We safeguard market fairness by preventing insider trading

We are vigilant about inside information and do not engage in insider trading

We do not disclose inside information. Furthermore, we neither engage, attempt to engage nor recommend engaging in insider dealing based on inside information.

Inside information is any information of a precise nature that has not been made public but likely has a significant price effect on one or more financial instruments if it became known to shareholders and/or investors.

You must immediately notify the Ad-Hoc Committee if you have (potential) inside information.

Why should we care?

Prohibiting insider trading ensures fairness in financial markets by preventing those with insider information from exploiting it to gain an unfair advantage over others.

Find out more:

– **Standard Insider Lists, Ad-hoc Publication and Prohibition of Insider Dealing**

If you need support, please contact the Legal Department.



AUMOVIO SE

Guerickestrasse 7
60488 Frankfurt

For all its subsidiaries

AUMOVIO SE is entered in the Register of Companies of Frankfurt am Main under the No. HR B 138483.
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