

# CODE OF CONDUCT





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#### **Code of Conduct**

As a family business, we know that we can only be successful together - together with our employees and together with our business partners. The basis for this are values. If we base our behavior on them every day, if we treat each other and our business partners with respect and fairness, we will continue the success story of the MEKRA Lang Group as a lea-

ding company of vision systems. Our entrepreneurial success depends on taking responsibility for our actions. We try to set out these actions in our Code of Conduct and define our values for our daily work. These values should apply to all employees of the MEKRA Lang Group, regardless of their hierarchical position, a binding standard for their daily actions, as well as for our suppliers.

So let us work together on the basis of this Code of Conduct, let us live the company's values for fair dealings with each other internally and outwardly!

Your Chief Executive Management of the MEKRA Lang Group

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SUSANNE LANG
Managing Partner

3.8

**BERND DEHNER**Managing Director

THOMAS KOLODZIEJ

Managing Director

BERND BÖGEL
Managing Director MGM

# COMPANY VALUES FOR EMPLOYEES





COURAGE
Accountability,
Will to make decisions

Employees at MEKRA are prepared to act on their own responsibility, to express their opinions honestly (dispute culture) and to bring about or demand necessary decisions in good time.



OPERATIONAL READINESS
Will to perform,
Motivation, pride

Employees at MEKRA support each other in achieving goals, are willing to develop themselves according to the goals and do not stop asking questions until they have understood a goal.



**CORRECTION**Discipline,
Adherence to guidelines

Employees at MEKRA comply with standards and contribute to their improvement with the aim of being able to manage requirements as easily as possible.



**RESPECT**Appreciation,
Reliability, tolerance

Employees at MEKRA value their colleagues, treat each other as equals, compensate for their weaknesses, value their strengths in return, are reliable and demand the dependability required to manage their daily work smoothly.



SINCERITY
Honesty,
Identification

MEKRA employees help in the decision-making process by pointing out alternatives, ensure transparency and do not withhold their knowledge, do not allow problems to be ignored.

# COMPANY VALUES FOR MANAGERS





COURAGE
Accountability,
Will to make decisions

Leaders at MEKRA live these values by making decisions or bring them about in a timely manner. They pick up on employees' issues and address them. They create an environment that strengthens employees' motivation and willingness to perform.



OPERATIONAL READINESS
Will to perform
Motivation, pride

Leaders at MEKRA exemplify these values by supporting all employees in their work, by working together to set clear goals and by encouraging them to achieve these goals.



CORRECTION
Discipline,
Adherence to guidelines

Managers at MEKRA exemplify these values by creating standards while observing applicable norms, guidelines and laws and demanding compliance with them.



**RESPECT**Appreciation,
Reliability, tolerance

Managers at MEKRA live out these values by treating their employees as equals and by and treating each other with respect, as well as being measured by their actions.



SINCERITY
Honesty,
Identification

Leaders at MEKRA exemplify these values by ensuring that problems are "uncovered," addressed and resolved to align word and deed.

# CORPORATE VALUES WITH A VIEW TO UNDERSTANDING







Argument culture at MEKRA means standing FOR something and to stand FOR something - so:

- ... arguing FOR the company (and its goals)
- ... argue FOR the cause (oriented on facts / key figures)
- ... fight FOR the employees (oriented towards further development / motivation)
- ... in doing so, we do not exploit any differences, and do not attack personally



#### UNDERSTANDING OF RESPONSIBILITY

Responsibility at MEKRA

- ... cannot be delegated. "Only" tasks can be delegated
- ... means that we "owe" answers and not that we raise questions without contributing to the solution



#### **UNDERSTANDING OF "WILL TO DECIDE"**

"You always do something wrong, you just have to make sure that what you do right is 'the several'." Quote: Heinrich Lang

# **PRINCIPLES**



This Code of Conduct applies to our entire Group, including subsidiaries. It is addressed to the entire workforce, from Chief Executive Management to divisional management, executives and employees. The principles and guidelines are intended to support individual employees in their daily work and provide guidance. All employees are therefore required to make their decisions and conduct themselves in accordance with our Code of Conduct. Only in this way can we be a reliable partner for our customers and economically successful.

#### **Our vision**

As a leading supplier, it is our aspiration to constantly evolve through innovation. In doing so, we combine experience, expertise and creativity to develop new products for our customers and to solve challenges and future issues. Our indirect vision products are designed to help customers ultimately contribute to a safer traffic environment. One of our particular concerns here is to play an active role in shaping the future of indirect vision for commercial vehicles, including through electronic mirror replacement systems. The aim is to do

pioneering work and actively help shape industry trends - from the initial idea to series production.

#### Law abiding behavior

We uphold the principle of legality for all actions, measures, contracts and other processes of the ME-KRA Lang Group. Therefore, we affirm the principle of acting exclusively legally. All employees are personally responsible for compliance with the law in their respective area of work. It is prohibited to induce third parties to commit unlawful acts or to knowingly participate in such acts.

Managers have a special responsibility to convey the contents of this Code of Conduct to employees by setting an example. They shall ensure that no violations of legal regulations or of this Code of Conduct occur in their areas of responsibility which could have been prevented by appropriate supervision; they shall make it clear that violations of the law are disapproved of and will lead to consequences under labor law, irrespective of the employees' hierarchical position in the company. We are aware of our duty to act sustainably and acknowledge our responsibility to act in

an economically, ecologically and socially responsible manner.

## Responsibility for the reputation of the MEKRA Lang Group

All employees must take care of the reputation of the MEKRA Lang Group when performing their duties. It is up to each individual to take personal responsibility for the good reputation of the company as a whole, because the conduct of each and every employee radiates into society. The success of the company also depends to a not inconsiderable extent on the honest, ethically correct conduct of all employees with integrity. This requires honest, timely and comprehensive communication internally and externally at all levels.



The MEKRA Lang Group is committed to its social and societal responsibility as a globally active company. First and foremost, we are committed to respecting human rights as laid down in the Universal Declaration of Human Rights of the United Nations, with its core sentence in Article I:

"All human beings are born free and equal in dignity and rights," supplemented by Article 29.1, which states, "Everyone has duties to the community, in which alone the free and full development of his or her personality is possible".

As Chief Executive Management, we do our utmost to offer our employees such an environment in which they can develop freely and with inalienable rights with their talents and personality professionally within a community, and whose rules are aligned with these human rights. On the basis of such value-oriented corporate governance, taking into account internationally recognized human rights, the fundamental principles of the Inter-

national Labor Organization (ILO) and the laws applicable in the various countries and locations, as well as in recognition of the different cultures, the following principles apply:

#### a. Behavior towards employees

We respect and protect the personal dignity of each individual. Discrimination and harassment will not be tolerated at any MEKRA Lang Group site. We are committed to respecting the fundamental rights of employees, in particular:

I: equal opportunities and equal treatment of all employees, irrespective of their skin color, race, nationality, social origin, possible disability, sexual orientation, political or religious religious conviction, gender or age.

**II:** respect the personal dignity, privacy and personal rights of each individual.

III: not to employ or force anyone to work against their will.

IV: not tolerate unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment, or discrimination.

**V:** not to tolerate behavior that is sexually coercive threatening, abusive or exploitative is.

VI: to ensure adequate remuneration and to guarantee the legally established national minimum wage.

VII: the maximum working hours stipulated by law in the to comply with the maximum working hours stipulated by law in the respective state.





#### b. Children and forced labor

It is particularly important to us that child labor and forced labor are not tolerated and are punished without exception, including by our business partners. Child labor is prohibited in accordance with the of the ILO and United Nations conventions and/or national United Nations and/or national legislation. Of these various standards, the one that imposes the most stringent requirements shall be applied. Any form of exploitation of children is prohibited. Working conditions similar to those of slavery or harmful to the health of children are prohibited.

The rights of juvenile workers shall be protected. In the event that children are encountered in situations that meet the definition of child labor under the above standards, the supplier shall implement and document policies and procedures that provide remediation for the working children. Further, the supplier company shall provide reasonable assistance to such children so that they may attend school while they are of child age. Non-compliance with these rules by a business partner shall constitute good cause for MEKRA Lang Group to terminate the cont-

ractual relationship for cause - after granting a reasonable period of time to take remedial action (measures). The following definitions form the basis for the child protection measures in force at the MEKRA Lang Group.

#### Definition of a child:

A person under the age of 15, unless a local minimum age law provides for a higher age for gainful employment or compulsory education, in which case the higher age applies. However, if the local minimum age is set at 14 based on the exceptions for developing countries under ILO Convention No. 138, this lower minimum age applies.

#### Definition for a young person:

An employee who is older than a child as defined above, but younger than 18 years of age.

#### Definition for child labor:

Work by a child or young person whose age is below the minimum age as defined above, which does not comply with the provisions of the applicable ILO standards. Child labor is defined as work that deprives children

of their childhood, robs them of their potential and dignity, or harms the psychological and physical development of children. This refers to work that is mentally, physically, socially and morally dangerous and harmful to children, deprives them of or restricts their opportunity to attend school, forces them to leave school early, encourages them to combine school and excessively long and hard work. Work which, by its nature or because of the circumstances under which it is performed, is likely to be harmful to the health, safety or morals of children





#### c. Environmental protection

The MEKRA Lang Group sees itself as having the particularly sensitive responsibility, as an economic company, of ensuring the sustainability and environmental compatibility of our products. It is the task of our group of companies and of everyone to avoid hazards to people and the environment, to keep impacts on the environment low and to use resources sparingly. We strive to achieve this through continuous improvements such as sourcing renewable energy, responsible chemical management, sustainable resource management, waste prevention, reuse and recycling, reducing water consumption and ensuring water and soil quality, and reducing CO<sub>2</sub> emissions.

We will also attach great importance to environmental protection within our supply chain and take this into account when selecting our suppliers. In addition, we apply the latest technologies and standards in order

to be at least exemplary - and in selected areas exemplary - as a pioneer when it comes to environmental protection.

#### d. Occupational safety, health and Fire protection

The MEKRA Lang Group considers itself responsible for ensuring and promoting the health, performance and well-being of our employees by constantly improving working conditions and implementing a wide range of preventive and health promotion measures. With this in mind, it is of particular concern to us that our processes, operating sites and resources comply with the applicable legal and internal requirements for occupational safety as well as health and fire protection. Health, safety at work and the humane design of working conditions are an essential element of our corporate policy. This applies in particular with regard to the provision and use of personal protective equipment, clean to-

ilets and access to drinking water; where appropriate, hygienic food storage facilities must be provided. Practices and conditions in the workplace that violate basic human rights are prohibited. Youth workers, in particular, shall not be exposed to situations that are dangerous, unsafe or harmful to their health. Failure to comply with these prohibitions shall constitute good cause for the MEKRA Lang Group to terminate the contractual relationship for good cause.





#### e. Prohibition of forced labor and Disciplinary measures

Any form of forced labor, for example obtained by posting a bond or withholding identity papers from employees at the beginning of the employment relationship, is prohibited. Prison labor that violates basic human rights is also prohibited. The use of corporal punishment as well as psychological or physical coercion and verbal abuse is equally prohibited. Failure to comply with these prohibitions shall constitute good cause for the MEKRA Lang Group to terminate the contractual relationship without notice.

#### f. Equal treatment and equal opportunities

For generations, our group of companies has stood for equal opportunities and equal treatment in order to ensure open, unprejudiced and fair cooperation. We promote respectful tolerance and diversity. Moreover, we are firmly convinced that in this way we can achieve a high level of efficiency and productivity as well as innovative capability and technology leadership.

Furthermore, the MEKRA Lang Group commits itself and all its employees to recruit ethically and treats all applicants and employees equally. Our ethical recruitment is based not only on international standards, but also on national standards of the respective locations.

#### g. Living wages

We, the MEKRA Lang Group, are committed to paying our employees appropriate wages that at least meet the legally valid minimum that must be guaranteed. We expect the same from our suppliers and their partners along the supply chain. If there are no legal or collectively agreed regulations, remuneration is based on the industry-specific, local collectively agreed benefits that ensure an appropriate and living standard for employees and their families.





# INFORMATION HANDLING



#### a. Reporting

All our records, reports and pronouncements must be accurate and truthful. The principles of proper book-keeping and accounting must be observed. Accordingly Data entry and other records shall be complete, accurate, timely and orderly. The preparation of records, files and the like for which confidential information of the company is used shall only be permitted if this is done directly in the interest of the MEKRA Lang Group and all data protection standards are complied with. It is done in the direct interest of the MEKRA Lang Group and all data protection standards are complied with

#### b. Accounting and financial reporting

As a group of companies, we understand our obligation to record data collection and records in financial reporting and accounting, complete, timely and orderly. We are committed to complying with legal requirements and supplement these with company-specific requirements. As a result, we provide regular and timely reporting for interest-based third parties.

## c. Protection of information, intellectual property, knowledge and know-how

Sensitive company-specific information must be protected during the design and execution of all (also IT-supported) business processes, on the basis of and in compliance with both the applicable statutory regulations and existing work instructions. With regard to data protection and IT and data security, both the protection of personal rights and privacy and information security must be ensured.

MEKRA Lang Group employees must protect confidential information against misuse or disclosure. Unauthorized, irresponsible disclosure or use of this sensitive information may have consequences for the employees concerned not only under labor law, but also under civil and criminal law. The confidentiality of confidential information remains valid even after termination of the existing employment relationship. Confidential information includes all non-public information, such as - but not limited to - the MEKRA Lang Group's trade secrets, business plans, marketing campaigns, product development information,

inventions, manufacturing processes, employee data, salary information, medical records and business figures.

Confidential information entrusted to the MEKRA Lang Group must be treated with the same care as the confidential information of the MEKRA Lang Group itself.





#### d. Privacy

We understand the importance of protecting the personal data of our employees, customers, suppliers, business partners, former employees and other data subjects. Only on the basis of the express written consent of the data subject, a previous contractual provision, legal regulations or extraordinary official basis, personal data may be collected, stored, processed, passed on or otherwise used. Insofar as personal data (of customers, suppliers, employees or other data subjects) are collected, processed or transmitted in connection with business processes, the applicable data protection regulations must be observed.

#### e. IT-Security

The IT and EDP security of our company is an important concern for us, as digital data is particularly sensitive and requires extraordinary protection. Digital data is exposed to a variety of risks, including the loss of data due to program errors, various malware such as viruses, or data misuse by hackers. The MEKRA Lang Group is committed to complying with all applicable

legal and regulatory requirements in order to protect its own data and also the data entrusted to us by third parties to the best of its ability at all times.

#### f. Secrecy

Confidential information of the company and information entrusted to us by third parties must be kept secret. This obligation remains valid even after termination of the employment relationship. If the disclosure of information is necessary and required for the proper conduct of business, it must be ensured that the information is classified in accordance with the existing current company guidelines with regard to its confidentiality and protected by appropriate measures (e.g. by a non-disclosure agreement).

#### g. Marketing and public relations

We attach great importance to clear communication with all our stakeholders, as well as with the press in a legal and honest manner. We respect the personal and professional reputation of our business partners and strive to communicate in a consistently appreciative manner. In order to ensure a consistent and

uniform appearance of our group of companies, all employees are obliged to follow the internal guide-lines. These require consultation with, and at best the involvement of, the Communications department.



#### a. Free market and fair competition

To the satisfaction of all market participants, it is our duty to comply with and protect all applicable competition and antitrust laws. Special care must be taken not to engage in any territorial or customer sharing, agreements or exchanges of information on prices or components, supply relationships and conditions of any kind, capacities and supply behavior with market participants. Any dominant market position that may exist must not be exploited. Unequal treatment of customers, suppliers and other business partners without an objective basis is not permitted. All employees are obliged to comply with the rules of fair competition within the framework of legal and company regulations. Any violation of applicable national and international regulations not only damages the reputation of the MEKRA Lang Group, but may also result in substantial fines and penalties. For the employees concerned, it can lead to consequences under labor law. In particular, it is not permissible for competitors to divide up territories or customers, to agree on or exchange information on prices/price components, supply relationships and conditions of any kind, or on capacities or supply behavior.

The same applies to the exchange of information on market strategies and participation strategies. Not only written contracts in this regard, but also verbal agreements or tacit, deliberate parallel behavior are generally not permitted. Agreements with customers and suppliers are not permitted which are intended to restrict customers' freedom to determine their prices and other conditions autonomously when reselling.

#### b. Supplier and customer relationships

Agreements with customers and suppliers must be made exclusively in the interests of the company. Internal control regulations (e.g. "four-eyes principle") must be observed by all employees. Suppliers are to be selected solely on a competitive basis after comparing price, quality, performance, company strategy and suitability of the products or services offered. Compliance with legal regulations and the provision of fair and safe working conditions by our suppliers are a basic prerequisite for cooperation.

#### c. Corruption

Corruption is not acceptable in any form and is detrimental to the company, as well as the economy. We do not tolerate any agreements or ancillary agreements that are based on taking advantage of or favoring individuals in connection with the procurement, awarding, delivery, processing and payment of orders. Attempts by suppliers or customers to unfairly influence employees of the MEKRA Lang Group in their decisions shall be reported to the responsible management. Commissions and remuneration paid to authorized dealers, agents or consultants must be in reasonable and justifiable proportion to their activities. No services may be agreed upon for which it can be assumed that they are intended in whole or in part for the payment of bribes. Violations of the legal requirements will not only result in fines for the MEKRA Lang Group, but also in consequences under labor, civil and criminal law for the employees concerned.

## d. Gifts, entertainment, invitations and other benefits

The acceptance and giving of gifts and other benefits (for example, participation in events not directly related to business), including invitations and other hospitality (from and to suppliers or customers), must be handled in an extremely restrictive manner.





Their financial scope must be such that their acceptance need not be concealed by the recipient and does not place him or her in an obligatory dependency. In cases of doubt, the written consent of the responsible management must be obtained. Employees are required to represent the interests of the MEKRA Lang Group at all times and to avoid conflicts of interest.

Gifts of any kind received by employees as employees of the MEKRA Lang Group are to be forwarded to the company management without exception; as a rule, they are given to the annual raffle, which is open to all employees in order to ensure equal treatment of all employees in this area as well.

## e. Prohibition of terrorist financing and money laundering

We understand our responsibility not only to act in accordance with applicable national and international regulations, but also to thoroughly review the standards of our suppliers, customers and other business partners with respect to these requirements.

Terrorist financing describes the act of using funds for terrorist purposes or to support terrorist groups. Money laundering is the use of funds derived directly or indirectly from criminal acts for legal functions in order to conceal their origin. One's own knowledge of the improper use of money for money laundering or terrorist financing is not a mandatory prerequisite for criminal liability. Thus, even unintentional support of these illegal activities can be punishable by severe penalties for all those involved, including individual employees.

#### f. Handling company property

The operating and fixed assets of the MEKRA Lang Group may only be used for business purposes. Use for personal purposes, fraudulent intentions or similar inappropriate purposes is prohibited. This applies equally to tangible property and intangible property (patents, knowledge, trademarks, data processing systems, etc.).





#### g. Conflicts of interest

A conflict of interest exists if your private interests, personal relationships or outside activities influence the performance of your professional duties or can give the impression of influencing them. In particular, secondary activities of employees can lead to a conflict of interest between the interests of the MEKRA Lang Group and the private interests of the employee. As a company, we make our decisions on a factual basis and not based on personal interests. In addition, we respect the private interests of the College and expect the same from our employees.

Employees damage the Group if they put their private interests above those of the company, so it is important for everyone to avoid and prevent conflicts. This also includes dealing with business relationships with acquaintances and appearing in social media.

### h. Handling with external consultants Intermediaries

In order to make an objective decision, it is advisable to entrust certain tasks in some areas of the corporate group to an external service provider. However, special care must be taken in the selection of these service providers, as the MEKRA Lang Group does not intend to hire third parties who do not meet the high ethical standards of our group of companies. Any misconduct on the part of these consultants and intermediaries is not only undesirable, but could under certain circumstances damage the reputation of the MEKRA Lang Group and lead to penalties of a not inconsiderable amount. Therefore, the selection of our external consultants and intermediaries is based on internal guidelines, as well as best ethical judgment and in accordance with legal requirements. Remuneration is always within an appropriate framework.

## Dealing with public officials and persons in public positions

Dealing with governments, authorities, office holders and elected officials or other public institutions is usually subject to special legal conditions. Even seemingly inconspicuous violations can seriously damage the MERKA Lang Group. Therefore, we comply with the legally applicable regulations and internal guidelines for the prevention and avoidance of corruption or conflicts of interest. In accordance with this, we also distance ourselves from any form of "facilitation payments" to expedite official acts.





#### j. Purchasing and procurement

The MEKRA Lang Group has contractual relationships with a large number of suppliers and service providers. None of our service providers and suppliers are chosen on the basis of personal interest or treated unequally. The choice is always made on a competitive basis based on price comparisons, quality, performance, company strategy, company standards and suitability of the products and services offered. The purchasing department is consulted as a neutral authority in the decision-making process.

#### k. Taxes and duties

As a global company, the MEKRA Lang Group must comply with various tax and customs laws. Compliance with these regulations, as well as with the foreign trade laws of the countries concerned, is a top priority and enables the Group to build and maintain a positive reputation. In the event of irregularities, this sensitive reputation can be irregularities, and financial damage is often the result.

The trust of customers, financial authorities and society is also built up and strengthened by law-abiding conduct. Any violation of legal and regulatory requirements harms the company and can also have a significant impact on the employee responsible.

#### I. Import and export control

Export control regulations cover not only the export of goods, but also of technologies and software. The only temporary export of intellectual and physical company property, as well as the technical transfer through, among other things, e-mails and cloud data is also covered. Exports of all types, including those previously mentioned, are subject to prohibitions, licensing requirements, restrictions or other monitoring measures under national and international import and export controls. In general, any business relationships with companies or third parties of any other kind that are on sanctions lists must be prevented.

# RELATIONSHIPS AT THE SOCIETAL LEVEL



As a company, we are integrated into society as a whole and assume responsibility.

#### a. Donations, sponsorship and charitable Acts

The MEKRA Lang Group likes to get involved in the form of donations and sponsoring of diverse projects in the areas of education, science, culture, sports and social concerns. These actions serve the reputation as well as the perception of our group of companies in the public and society. Donations are always made on a voluntary basis and do not require anything in return. Sponsoring in return, requires a contractually agreed consideration.

The allocation of such donations is decided exclusively by the Chief Executive Management they will always be processed in accordance with the legal regulations and the company's own guidelines. These guidelines are intended to avoid conflicts of interest and ensure uniform conduct. When making such donations, the principle of altruistic action must be observed. In addi-

tion, the granting of donations and sponsoring requires a transparent approval process.

#### b. Product quality / conformity and safety

We are aware of the possible disadvantages, damages and dangers for the health, safety, environment and assets of customers and third parties. Thus, "Passionately Better" means for us to always live up to our own claim of meeting the high quality and safety demands of our customers in compliance with all applicable legal regulations. We implement any improvements required for this purpose thoroughly and sustainably.

If, despite all efforts, deficiencies should have occurred, we act to eliminate them in accordance with legal stipulations, contractual obligations and with the clear priority of avoiding damage to life and limb. In this case, target-oriented measures would be initiated immediately.

#### c. Political representation of interests

Both politics and legislation influence the economic influence the economic framework conditions. Participation in political interest groups can have a significant impact on decision-making processes in the interests of our Group. This involvement is handled centrally and in accordance with the principles of openness, transparency, accountability and neutrality. All employees exercising their functions at MEKRA Lang are strictly prohibited from exerting unfair influence on political and legislative bodies, including but not limited to financing election campaigns and making donations to political parties or individual politicians.



#### RELATIONSHIPS AT THE SOCIETAL LEVEL



#### d. Reporting of irregularities

These rules of conduct are a central component of the corporate values we live by. Group-wide and uniform compliance with these values is indispensable - all employees are responsible for this.

Supervisors have a special responsibility to communicate the contents of this Code of Conduct to employees by setting an example. Every employee has the right to point out to his or her manager or the Human Resources Department circumstances that indicate a violation of the regulations contained in this Code of Conduct; if necessary, this can also be done anonymously. These indications will be investigated and, if necessary, remedial action will be taken.

If you have any doubts about how to behave in a particular situation or wish to report a violation of this Code of Conduct, the e-mail address compliance@mekra.de is available to you.

At any time, (also anonymous) tips can be made to the Human Resources Department via the mailbox of the Human Resources Department or to the supervisor(s) by means of an in-house mail envelope.

#### e. Whistleblowing

Employees and external persons have the right to report abusive behavior in confidence. This includes, for example, violations of our Code of Conduct, applicable laws or other requirements. To guarantee the greatest possible protection for whistleblowers and those affected, we have set up an independent confidentiality office. This function is performed by our long-standing data protection officer, atarax. The statutory duty of confidentiality and the right to refuse to testify ensure that the identity of the whistleblower is protected. The following communication channels are available to ensure complete confidentiality:

- Written notification by mail to: atarax Company group Luitpold-Maier Str. 7 91072 Herzogenaurach
- Via a whistleblower portal with contact form;
   Of course, already this forwarding will not be traced. It is your decision whether you want to report it anonymously via the portal or not.
- By phone at: +49 (0)160 96210839
- per E-mail to: compliance@atarax.de

In order to process cases and, if necessary, initiate appropriate investigative measures, it is often necessary to engage in dialog with whistleblowers. It is therefore important that the whistleblower is as specific as possible. In addition, it is helpful if you are available to answer further questions.



#### RELATIONSHIPS AT THE SOCIETAL LEVEL



#### f. Monitoring

Each company of the MEKRA Lang Group is responsible for compliance with the regulations contained in this Code of Conduct as well as other rules laid down within the company in its area of responsibility. We also require our suppliers to comply with the rules of this Code of Conduct. By handing over and signing the receipt of this Code of Conduct, they also agree to an audit with all legal consequences.

#### g. Sanctions

Many of our standards are not only based on the company's own values, but are also based on legal and regulatory requirements. Therefore, the Group reserves the right to take appropriate measures (up to and including termination of the business relationship or employment for good cause) in the event of serious violations of the regulations of the Code of Conduct or unreasonable obstruction in their review. The place of jurisdiction is generally Germany, unless otherwise agreed in an individual contract.

#### h. Responsible bodies

In case of questions or indications of misconduct, their responsible contact person:

#### Internal reporting of violations

Head of Legal compliance@mekra.de phone: +49 (0) 9847 989-8588

## Anonymous breach notification (external + internal) and Data Protection Officer

compliance@atarax.de phone: +49 (0) 16096210839 www.atarax.com

#### **General Contact Persons**

Human Resources Supervisor

#### **Human Rights Officer**

Anna-Theresia Harbusch@mekra.de phone: +49 (0) 9847 989-8682

#### A sympathetic ear for Susanne Lang (Managing Partner)

Tuesdays 13:30 - 14:30

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