

**Coros GmbH**

Code of Conduct

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## 1 EMPLOYEES IN FOCUS

### 1.1 Human Rights



As a company that operates all throughout Europe, we at Coros bear responsibility. We rely on an environment of mutual trust between our institutions, management and employees. In our dealings with each other and with others involved in our entrepreneurial activities, we foster a culture characterized by openness and tolerance, by respect and civility, and by fairness.

We protect, promote and highly regard the current regulations for the protection of human and children’s rights worldwide as fundamental and universal standards. We strongly object to any use of child labor, compulsory labor, or forced labor as well as modern slavery and human trafficking of any kind. At our company, compliance with all labor and social legal regulations and standards is a matter of course. This applies not only to cooperation within the company but also to behavior from, and towards, our business partners.

### 1.2 Equal Opportunity and Diversity



Diverse ideas, perspectives, experiences and abilities have the potential to improve the quality of our services and thus substantially contribute to the preservation of our innovative and dynamic corporate culture.

For this reason, we do not discriminate and tolerate no discrimination on the basis of ethnicity or nationality, gender, religion, ideology, age, disability, sexual orientation, skin color, political beliefs, social background or other characteristics protected by law. We live diversity, actively advocate for inclusion, and create an environment that promotes the individuality of each person in the interest of the company.

Our employees are chosen, hired, and promoted purely based on their qualifications and skills.

### 1.3 Personal Rights and Privacy



A fair and cooperative environment is essential in providing the best possible services for our company and for our customers. To achieve this, we treat every individual with respect and are considerate of one another.

Therefore, we expect collegiality and respect for colleagues and business partners as well as their employees from all management and employees in our organization.

We do not tolerate any comments or behavior that are personally derogatory, hostile and aggressive, or that could be taken as such by colleagues, business partners and their employees.

All forms of harassment or bullying are strictly prohibited at Coros. We all unequivocally oppose such behavior.

We define harassment as any behavior with the purpose or effect of violating someone's dignity and creating an intimidating, hostile, degrading, humiliating or abusive work environment.

## 1.4 Data Protection



Responsible and trustful collaboration between employees, business partners and customers as well as their employees requires that we respect the privacy of others and, if necessary, protect it.

We therefore collect, process, use and store personal data only in accordance with current legal regulations. All components of data processing performed by our company must be secured so that the confidentiality, integrity, accessibility, verifiability and resilience of sensitive information is guaranteed at all times and any unauthorized use is prevented.

## 1.5 Occupational Health and Safety



Alongside the quality of our services and the economic success of our company, the protection of employee health and safety is an equally important corporate objective.

Occupational safety and health protection are an integral part of all operational processes and are included in all technical, economic, and social considerations from the very beginning, even in the planning phase.

Each employee is responsible for the safety and health protection in his or her workspace and must adhere to the operational safety guidelines in all situations. Management is obligated to support employees in assuming this responsibility.

Therefore, we avoid risky behavior. As soon as we recognize a dangerous situation, we intervene and inform our superiors or warn our colleagues accordingly.

## 2 Environment and Resource Protection



Environment and resource protection is a corporate mission and a fundamental part of our social responsibility. Within the company, we work on environmental protection and, together with our customers, develop solutions, products and buildings for which we constantly optimize energy and resource efficiency in order to create sustainable values for our customers and society.

Climate protection is inextricably linked to energy consumption. Thus, we always strive to use the required energy as rationally and efficiently as possible.

Our processes are designed to ensure the best possible environmental impact of our products, services, buildings and facilities and to prevent unnecessary emissions, noise pollution, water pollution and waste.

## 3 COMMITMENT TO ETHICAL CONDUCT AND INTEGRITY

### 3.1 Adherence to the Rules of Fair Competition



Collaboration with our business partners and customers is the foundation of our success. Therefore, it is our goal to convince customers and the market of our competence exclusively by offering the best possible services and competitive prices.

For this reason, we are committed to fair competition and work respectfully and honestly with our business partners and customers.

One of the fundamental principles of Coros is that all bodies, management and employees act in accordance with the relevant competition law regulations.

### 3.2 The Active Fight Against Corruption



#### 3.2.1 Contributions to Public Officials and Business Partners

Coros and its employees act responsibly and actively oppose any form of bribery, corruption, or unlawful influence. We only wish to obtain orders from public sector customers and private business partners fairly and legally. Coros does not tolerate immoral or corrupt behavior from its management, employees or business partners.

Employees of Coros must not in any way be involved in corruption and/or granting of undue advantage, neither in the public nor private sector, whether actively as a donor or passively as a recipient.

It is our goal to avoid even the impression that benefits of any kind, whether material or immaterial, can be interpreted or viewed as compensation for a specific desired behavior.

We generally avoid offering public officials or employees of private companies any form of bribery, payoffs, facilitation payments, "kick-backs" or other tangible or intangible benefits in order to secure a deal or execution of a job or transaction.

It is also forbidden to request or accept any of the benefits listed above from public officials or employees of private companies, for oneself or for a third party.

### **3.2.1.1 Public Sector Officials and Employees**

The definition of a public official in most states is very broad. It includes not only civil servants, judges, soldiers and international officials but also employees of public administration and employees of public-law dominated private companies, like public utilities.

With representatives from the public sector, especially in the case of invitations, written consent from a supervisor must be obtained beforehand. In dealings with public sector officials and employees, we are expected to exercise special care to ensure that all laws, regulations, statutes and guidelines are observed.

### **3.2.1.2 Acceptance of Contributions and Invitations**

As a matter of principle, employees of Coros do not accept contributions or invitations from business partners, nor allow them to be promised if a business partner or outside third party could receive the impression that the decisions of Coros employees can be influenced by these contributions or invitations.

### **3.2.1.3 Granting of Contributions and Invitations**

It's common in the course of business to give the occasional gift or to treat employees of customers or business partners to hospitality and entertainment. Coros does not, however, consider this socially appropriate behavior, which should be consistent with conventional hospitality, to be an opportunity to influence decisions or to secure illegitimate benefits from an official or other private business partner.

In principle, gifts and invitations must be moderate, sporadic and appropriate to the occasion as well as the position of both giver and receiver of the invitation.

Gifts and invitations must always remain within the scope of normal business dealings for donor and recipient and must never influence business decisions or even appear to influence the recipient or uninvolved third parties.

If the company, office, or public body at which the recipient of the gift or invitation is employed has its own compliance regulations, these must be observed with regard to the choice and value of the gift / invitation.

Under no circumstances is it permitted to give monetary gifts or gifts with a cash equivalent [gift certificates, vouchers, etc.].

### 3.2.1.4 Use of Third Parties in Granting of Contributions and Invitations

Our company's strict Zero Tolerance Policy in the field of corruption also applies to third parties employed by our company as intermediaries, consultants, agents, sales representatives, suppliers, lobbyists, or other service providers, both nationally and internationally. Under no circumstances may third parties be engaged to circumvent our company's strict anti-corruption policy. In engaging third parties, it must be ensured that all third parties also fully comply with all applicable laws, guidelines and regulations as well as all requirements from the Code of Conduct for business partners and all relevant business procedures of Coros.

### 3.2.2 Avoiding Conflicts of Interest

Furthermore, all corporate bodies, managers and employees of Coros are obligated to make their business decisions free from conflicts of interest and exclusively in the interest of their company. By our definition, a conflict of interest can occur if the objective decision-making ability of the affected party could be influenced by their own interests or those of a third party and if there is a risk that the decision can no longer be made solely for the exclusive benefit of our company. To rule out the possibility of a conflict of interest, the question should be asked whether from our behavior, a third party could draw negative conclusions about our integrity and loyalty to the company.

For this reason, we avoid situations where our private interests could collide with the interests of the company or with those of our business partners. If such a conflict of interest has arisen, we are obliged to immediately disclose it and work with the respective management and compliance officer to find the best solution, taking into account the interests of our company.

### 3.2.3 Committee Membership and Secondary Employment

Taking on a position in the executive board, supervisory board or advisory board of another business enterprise or trade association is only allowed if it has been approved in writing by Coros management beforehand. The application for approval must be submitted to the Human Resources department.

Before we accept paid secondary employment, it should be authorized by the HR department. A secondary position can be denied or permission can be revoked if it leads to an impairment of the employee's work performance, conflicts with company responsibilities or if there is risk of a conflict of interest, especially in a competitive situation or within a contract and supply chain.

## 3.3 Protection of Company Secrets and Assets



We recognize the value of proprietary know-how and protect it carefully. The success of Coros and the innovative firms that belong to Coros depends on how management and employees handle confidential information. Data and information that come to our attention in the scope of operations may only be used within the authorized framework. Any release of information to a third party, whether a subcontractor, supplier, customer or colleague, is allowed only after

careful verification that the recipient is authorized to receive the information. It is also necessary to check which information the recipient actually needs to perform his/her assignment.

Examples of company intellectual property and intangible assets include:

- Trademark, patent and copy rights,
- Commercial and financial information,
- Information regarding research and development, including know-how and innovations,
- Business related records and documents,
- Information on customers and suppliers.

We respect the intellectual property of competitors, business partners and other third parties.

Our company provides us with a wide variety of tools, vehicles, equipment, inventories and materials for our day-to-day work. We take full responsibility for the items entrusted to us. Company property must be used exclusively for company purposes. Improper use for other personal or unauthorized purposes is forbidden. We protect these company assets from theft, misuse, damage and waste.

### 3.4 Combating Money Laundering

*Sustainable  
Development  
Goals*

ESG

*Environment  
Social  
Governance*

Money laundering is the covert introduction of illegally obtained assets into legal economic circulation, thereby concealing the criminal origin of the money. Coros is subject to the Money Laundering Act and is committed to the prevention of money laundering. Therefore, it has among other things appointed a money laundering officer.

Especially with new business partners, it's important to watch out for warning signs of money laundering. This can mean unusual payment methods, like offshore accounts and trust accounts, but also the desire to pay all or part of the balance owed in cash. Another indication can be that the true beneficial owner, or the person that is actually behind the business, is deliberately kept secret.

If in doubt or in the case of suspected irregularities, please contact your supervisor or appointed money laundering officer.

### 3.5 Insider Trading

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Development  
Goals*

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Social  
Governance*

Insider trading is unethical and illegal. Employees may not trade shares of a company if they are in possession of important, nonpublic information about that company. It is also illegal to pass on insider information to others who can make investment decisions based on this information, or to divulge this information to third parties. Coros has an available compliance policy that defines responsibilities concerning relevant employee trading.





## 3.6 Tax Compliance

<p><b>Sustainable Development Goals</b></p>		<p><i>Environment Social Governance</i></p>
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Coros contributes to public finances by punctually paying taxes. Observance of tax regulations includes measures such as providing the proper authorities with up-to-date relevant or statutory information, so that the taxes incurred in connection with Coros’ business operations can be correctly assessed, as well as observing the Arm’s Length Principle in determining any transfer prices that may be required.

## 4 DONATIONS AND SPONSORSHIPS

<p><b>Sustainable Development Goals</b></p>		<p><i>Contribution to a particular goal is case dependent</i></p>		<p><i>Environment Social Governance</i></p>
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As a responsible member of society, Coros supports education, science, research, culture and social issues as well as athletics and the environment. Support in the form of donations or sponsorships may only occur in an economically appropriate manner within the legal framework. The goal of a donation or a sponsorship is always to positively shape Coros’ public perception and reputation.

Donations and sponsorships in order to secure economic or legal advantage are not permitted.

Donations to individuals, to private accounts, and to people or organizations that may hurt the reputation or interests of our company will not be granted.

Without exception, all donations and sponsorships require written approval from management as part of a transparent and clearly documented approval process. This approval is to be obtained before commitment to any donation or sponsorship.

## 5 DEALING WITH SUPPLIERS AND SUBCONTRACTORS

<p><b>Sustainable Development Goals</b></p>			<p><i>Environment Social Governance</i></p>
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Business partners, i.e., subcontractors, suppliers, and service providers, are important to the success of Coros. They play not only an important role in the satisfaction of our customers, but also support us in creating sustainable values.

We maintain business relations only with respectable partners that comply with the law. Sustainability is the core of our subcontractor and supplier management. Thus, we have the same high expectations for our business partners and their actions as for our own.

The following principles apply to all business collaborations:

- We work faithfully and collaboratively with our business partners.
- We dedicate ourselves to the partnership and help our business partners grow.
- We prefer to work only with business partners that are willing to solve problems proactively and implement appropriate safety measures.
- We carry out all legally required checks of our business partners, e.g. to avoid illegal employment.

## 6 THE COMPLIANCE MANAGEMENT SYSTEM AT COROS

### 6.1 Compliance Organisation



The Coros Compliance Organisation ensures that for all managers and employees in every company and every branch or division of Coros, there is an onsite contact for issues of compliance.

The Compliance Manager (CM) serves as “ambassador” for the subject of compliance at Coros. They are the central contact for all questions and issues regarding compliance and conduct training to support implementation of Coros compliance programs. They create an annual compliance report covering possible compliance incidents and conducted training courses, or training courses they believe to be necessary. They are also responsible for timely ad hoc reporting of compliance related issues to company leadership.

### 6.2 Implementing the Code of Conduct



The corporate body and senior management at Coros are responsible for ensuring that their employees are familiar with the relevant laws, specifications of the Code of Conduct and related business procedures and that they always follow these guidelines in their professional environment.

With support from the Compliance Organization, the values of Coros, the Code of Conduct and all related business procedures are regularly reviewed. Adherence to these policies and procedures is strictly required by the corporate body and management and is an integral part of operational performance evaluation.

Coros compliance representatives are available to all Coros employees for personal conversations, either by telephone or e-mail.

Coros encourages its employees and business partners to speak freely about any noticed violations of the law, Coros values, this Code of Conduct, or Coros business procedures. Upon request, any hints at possible unethical or unlawful behavior, given to the best of knowledge, will be handled confidentially as far as possible. Coros takes such information very seriously and follows up with an established, structured investigation procedure. The results of the investigation

are discussed within the Compliance Office, at which point the compliance representatives document the findings and report them to Coros company leadership.

## 6.3 Coros' Zero Tolerance Strategy

*Sustainable  
Development  
Goals*

ESG

*Environment  
Social  
Governance*

In the event of employee violation of company rules of conduct or legal regulations, Coros will take the necessary disciplinary and labor law measures against employees responsible.

These can range from a written warning to extraordinary termination of employment. Irrespective of possible further criminal consequences, the company reserves the right to pursue any damages caused by the employee's behavior within the scope of possibilities under labor law.

## 7 ADDITIONAL INFORMATION AND GUIDANCE

This Code of Conduct and the related policies and procedures cannot anticipate and cover every imaginable situation. If in any particular situation you, as a manager or employee, feel uncertain and have questions regarding proper behavior, please always consult your Compliance Officer.

For all questions regarding compliance and acting with integrity, Coros' Compliance Organisation can be reached through the following channels:

E-mail: [aml@coros.de](mailto:aml@coros.de)