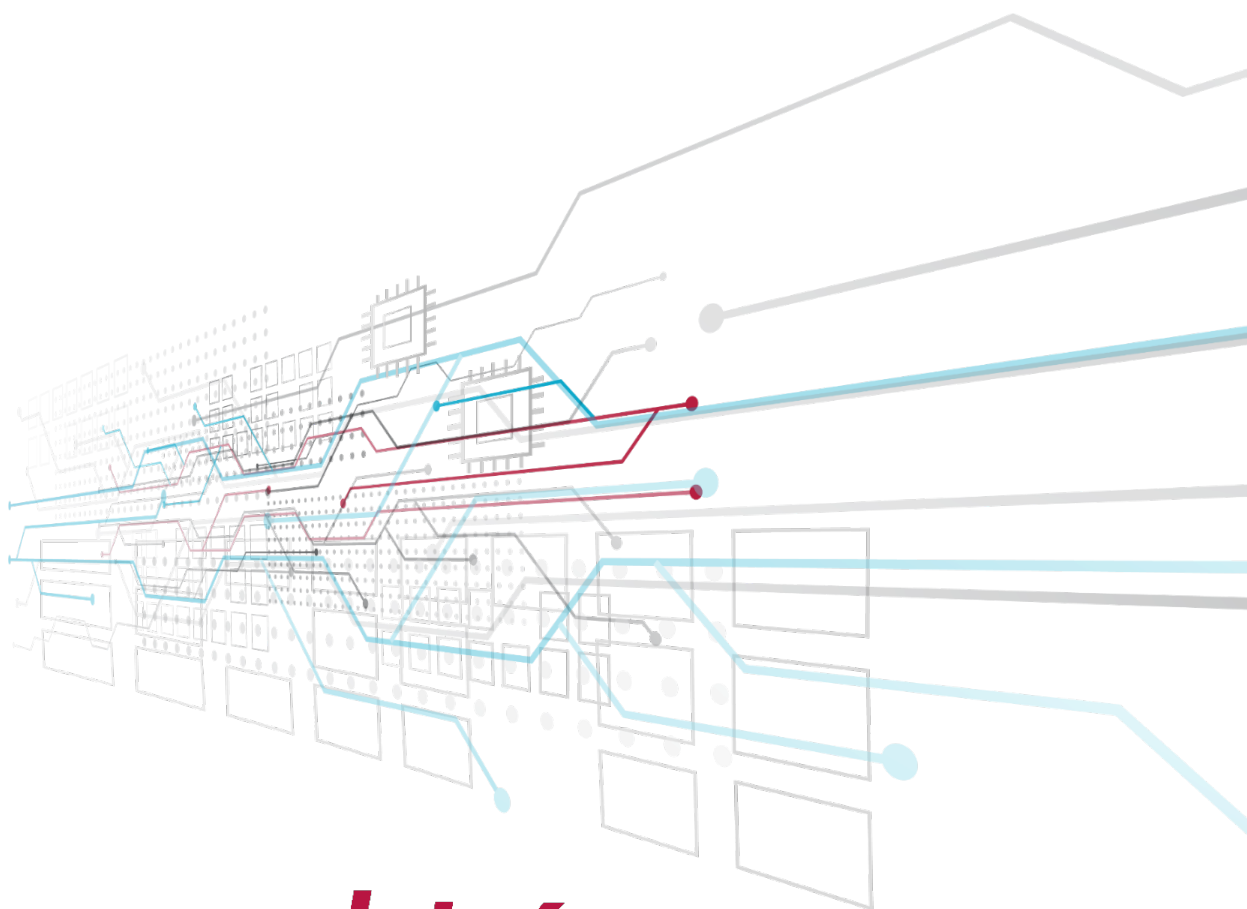


CODE OF CONDUCT

btv technologies GmbH policy statement

07.2025 | EN Vers. 2.10



btv
technologies

Dear business partners and suppliers,

As demanded by many of our customers, it goes without saying that **btv technologies GmbH** also wants to prevent human rights and environmental violations in connection with our business activities. With this declaration of principles, we take the opportunity to communicate our own standards externally and, in particular, to pass them on to our valued suppliers, and thus business partners, in our supply chain with the aim of contributing to a socially just, environmentally friendly and sustainable world.

The **content of this Code of Conduct, or Human Rights Policy**, represents central values and principles. The **Code of Conduct** is aimed at our business partners and suppliers as well as our employees at all current and future affiliated locations.

Sustainability and integrity are at the heart of our services and at the heart of our employees. With our customized services along the value chains of our globally active customers, we are helping to drive the ongoing transformation of the economy towards a healthy ecosystem for sustainable mobility and industries, particularly with our logistics concepts. Where btv can, we support our customers' demands for carbon neutrality along the entire value chain. Many of our customers are already demanding 100% emission-free mobility, 100% closed resource and product cycles and 100% responsible procurement. The goal of reducing negative impacts along the value chain and creating economic, social and ecological value for all stakeholders and society is therefore also btv's goal.

Specifically for our staff, we also refer to our Code of Ethics and Conduct, which is available to all employees on our intranet and whose defined rules of conduct apply throughout the company regardless of hierarchical levels.

This code of conduct is intended to promote social change. We all live on the same planet and share the same finite amount of natural resources, so we all share some responsibility for each other's happiness or misery. Sustainable business practices and integrity should therefore follow the guiding principles of the United Nations.

Note: For reasons of better readability, all genders are meant in the following text wherever a specific gender is mentioned.

Content

1.	Compliance with laws, regulations and legal provisions	3
2.	Corruption and bribery	3
3.	Human rights, forced labor, child labor, social responsibility and occupational health and safety	3
4.	Due diligence / conflict minerals / Dodd-Frank Act / REACH / ban on substances of very high concern in the supply chain.....	4
5.	Sustainability, environmental protection and ecological responsibility.....	4
6.	Respect for the fundamental rights of employees, equal opportunities, freedom of association and prohibition of discrimination.....	5
7.	Social responsibility, remuneration and working hours	5
8.	Confidentiality and data protection	5
9.	Information security / ISMS / business information and intellectual property	5
10.	Supply chain / technical compliance.....	6
11.	Complaints procedure	6

1. **Compliance with laws, regulations and legal provisions**

Our suppliers are obliged to comply with existing laws and regulations of the countries in which they do business and to take appropriate measures to ensure compliance with laws, rules and regulations. This includes all applicable antitrust laws, trade practice laws and all other competition laws, rules and regulations dealing with, for example, monopolies, unfair competition, restraints of trade and relationships with competitors and customers. The prevention of money laundering and compliance with export and import regulations as well as protection against eviction and land confiscation are considered absolutely binding.

2. **Corruption and bribery**

We strictly reject any form of corruption or bribery. Likewise, we strictly reject any conduct in which business is conducted by unfair means. This also includes any benefits that could lead to an impairment of an objective and fair business decision or even give the appearance of such. Theft, embezzlement or extortion, illegal.

Payments, in particular payments or other benefits to companies or individuals, as well as to government officials, with the aim of influencing the decision-making process in violation of applicable laws. We do not accept any illegal benefits, such as bribes, kickbacks or other illegal advantages, including inappropriate gifts and hospitality, in exchange for business opportunities.

To prevent conflicts of interest, our employees are expected to act in the best interests of our company. Personal and private interests must therefore not influence business decisions. If you become aware of any potential conflicts of interest, please inform btv technologies GmbH immediately.

3. **Human rights, forced labor, child labor, social responsibility and occupational health and safety**

The Universal Declaration of Human Rights (UDHR) of 1948 is probably the best-known human rights document, and this and the UN Guiding Principles on Business and Human Rights represent an important cornerstone for the international protection of human rights.

Accordingly, btv technologies GmbH is committed to the observance of human rights in accordance with the applicable human rights charter. Due diligence along the supply chain should be mandatory for every company. For this reason, we naturally also demand this along our suppliers' supply chains.

All forms of forced labor and child labor, including wage slavery, are prohibited and suppliers may, of course, only employ workers who have reached the minimum age applicable in the region. Our suppliers are obliged to procure their goods and their components only from sources that do not use forced labor or child labor. For btv, health and safety in the workplace is one of the fundamental rights of employees. All suppliers are thus required to establish responsible practices in order to manufacture and deliver safe products for the supply chain, in which btv is an important link with logistical service concepts. The goal should be to create a safe, healthy and ergonomic work environment that prioritizes accident prevention and minimizes health risks for the supplier's (business partner's) employees and contractors or subcontractors. In order to achieve this goal, the respective official regulations for safety and health management systems must be implemented. We require emergency management, comprehensive fire prevention measures and the responsible handling of chemicals.

4. Due diligence / conflict minerals / Dodd-Frank Act / REACH / ban on substances of very high concern in the supply chain

The preservation of natural resources for future generations is part of our company's corporate responsibility. Conflict Minerals / Dodd-Frank Act: Disclosure and reporting obligations must be complied with where applicable.

The Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) regulation must be complied with where applicable. Compliance with these requirements is specified by our customers along the supply chain. As a non-manufacturer of products, btv supports these strict requirements and recommends that our customers are bound by these requirements when selecting the products and manufacturers that btv includes in the supply chain in accordance with the set part and set supplier specifications, so that evidence or statements from the manufacturers about these obligations are consistently available. We recommend the same approach for due diligence checks along the supply chain in order to identify risks at an early stage that may relate to human rights violations and environmental impacts.

btv expects that all applicable legal requirements relating to minerals from conflict-affected and high-risk areas are consistently known by manufacturers of products and that these requirements are complied with, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

5. Sustainability, environmental protection and ecological responsibility

The importance of promoting natural resources and avoiding environmental risks, as well as promoting CO2 neutrality and, as a non-manufacturer of products, supporting our customers in contributing to the transition to a low-carbon economy, is one of our company's goals and goes hand in hand with sustainability and environmental protection as well as climate protection.

All suppliers are required throughout the supply chain to adhere to the principles and standards of sustainability and environmental protection. This includes acting in an environmentally conscious manner and using natural resources responsibly. The environmental impact should be constantly minimized and environmental protection improved wherever possible in business operations. All links in the supply chain are obliged to comply with the applicable national and international environmental protection regulations and standards relating to their respective activities. Environmental pollution must be minimized, environmental protection must be continuously improved and resources must be used sparingly. Increasing energy efficiency and generating or purchasing energy from renewable sources are measures required in the supply chains that contribute to reducing CO2 emissions and thus to preserving all our natural resources.

Product manufacturers are expected to set up and apply an environmental management system in accordance with ISO 14001 or an environmental management system suitable for the respective industry. This is a component of the requirements along the automotive supply chain. We recommend that non-manufacturers maintain an environmental management system based on ISO 14001, as btv does. Comprehensive reporting on the respective environmental performance (emissions, water, waste, etc.) and its publication via sustainability reports or platforms such as CDP is increasingly required throughout the supply chain.

Use resources sustainably by demonstrably reducing the consumption of energy, water, raw and auxiliary materials. Especially in areas with water shortages, water extraction should be minimized and access to drinking water and sanitary facilities should be a matter of course. The quality standards for waste and waste water as well as soil protection and the protection of water bodies must be defined and monitored within the framework of the applicable legal and official requirements.

All partners involved in the supply chain are called upon to observe the ban on the non-environmentally friendly handling, collection, storage and disposal of waste in accordance with the regulations

applicable in the respective legal system. The circular economy approach shall be promoted and the use of recycled materials shall be encouraged wherever possible.

Appropriate environmental management procedures should be standard and maintained. Climate protection and the protection of air quality as well as the responsible use of chemicals, including the final topics listed below, are necessary: Soil protection, water protection, biodiversity conservation, proper waste treatment and handling, noise prevention and limiting deforestation.

6. Respect for the fundamental rights of employees, equal opportunities, freedom of association and prohibition of discrimination

Excellent employees come from different walks of life, but they all expect to be treated fairly and ethically. Companies with a Code of Conduct assure potential employees that they will not be discriminated against, sexually harassed, intimidated, bullied or subjected to any other type of harassment in the workplace.

The personal dignity, privacy and personal rights of everyone must be respected. Any form of discrimination or physical punishment against employees must be prohibited as a matter of principle, as must psychological, sexual and verbal harassment or abuse.

Our suppliers and business partners are committed to equal opportunities and equal treatment of their employees regardless of their ethnic origin, skin color or gender, religion or ideology, disability, age, sexual identity or political persuasion.

The fundamental right of employees to form trade unions and to join them of their own free will is respected. Membership of trade unions and employee representative bodies must not be a reason for unjustified unequal treatment. The right to collective bargaining to regulate working conditions and the right to strike must be granted in accordance with the laws of the respective countries.

7. Social responsibility, remuneration and working hours

Suppliers are aware of their social responsibility towards their staff and undertake to fully comply with the applicable social standards at their sites by ensuring a safe and healthy working environment. It goes without saying that working hours comply with the locally applicable laws and that break, rest and vacation times are observed. Standard industry regulations on working hours and pay are applied.

Continuing education and training of staff to develop performance should be an important part of social responsibility throughout the supply chain.

8. Confidentiality and data protection

Our suppliers undertake to keep confidential all business and financial data of btv technologies GmbH as well as business correspondence and to use them only for the purposes agreed with us. Likewise, all applicable laws and applicable regulations regarding the protection, use and disclosure of internal, confidential and personal data must be complied with. Special data processing contracts, in the case of the processing of personal data, must be negotiated specifically.

9. Information security / ISMS / business information and intellectual property

btv technologies GmbH recommends that suppliers of products and services with relevance to data protection and information security implement a management system for data protection and information security. Recognized standards such as ISO/IEC 27001 or TISAX as well as BSI IT-Grundschutz can serve as a basis for this. However, such management systems are not mandatory for suppliers of products and services unless they are explicitly required as part of contracts.

Irrespective of this, it must be ensured along the supply chain that all sensitive business information or business secrets, which are referred to as "business information" due to joint business activities, are treated as strictly confidential and are not misused or passed on to third parties. Intellectual property rights must be respected along the supply chain.

10. Supply chain / technical compliance

Irrespective of the fact that btv technologies GmbH receives manufacturers and sources of supply specified by our customers in the course of its logistics services and that the manufacturers and suppliers also deliver directly to our customers, we pass on requirements along the supply chain in order to promote the common goal of compliance. The respective technical conformity of the products and compliance with the ordered product specifications must be ensured by the manufacturers, applying the respective legal and technical regulations, industry standards and other norms as well as state-of-the-art product integrity. Product safety, product conformity and cyber security of the product are requirements of the common customers along the supply chain.

We thus call on our suppliers in the supply chain and at the same time oblige them to pass on compliance with this declaration of principles to their suppliers in the supply chain to the best of their ability.

This declaration of principles also contains requirements from our customers, which we continuously evaluate and pass on to btv technologies in accordance with their requirements in the best possible way in line with the setting part and setting supplier specifications in the supply chain. We do this irrespective of the fact that the requirements have in all probability already been directly addressed in the supply chain by our joint customers to our specified suppliers.

11. Complaints procedure

Possible violations of human rights and environmental regulations, laws and other serious misconduct in the supply chain can be reported to us, anonymously if desired.

Business partners, including our valued suppliers, can also use this channel to report violations of this policy to btv technologies GmbH at any time.

Address btv technologies

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