



CODE OF CONDUCT

VERSION 2026



HIRSCHMANN
AUTOMOTIVE

Content

| | | |
|----------|--|---------|
| 1 | Foreword | page 04 |
| 2 | Scope | page 05 |
| 3 | Basic Rule of Conduct | |
| 3.1 | Legal Compliance and Integrity | |
| 3.2 | Trustful Cooperation | |
| 3.3 | Error Culture | |
| 3.4 | Avoidance of Conflicts of Interest | |
| 3.5 | Conduct in Public | |
| 3.6 | Financial Responsibility | |
| | | page 06 |
| 4 | Conduct towards Business Partners and Third Parties | |
| 4.1 | Prohibition of Corruption and Bribery | |
| 4.2 | Invitations and Gifts | |
| 4.3 | Donations and Sponsorship | |
| 4.4 | Fair Competition | |
| 4.5 | Money Laundering and Terrorist Financing | |
| 4.6 | Economic Sanctions and Export Controls | |
| | | page 09 |
| 5 | Sustainability and Environmental Protection | |
| 5.1 | Environment, Climate and Animal Protection | |
| 5.2 | Sustainable Use of Resources and Waste Management | |
| | | page 13 |

6 Social Responsibility

- 6.1 No Discrimination
- 6.2 Respect for Human and Labor Rights
- 6.3 Fair Working Conditions
- 6.4 Forced and Child Labor
- 6.5 Health and Safety at Work
- 6.6 Recruitment, Training and Development

page 15

7 Information and Property Protection

- 7.1 Privacy
- 7.2 Handling of Confidential Information
- 7.3 Handling of Corporate Property
- 7.4 Protection of Intellectual Property
- 7.5 Protection of Innovation
- 7.6 Artificial Intelligence

page 19

8 Compliance with the Code of Conduct

page 22

9 Whistleblower System

page 23

10 Contact

page 24

1 Foreword

Dear Colleagues!

Responsible conduct, fair interactions, legally compliant behavior, sustainability, and integrity are top priorities within Hirschmann Automotive Group (hereinafter „Hirschmann Automotive“) and are central components of our **corporate culture**. At the same time, we take our social responsibility very seriously.

This Code of Conduct is based on our values (**passion, cooperation** and **commitment**) and key international standards, supports us in achieving our strategic goals, and is essential for ensuring compliance with the applicable legal framework.

To ensure responsible and lawful conduct, we place great importance on social, economic and environmental aspects, such as fair working conditions, health and safety in the workplace, sustainability, environmental protection and conserving resources. With this Code of Conduct, we aim to promote a culture of integrity and respect in which all employees are treated equally, even in an intercultural context. In doing so, we follow the principle that responsible conduct and economic success are not mutually exclusive but rather complement each other.



This Code of Conduct establishes a **globally uniform standard for our conduct** at Hirschmann Automotive, is based on the principles of the United Nations Global Compact and is characterized by openness, honesty, transparency and fairness. These principles are an important tool for ensuring that we behave in a legally compliant, ethical, moral, and responsible manner.

To achieve these goals, **we must all make our contribution**, which at the same time serves our long-term corporate success. Each and every one of us plays a critical role in the implementation of this Code of Conduct. By acting according to these principles and working together to promote social responsibility, we can foster positive change and create a better future for all of us.

We thank you for your support and commitment in implementing and complying with this Code of Conduct.

Together we can achieve great things.

[#ConnectedByPassion](#)

Handwritten signature of Angelo Holzknrecht in blue ink.

Angelo Holzknrecht, CEO

Handwritten signature of Stefan Tschol in blue ink.

Stefan Tschol, CFO

2

Scope

This Code of Conduct applies to all employees of Hirschmann Automotive and is our binding guideline for compliant behavior.

This Code of Conduct forms the basis for our responsible and compliant behavior within Hirschmann Automotive Group and towards third parties. It serves as a globally **binding guideline for all employees of Hirschmann Automotive** and thus applies to all supervisors, white-collar employees, workers, apprentices, employees on a contract-for-work-basis, security personnel, leased employees and other personnel of other companies working at Hirschmann Automotive sites.

The Code of Conduct **enters into force** and becomes **binding** upon its publication in the intranet and is **accessible** there at any time for everyone. We commit ourselves to always complying with the provisions of this Code of Conduct.



3

Basic Rules of Conduct

We act with integrity by complying with guidelines, reflecting our actions and making responsible decisions.

3.1 Legal Compliance and Integrity

Integrity means doing the right thing and adhering to both external and internal guidelines. This not only ensures legal compliance but also strengthens trust between us and our business partners.

We safeguard that we implement this principle in all areas by **always acting in accordance with the applicable laws**, regulations, regulatory requirements and internal guidelines when carrying out our activities for Hirschmann Automotive. In doing so, we regularly question our actions and make conscious, well-considered decisions.

We take all necessary measures to ensure legally compliant behavior and integrity at Hirschmann Automotive globally.

If you have any questions about legal provisions or internal regulations that apply to your work, please contact your supervisor or the Compliance Helpdesk.

We promote positive cooperation through respect, transparency and open communication.

3.2 Trustful Cooperation

At Hirschmann Automotive, we place great importance on a **respectful and open working environment**. Trusting and fair interaction creates positive conditions in which every idea is welcome and everyone can actively participate. In this way, we not only promote cooperation, but also strengthen mutual appreciation.

Each and every one of us contributes to ensuring that decisions are clear and comprehensible. Through **open communication and honest exchange**, we can overcome challenges together and learn from each other.



We create a work environment where mistakes can be addressed openly in order to learn and develop together.

3.3 Error Culture

Dealing openly and honestly with mistakes promotes **further development** and creates **space for innovation**. Sharing experiences and supporting each other enables continuous improvement in working methods and collaborative learning.

It is the responsibility of each and every one of us to create an environment in which mistakes can be addressed openly without fear of unfair consequences. An open error culture in our daily work is essential for Hirschmann Automotive and also means that we **address irregularities**, actively seek dialogue, give each other **open and respectful feedback** and seek support if we have questions or problems.

Supervisors have a special **role model function** in this regard. They promote an open culture of dealing with mistakes, support employees in complying with rules, and investigate violations. In this way, a culture characterized by trust and continuous improvement is created.

3.4 Avoidance of Conflicts of Interest

We ensure that personal interests do not influence business decisions and disclose potential conflicts of interest immediately.

At Hirschmann Automotive, everyone's personal interests and private life are respected. At the same time, however, it is crucial that **personal interests do not influence Hirschmann Automotive's business decisions or goals**. Conflicts of interest can result in economic and financial damage and have a negative impact on the company in the long-term.

We ensure that conflicts of interest are avoided. Should potential conflicts of interest nevertheless arise, **we disclose them immediately** and work together with the respective supervisor, Human Resources (HR), or the Compliance Helpdesk to find a solution that does not affect the interests of Hirschmann Automotive.

Examples

Conflicts of interest may arise when, for example, contracts are awarded to family members or friends, when objectively unjustified recruitment or promotion of family members or friends takes place, or when secondary employment in other companies interferes with objective decision-making in the context of our professional activities.

Your supervisor assigns you the task of reviewing offers from various suppliers and making a selection. You notice that one of the offers comes from a good friend's company. To maintain transparency and prevent any potential conflict of interest, you inform your supervisor and withdraw from the decision-making process. This ensures that the decision remains objective and is based solely on business criteria.

Secondary employment in other companies can also constitute a conflict of interest. Therefore, any secondary employment may only be carried out with the prior approval by Hirschmann Automotive and in consultation with HR.



Public statements made on behalf of Hirschmann Automotive to the media are always controlled by Marketing & Communication. We behave fairly and respectfully in public and express our personal views in our own name.

3.5 Conduct in Public

To ensure a consistent public appearance of Hirschmann Automotive, **statements made by Hirschmann Automotive** to the media (e.g. online, print, TV, radio and social media) are controlled exclusively by the Marketing & Communication department and must be coordinated with Marketing & Communication in advance. In doing so, we ensure at all times that all communications directed at the public are accurate, clear, understandable and not misleading.

Of course, we can express our personal views – for example on social networks or in interviews at events – in our own name. However, we must maintain **confidentiality** of company information, remain **fair and respectful**, and comply with all **legal and internal guidelines**. We also make sure that it is clear to everyone that these are our personal opinions and not official statements on behalf of the company.

Examples

You see a new post from Hirschmann Automotive on LinkedIn and want to comment on it. Make sure that you behave fairly and respectfully.

You visit a trade fair and are approached by a journalist about current developments in the automotive industry. The journalist is also interested in Hirschmann Automotive's future plans and asks you for a statement. You kindly explain that you cannot provide any information on specific company plans and refer the journalist to the responsible department (Marketing & Communication), which can provide this information.

When using social media in relation to Hirschmann Automotive, we adhere to the provisions of the **Social Media Playbook for Employees**.

We record financial transactions correctly and in accordance with legal requirements and internal regulations.

3.6 Financial Responsibility

We bear a significant responsibility in the handling of financial resources. Hirschmann Automotive attaches great importance to maintaining the highest standards when recording and executing financial transactions as well as preparing financial reports.

Our task is to always record and document financial transactions correctly and comprehensibly – in compliance with all applicable legal provisions and internal requirements.

All payments and incoming payments must be recorded and approved in accordance with internal guidelines. The **Rules for Competencies and Signature Authorization** regulate in detail, following the four-eye principle, who approves which transactions and who signs which documents (such as contracts).

4

Conduct towards Business Partners and Third Parties

We strictly reject corruption, fraudulent behavior and the unlawful acceptance of personal advantages and maintain business relationships exclusively on an objective basis.

4.1 Prohibition of Corruption and Bribery

Corruption is the **abuse of a position of power or trust to gain a financial or personal advantage**. Corruption therefore essentially involves people exploiting their position or authority to obtain (personal) advantages to which they are not entitled (such as paying bribes in order to receive something in return). Such behavior not only leads to damage for Hirschmann Automotive but is also a criminal offense and punishable by law.

We strictly reject any kind of active and passive corruption and **avoid even the appearance of undue influence** – whether towards business partners, authorities, public officials, politicians or other third parties. Likewise, fraudulent behavior, extortion and other activities aimed at obtaining an advantage dishonestly or unlawfully are strictly prohibited.

We therefore establish and maintain business relationships **exclusively on the basis of objective criteria** such as quality, price, technological standard or reliability. Illegal personal advantages are neither accepted, demanded, offered, nor granted.

Examples

A supplier asks you to make a decision in favor of his company when selecting an order and promises you a financial share of the profits in return. You realize that this is a form of bribery. To avoid corruption, you reject the offer and inform your supervisor or the Compliance Helpdesk about the supplier's behavior. The contract will be awarded exclusively on the basis of objective criteria.



We only accept invitations and gifts if they are of low value, appropriate to the occasion, and do not serve to influence our decisions.

4.2 Invitations and Gifts

Invitations and gifts are **common in business relationships** and can help to strengthen partnerships. At the same time, it is essential that they are handled **responsibly and transparently**.

We grant or accept invitations and gifts only if they are **appropriate to the occasion, of low value** and considered **part of generally accepted business practice** (e.g. promotional gifts). Invitations to business meals or events are accepted only if they are **unsolicited**, serve a **business occasion**, are **not repeated too often** and are **proportionate to the occasion**.

We make sure that invitations and gifts are **not misused for the purpose of influencing our business decisions** and are neither suggested nor requested or demanded by us. If there is even the slightest appearance of inappropriate influence, we immediately decline such invitations or gifts.

Examples

You work in purchasing and receive an invitation from a supplier to a sports event lasting several days, including accommodation in a luxury hotel. Negotiations are currently ongoing with the supplier about a large order. In this case, the impression may arise that the invitation is intended to influence the negotiations in favor of the supplier. Furthermore, the value of the invitation is unreasonably high. You therefore inform your supervisor or the Compliance Helpdesk and decline the invitation.

The **Guideline on the Handling of Gifts & Invitations** provides you with guidance on whether it is permissible to accept a gift or invitation. If you have any questions or uncertainties regarding invitations and gifts (particularly with regard to their appropriateness), you must consult your supervisor or the Compliance Helpdesk. The Compliance Helpdesk is available at any time by e-mail or can be contacted to clarify specific cases using the **form** provided for this purpose.



We carry out donations and sponsorship in accordance with the applicable internal guidelines and coordinate them in advance with Marketing & Communication or the Compliance Helpdesk.

4.3 Donations and Sponsorship

Hirschmann Automotive is committed to social purposes through donations and sponsorships and provides targeted support for charitable projects. Donations are made voluntarily and without expectation of anything in return to recognized non-profit organizations or for charitable purposes. Donations to political parties, their representatives, politicians as well as elected officials and candidates for political office are excluded. This ensures that the funds are used exclusively for the common good.

Sponsorship, on the other hand, serves to promote cultural, sporting, social, or charitable initiatives and is based on a contractually agreed consideration. It is intended to contribute to shaping the public image and perception of Hirschmann Automotive in a positive way and must be approved by Marketing & Communication.

We make sure that all donations and sponsorship measures are carried out in accordance with the applicable legal provisions and internal guidelines. If necessary, we coordinate with the Compliance Helpdesk at an early stage.

4.4 Fair Competition

We strictly adhere to competition and antitrust laws and refrain from inadmissible agreements and anti-competitive behavior.

Competition and antitrust laws form the basis for smooth interaction between market participants and serves to **ensure functioning, fair and unrestricted competition**. Violations of competition or antitrust laws can have serious consequences for both Hirschmann Automotive and the employees involved. Such misconduct can result in heavy fines, civil lawsuits and even claims for damages by third parties.

We pursue our corporate objectives and strategic goals solely based on the **principle of performance** and in strict compliance with the applicable competition rules. It is therefore of great importance that we strictly avoid anti-competitive behavior such as price agreements, market sharing, or the impermissible exchange of competition-relevant information with business partners. It is our joint responsibility to **ensure compliant behavior** and consistently prevent violations of competition and antitrust laws.

Examples

Misleading advertising statements, the damage to the reputation of competitors or the deliberate imitation of third-party services are prohibited under competition law. Antitrust law is violated, for example, by anti-competitive agreements with business partners (e.g. market sharing or price fixing), the exchange of sensitive information (e.g. on pricing strategy or product strategy) and the exploitation of a dominant position.

You visit a trade fair and get into conversation with a competitor. During the conversation, the competitor begins to talk about prices and future market strategies. Since sharing such competition-relevant information violates competition law, you immediately steer the conversation to a harmless topic or end it. In addition, you inform your supervisor or the Compliance Helpdesk to avoid possible legal risks for the company.



We strictly adhere to the legal requirements against money laundering and terrorist financing and report suspicious transactions immediately.

4.5 Money Laundering and Terrorist Financing

Money laundering and terrorist financing are **serious crimes** that can have significant legal and economic consequences. For this reason, we strictly adhere to the relevant **legal obligations to combat money laundering and terrorist financing** and ensure that we do not engage in or facilitate activities related to money laundering and terrorist financing.

We stay informed about the applicable legal requirements and design our business processes in a way that prevents any form of legal violation or economic crime. In addition, we immediately report all financial transactions that could raise suspicions of money laundering or terrorist financing to the Compliance Helpdesk.

Examples

A business partner has transferred an excessive amount and is now asking not to transfer the overpaid money to the original account, but to refund it in cash. You should ask the business partner for an explanation as to why the refund cannot be made in the same way as the original payment. In addition, inform your supervisor or the Compliance Helpdesk to make sure everything is done correctly. Until the final clarification, no repayment shall be made.

4.6 Economic Sanctions and Export Controls

Economic sanctions and export controls are measures taken by states or international organizations to punish or pressure certain countries, companies, or individuals. They help to **maintain international security** and promote lawful behavior on a global level.

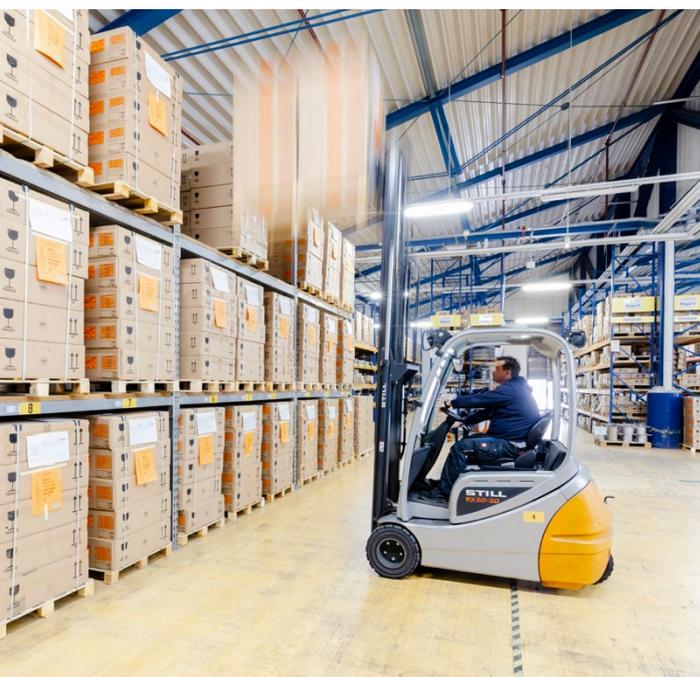
At Hirschmann Automotive, we always comply with all **applicable regulations governing the import and export** of goods, services and information. We pay particular attention to compliance with the applicable customs and tax regulations, export control provisions, trade restrictions, embargoes, sanctions lists and other restrictions or economic sanctions.

We ensure that all relevant regulations for the import and export of goods, services and information are always complied with.

Examples

You receive an order from a customer located in a country subject to international sanctions. This country is bound by specific export restrictions that prohibit the sale of certain goods.

Before the order can be processed, it is necessary to check whether the export of our products to this country is permitted. You can contact the Compliance Helpdesk to carry out this check. If the export is not allowed due to the sanctions, inform your supervisor and refuse the delivery.



5 Sustainability and Environmental Protection

5.1 Environment, Climate and Animal Protection

At Hirschmann Automotive, we are committed to the **responsible use of natural resources** and value **environmentally conscious business practices in all areas**. We are guided by ecological principles that are taken into account in our products, their production and the entire value chain. In doing so, we comply with the relevant international standards and applicable legal provisions on environmental, climate and animal welfare.

We all actively contribute to reducing the environmental impact of our business activities – throughout the entire life cycle of our products. Through **responsible use of resources** and the **increased use of environmentally friendly technologies**, we are making our processes increasingly sustainable.

As part of our sustainability strategy, we are pursuing the goal of becoming CO₂-neutral by 2039 and publish comprehensive sustainability reports annually.

We operate in an environmentally conscious manner along the entire value chain and take care to use natural resources carefully.

You can find detailed insights into our sustainability strategy on our **sustainability website** and in the latest **Sustainability Report**.



We promote sustainable production through resource-saving processes, efficient waste management, and the use of environmentally friendly energy sources.

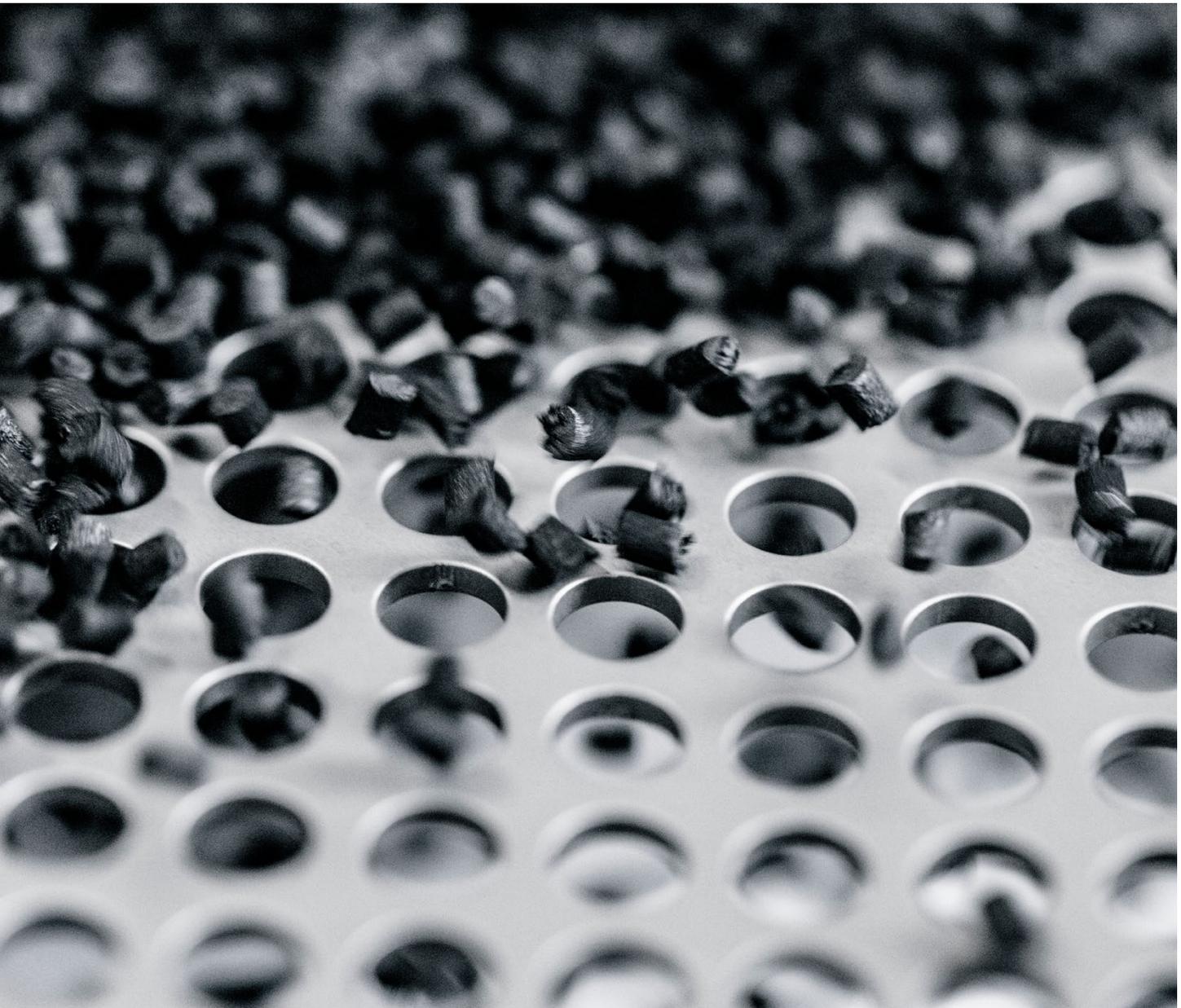
5.2 Sustainable Use of Resources and Waste Management

We promote resource-efficient production and effective waste management. Together, we strive to **minimize energy and water consumption** as well as **waste production** in our processes. In doing so, we attach great importance to closing material cycles by recycling and reusing materials in order to conserve valuable resources and reduce waste.

In addition, we rely on **environmentally friendly energy sources** to make our production processes more sustainable and further reduce our environmental impact.

Examples

You take care to conserve resources and protect the environment by separating waste correctly. When you leave the office, you switch off the PC, lights and monitor to save energy. You also remind your colleagues that this is an important step towards reducing our environmental impact.



6 Social Responsibility

6.1 No Discrimination

At Hirschmann Automotive, **we promote diversity, individuality, equal opportunities and equal treatment** – these values shape our daily interactions. Treating each other with **respect, fairness, and appreciation**, both within the team and with our business partners, is very important to us. Of course, we also do not tolerate any unlawful behavior by security personnel towards employees or third parties.

Therefore, we reject any behavior that constitutes discrimination or harassment, whether on the basis of gender, sexual identity, skin color, culture, ethnic origin, nationality, membership of a minority, age, disability, religious affiliation or belief. Discrimination, harassment, unfair behavior and bullying have no place at Hirschmann Automotive – they contradict our principles and will not be tolerated. It is our common objective to ensure a fair, appreciative and collegial working environment.

Examples

You attend a meeting where employees repeatedly make offensive remarks about a team member's nationality. To maintain a respectful and fair work environment, address your colleagues directly about their discriminatory behavior or contact your supervisor.

Discrimination and harassment can take many forms. Often, it is not only clear assaults, but also subtle statements or behaviors that are perceived as inappropriate. Examples include repeated personal questions even when it's clear the person being addressed is uncomfortable, or frequent comments about a person's appearance that go beyond a professional level and are perceived as uncomfortable.

We reject any form of discrimination or harassment and rely on respectful and fair treatment.



We ensure compliance with human and labor rights, respect the right of association and protect the rights of local communities.

6.2 Respect for Human and Labor Rights

Consistent **respect for national and internationally recognized human and employee rights** as well as their active promotion is an essential part of our corporate responsibility. We are committed to complying with all applicable legal provisions regarding human and labor rights, as well as the United Nations International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the Ten Principles of the UN Global Compact and the internationally recognized standards (core labor standards) of the International Labor Organization (ILO).

Hirschmann Automotive respects the **right and freedom of association** of its employees by complying with relevant legal standards and is striving for respectful and open interaction with employee representatives and unions. In doing so, we always ensure to achieve a fair balance between the economic interests of the company and the interests of the employees.

We also take into account the **rights of local communities** (e.g. indigenous peoples) that may be affected by our business activities, such as land, forest and water rights, as well as the prohibition of forced evictions. In the context of development projects and during the ongoing operations of our company, we also take care to minimize any adverse effects on the local population.

We ensure fair working conditions, appropriate wages, reasonable working hours and a work-life balance.

6.3 Fair Working Conditions

We ensure **fairness with regard to working hours and remuneration**, in accordance with the applicable labor law regulations. We reward all employees with competitive and performance-based compensation, which can be supplemented by additional services and benefits. We follow the principle: Equal pay for equal work and qualifications. Overtime is paid at a higher wage than the regular hourly rate.

In addition, we comply with the national working time regulations and promote the **compatibility of work and private life**. Work weeks will not exceed 60 hours per week including overtime (except in emergencies or exceptional situations) or the maximum set by local law, whichever is less. Employees are granted at least one day off every seven days.



6.4 Forced and Child Labor

Any kind of forced and compulsory labor, modern slavery, involuntary or exploitative prison labor, human trafficking or other forms of exploitation is strictly prohibited at all Hirschmann Automotive locations (**prohibition of forced labor**). Employment relationships are always voluntary and can be terminated by employees at their own discretion and with a reasonable period of notice.

We also ensure that we only employ staff who have reached the minimum age required by the applicable national legislation to perform work (**prohibition of child labor**). In doing so, we comply with the ILO Conventions on Minimum Age (No. 138) and on the Worst Forms of Child Labor (No. 182). The term “child” includes anyone under the age of 15 or the age at which compulsory education ends or the legal minimum age for employment in the respective country is reached, whichever is higher. Employees under the age of 18 (young employees) are not allowed to perform work that could endanger their health or safety, including night shifts and overtime.

We strictly reject any form of forced or child labor and only employ staff who meet the legally required minimum age and are employed on a voluntary basis.

6.5 Health and Safety at Work

Maintaining the **physical and mental health** of our employees is a high priority for us. For this reason, we consistently comply with the applicable occupational health and safety laws worldwide and set standards that go beyond them in order to improve occupational safety and promote the health of our employees.

The aim is to prevent accidents at work and work-related illnesses by creating and maintaining an appropriate working environment, establishing and **maintaining high safety standards** and providing personal protective equipment. We comply with the applicable occupational health and safety regulations, always act responsibly and ensure that neither our own nor the safety of others is endangered. Potential incidents, hazards and risks must be reported immediately to the Integrated Management Systems department (IMS). Hirschmann Automotive also offers various programs at all locations that are preventively oriented and promote our health.

We promote the health and safety of our employees by complying with occupational safety laws, establishing high safety standards and offering prevention programs.



6.6 Recruitment, Training and Development

We promote the individual development of our employees through targeted recruitment, training and further education.

We attach great importance to hiring new employees according to their individual abilities and supporting them in their development. Through **targeted training and further education opportunities**, we strengthen our skills and talents in order to ensure high performance and employability in the long term. We also ensure that all employees are trained regularly, know the Code of Conduct, understand their duties and consistently comply with them in our day-to-day work.



7

Information and Property Protection

7.1 Privacy

We ensure the protection of personal data.

The protection of privacy and personal data is an important part of all our business relationships. Therefore, we ensure that the **confidentiality of personal data is respected** and that personal data is always processed in compliance with the applicable legal requirements.



We handle confidential information carefully, use it exclusively within the scope of our work for Hirschmann Automotive and only pass it on with appropriate permission and an existing confidentiality agreement.

7.2 Handling of Confidential Information

Confidential information is of particular value to Hirschmann Automotive and our business partners. We therefore treat confidential information with particular care and responsibility and protect it in accordance with legal regulations and internal requirements.

The unauthorized disclosure and use of confidential information or any other abuse of trust can lead to considerable damage to Hirschmann Automotive or our business partners. Therefore, we all have the responsibility to handle the information that comes to our attention in the course of our activities – regardless of whether the information concerns Hirschmann Automotive or third parties – with particular care and confidentiality. In doing so, we adhere to the applicable guidelines and ensure that this information is handled responsibly.

We use confidential information **exclusively in the context of our work for Hirschmann Automotive and do not pass it on to unauthorized third parties.** Disclosure to

third parties will only take place if it has been expressly approved, is necessary and a non-disclosure agreement exists with the respective business partner. In principle, all information obtained in the course of the employment relationship is subject to the obligation of secrecy and confidentiality, in particular – but not exclusively – financial data, contracts, technical data, correspondence, drawings, etc., regardless of the form or medium with which it is processed, transmitted or stored.

If we have access to non-public information that can influence the stock market value of business partners, we have a special responsibility. In addition to strictly maintaining confidentiality, in such a situation we comply with the applicable securities laws and regulations that prohibit the purchase or sale of securities of these business partners (**misuse of insider information**).

Examples

You work in development and are involved in a project that includes a new technology for one of our products. A friend who also works in the automotive industry asks you for details about this project during a conversation. He is curious and interested in learning more about it. Despite his interest, you remember that this information is confidential and therefore you do not reveal any details about it.

We use corporate property carefully, appropriately and in accordance with applicable guidelines.

7.3 Handling of Corporate Property

We take care to use our corporate property with the utmost care and to **avoid misuse or improper use**. Work equipment and other items owned by Hirschmann Automotive are for business purposes only, may only be used for private purposes within the scope of our relevant policies, and are carefully protected against loss, theft, damage, or misuse.

Examples

Expensive software is installed on your work laptop. A friend asks you if he can borrow the device for personal purposes to use one of these programs. Since corporate property may only be used for business purposes and may not be passed on to third parties, you politely decline.



We protect our intellectual property while respecting the rights of others.

7.4 Protection of Intellectual Property

Our intellectual property (such as patents, trademarks, know-how, inventions, research results, product developments, technical data, etc.) forms the **basis for Hirschmann Automotive's success** and must therefore be protected accordingly. To secure our innovations, we do not share information about new products prior to patent filing and only communicate confidential content with business partners if it is protected by a non-disclosure agreement. We also take care not to use third-party intellectual property, such as patents, trademarks, design or copyrights, without authorization.

Examples

You are working on a new product that is in the development phase and will soon be patented. A business partner asks you for certain technical details during a meeting to discuss a possible cooperation. You remember that you are only allowed to share information about this product after the patent application has been filed, in order to preserve the novelty requirement in patent law and not jeopardize the patent application. You therefore decide not to disclose any details to the business partner.

To protect our products and innovations, we take consistent action against product piracy and violations of our intellectual property rights.

7.5 Protection of Innovation

We attach great importance to the safety and quality of our products. To ensure our long-term success, it is **essential to protect our products and innovations accordingly**. However, product piracy (i.e. the production of counterfeit or fake products by third parties) cannot always be completely prevented.

If we detect potential product piracy or infringement of our intellectual property rights, such as patents or trademarks, we immediately report them to our supervisor or the Compliance Helpdesk. This allows us to react quickly and protect both our products and our company.

Examples

You discover products on an online platform that look very similar to Hirschmann Automotive's products. The description and design suggest that these are unauthorized imitations. You are aware that such imitations may constitute a violation of our intellectual property rights and you therefore inform your supervisor and the Compliance Helpdesk immediately. This allows us to react promptly to have the imitations removed from the platform and, if necessary, to initiate legal action against product piracy.



We ensure that artificial intelligence is used responsibly and adhere to internal guidelines.

7.6 Artificial Intelligence

Artificial intelligence (AI) offers great economic potential and can help us to process tasks faster, more specifically and more efficiently. Its use is based on our values and in compliance with all legal requirements and international standards. We attach particular importance to **explainability, data protection and the security and reliability of the systems**. Sensitive or confidential information must not be entered into AI systems. It is also important to ensure that people remain at the center of all final decisions. Our aim is to use the opportunities offered by AI responsibly and to consciously manage potential risks.

8 Compliance with the Code of Conduct

Our Code of Conduct establishes fundamental values and principles for responsible and compliant behavior within Hirschmann Automotive Group. It is the responsibility of all of us to familiarize ourselves **with the content in the current version, to know it and to act accordingly**. Compliance with applicable law and this Code of Conduct is therefore the **personal responsibility of each and every one of us**.

To ensure compliance with this Code of Conduct, we participate in the **compliance training courses** offered to us and contact the **Compliance Helpdesk** if anything is unclear.

In addition, all **supervisors** must act as **role models** and ensure compliance with this Code of Conduct in their area of responsibility, inform their employees about the content and significance of this Code of Conduct, raise awareness and support them in complying with it.

Violations of laws, internal guidelines and this Code of Conduct may lead to massive economic damage for Hirschmann Automotive. Any misconduct must therefore be identified at an early stage to ensure fair treatment, avoid negative consequences and prevent damage to Hirschmann Automotive and its business partners. If there are specific indications of violations of this Code of Conduct, we consistently pursue them in the sense of a **“zero tolerance”** approach.

We do not tolerate violations of this Code of Conduct. Depending on the severity of the violation and the circumstances of the individual case, appropriate measures will be taken. These are based on the **Consequence Management Guideline** and can result in sanctions under employment law up to and including the termination of the employment relationship. If legal violations by employees cause damage to Hirschmann Automotive or third parties, this may also result in personal liability for the employee. In addition, serious violations of the rules may even result in criminal prosecution for the employee and the competent courts and authorities may impose penalties or fines.

Compliance with and implementation of this Code of Conduct are **regularly reviewed** and ensured by appropriate control measures.

We take responsibility for compliance with this Code of Conduct, support each other and consistently investigate violations in order to avoid negative consequences and prevent potential damage to Hirschmann Automotive or third parties.



9 Whistleblower System

In order to ensure compliance with this Code of Conduct and avoid possible violations of relevant regulations, it is crucial that **misconduct or grievances are identified, reported, investigated and remedied at an early stage**. In line with our open “speak-up culture,” we ensure that any known, proven, or suspected violations of this Code of Conduct or applicable legal standards are reported to a trustworthy authority. We consistently investigate any indication of misconduct and undertake appropriate measures to eliminate the violation as well as to prevent similar incidents in the future.

Confidential and anonymous reports can be submitted through the following independent reporting channels:

To avoid violations of the Code of Conduct or legal provisions, misconduct must be identified, reported and investigated at an early stage, with all reports being treated confidentially and pursued without negative consequences for reporting employees.



Online: Hirschmann Automotive's online whistleblowing channel is operated by an external service provider. It can be accessed via the link <https://hirschmannautomotive.whistlelink.com> and used to submit reports around the clock.



Mail: Messages can also be sent to the following e-mail address: whistleblowing@hirschmann-automotive.com.

Mail: Alternatively, reports may be submitted via mail to the following address: Hirschmann Automotive GmbH, attn LC, Oberer Paspelsweg 6-8, 6830 Rankweil, Austria.

Telephone: Telephone messages are also accepted at the following number: **+43 5522 307 0**. In this case, the whistleblower must indicate at the start of the conversation that they would like to report misconduct or a violation of the law. They will then be connected to a reliable and competent employee who will take up the case.

Personal: If desired, information can also be reported in person.

All reports of misconduct are treated confidentially in all cases and will not result in any negative consequences for the employee submitting a report. Knowingly false accusations, however, may be punished by means of disciplinary measures (see Consequence Management Guideline).



10

Contact

This Code of Conduct cannot provide definite answers to all questions and situations and is supplemented and elaborated upon by further guidelines and instructions for action. Further details can be found in the **Compliance Policy** and the additional rules mentioned therein.

If we have suggestions for improving the Hirschmann Automotive Group's compliance rules, we speak up. We actively promote a "**speak-up culture**" in which comments and ideas are welcome and no one has to fear repercussions for expressing concerns or suggestions in good faith.

All employees can contact their supervisor, the **Compliance Helpdesk** or the **Legal & Compliance (LC)** team at any time if they have any questions or doubts.

Compliance Helpdesk:

✉ compliance@hirschmann-automotive.com

Legal & Compliance (LC):

Gertraud Mathis-Dietrich

Global Head of Legal & Compliance

☎ +43 5522 307 1532

✉ gertraud.mathis-dietrich@hirschmann-automotive.com

Dominik Schelling

Senior Legal Counsel

☎ +43 5522 307 1474

✉ dominik.schelling@hirschmann-automotive.com



Hirschmann Automotive Group

Headquarters
Hirschmann Automotive GmbH
Oberer Paspelsweg 6–8
6830 Rankweil, Austria

www.hirschmann-automotive.com

01/2026 Subject to change. All rights reserved by Hirschmann Automotive GmbH.