



# Code of Conduct (CoC)

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We are an IT service provider and tool-specialist in the automotive industry with outstanding measurement, calibration and diagnostics expertise.

## INTRODUCTION

For our Company, social responsibility and protecting the environment are in harmony with economic success. Our employees act on behalf of the Company and their actions are based on a uniform Code of Conduct.

To be successful as a whole, it is crucial that each of our employees understands and lives our values. Additionally, this code gives our business partners an understanding of our values and our behavior.

## About our Code of Conduct

This Code of Conduct is binding for all RA Consulting GmbH employees worldwide. It defines uniform and universally applicable principles for behavior and action in our Company.

Our code is not intended to describe every applicable law and every internal policy that applies to an individual employee. Rather, all employees are obliged to respect our code as well as local laws and our internal policies.

## Scope

- Our Code of Conduct covers these areas:
- Human Rights and Working Conditions
- Health Protection and Product safety
- Environmental Performance
- Business Ethics

Our principles are based on internationally recognized standards.

These are:

- The United Nation's Global Compact
- The OECD Guidelines for Multinational Enterprises.
- The International Bill of Human Rights.
- The International Labor Standards by the International Labour Organization (ILO)
- IEEE Code of Ethics

## Auditing our Code of Conduct

On a annual base, our Code of Conduct is assessed by qualified authorities during our ISO 9001:2015 certification audit.



## HUMAN RIGHTS AND WORKING CONDITIONS

We want to ensure that all employees act in accordance with internationally recognized human rights. These standards include the International Bill of Human Rights, the OECD Guidelines for Multinational Companies and the International Labor Standards as formulated by the International Labor Organization (ILO) and ratified by the Federal Republic of Germany.

### Human Rights

We promote and encourage the observance and protection of internationally recognized human rights as the basis of human coexistence. We are strictly against any form of forced labor, slavery or child labor.

### Working Hours and Leave

We respect and follow the applicable laws on working and resting hours, including overtime working hours. Furthermore, the regulations for annual leave, sick days, parental leave and all other applicable leave regulations.

### Wages and Social Benefits

We pay our employees and subcontractors fair wages and provide them the social benefits that at least fulfill the applicable laws.

### Non-discrimination

We are committed to respect and openness among our employees and towards our business partners. We particularly prohibit any discrimination on the basis of age, race, color, sex, sexual orientation, gender identity or expression, origin, religion or disability. This principle applies particularly to recruiting, hiring, training, job rotations, promotions, pay practices, benefits, disciplinary actions and terminations. Employees are strictly selected, hired and promoted on the basis of their qualifications and skills. RA Consulting business partners are not permitted to discriminate against any employees.

### Harassment

RA Consulting prohibits sexual harassment and other workplace harassment. All employees must treat each other with dignity and respect. Business partners are committed to a work environment that is free from harassment.

### Collaboration, freedom of association and collective bargaining

We respect the legal regulations for the collaboration between employees and their employer. We promote an open and trustful dialogue between supervisor and their employees. We respect the fundamental right of all employees to form and join trade unions and employee representative bodies.

### No to slavery and human trafficking

RA Consulting rejects any known use of forced and compulsory labor, as well as any form of modern slavery and human trafficking. Employment relationships are strictly voluntary.

## HEALTH PROTECTION AND PRODUCT SAFETY

Economic considerations do not take priority over safety or health. Assessing the functional safety of our products is a fundamental part of our product development.

### Health Protection

We take precautions against hazards and ensure compliance with the legal regulations on health and safety.

### Safety of our Products and Services

We strengthen the trust of our customers and business partners in our services and in our integrity. We ensure to offer our services and products according to the appropriate standards and in compliance with all applicable laws. This applies in particular to the safety and reliability of the services we provide and the products we craft. We follow the recognized

principles of engineering as described in the „IEEE Code of Ethics“ and adapt our principles to the respective state of the art.

## **ENVIRONMENTAL PERFORMANCE**

We take economic, ethical and environmental responsibility in all of our business activities and decisions. When designing our processes and offering our products and services, we strive for sustainable solutions for the environment.

### **Environmental Protection**

When designing our internal processes, we pay attention to a resource-saving approach, while taking into account economic efficiency. The use of resources such as air, water, soil and energy may be used for our purposes only within the framework of approvals granted by the relevant authorities and laws. We strictly ensure compliance with the applicable environmental legislation. Every employee must use our resources with the aforementioned responsibility.

We support our customers in developing innovative mobility solutions with a small environmental footprint.

### **Management of sustainable resources**

We monitor, track and document our consumption of resources such as water, with the aim of increasing our efficiency in using them. We are open to new technologies and innovations that enable us to increase our resource efficiency. When using energy, we encourage the use of renewable energy sources.

### **Disposal**

Waste must be disposed in accordance with legal regulations. If we act as a reseller for electronic devices, we require suppliers to provide proper proof of the fulfillment of their legal obligations.

## **Greenhouse gas emissions, energy efficiency and renewable energies**

We are responsible for the continuous improvement of the environmental compatibility with regard to the operation of the Company and its real properties and facilities. We always promote the use of more environmentally-friendly and renewable energy sources.

We operate an environmental management system in accordance with ISO 14001:2015 to plan, implement, review and continuously improve our environmental performance, which is certified annually.

## **BUSINESS ETHICS**

Ethical behavior and personal integrity are at the core values of our corporate culture. We are taking responsibility for our decisions and avoid any knowing involvement in actions that are considered illegal, unethical or otherwise inappropriate.

### **Conflicts of Interests**

We expect our employees to act in the best interest of the Company and to safeguard its reputation. Personal interests and private relationships must not influence their business activities.

Employees must inform their supervisors of existing personal conflicts of interest or seek their supervisor's advice when in doubt.

### **Prevention of Corruption**

We condemn any corruption and we act in accordance to legal requirements. To avoid corruption, we respect the regulations of our customers, partners, suppliers and subcontractors. The relationships to our business partners should be based solely on objective criteria and on values such as quality, economic efficiency, reliability and competitive prices.

Our employees must reject any obvious and unauthorized benefits from third parties. They

are obliged to report these incidents to their supervisors.

## **Fair Competition**

It is part of our business policy to respect and promote free and fair competition. All of our employees must act in accordance to applicable antitrust and competition law. Behaviors or agreements that restrict or even prevent competition under the applicable laws are prohibited.

## **Financial responsibility**

We acknowledge the Company's responsibility to accurately record, maintain, and report business records, including, inter alia, financial statements and transactions relevant to accounting. We comply with the accounting regulations and we regularly publish information on business activities and financial status in accordance with the legal requirements.

## **Export Regulations and Custom**

We strictly comply with import and export regulations for the trade of goods, services and information. We respect national and international restrictions on trade and payments for individual countries, regions or individuals.

RA Consulting GmbH has reached the status of an "Authorized Economic Operator" (AEO) and is a successfully audited Company according to the customs law of the European Union. The status has been granted due to the fulfillments of extensive requirements with regard to reliability, solvency, ongoing compliance with the relevant legal provisions and, if applicable, the fulfillment of certain security standards.

## **Procurement**

Suppliers and subcontractors are carefully selected and regularly audited.

## **Insider Trading Laws**

We prohibit all of our employees to disclose

confidential information to third parties. This includes any non-public and stock-exchange relevant information from listed customers and business partners. In particular, we forbid to buy or sell securities by means of confidential information for our employees' own accounts or third-party accounts. It is also forbidden to recommend them. See section 14 of the German Securities Trading Act (WpHG).

## **Data Privacy**

We respect the privacy and integrity of our employees, business partners and all persons whose personal data are protected by the European General Data Protection Regulation (GDPR).

We adhere to the strict standards of the applicable General Data Protection Regulation when storing and processing personal data. Our employees must be compliant with these regulations at any time. They have to contact our data protection officer or their supervisor if in doubt.

We give employees, business partners and all authorized persons the opportunity to contact our data protection officer at any time with questions about their personal data.

## **Confidential Information**

Any non-public information about RA Consulting is the confidential property of our Company. Employees must keep any non-public information secret at all times and must not use this kind of information for personal interests. The same applies to non-public information about business partners, that was acquired while working for our Company. Employees are encouraged to contact their supervisor if there are any doubts about the right to share information.



## Data Security

We commit ourselves to treat any non-public information or personal information of our business partners with the necessary care and security. We restrict access to such information according to strict rules and with accurate means. We proof these measures with our TISAX certification and consider this certification as an important tool for the implementation of data security in our Company.

## Intellectual Property

We respect know-how, inventions, patents, brands, copyrights and other intellectual property of any Company and individuals. We only use this property if we were granted the appropriate right of use.

Source code, copies of our software, patents, inventions and expert knowledge are particularly important for the long-term success and value of our Company. We prohibit our employees from passing on and publishing these asset values, particularly our source code, wherever the passing on is not explicitly permitted by our regulations.

## Protection of Company Property

Any property of RA Consulting must be handled appropriately and respectfully by our employees. We ask everyone to treat equipment, systems, materials and other resources carefully and appropriately, and to protect them against loss, damage, theft, misuse or unauthorized use.

## Plagiarism

We aim to prevent any introduction or use of plagiarized and counterfeit materials. If plagiarized or counterfeit materials are detected, they are isolated and, where appropriate, OEMs and law enforcement agencies are informed.

## Privacy

We acknowledge that neither employees nor business partners can be subjected to any arbi-

trary intrusions into their private lives, families, homes or private correspondence that are defamatory or damaging to their reputations.

## Amendments to the Code of Conduct

The General Management of RA Consulting GmbH is responsible for the approval and publication of the Code of Conduct. The General Management reviews the code at regular intervals and ensures compliance with applicable laws at all times. The General Management has the sole right to change this Code of Conduct.

