

CoC - Code of Conduct

ATX-Group



PREAMBLE

Our Code of Conduct is intended to be a guideline for the entire ATX Group and therefore applies equally to all of us. Specifically, it is aimed at the management, our executives, all our employees and our partners. On the one hand, it represents the demands we place on ourselves to live up to the values and principles set out therein and, at the same time, signals responsible conduct towards our business partners, customers and employees to the outside world.

COMMITMENT OF THE COMPANY MANAGEMENT

The ATX Group considers it its duty to act in an economically, socially and environmentally responsible manner. The ATX Group endeavors to conduct its business competently and on an ethical and moral basis and to compete fairly in all markets in which it operates. This includes compliance with applicable laws and the acceptance of anti-trust prohibitions and restrictions on competition. We want to avoid gaining undue advantages over partners and competitors.

TEAM SPIRIT, CONSTRUCTIVE COOPERATION

We constantly question existing solutions and develop new ideas for the benefit of our partners. To this end, we promote constructive teamwork among our employees. Their interests and requirements are decisive for our work and further development. We are successful in our collaboration thanks to the diversity of our employees and their commitment to the business areas.

STANDARDS OF COOPERATION

We expect all of our employees to always act in accordance with the highest professional standards and our company guidelines. If employees violate existing guidelines, rules or regulations in the course of their work or through their behavior, they will be subject to disciplinary action.

OPEN COMMUNICATION WITH EMPLOYEES

We do not cover up misconduct. If employees report actual or suspected misconduct in good faith, we do not tolerate any attempts at intimidation or reprisals against them. We understand "in good faith" to mean that the employee is convinced that their report is true. This applies regardless of whether a subsequent investigation confirms the employee's version or not.

DIALOGUE WITH COOPERATION PARTNERS

As a matter of principle, all business information of our partners and their trade secrets are treated sensitively and confidentially. Necessary documents are created and stored appropriately or, if necessary, destroyed after the end of the cooperation.

CUSTOMER ORIENTATION

We behave fairly and honestly towards our customers and business partners. We record the wishes, needs and expectations of our customers and business partners in order to ensure targeted implementation in products, services or other processes. Our primary goal is to build a long-term and stable relationship with our customers and business partners based on trust.



ACCEPTANCE OF GIFTS, DONATIONS

a) Gifts to our employees

Our employees do not demand or accept any personal benefits from customers or suppliers that could influence or affect their own behavior with regard to their work for the company. If gifts are offered by third parties, they may only be accepted if they are common practice and can be recognized as a courtesy or favor (promotional gifts with the logo of the giving company, such as calendars or pens). The Compliance Officer or management must be informed in the case of gifts whose value exceeds the usual amount. If this is not possible, these gifts must always be refused.

b) Gifts from our employees

Gifts on our part may also only be offered within the usual framework for the business relationship and to a materially appropriate extent. The recipient must not be able to associate this with any obligation that would influence his or her business decisions.

c) Donations

The companies of the ATX Group do not make donations to political parties, individuals or organizations whose goals contradict our corporate philosophy or damage our reputation. Donations are always made transparently.

BRIBERY AND CORRUPTION

We do not tolerate any form of corruption or bribery, regardless of whether it damages our company assets or the assets of third parties. We use control mechanisms to ensure that bribery, theft, embezzlement, fraud, tax evasion and money laundering are prevented. Our employees are prohibited from accepting or granting favors of any kind (cash, travel, gifts, etc.) that are linked to an improper advantage (awarding of contracts, project bonuses, etc.). Our business partners are also required to avoid conflicts of interest that involve a risk of corruption.

DATA PROTECTION

We treat all personal data of our customers, business partners and employees with the utmost care. This includes names, addresses, telephone numbers and dates of birth or information about current health. Our employees are obliged to take all measures to secure the data that are suitable to protect our IT system from both internal and external data theft. This applies in particular to passwords misused within the company and unauthorized downloading of files, especially inappropriate material from the Internet.

PROTECTING THE ENVIRONMENT

Protecting the environment and the climate is important to us. Our employees are required to treat all natural resources used in our company (e.g. energy, water, land) with care. Our employees are expected to act responsibly in the manufacture and distribution of our products and/or services. To protect our employees, we comply with all laws and regulations relating to health and safety in the workplace. To this end, our managers in particular take measures to create a healthy and safe working environment for our employees.



COMPLIANCE WITH APPLICABLE LAW

We require our managers to familiarize themselves with the laws, regulations and rules that are relevant to their area of responsibility and to comply with them without exception. Our managers in particular bear a high level of responsibility in fulfilling the Code of Conduct. The business practices of our business partners and their suppliers must also comply with the applicable laws. This applies in particular to import, export and domestic trade in goods, technologies or services, but also to payment and capital transactions. Violations of economic embargoes and trade, import and export control regulations by our business partners must also be ruled out, as must the financing of terrorism.

FAIR COMPETITION

We are committed to fair competition and adhere to these laws and rules. We refrain from agreements on prices, conditions and strategies with competitors, suppliers, other companies and dealers that hinder fair competition. We do not take part in any anti-competitive boycotts.

PROHIBITION OF DISCRIMINATION

Any form of discrimination is prohibited as a matter of principle. Regardless of whether this relates to nationality, ethnicity, age and gender, sexual orientation, marital status, pregnancy or disability, or religion or ideology. Promotions and new appointments are always free of discrimination.

DEALING WITH INTERNAL COMPANY INFORMATION

It is important to us that the products manufactured, the work equipment used and the company's intellectual property are handled carefully and responsibly.

PROTECTION FROM CHILD OR FORCED LABOR

We strictly reject child or forced labor without exception and expect the same from our business partners. School-age children (under the age of 15) may not be employed even if the legal requirements of the respective country of our supplier would permit this.

IMPLEMENTATION AND ENFORCEMENT

The companies of the ATX Group undertake to make the necessary efforts to comply with the principles and values described in this Code of Conduct.

Puerger, 04.12.2025

Location, Date

A handwritten signature in blue ink, appearing to read 'M. Rauch'.

Markus Rauch
Managing Director

A handwritten signature in blue ink, appearing to read 'J. Brüggemeier'.

Jens Brüggemeier
Managing Director