

THIEN eDrives Code of Conduct

Dear Business Partner,

For TeD, business success is inextricably linked to corporate responsibility towards our business partners, employees, society and the environment. This includes complying with applicable laws at all times and in all places, respecting ethical values and acting in a sustainable manner.

We expect our business partners to share these principles and to conduct their business accordingly. Every business partner is required to observe the associated requirements and to act in accordance with the relevant legal and ethical standards.

This Code of Conduct sets out our company's fundamental legal and ethical principles and serves as a guide for responsible conduct and sound decision-making in day-to-day business. Neglecting or disregarding these principles in pursuit of commercial advantage runs counter to our understanding of partnership-based and sustainable cooperation.

Integrity is one of our core values. We therefore expect our business partners to act in accordance with this Code of Conduct and to actively support our values.

Thank you for your support



Reinhard Robitschko



Norbert Eckmayer

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2 Application of the THIEN eDrive Code of Conduct

Compliance means that TeD adheres to the applicable laws and regulations and, furthermore, upholds its own ethical standards. Breaches of these principles can cause significant damage to the company, its business partners and employees. In addition to financial disadvantages and potential regulatory sanctions, there is a particular risk of significant reputational damage.

We therefore expect our business partners to comply with the applicable legal provisions and to adhere to high ethical standards.

This Code of Conduct defines the legal and ethical principles that guide TeD and also serves as a guide for responsible cooperation. It helps to identify potential areas of risk and conflict and to act appropriately in such situations.

Breaches of these principles are unacceptable and may result in appropriate consequences within the context of the business relationship.

3 Code of Conduct

3.1 Anti-discrimination

TeD does not tolerate any form of discrimination on the grounds of ethnicity, nationality, gender, cultural background, skin colour, age, disability, religious beliefs or sexual orientation. We also firmly reject any form of sexual harassment and bullying.

We expect our business partners to adhere to these principles within their own areas of responsibility and to actively contribute to a respectful, fair and non-discriminatory environment.

Sexual harassment is defined as any behaviour of a sexual nature that is unwanted by the person concerned or to which they are subjected against their will. This includes, for example, unwanted physical advances and touching, suggestive remarks, sexist comments or jokes, ambiguous requests, and the display or distribution of material with sexual content.

Bullying describes behaviour in which a person or group repeatedly and over a prolonged period exerts considerable psychological pressure on another person, systematically harassing, excluding or belittling them.

Should business partners observe discriminatory or harassing behaviour within their area of responsibility, we expect such incidents to be addressed appropriately.

3.2 Anti-corruption

TeD pursues a zero-tolerance policy towards corruption and bribery.

We expect our business partners to consistently reject and refrain from any form of corruption and bribery. Offering, promising, granting or accepting benefits with the aim or effect of improperly influencing business decisions – whether towards TeD, other business partners or public officials – is strictly prohibited.

Strict standards apply to the offering or acceptance of gifts, invitations and other benefits. These must always be appropriate, take place within a transparent framework and must neither influence business decisions nor give the impression of doing so.

In cases of uncertainty regarding the permissibility of benefits, we expect business partners to carefully examine the relevant facts and, where in doubt, to consult with the appropriate contacts.

3.3 Conflicts of interest

TeD expects its business partners to avoid situations in which their own interests conflict or could conflict with those of TeD.

Business partners are obliged to disclose immediately any actual or potential conflicts of interest arising in connection with the business relationship with TeD.

The existence of personal interests in a business-related situation does not necessarily imply a conflict of interest. In many cases, such situations can be resolved by transparently presenting relevant interests and the basis for decision-making, and by documenting them in a comprehensible manner. It must be clearly explained why no impermissible conflict of interest exists.

Such transparency and documentation benefits all parties involved: it strengthens trust in cooperation based on integrity and supports compliance with TeD's Code of Conduct.

3.4 Proper conduct in competition

TeD is convinced of the importance of functioning markets and free and fair competition as the basis for innovation, technical progress and continuous quality improvement.

Breaches of applicable antitrust and competition law can cause considerable damage. We therefore expect our business partners not to enter into any agreements or coordinate any conduct that prevents, restricts or distorts competition.

It must be ensured that no sensitive information is exchanged in contact with competitors that could provide insights into current or future market behaviour. Contact with competitors should take place exclusively within the context of permissible business occasions.

In cases of uncertainty, we expect business partners to carefully examine the relevant facts and, where necessary, seek appropriate clarification.

3.5 Data Protection, Confidentiality and Protection of Business Assets

TeD complies with applicable data protection laws and protects the personal data of business partners and employees. We expect our business partners to process personal data exclusively for legitimate purposes and in accordance with legal requirements, and to treat it as confidential. Data protection incidents or suspected incidents must be addressed immediately in order to comply with statutory reporting deadlines.

The unauthorised disclosure of technical know-how and of trade and business secrets belonging to TeD or third parties is prohibited and may have serious consequences. Such information must be treated as confidential and given special protection.

TeD's tangible and intangible business assets may only be used for contractually agreed purposes. Business partners are obliged to handle these assets with care and responsibility and must ensure that they are neither misused nor damaged.

3.6 User safety, health and the environment

TeD attaches great importance to a safe and healthy working environment and to the protection of users. We expect our business partners to comply with the applicable regulations on occupational safety and health protection and to ensure that appropriate standards are maintained within their area of responsibility.

TeD also aims to actively contribute to improving safety and health through its products and services.

Any defects or risks that come to light in these areas must be reported immediately to the appropriate contacts so that appropriate measures can be taken.

For TeD, sustainable business practice requires the protection of the environment and climate. We therefore expect our business partners to use resources responsibly and to comply with all relevant environmental regulations. Environmental risks must be identified at an early stage and dealt with accordingly.

4 Conduct in the event of known or suspected breaches

TeD expects its business partners to address potential breaches of this Code of Conduct or applicable law openly and promptly. This applies in particular where there are indications of irregularities in connection with the collaboration.

Reports should be made responsibly and to the best of one's knowledge. Business partners who provide information in good faith must not suffer any disadvantage as a result.

TeD values open and trusting communication. At the same time, it is expected that reports are not made in an abusive manner or with the intention of providing false information. Such behaviour may have consequences for the business relationship.