



We care



**SafeDriver
Group**

Code of Conduct

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SafeDriver – We Care

With 30 years of experience in mobility, the SafeDriver Group and its brands strive to create a culture of excellence, integrity, and inclusivity. Our success depends on the trust we earn from our employees, partners, customers, and the communities we serve. This Code of Conduct outlines the principles and standards that guide our actions, decisions, and interactions.

Preamble



Dear reader,

I am delighted to introduce our Code of Conduct, a guiding document that reflects our company group's commitment to high performance, high quality and compliance. This Code sets the standards for our behavior, outlines our ethical principles, and serves as a compass for all our actions, decisions, and interactions.

At the SafeDriver Group we understand that our success is built upon the trust we earn from our employees, partners, customers, and the communities we serve. It is imperative that we uphold the highest standards of ethics, transparency, and responsibility in everything we do. This Code of Conduct serves as a reminder of the values we hold dear and provides a framework for our conduct as we pursue our mission.

Reporting violations and ensuring compliance is a shared responsibility. We encourage all team members to speak up if they witness any potential violations of this Code or any other policies. We commit to providing a safe reporting environment, protecting those who come forward in good faith, and taking appropriate action to address any issues raised. We are committed to creating a culture where we can openly discuss challenges, learn from them, and strive for better outcomes.

I urge each and every one of you to familiarize yourself with this Code of Conduct and incorporate its principles into your daily work. By upholding these standards, we will build a company group that stands as a beacon of integrity, innovation, and social responsibility in the mobility industry.

Together, let us embark on this journey, driven by our shared commitment to excellence and our determination to make a positive impact on the world of mobility.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Mohnke'. The signature is fluid and cursive, with a large initial 'T'.

Thomas Mohnke
CEO, SafeDriver Group



1. Ethical Behavior

1.1 Human and Labor Rights Policy

At the SafeDriver Group, we are deeply committed to upholding the fundamental principles of human and labor rights. We believe in a workplace that is built on respect, fairness, and equality. Our Code of Conduct for Human and Labor Rights serves as a guiding light, ensuring that every member of our organization and our partners adhere to these essential principles. We are unwavering in our commitment to the following themes:

1. Child Labour and Young Workers

1. We strictly prohibit the employment of child labor. All workers must meet the minimum age requirements as defined by international labor standards.
2. We provide young workers with a safe and supportive environment, ensuring that their employment does not hinder their education and personal development.

2. Working Hours

1. Working hours shall not exceed the legal limits of the country where we operate. Overtime work is voluntary, and workers have the right to reasonable rest periods.

3. Compensation, Wages, and Benefits

1. We offer fair and competitive wages that meet or exceed local minimum wage standards.
2. Workers are provided with clear and understandable information about their compensation and benefits.

4. Terms of Work and Compliance

1. Employment is based on voluntary and mutually agreed-upon terms.
2. All workers are entitled to written contracts outlining the terms and conditions of their employment.



1. Ethical Behavior

1.1 Human and Labor Rights Policy

5. Anti-Discrimination and Equality

1. We do not tolerate any form of discrimination or harassment based on race, color, gender, religion, disability, age, or other protected characteristics.
2. Equal opportunities are provided to all employees, and decisions regarding hiring, promotion, or termination are based on merit and competence.

6. Harassment

1. Harassment, in any form, is strictly prohibited. This includes but is not limited to verbal, physical, or psychological harassment.
2. All employees have the right to work in an environment free from any form of harassment.

7. Freedom of Association and Collective Bargaining

1. Employees have the right to freely join or form associations and engage in collective bargaining without fear of retaliation.
2. We respect the rights of workers to represent their interests collectively.

8. Raising Grievances

1. We maintain an open-door policy to ensure that employees can raise concerns or grievances without fear of reprisal.
2. Grievances are addressed promptly and fairly, and appropriate measures are taken to resolve them.

9. Communication of Rights

1. We are committed to providing our employees and partners with clear and accessible information about their rights and responsibilities regarding human and labor rights.
2. Training and awareness programs are implemented to ensure that everyone understands and complies with our Code of Conduct.

We recognize the importance of these fundamental human and labor rights, and we actively seek to promote and enforce them within our organization and throughout our supply chain. We are dedicated to continuous improvement and will regularly review and update our Code of Conduct to ensure our commitment to these principles remains unwavering. Together, we can create a better and fairer workplace for all.



1. Ethical Behavior

1.2 Respectful and Inclusive Environment

Diversity and Inclusion: We embrace diversity in all its forms and create an inclusive environment that values and respects the uniqueness of every individual. We do not tolerate discrimination, harassment, or any form of prejudice based on race, ethnicity, gender, sexual orientation, religion, disability, or any other protected characteristic.

Respectful Communication: We promote open and respectful communication. We listen actively, value diverse opinions, and engage in constructive dialogue. We treat others with respect, avoiding offensive, discriminatory, or derogatory language.

Work-Life Balance: We recognize the importance of work-life balance and support our employees in maintaining healthy and fulfilling personal lives. We strive to provide flexible work arrangements whenever possible.



2. Well-Being, Health, and Safety

2.1 Creating an environment

The well-being, health, and safety of our employees, partners, and communities are paramount. We are unwavering in our commitment to creating a workplace that prioritizes the physical and mental health of all individuals. Our Code of Conduct for Wellbeing, Health, and Safety is a testament to our dedication to these essential principles. We are steadfast in our commitment to the following themes:

1. Health and Wellbeing

1. We promote a culture of health and wellbeing, encouraging all employees to prioritize their physical and mental health.
2. Our organization provides resources and support to help employees maintain a healthy work-life balance.

2. Occupational Health and Safety

1. We are committed to providing a safe and healthy working environment that complies with all applicable laws and regulations.
2. We conduct regular risk assessments and implement measures to minimize workplace hazards.

3. Emergency Preparedness and Response

1. We have a robust emergency response plan in place to ensure the safety and security of our employees and assets.
2. Regular drills and training sessions are conducted to ensure that all employees are well-prepared in case of emergencies.

4. Personal Protective Equipment (PPE)

1. PPE is provided where necessary to protect employees from occupational hazards.
2. Employees are required to use and maintain PPE as per our guidelines and safety protocols.

5. Workplace Ergonomics

1. We design workspaces and tasks with ergonomics in mind to prevent musculoskeletal disorders and promote overall comfort and productivity.
2. Training and resources are provided to help employees maintain proper ergonomics.



2. Well-Being, Health, and Safety

2.1 Creating an environment

6. **Substance Abuse and Alcohol Policy**
 1. We strictly prohibit the use of illegal drugs and alcohol abuse in the workplace, both in-office and in the car.
 2. Support and resources are available for employees facing substance abuse issues.
7. **Stress Management**
 1. We acknowledge the importance of managing stress in the workplace and provide support, counseling, and resources to employees when needed.
 2. Workloads and expectations are reasonable to prevent undue stress.
8. **Training and Education**
 1. Through the SafeDriver Academy, regular training and educational programs are conducted to ensure that employees are aware of health and safety protocols and best practices.
 2. Employees are encouraged to actively participate in these programs.
9. **Incident Reporting and Investigation**
 1. A transparent and confidential incident reporting system is in place to enable employees to report accidents, near-misses, or unsafe conditions.
 2. Thorough investigations are conducted to prevent the recurrence of incidents.
10. **Continuous Improvement**
 1. We are dedicated to ongoing improvement in wellbeing, health, and safety.
 2. Feedback from employees is valued and actively sought to enhance our policies and practices.

Our commitment to well-being, health, and safety extends not only to our employees but also to our partners, contractors, and the communities in which we operate. We will continue to monitor and evolve our Code of Conduct to ensure that we maintain the highest standards in these critical areas. Together, we can create a workplace that prioritizes the well-being, health, and safety of all.



2. Well-Being, Health, and Safety

2.1 Creating an environment

Additionally, throughout our company, we ensure that the most basic needs of our employees are met:

- **Clean Toilets:** We maintain clean and accessible toilet facilities for all employees and visitors.
- **Drinkable Water:** Access to safe, drinkable water is provided throughout our premises.
- **Sanitary Eating Facilities:** We offer sanitary eating facilities to ensure employees can enjoy their meals in a clean and comfortable environment.

2.2 Addressing Hazards

The wellbeing, health, and safety of our employees, partners, and communities are at the core of our values. Our commitment to these principles is unwavering. We take every measure to create a workplace that is not only free from harm but also supportive of physical and mental health. Our Code of Conduct for Wellbeing, Health, and Safety is a testament to our dedication to these essential principles, addressing a range of hazards including mechanical, electrical, chemical, fire, and physical risks.

2.2.1 Mechanical Hazards

1. We rigorously maintain and inspect all mechanical equipment and machinery to prevent accidents.
2. Proper training is provided to employees operating machinery, and safety measures are in place to prevent entanglement or crushing hazards.

2.2.2 Electrical Hazards

1. Electrical systems and equipment are regularly inspected for safety and compliance.
2. Employees are trained in electrical safety procedures, including the identification of electrical hazards and the proper use of electrical equipment.



2. Well-Being, Health, and Safety

2.2 Addressing Hazards

2.2.3 Chemical Hazards

1. We store, handle, and dispose of chemicals in accordance with local and international regulations.
2. Material Safety Data Sheets (MSDS) for all hazardous chemicals are readily available, and employees are trained in safe chemical handling.

2.2.4 Fire Hazards

1. We have a comprehensive fire safety plan in place, including fire prevention measures, emergency exits, and fire-fighting equipment.
2. Regular fire drills and training ensure employees are well-prepared in case of a fire emergency.

2.2.5 Physical Hazards

1. We assess and minimize physical risks, including slip and trip hazards, and maintain a clean, well-organized workspace.
2. Personal Protective Equipment (PPE) is provided where necessary to protect against physical hazards.

This Code of Conduct reflects our unwavering commitment to the safety and wellbeing of our workforce and partners. We encourage all employees to actively participate in maintaining a safe and healthy workplace. We regularly update and improve our policies to ensure we meet and exceed the highest standards in wellbeing, health, and safety. Together, we create a workplace where everyone can thrive.



3. Environment

At the SafeDriver Group we understand the critical importance of environmental responsibility. We are dedicated to ensuring that our operations are carried out with the utmost care and respect for the environment. Our Code of Conduct for the Environment encompasses a wide range of practices and policies to mitigate our environmental impact, including resource and energy efficiency, the use of renewable energy, recycling, waste management, and strict adherence to environmental regulations.

Resource and Energy Efficiency

1. We continually strive to improve resource and energy efficiency throughout our operations.
2. We invest in technologies and processes that reduce our resource consumption and energy usage while maintaining or improving productivity.

Renewable Energy

1. We are committed to reducing our carbon footprint by sourcing a significant portion of our energy needs from renewable sources.
2. Whenever feasible, we invest in and support the use of renewable energy technologies.

Recycling

1. We promote a culture of recycling, with clearly labeled recycling bins throughout our facilities.
2. We actively seek to reduce waste and minimize our environmental impact through the responsible management of materials.



3. Environment

Waste Management

1. Our waste management practices align with the highest environmental standards.
2. We ensure the proper disposal and recycling of waste materials in compliance with local and international regulations.

Environmental Compliance

1. We maintain all environmental permits required by law, staying fully compliant with all applicable environmental regulations.
2. Our employees are educated on the importance of environmental compliance and the measures necessary to achieve it.

This commitment extends beyond mere compliance; it is part of our ongoing mission to create a sustainable future for our planet. By adhering to our Code of Conduct for the Environment, we are taking meaningful steps toward conserving natural resources, reducing pollution, and fostering a culture of environmental stewardship.

We consider it our responsibility to leave a positive environmental legacy for future generations. We actively seek opportunities to further reduce our environmental impact and continuously improve our environmental practices. Our dedication to these principles is steadfast, reflecting our promise to operate as a responsible and environmentally conscious organization. Together, we can make a lasting and positive impact on the world.



4. Business Ethics and Integrity

We are unwavering in our commitment to conducting business with the highest standards of ethics and integrity. Our Code of Conduct for Compliance and Anti-Corruption outlines our policies and expectations in various critical areas, ensuring that our employees, partners, and stakeholders act in accordance with the principles of transparency, fairness, and legality.

Customers: We are dedicated to understanding and meeting our customers' needs while providing high-quality products and services. We act with integrity, ensuring fair and transparent business practices.

Partners and Suppliers: We cultivate mutually beneficial relationships with our partners and suppliers, based on trust, respect, and fairness. We select partners and suppliers who share our commitment to ethical conduct and sustainability.

Communities: We are responsible corporate citizens, contributing positively to the communities where we operate. We engage in philanthropic activities, support local initiatives, and respect the social, cultural, and environmental values of the communities we serve.

4.1 Anti-Corruption, Extortion, and Bribery

1. We strictly prohibit any form of corruption, extortion, or bribery in all aspects of our business.
2. Our employees and partners are required to uphold the highest ethical standards, refraining from offering, soliciting, or accepting bribes or kickbacks.

4.2 Compliance

1. We are committed to full compliance with all applicable laws, regulations, and industry standards.
2. Our employees and partners are responsible for understanding and adhering to the rules and regulations that govern our operations.

4.3 Tax Justice

1. We are dedicated to fair and ethical tax practices.
2. We ensure that all tax obligations are met in a transparent and lawful manner.



4. Business Ethics and Integrity

4.4 Intellectual Property

1. We respect the intellectual property rights of others and require our employees and partners to do the same.
2. Unauthorized use, reproduction, or distribution of intellectual property is strictly prohibited.

4.5 Data Security and Privacy

1. We uphold the highest standards of data security and privacy.
2. We safeguard all sensitive and personal data, following best practices to protect the confidentiality and integrity of information.

4.6 Whistleblowing System

1. In our commitment to transparency, we have established a Whistleblowing System. If you become aware of any unethical, illegal, or non-compliant behavior within our organization, we encourage you to report it to HR or anonymously to report-concern@safedriver.de.
2. The Whistleblowing System is accessible through our website, providing a safe and confidential means for employees and stakeholders to report concerns. Reports will be thoroughly investigated, and appropriate action will be taken.

4.7 Formal Policy in Business Ethics and Integrity

1. Our Formal Policy in Business Ethics and Integrity is the cornerstone of our commitment to ethical conduct.
2. This policy serves as a guide for all employees and partners, outlining our expectations, principles, and procedures for upholding the highest standards of ethics and integrity in every aspect of our business.

4.8 Compliance Training and Monitoring

We provide regular training and guidance to our employees to ensure they understand and comply with this Code of Conduct and related policies. We conduct regular monitoring and auditing to assess compliance and address any identified issues promptly.

By adhering to our Code of Conduct and Formal Policy in Business Ethics and Integrity, we aim to maintain the trust of our stakeholders, protect our reputation, and contribute to a more ethical and compliant business environment. It is our collective responsibility to uphold these principles and report any violations through our Whistleblowing System. Together, we can ensure that the SafeDriver Group operates with the highest standards of integrity and ethics.



5. Accountability and Consequences

6.1. Consequences for Violations: Violations of this Code of Conduct or related policies may result in disciplinary action, up to and including termination of employment or business relationships, as appropriate.

6.2. Continuous Improvement: We are committed to continuously improving our practices and processes, incorporating feedback and lessons learned to ensure the ongoing effectiveness of our Code of Conduct.





By adhering to this Code of Conduct, we contribute to a strong ethical foundation, foster trust among our stakeholders, and drive sustainable growth in the world of mobility.

