

ADS-TEC Group

Code of Conduct

Version 1.1



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1.0	15th August 2024	Bektas, Fatma	Creation
1.1	28th November 2025	Meinzer, Fabian	Format changes 10 Information Security added

1 Preamble

ADS-TEC Group is committed to responsible business practices everywhere that it conducts business. We are committed to continuously improving our performance in social, environmental and financial domains. In order for the company to live up to this responsibility, we have laid down defined rules of direction and conduct in the form of a Code of Conduct (CoC).

This Code of Conduct is applicable to all managing directors, officers, employees and suppliers, in other words, anyone working for or on behalf of ADS-TEC Group. This Code is based on the United Nations Global Compact principles for responsible business.

2 Basic understanding of responsible business practices

This CoC details a common basic level of the responsible business practices of ADS-TEC Group. For ADS-TEC Group, this means that it assumes responsibility by considering the consequences of its business decisions and actions in economic, technological, social and ecological terms and achieving an appropriate balance of interests. ADS-TEC Group voluntarily contributes to the well-being and sustainable development of the global society in all markets where it conducts business. In doing so, we orient ourselves toward high ethical values and principles, in particular integrity and honesty and respect for human dignity.

3 Scope of application

This CoC applies to all branches and business units of ADS-TEC Group worldwide. Without a doubt, it is applicable to all managing directors, employees, and suppliers, in other words, anyone working for or on behalf of ADS-TEC Group.

ADS-TEC Group also promotes compliance with the contents of this CoC among its suppliers and in the wider value chain.

4 Compliance with the law

ADS-TEC Group complies with the applicable laws and other relevant legal provisions of the countries in which it operates. Our Code of Conduct requirements apply globally and may exceed legal requirements in different markets.

5 Integrity and corporate governance

ADS-TEC Group bases its actions on recognized accepted ethical values and principles, in particular integrity, respect for human dignity, openness and non-discrimination of religion, belief, gender or any other forms of diversity.

6 Anti-corruption

ADS-TEC Group rejects corruption and bribery (within the meaning of the corresponding UN Convention¹). We promote transparency, integrity and responsible leadership and control within the company and we work against corruption in all forms, including extortion and bribery.

7 Fair competition

ADS-TEC Group follows clean and recognized business practices and fair competition. In competition, we focus on professional behavior and quality-oriented work.

8 Consumer Interests

As far as consumer interests are concerned, ADS-TEC Group adheres to consumer protection regulations and appropriate sales, marketing and information practices. Particularly vulnerable groups (e.g. protection of minors) enjoy special attention.

9 Communication

ADS-TEC Group communicates openly and dialog-oriented about the requirements of this CoC and about its implementation to employees, customers, suppliers and other stakeholder groups. Documents are dutifully created, not unfairly changed or destroyed and stored properly. Trade secrets and business information of partners are treated sensitively and confidentially.

10 Information Security

All key strategic and operational functions and tasks are significantly influenced by information technology (IT). Since the core competence of the ADS-TEC Group lies in the development of innovative and secure products, protecting this information from unauthorized access and unauthorized modification is essential. Likewise, the protection of processed data, from development to production and delivery, must be ensured without any disruptions.

11 Human Rights

ADS-TEC Group is committed to respect the protection and promotion of internationally recognized human rights, and we work to ensure that we are not complicit in human rights abuses. Human rights are respected in accordance with the UN Charter of Human Rights, in particular the following:

11.1 Data Privacy

We take active measures to protect the privacy of employees as well as customer information.

11.2 Health and Safety

Safeguarding health and safety at work, in particular ensuring a safe and health-promoting working environment to avoid accidents and injuries.

¹ United Nations Convention against Corruption of 2003, in force since 2005

11.3 Harassment

Protect employees from corporal punishment and from physical, written, sexual, psychological or verbal harassment or abuse. We do not allow bullying or intimidation.

11.4 Freedom of expression

Protection and granting of the right to freedom of opinion and expression.

11.5 Working conditions

ADS-TEC Group complies with the following ILO² core labor standards.

11.5.1 Children's Work

The prohibition of child labour, i.e. the employment of people under 15 years of age, provided that local legislation does not set higher age limits and provided that no exceptions are permitted³.

11.5.2 Forced labour

The prohibition of all forms of forced and compulsory labour including human trafficking, child labour and forced marriage⁴.

11.5.3 Fair Remuneration

The labour standards regarding remuneration, in particular with regard to the level of remuneration in accordance with applicable laws and regulations⁵.

11.5.4 Employee rights

Respect for the right of employees to freedom of association, freedom of assembly and collective bargaining, insofar as this is legally permissible and possible in the respective country⁶.

11.5.5 Prohibition of discrimination

ADS-TEC Group practices a discrimination-free treatment of all employees and partners in all aspects of business⁷.

11.5.6 Working hours

ADS-TEC Group complies with the labour standards regarding to the maximum permissible working hours.

11.6 Environmental protection

ADS-TEC Group complies with the regulations and standards for environmental protection and acts in an environmentally conscious manner at all locations. We take responsibility for dealing with natural resources in accordance with the principles of the Rio Declaration⁸. We take a precautionary approach to environmental management which is further described in our Sustainability Policy.

² ILO= International Labour Organization

³ ILO= Convention No. 138 of 1973 and ILO Convention No. 182 of 1999

⁴ ILO-Convention No. 29 von 1930 und ILO- Convention No. 105 of 1957

⁵ ILO-Convention No. 100 of 1951

⁶ ILO-Convention No. 87 of 1948 and ILO- Convention No. 98 of 1949

⁷ ILO-Convention No. 111 of 1958

⁸ The 27 principles of the „Rio Declaration on Environment and Development“ of 1992 as a result of the United Nations Conference on Environment and Development in Rio de Janeiro

12 Reporting violations or concerns

Anyone concerned with possible violations to this code can first talk to their manager or can contact whistleblowing@ads-tec.de, or report via the encrypted whistleblower system. The company will investigate all reported possible Code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances.

13 Civic engagement

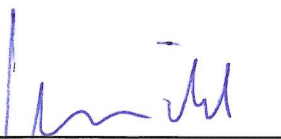
ADS-TEC Group contributes to the social and economic development of the country and region in which it operates and promotes corresponding voluntary activities by its employees.

14 Implementation and Enforcement

ADS-TEC Group makes all appropriate and reasonable efforts to continuously implement and apply the principles and values described in this CoC.

Approval

Nürtingen, 7th April 2026



Thomas Speidel
Managing Director
ads-tec Holding GmbH