

## CiS Group

# ETHICS AND CONDUCT CODE, Code of Conduct

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The principles of the Code of Ethics and Conduct are binding for all employees of the CiS Group.

The CiS Group includes the following companies:



CiS electronic GmbH  
CiS systems s.r.o.  
CiS automotive GmbH  
CiS automotive SRL



newcab GmbH & Co. KG



Zabel Technik GmbH & Co. KG

In the following, we therefore refer to the CiS Group, CiS and the employees of the CiS Group - this then also includes the employees of newcab GmbH & Co. KG and Zabel Technik GmbH & Co. KG.

## **CiS-Group**

# **ETHICS AND CONDUCT CODE, Code of Conduct**

Content: 18 Pages, as of May 2023

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**CiS Group**  
**ETHICS- and CONDUCT CODE, Code of Conduct**

**MISSION STATEMENT - Commitment to integrity**

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Integrity is part of our company's self-image. CiS sees itself as an "honourable company" in the sense of the honourable businessman.

It is obligatory that sincerity, honesty, openness, striving for justice and trustworthiness determine the actions and behaviour of every employee with mutual respect internally and externally. Our motto "connect with confidence" is not an advertising slogan, but our self-image.

The credibility of our company and the trust of our customers, suppliers, banks, employees and the public are decisively influenced by the behaviour of each individual employee.

We expect all employees of the CiS Group to know and always observe the principles of the CiS Code of Ethics and Conduct. We have value concepts that make our actions predictable, give us and our business partners security. We support and live the 10 principles of the "Global Compact" of the United Nations, which are also the basis of our values.

It goes without saying that we comply with the laws of the countries in which employees of the CiS Group are active and respect and observe generally accepted customs. This includes, for example, the laws on the punishability of bribery and corruption in business transactions as well as the internationally applicable human rights that are decisive for our social standards, but also good customs and traditions.

This Code of Conduct is binding for all employees of the CiS Group. All managers of our company are obliged to live the principle of commitment to integrity conveyed by this code of conduct, to communicate it clearly and to take responsibility for its maintenance.

Violations and gross breaches of this Code of Conduct, in particular by managers of the CiS Group and executives, may lead to the termination of the employment relationship, in serious cases also to immediate dismissal. The employee acknowledges the Code of Conduct and is

aware that it is the subject of the employment contract, i.e. the obligations under the employment contract are concretised in detail by this Code of Conduct.

CiS Group, May 2023



Peter M. Wöllner  
Shareholder of the CiS Group



Markus Kordel  
CiS electronic GmbH  
Managing Director



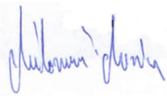
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Jan Steves  
Zabel Technik GmbH & Co. KG  
Managing Director



Axel Vornhagen  
CiS systems s.r.o.  
Managing Director

## **Mai**

### **OUR VALUES:**

Every employee is expected to decide and act based on the values of the CiS Group.

The basic values of the CiS Group are integrity, trust, socially acceptable cooperation and responsibility. They serve as a benchmark for the evaluation of our decisions and actions.

### **Integrity**

Our decisions and actions are always and continuously in harmony and in accordance with our values.

### **Trust**

Each individual always works in such a way that trust is strengthened in his or her decisions and actions.

### **Socially acceptable cooperation**

The achievement of our corporate goals and socially acceptable interaction are always in harmony with each other.

### **Responsibility**

Each individual employee assumes responsibility for the manageable consequences of his or her decisions and actions. This applies both to the responsibility before a decision or an action (there is clarity about the possible consequences of the action) and for the possible consequences after a decision and/or action.

### **Our corporate principles**

Based on our value system, the following guidelines are binding for our company.

#### **1. We respect our stakeholders, internal and external partners.**

CiS strives to optimise its own economic success and that of its partners. Therefore, we conduct our business in a manner that is lawful and fair in our dealings with employees, customers, suppliers and society, and with the highest possible integrity.

#### **2. We are committed to sustainable corporate success.**

The goal of our results orientation is to ensure the long-term existence of the company.

#### **3. We support a climate of trust**



We always decide and act in such a way that trust in CiS is strengthened and promoted both internally and externally. In the case of competing interests, we consider the consequences for all parties involved.

**4. We support a growing identification with CiS.**

We always decide and act in such a way that our external and internal partners can identify with CiS values, principles, decisions and actions at all times and thus become valuable partners in the long term.

**5. We are committed to providing comprehensible information and transparency.**

We decide and act in such a way that all partners feel informed and can understand our decisions at all times.

**6. We promote and develop competence**

The success of CiS is based on the professional-technical and social competence of our employees. We take into account the promotion and development of these competences in our decisions and actions.

**7. We demand and support independence and self-responsibility**

CiS designs and develops its corporate culture in such a way that all internal and external participants are able to make decisions and act independently and on their own responsibility.

**8. We demand and support motivation and performance.**

The willingness of all internal and external partners to perform is a matter of course for CiS. It is our obligation to demand and develop this willingness.

The performance of all internal and external partners is promoted in our decisions and actions and at the same time taken into account in the delegation of tasks, projects and goals.

**9. We do not tolerate discrimination**

We have respect for different cultures. To this end, we respect the rights of every individual. Each of our partners is treated equally. To this end, we create a working climate that is free from discrimination.

## **1. BEHAVIOUR TOWARDS BUSINESS PARTNERS**

In dealings with business partners (customers, suppliers, banks, competitors, etc.) and representatives of public and state authorities, it is imperative to draw a clear line between the usual framework of a business relationship and private interests.

CiS places the highest demands on the avoidance and combating of any kind of corruption and unconditionally complies with the respective applicable anti-corruption laws.

In connection with all business activities, offering, granting, demanding or accepting money or anything of value for CiS Group employees is strictly prohibited.

All business transactions must be fully and flawlessly documented in accordance with legal regulations and customer-specific requirements (e.g. tax and commercial law retention requirements for annual financial statements, accounting vouchers, business letters and contracts).

Business partners can contact our responsible CSR officer, Ms Doris Wöllner, [d.woellner@cis.de](mailto:d.woellner@cis.de) Company address Krefeld, in all cases. These enquiries are handled in a strictly confidential and neutral manner.

### **1.1 Conflicts of interest**

CiS expects its employees to be loyal to the company and its business partners. All employees must avoid situations in which their personal or financial interests conflict with company interests or the interests of business partners. This includes that employees do not make private expressions of opinion in public in connection with their function in the company.

### **1.2 Offering and granting gifts or other benefits**

Benefits of any kind by employees of the CiS Group to business partners, their employees or other third parties, in return for preferential treatment, are strictly prohibited.

Remuneration and reimbursements (e.g. discounts) to contractual partners may only be paid on a contractual basis and to the business accounts of the business partners.

Courtesy gifts, which to a certain extent correspond to generally accepted business practices, must in any case be designed in such a way that the recipient does not have to conceal their acceptance and that they are not forced into an obligatory dependency. One guideline here can be the accepted threshold for tax-deductible business expenses. Higher-value gifts always

require the approval of the superior. The adverse tax consequences for CiS must also be taken into account.

Invitations (e.g. in connection with hospitality and events) to business partners or their employees may only be extended if they do not exceed a customary business scope.

### **1.3 Requesting or accepting gifts or other benefits**

Gifts or invitations from business partners are to a certain extent in line with generally accepted business practices. However, acceptance may lead to conflicts of interest and jeopardise the good reputation of the company.

No employee may use his or her position or function in the company to demand, accept or obtain personal benefits. The acceptance of occasional gifts of small value is permitted. The acceptance of gifts of a higher value and other benefits for oneself and related persons requires the information and approval of the superior.

### **1.4 Representatives of state agencies, political donations, sponsoring**

No personal advantage of any kind may be offered to any public official at home or abroad.

Generally customary gestures of courtesy such as hospitality or other benefits of a small, customary and reasonable value and without influence on business-relevant decisions are excluded. Each case of such a personal benefit requires the approval of the superior. Take into account that the administrative regulations for the conduct of government agencies in this context sometimes provide for different and very low thresholds, so that extreme restraint is generally required.

### **1.5 Rejections of business relationships under certain conditions**

CiS does not enter into business relationships with business partners who violate international human rights law such as child labour, forced labour, gross violation of labour safety measures or similar.

### **1.6 Expectations of our suppliers and business partners**



Our suppliers and business partners are of particular importance in supporting the aforementioned rules of conduct. We expect all suppliers to share the CiS value principles and to ensure compliance with ethical standards and legal requirements. The basis for business relationships is strict compliance with the 10 principles of the "Global Compact" of the United Nations, which are also the basis of our values.

Procurement of primary products:

We expect our suppliers to act as a responsible social enterprise in the procurement of intermediate products, components and raw materials. This also includes that such procurements are not made in regions where the money from the extraction of raw materials is used to finance war and oppression. This includes in particular the materials tantalum, gold, tin and tungsten from the Congo region and neighbouring countries. We trust in your responsible behaviour and assume in good faith that you, as our supplier, only use materials that do not originate from this region, unless a separate note is made at the time of delivery.

### **1.7 Trade controls**

CiS generally complies with all export control and customs laws and regulations applicable in the respective countries of its business activities. Export control laws may apply in connection with direct or indirect exports or imports from or into sanctioned countries or in connection with third parties against whom, for example, there are suspicions with regard to national or international security or who are involved in legal violations. Violations of these laws and regulations can lead to drastic penalties, such as fines as well as an officially ordered exclusion from simplified import and export procedures (i.e. interruption of the seamless supply chain).

All employees engaged in the import and export of goods as described above are required to comply with all applicable economic sanctions, export control and import laws and regulations.

## **2. BEHAVIOUR TOWARDS EMPLOYEES**

Our appreciation is the same for all employees. Therefore, our company is characterised by the fact that all employees treat each other politely, fairly and openly as well as with understanding, respect and tolerance.

Accordingly, we expect every employee to treat colleagues and staff at all levels and in all areas of the company in a fact-oriented, friendly and fair manner. Every manager and employee with management responsibility is obliged to live this Code of Ethics and Conduct as a good example for all employees.

## **2.1 Interaction - Discrimination**

No employee may be discriminated against on the basis of race, gender, age, nationality, ethnicity, skin colour, political opinion, sexual orientation, religious conviction, social origin, physical constitution or other personal characteristics, i.e. without objective reason.

We call on every employee to contribute to an atmosphere of respectful cooperation in which any kind of personal harassment is excluded.

This includes, in particular, workplace harassment (bullying), unwanted sexual advances, unwanted physical contact, indecent offers or a work environment marred by crude or offensive remarks or humiliation. In particular, we promote the balancing friendship among our German, Czech, Polish and Romanian employees and see ourselves as a "CiS family".

## **2.2 Occupational health and safety**

The health of our employees is a high priority. CiS ensures occupational safety and health protection at all workplaces and complies with all relevant national regulations. Alcohol consumption is prohibited and is generally not consumed immediately before and during working hours. Exceptions on special occasions (e.g. wedding, birth of a child, major order, etc.), require the approval of the management, whereby legal regulations must be observed and the safety of the employees and the company are not endangered. A glass to toast should be the measure here. It goes without saying that smoking is not permitted in any room. All technical devices, machines and equipment, alarm and fire extinguishing systems, defibrillators, etc. are monitored with regard to their technical safety. All employees of the CiS Group are called upon to actively participate in the continuous improvement of occupational safety and health protection.

## **2.3 Error culture**

Human lives can depend on the quality and reliability of our products. Therefore, it is the highest duty of every employee of the CiS Group to ensure that no defective product leaves our premises.

Every employee of the CiS Group is intensively trained and qualified for the activities and processes he or she is to perform. Nevertheless, every employee of the CiS Group can make a mistake, which is basically not a problem. People make mistakes and our organisation can deal with them. However, mistakes must never be covered up, but must be recognised by the person who caused them. Faulty processes or products must not be passed on to the next follow-up process. The causes must be analysed and appropriate corrective measures introduced. Errors offer the option of continuous improvement.

Employees who report an error are generally to be praised by the respective supervisor for discovering and disclosing this error. Disclosing an error keeps harm away from the company and, if applicable, from the customer. Therefore, CiS promotes a fear-free error culture.

## **2.4 Dealing with internal knowledge**

Employees of the CiS Group communicate openly with each other and exchange information as a matter of course.

Knowledge relevant to the activity may not be unlawfully withheld, falsified or selectively passed on. Information must be passed on correctly and completely to other areas, always provided that there are no overriding interests (e.g. secrecy).

## **2.5 Environment**

The careful use of ecological resources accompanies our actions and decisions at all times. CiS has introduced an active environmental management system to ensure that the burden on the environment and the conservation of resources is as effective and sensible as possible. From time to time, CiS has its energy efficiency checked by specialist companies in order to uncover and exploit potential for optimisation. Furthermore, CiS participates in the environmental initiative "World Forest Climate" of the "Senate of Economy" and reduces CO<sub>2</sub> by supporting worldwide reforestation. ([www.senat-deutschland.de](http://www.senat-deutschland.de)) CiS electronic GmbH and all its locations in Germany have been climate neutral since July 2012. (see [www.cis.de](http://www.cis.de))

### **3. BEHAVIOUR TOWARDS THE COMPANY**

The commitment to integrity is also reflected in our everyday business practices.

CiS Group employees behave loyally and always use company assets prudently, responsibly, sparingly, in an environmentally friendly manner and in compliance with the law. Each employee is responsible for the quality and performance of his or her own work and is aware that human lives may depend on the quality of our products. Employees are obliged to report perceived injustices or grievances within the company internally or, if necessary, to contact our ombudsman/woman in order to remedy them. Public denunciations, e.g. in social networks, are not desired.

#### **3.1 Company property**

Every employee is responsible for protecting the property of the CiS Group as well as the property entrusted to us by our customers and business partners from damage, loss, theft or misuse. It is a matter of course not to close one's eyes to disregard of this rule, but to actively intervene with civil courage and to openly point out disregard.

The private use of company property, including work services, equipment, buildings and other assets, is prohibited - unless permitted by separate agreements. Company equipment and objects may also not be removed from the company's premises without the express consent of the departments responsible within the company.

Intellectual property is also a valuable asset that we protect against unauthorised use and disclosure. This includes trade secrets, confidential information, copyrights, trademarks and logos, as well as customer lists, business opportunities and product specifications. The protection applies regardless of whether the intellectual property is owned by CiS, affiliated companies or business partners.

Every employee of the CiS Group respects effective intellectual property rights of third parties and refrains from their unauthorised use. No employee may obtain and/or use secrets of a business partner or other third parties without authorisation.

### **3.2 Confidentiality**

Employees of the CiS Group protect all company and business secrets from the knowledge of unauthorised persons, this applies both during the duration and after the termination of the employment relationship. This includes internal company interests as well as any information concerning CiS customers and their trade secrets.

Internal and external information is absolutely subject to the protection of absolute confidentiality. The only exceptions to this are information that is already in the public domain, accessible to third parties or requested by public authorities.

In the case of internal conflicts of interest, we avoid a negative external effect. We maintain absolute silence vis-à-vis third parties and seek an internal solution. The entrepreneurial interest and the trustful interaction within the framework of business relations with customers, business partners and the public must not be impaired under any circumstances.

### **3.3 Communication to the public and with the media**

The disclosure of company data and information to the public and the media is made exclusively by the managing director CEO or with his approval.

This includes financial data, information about accidents and crises, mergers and acquisitions or personnel changes in the management structure. Business-related information that is exchanged directly with individual business partners, authorities, banks, auditors, etc. must be carefully communicated by expressly authorised employees.

The Managing Director COO is responsible for product and marketing information, if applicable.

Irrespective of whether the statements can be interpreted positively or negatively for CiS, permission must be obtained for company-related expressions of opinion by individual employees to the media. In private and social networks, each employee shall ensure fair treatment of colleagues and the company. Statements that are defamatory or damaging to the company's reputation are prohibited and violate our ethical values.

### **3.4 Data protection**

We collect, process and use personal data only if it is necessary for specified, explicit and legitimate purposes.

At CiS, we take all measures to protect data that the company receives from employees, business partners and customers. Our measures, security concepts and processes are monitored and audited by a neutral data protection officer.

The use of data must be transparent for those affected, and their rights to information and correction and, if applicable, to objection, blocking and deletion must be safeguarded.

An essential component of data security are the internal CiS guidelines, which regulate in detail the handling of the respective communication facilities (IT systems, e-mail, Inter-/Intranet). These rules are binding for all employees.

## **4. APPLICATION | COMPLIANCE AND IMPLEMENTATION OF THE ETHICS AND CODE OF CONDUCT**

With our Code of Ethics and Conduct, we commit to our ethical core values. At the heart of our corporate values is honest, direct and fair dealings with our employees and customers. We protect the environment and use raw materials and energy sparingly. It contains standards that are binding for every employee of the CiS Group. It is intended to help overcome legal and ethical challenges in daily work, to provide orientation and thus to further strengthen trust in the performance and integrity of the company.

There is no alternative to personal integrity and sound judgement. Any employee facing a difficult situation should ask themselves the following questions:

- Is my action or decision legal?
- Does the action serve the business objectives and strategies of CiS?
- Is it in line with our values, our understanding of quality and our guidelines?
- Is it factually correct and free of personal interests?
- Does my action or decision stand up to scrutiny?
- Does my action or decision protect CiS's reputation as a company with high ethical standards?

If all questions can be answered with "yes", then the action or decision is, in our opinion, correct and complies with the preceding guidelines of the Code of Conduct.

#### **4.1 Upholding the Code of Ethics and Conduct and Issues**

The Code of Ethics and Conduct is handed over to the executives, in particular the managers and department heads of the CiS Group and can be viewed in its current version on the intranet and on our homepage. It is the responsibility of each manager to ensure that the employees entrusted with their respective responsibilities receive a personal copy of the Code of Conduct, know its contents and comply with it. Newly hired employees receive sufficient training during their probationary period, which is documented in the personnel file until the end of the probationary period. Every employee can confidentially contact our works council, his or her superior or the CSR representative responsible in her function as ombudswoman, Ms Doris Wöllner Ombudsmann@cis.de, company address Krefeld, Czech Republic or Romania, with questions or in case of uncertainty about correct behaviour. In principle, the respective manager is responsible for compliance with our regulations in his area of responsibility and lives our values as a role model.

#### **4.2 Violations and sanctions**

Violations of the Code of Conduct can lead to consequences for the employment relationship and its continuation as well as to claims for damages. Every employee can rely on the fact that indications of violations are conducive to our understanding of values and are not detrimental to him or her personally.

### **5. Appendix: The Ten Principles of the Global Compact**

CiS supports the Ten Principles of the United Nations Global Compact with its Code of Conduct:

The foundations of the Global Compact's ten universally recognised principles in the areas of human rights, labour standards, environmental protection and anti-corruption are:

- the Universal Declaration of Human Rights,
- the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation,
- the principles of the Rio Declaration on Environment and Development

- the UN Convention against Corruption

The Global Compact calls on companies to commit to a set of core values in the areas of human rights, labour standards, environmental protection and anti-corruption, to support them and to put them into practice within their sphere of influence:

### **Human Rights**

- Principle 01: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 02: ensure that they are not complicit in human rights abuses.

### **Labour standards**

- Principle 03: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
- Principle 04: Businesses should uphold the elimination of all forms of forced and compulsory labour.
- Principle 05: Businesses should uphold the elimination of child labour.
- Principle 06: Businesses should uphold the elimination of discrimination in respect of employment and occupation.

### **Environmental protection**

- Principle 07: Businesses should apply the precautionary principle in dealing with environmental problems.
- Principle 08: Businesses should take initiatives to promote greater environmental awareness.
- Principle 09: Businesses should accelerate the development and diffusion of environmentally sound technologies.

### **Fighting corruption**

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

