swoboda
technologies

CODE OF CONDUCT

FOR EMPLOYEES OF THE SWOBODA GROUP

VERSION: FEBRUARY 2026

PREAMBLE

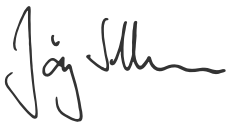
Swoboda is a family business that operates internationally. Our independence gives us the great flexibility and speed that we need to successfully exploit the dynamics of the market. With their innovative technologies and an uncompromising commitment to quality, our teams are shaping the future. We have declared it our goal to continue developing in this way in the years to come. Reliability, expertise, commitment, and thinking ahead to the future are the values that guide us.

We are committed team players, reliable problem solvers, dynamic idea generators and, at the same time, a quality-oriented guarantor of success.

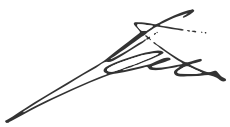
We enjoy taking on responsibility in all areas. We are particularly proud of technologies that allow us to make a valuable contribution toward creating mobility solutions that are safer, more convenient, and more energy efficient. Our stringent requirements regarding innovation, quality, and cost optimization motivate us to consistently do our best across all technological boundaries.

As a company that operates globally, we are also aware of our social, societal, and environmental responsibility. Therefore, the Board and all employees are required to comply with certain legal regulations and ethical principles. The long-term success of our company depends on establishing a strong brand through quality and performance, as well as deploying cost-effective production methods.

The mandatory requirements are based on national and international specifications and conventions. They are implemented as part of our daily work in a range of areas: our commitment to human rights and anti-corruption, our guidelines for occupational health and safety, our environmental targets and environmental requirements, our quality standards, and the Code of Conduct for our employees and Board.



DR. JÖRG SCHERNIKAU
CEO/COO



CHRISTIAN GÖSER
CSO

DR. KLAUS SKROBANEK
CTO

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RESPONSIBLE MEMBERS OF SOCIETY

All Swoboda employees must be aware of their social responsibility, in particular with regard to the well-being of people and the environment, and ensure that our company makes a contribution to sustainable development. The following principles in particular derive from Swoboda's social responsibility:

HUMAN RIGHTS

BACKGROUND

The United Nations Universal Declaration of Human Rights and the European Convention for the Protection of Human Rights and Fundamental Freedoms set out the requirements and expectations of the international community with regard to respecting and upholding human rights.

CORPORATE PRINCIPLE

Swoboda respects, protects, and promotes the applicable regulations for the protection of human and children's rights (hereinafter referred to as human rights) worldwide, and deems these to be fundamental and universally applicable standards. We reject any use of child, forced, and compulsory labor as well as any form of modern slavery and human trafficking. This applies not only to cooperation within our company, but of course also to the conduct of and towards business partners.

MY CONTRIBUTION

As an employee, I can also play a part in ensuring human rights are upheld. I respect human rights as a fundamental guideline and am vigilant against human rights violations that take place around me. I ensure that human rights violations that take place within my professional environment are prevented or rectified. If necessary, I will inform my supervisor or the contact persons named below of any such violations.

RESPONSIBLE MEMBERS OF SOCIETY

EQUAL TREATMENT AND EQUAL OPPORTUNITIES

BACKGROUND

Fair, unprejudiced, and open interaction is based on equal treatment and equal opportunities. Swoboda promotes tolerance, diversity, and cooperation underpinned by respect and partnership. This enables us to achieve maximum efficiency, productivity, competitiveness, innovation, and creativity.

CORPORATE PRINCIPLE

We offer equal opportunities for all. We do not discriminate against anyone and do not tolerate discrimination on the basis of ethnic or national origin, sex, religion, ideology, age, disability, sexual orientation, skin color, political views, social background, or any other legally protected characteristic. We embrace diversity, are actively committed to inclusion, and create an environment that promotes the individuality of each person in the interests of the company. The selection, recruitment, and promotion of our employees is fundamentally based on their qualifications and skills.

MY CONTRIBUTION

I treat everyone around me equally by respecting the principles of equal opportunities and equal treatment. I point out misconduct to the person in question if I observe violations of the principles of equal opportunities and equal treatment (e.g. through discrimination, harassment, and bullying). If I cannot have any direct influence on the incident, I will report the case to the HR department or to the contact persons named below.

RESPONSIBLE MEMBERS OF SOCIETY

PRODUCT CONFORMITY AND SAFETY

BACKGROUND

Our products are used by countless people every day. Swoboda is obliged to avoid, as far as possible, all potential risks, disadvantages, and dangers to the health, safety, environment, and assets of our customers or third parties.

CORPORATE PRINCIPLE

It is not only a legal obligation, but also our aspiration to comply with the legal and official regulations and internal standards that apply to our products. Our products have been developed in accordance with legal requirements and the latest technological developments. This is continuously and systematically ensured through our processes and structures, without compromise. We ensure that suitable measures can be taken in good time if deviations from our standards occur.

MY CONTRIBUTION

I take action if I discover or have concerns that our products pose a risk or that regulations are not being complied with. I report the case to my supervisor and the relevant departments/people within the company, such as the Product Safety Officer in my division.

RESPONSIBLE MEMBERS OF SOCIETY

ENVIRONMENTAL PROTECTION

BACKGROUND

Our technological solutions make a valuable contribution to sustainability, as they make the world safer, more convenient, and more energy efficient. We help our customers lower their emissions and utilize environmentally compatible processes and materials. Our commitment to sustainability and environmental protection is a firm component of our corporate philosophy. Our resource efficiency is regularly monitored in accordance with the EN ISO 14001 and DIN EN ISO 50001 standards.

CORPORATE PRINCIPLE

As a commercial enterprise, we are responsible for ensuring the environmental compatibility and sustainability of our products, locations, and services. We rely on environmentally compatible, advanced, and efficient technologies and implement them throughout the entire life cycle of our products. As early as the development and production stages, we are mindful of the importance of using natural resources sparingly, reducing our environmental impact on a continuous basis, and complying with environmental protection laws and regulations. In addition, we constantly re-evaluate the environmental compatibility of our products and manufacturing processes and optimize these where necessary.

MY CONTRIBUTION

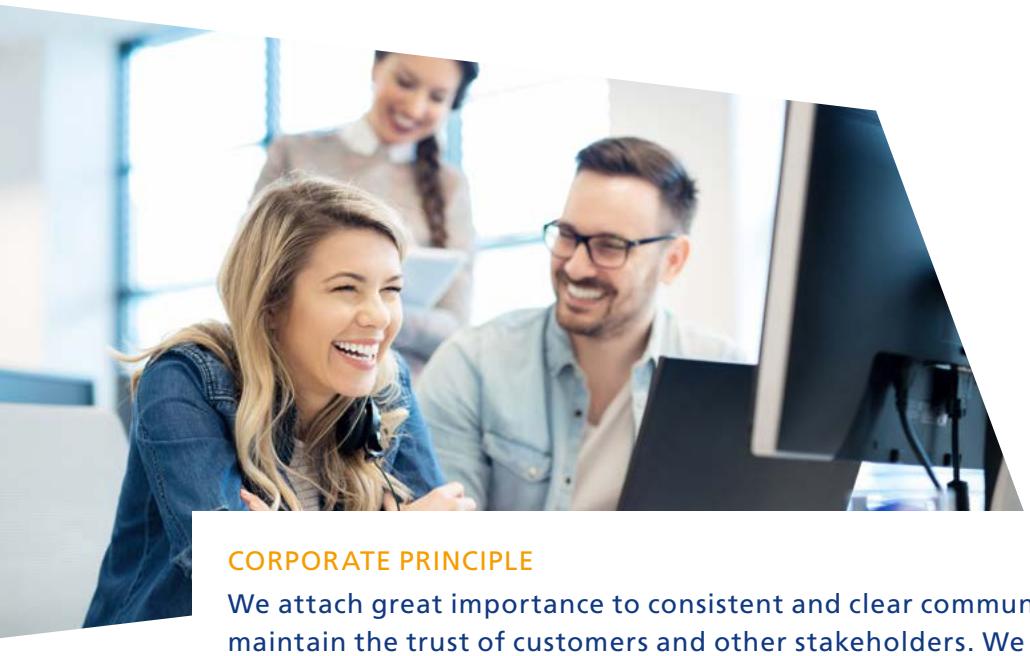
As part of my work, I use resources and energy appropriately and sparingly and take environmental protection concerns into account. I ensure that my activities comply with environmental laws and regulations and have the least possible negative impact on the environment.

RESPONSIBLE MEMBERS OF SOCIETY

COMMUNICATION AND MARKETING

BACKGROUND

Swoboda values transparent and open communication with employees, business partners, the media, and other stakeholders and ensures all dialog takes place within a legal framework. To ensure the company's brand presence remains uniform and consistent, all employees are responsible for following the internal communication guidelines.



CORPORATE PRINCIPLE

We attach great importance to consistent and clear communication in order to maintain the trust of customers and other stakeholders. We coordinate planned communication and marketing measures with the relevant specialist department prior to approval and implementation.

MY CONTRIBUTION

I emphasize that any comments I make about Swoboda at public, professional, or cultural events and on the Internet are my personal opinions only. If I receive external inquiries on topics that affect Swoboda as a company, I liaise with the Corporate Communications department before responding. I am familiar with the Swoboda communication guidelines.

RESPONSIBLE BUSINESS PARTNER

Integrity, transparency, and fairness are important in order to create credibility and trust in business dealings. Swoboda emphasizes that it consistently implements and clearly communicates the legal requirements, internal guidelines, and corporate principles to which all must adhere. Swoboda's responsibility as a business partner means it is subject to the following principles in particular:

CONFLICTS OF INTEREST

BACKGROUND

If the private interests of one of our employees collide or could collide with those of Swoboda, there is a potential conflict of interest. Secondary employment in particular can lead to such a conflict of interest. Employees can harm the company if they put their personal interests above those of the company.

CORPORATE PRINCIPLE

We respect the personal interests and private lives of our employees. However, we take care to avoid any discrepancies between personal and business interests, or even the appearance thereof. We do not allow ourselves to be influenced by personal interests or relationships when we make our decisions.

MY CONTRIBUTION

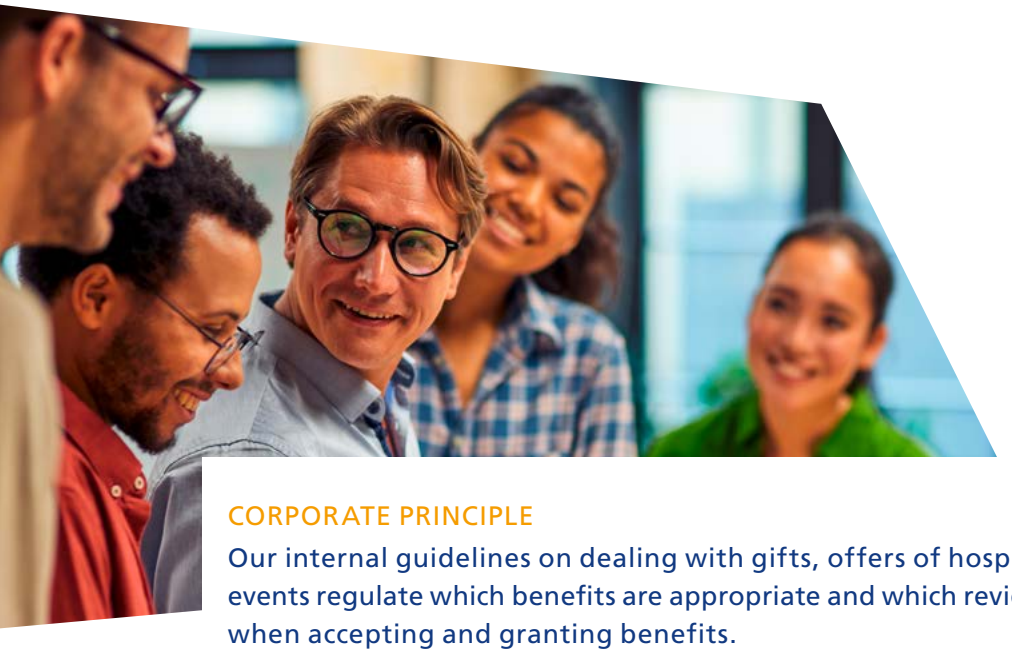
I have already tried to avoid a conflict of interest by disclosing any apparent or actual conflicts of interest to my supervisor and the relevant HR department. We work together to look for solutions that do not negatively affect the company.

RESPONSIBLE BUSINESS PARTNER

GIFTS, OFFERS OF HOSPITALITY AND INVITATIONS

BACKGROUND

Gifts, offers of hospitality, and invitations are common in business relationships. As long as such benefits remain within reasonable limits and do not violate internal or legal regulations, there can be no criticism of them. However, it may be a criminal offense if such benefits exceed legal thresholds and are used to influence third parties.



CORPORATE PRINCIPLE

Our internal guidelines on dealing with gifts, offers of hospitality and invitations to events regulate which benefits are appropriate and which review steps must be observed when accepting and granting benefits.

MY CONTRIBUTION

I strictly adhere to the guidelines on dealing with gifts, offers of hospitality, and invitations. I review my behavior in this context in order to avoid conflicts of interest.

RESPONSIBLE BUSINESS PARTNER

PROHIBITION OF CORRUPTION

BACKGROUND

Corruption is a major problem in commercial transactions. It leads to inappropriate decisions, distorts competition, and is harmful to society. Corruption is illegal and could lead to Swoboda being issued with heavy fines and the employees concerned being prosecuted under criminal law.

CORPORATE PRINCIPLE

Our success depends on the quality of our company's products and services. Corruption is not acceptable to us. We only grant benefits to business partners, customers, or other external third parties in accordance with the legally permissible conditions and our internal guidelines.

MY CONTRIBUTION

I never bribe others, either directly or indirectly. I familiarize myself with the relevant internal regulations independently before I give or receive gifts or extend or accept invitations and offers of hospitality. I report allegations of corruption immediately to one of the contact persons named below.

RESPONSIBLE BUSINESS PARTNER

MONEY LAUNDERING AND TERRORIST FINANCING

BACKGROUND

Almost every country in the world has laws that prohibit money laundering and terrorist financing. Money laundering occurs when funds or other assets enter the legal economic cycle as a direct or indirect result of criminal activity and their origin is concealed as a result. When money or other resources are provided to fund terrorist offenses or to support terrorist organizations, this is considered terrorist financing. The participant's knowledge that money is being laundered through a specific legal transaction or transfer is not required for an individual to be held liable for money laundering. Even unintentional participation in money laundering can lead to considerable consequences for all parties involved.

CORPORATE PRINCIPLE

We carefully screen all customers, business partners, and other third parties with whom we wish to do business. It is our declared aim to work only with reputable partners whose business activities comply with legal regulations and whose operating resources are legitimate. We immediately allocate incoming payments to the corresponding services and enter them into our accounts. We guarantee transparent and open payment processing.

MY CONTRIBUTION

I will not take any measures that could violate national or international money laundering laws. I pay close attention to suspicious behavior on the part of customers, business partners, and other third parties. If there is evidence to support such a suspicion, I will immediately contact the Money Laundering Officer or one of the contact persons named below. I comply with all applicable regulations for recording and accounting transactions and contracts in my area of responsibility.

RESPONSIBLE BUSINESS PARTNER

TAXES AND CUSTOMS DUTIES

BACKGROUND

Due to our global activities and the opening up of new markets, we are required to comply with a large number of statutory foreign trade, tax, and customs regulations. Compliance with tax and customs laws creates trust among customers, tax authorities, and the public. If there are irregularities, this could result in considerable financial losses for Swoboda and significant damage to its reputation. The employee responsible must also expect negative consequences.

CORPORATE PRINCIPLE

We are expressly committed to complying with national and international legislation and are aware of our social responsibility in fulfilling tax and customs obligations.

MY CONTRIBUTION

I design the internal structures and processes in such a way that the taxes and customs duties payable are determined completely, correctly, and on time, recorded in the reporting system, and paid to the responsible tax authorities. If I perceive any indications that violations of tax and customs regulations have occurred in my professional environment, I take every opportunity to prevent or correct these violations. If this is not possible, I will get in touch with the relevant contact person in the tax and customs department.

RESPONSIBLE BUSINESS PARTNER

FAIR AND FREE COMPETITION

BACKGROUND

Competition and antitrust laws protect fair and free competition. Compliance with these laws protects competition on the market for the benefit of all market participants. In particular, agreements and practices between competitors that impede free competition are prohibited. Abusing a dominant market position is also not permitted. There is a possibility that such abuse can occur by treating customers unfairly (discrimination), refusing deliveries, imposing unreasonable purchase or sales prices and conditions, or carrying out tie-in transactions without objective justification for the additional service demanded. Anti-competitive conduct can not only significantly damage Swoboda's reputation, but can also result in substantial fines and penalties.

CORPORATE PRINCIPLE

We conduct our business exclusively according to the principle of merit and on the basis of the market economy and free, unimpeded competition. We like to compete with our competitors and always adhere to ethical principles and laws. We do not enter into agreements with competitors, suppliers, or customers. As long as our company has a dominant position on the market, we will not abuse this position. When working with our authorized distribution partners, we take into account the specific antitrust terms and conditions for distribution systems.

MY CONTRIBUTION

In any contact with competitors, I make sure that no information is received or given that allows conclusions to be drawn about the current or future business behavior of the provider of the information. When I talk to competitors or am in contact with them in any other way, I avoid topics that are relevant to our relationship as competitors. Such topics include prices, pricing structures, business planning, development status, and delivery times.

RESPONSIBLE BUSINESS PARTNER

PROCUREMENT

BACKGROUND

As part of its business activities, Swoboda is contractually bound to a large number of suppliers and service providers.

CORPORATE PRINCIPLE

Our selection of suppliers and service providers is based on objective criteria. We involve the relevant purchasing departments in the purchase of products and services in accordance with the relevant procurement principles.

MY CONTRIBUTION

I avoid any conflicts of interest and do not unilaterally favor any supplier or service provider without objective reason. I do not purchase goods or services without familiarizing myself with the market and other providers. In doing so, I take into account the applicable procurement guidelines and contact the responsible purchasing department at an early stage.

EXPORT CONTROL

BACKGROUND

As part of export control, cross-border trade is subject to prohibitions, restrictions, authorization requirements, or other monitoring measures. In addition to goods, technologies and software are also affected by export control laws. In addition to the actual export, temporary exports such as taking items and technical drawings on business trips and technical transfers such as by email or via the cloud are also recorded. Transactions with persons or companies on sanctions lists are generally prohibited, irrespective of the delivery process.

CORPORATE PRINCIPLE

We ensure compliance with all regulations applicable to the import and export of goods, services, and information.

MY CONTRIBUTION

When making decisions on the import or export of products and services, I specifically check whether this decision may be subject to export controls. In cases of doubt, I seek advice from the department responsible for customs and foreign trade law.

RESPONSIBLE IN THE WORKPLACE

It is Swoboda's primary interest to protect the health and safety of every employee. Obligations to protect and uphold security also apply to employee and customer data as well as company-specific expertise and business assets. The following Swoboda principles derive from the notion of responsibility in the workplace:

OCCUPATIONAL HEALTH AND SAFETY

BACKGROUND

Swoboda takes the health and safety of its employees very seriously. We follow the company's health and safety policy and national regulations.

CORPORATE PRINCIPLE

We maintain and promote the health, performance, and job satisfaction of our employees through the continuous improvement of working conditions and a variety of prevention and health promotion programs.

MY CONTRIBUTION

I comply with occupational health and safety regulations. I never put the health or safety of my colleagues or business partners at risk. I take all necessary and legally required measures within the scope of my authority to ensure that my workplace is always a safe working environment. I can play an active role in maintaining and promoting my health by voluntarily participating in prevention and health promotion measures.

RESPONSIBLE IN THE WORKPLACE

DATA PROTECTION

BACKGROUND

There are special legal provisions that protect the handling of personal data. It is generally necessary for the data subject to give their consent for personal data to be collected, stored, processed, and used in other ways. This can be ensured through a contractual provision or another legal basis.

CORPORATE PRINCIPLE

We protect the personal data of employees, former employees, customers, suppliers, and other data subjects. We collect, record, process, use, and store personal data only in accordance with legal requirements.

MY CONTRIBUTION

It is important to note that the collection, storage, processing, and use in any other way of personal data can only take place with the consent of the data subject, a contractual provision, or another legal basis. All aspects of information processing must be secured in such a way that the confidentiality, integrity, availability, verifiability, and resilience of the information worthy of protection are guaranteed and unauthorized internal and external use is prevented. If I have any questions, I contact my supervisor or the department responsible for data protection.

RESPONSIBLE IN THE WORKPLACE

SECURITY AND PROTECTION OF INFORMATION, KNOWLEDGE, AND INTELLECTUAL PROPERTY

BACKGROUND

Swoboda possesses numerous internationally protected patents, extensive trade and business secrets, and technical expertise. Our success depends on this knowledge. There is a possibility that the unauthorized dissemination of such information may cause considerable damage to the company and may have consequences for employees under employment, civil, and criminal law.

CORPORATE PRINCIPLE

We are aware of the importance of proprietary knowledge and protect it carefully. We recognize the intellectual property of competitors, business partners, and other third parties.

MY CONTRIBUTION

I treat all information from Swoboda with care and do not pass it on without authorization. I am particularly cautious when handling information relating to technical expertise, patents, and trade and business secrets.

RESPONSIBLE IN THE WORKPLACE

INFORMATION SECURITY

BACKGROUND

Although information technology (IT) or electronic data processing (EDP) are part of Swoboda's daily operations, both harbor numerous dangers. These include, in particular, the impairment of data processing through viruses or malware, the loss of data due to program errors, or the misuse of data by hackers.

CORPORATE PRINCIPLE

We take into account IT and EDP security and adhere to the applicable regulations.

MY CONTRIBUTION

I am familiar with the current IT security regulations and adhere to the provisions set out therein. I am aware that the exchange of unencrypted information (e.g. by email or USB stick) is not a secure means of communication.

DEALING WITH COMPANY ASSETS

BACKGROUND

Swoboda's tangible and intangible assets are used to support our employees in achieving the company's business objectives. This may only be done in accordance with company regulations.

CORPORATE PRINCIPLE

We respect the tangible and intangible assets of the company and do not use them for non-business purposes.

MY CONTRIBUTION

I adhere to company regulations and treat company assets with care and consideration.

RESPONSIBLE SOCIAL PARTNER

We respect the right of every employee to form trade unions and employee representative bodies. Our aim is to work together with employee representatives in an open and trusting manner, to engage in constructive and cooperative discussions, and to strike a fair balance of interests. Our corporate culture stipulates a professional approach to employee representation that allows neither favoritism nor discrimination. The aim is to secure the future of Swoboda and its employees through cooperative conflict management and social commitment in order to achieve economic and technological competitiveness. Securing employment opportunities and economic efficiency are equally important objectives.

IMPLEMENTATION, COMPLIANCE WITH THESE REGULATIONS, OR REPORTING OF VIOLATIONS

A breach of any of the rules set out here may result in financial loss or reputational damage – or both – for our company. However, individual employees may also be liable for damages or even be prosecuted. Compliance with the regulations is therefore of great importance. Employees can always contact their supervisor if they have any questions or are unsure about anything.

Please contact us; the protection of our company depends on good communication.

Employees and managers of Swoboda who become aware of abuses or other violations of existing laws, or other principles of ethical conduct in the business environment or along the supply chain are requested to submit an anonymous report via the digital whistleblower system under the link: **www.swoboda.com/messageline**, or to contact Swoboda's Compliance Officer directly by email at **compliance@swoboda.com**.

If you have any general questions or comments about this Code of Conduct, please contact Swoboda's Compliance Department via the email address above.

SWOBODA.COM/MESSAGELINE

COMPLIANCE@SWOBODA.COM

Swoboda Wiggensbach KG
Max-Swoboda-Straße 1
87487 Wiggensbach
Germany

SWOBODA.COM

swoboda
technologies