

ROSI Technology GmbH

OUR GUIDELINES

Vision + Mission

Breaking boundaries to establish solutions for tomorrow's mobility defines ROSI Technology GmbH.

ROSI is a competent partner in the field of vehicle electronics, diagnostics, and communication. As a customer-oriented company, we explore new avenues, addressing our clients' challenges with fresh thinking and youthful team spirit.

Mutual trust and respect for each individual form the basis of our actions.

This is our understanding: Our intention is to continuously adapt to market needs and serve our customers optimally through high flexibility. Customer proximity in collaborative projects, training, or consulting is our focus.

Our products and services are consistently reliable and high-quality. Through a high degree of ongoing innovation, we remain attractive to our customers, helping them retain and expand their competitive advantage. We can achieve this only by acting responsibly and with respect towards our employees, customers, and business partners, by respecting laws and regulations, conducting ourselves transparently and fairly in the market, and preserving the environment and resources.

To this end, we have formulated the following principles

Code of Conduct

1. Respect for Human Rights and Labor Rights of Employees
2. Environmental Protection
3. Transparent Business Relationship
4. Fair Market Behavior
5. Due Diligence for Promoting Responsible Raw Material Supply Chains
6. Quality Management, Information Security, Data Protection
7. Prozesse Integration of Sustainability Requirements into Organizations and Processes

Code of Conduct der ROSI Technology GmbH

Introduction

As a company operating in the economic-technical sector, ROSI is aware of its responsibility to society, employees, business partners, the market, and the environment. Responsibility and integrity are integral parts of our corporate culture. They form the basis of the trust bestowed upon us by our customers, cooperation and business partners, and the public.

We expect our employees to respect these values and integrate the principles set forth here into their daily work. We also expect our suppliers to adhere to the standards outlined here.

The Code of Conduct of ROSI is based on the following globally recognized guidelines:

- Universal Declaration of Human Rights by the United Nations
- United Nations Global Compact
- ILO Declaration on Fundamental Principles and Rights at Work
- Drive Sustainability Initiative guidelines for improving sustainability performance in the supply chain
- Internal norms and values
- Declaration of compliance with applicable legal, regulatory, normative, and contractual requirements for ROSI.

1. Respect for Human Rights and Labor Rights of Employees

No slavery, no human trafficking, no child labor, and protection of young employees. Respecting internationally recognized human rights is a top priority in our company.

No slavery, no human trafficking, no child labor, and protection of young employees. Respecting internationally recognized human rights is a top priority in our company. Therefore, we ensure that no business partners associated with us engage in forced or compulsory labor, debt bondage, or prison labor.

We attach great importance to meeting the minimum age according to state regulations or the ILO (no directly or indirectly employed persons under 15 years old) and ensuring appropriate working conditions. Child labor is not permissible.

No discrimination and no harassment

All employees in our company are selected based on their qualifications and abilities. We reject any form of discrimination and harassment in the workplace (whether based on ethnic or social origin, gender, religious or state affiliation, tolerant political views, age, physical or mental ability, sexual orientation, marital status, or pregnancy) and promote and support a positive, respectful working environment.

Compensation, benefits, and working hours

Compensation and working hours comply with legal and industry-specific standards, ensuring all involved employees a decent lifestyle, fair working hours, and sufficient breaks.

Occupational, health, and fire protection

We ensure compliance with all occupational, fire, and health protection regulations relevant to our workplaces, in accordance with applicable legal and regulatory requirements, and continuously strive to improve beyond those standards. We expect the same commitment from our business partners.

To achieve this, the company guarantees the implementation of protective measures such as fire safety equipment and the monitoring of potential hazards, such as the storage of chemicals and emergency materials. Employees of the company are comprehensively informed and trained on all potential workplace hazards, and protective equipment is provided free of charge.

Freedom of association

The company is committed to open, constructive, and trusting communication with its employees and employee representatives. It respects the right of employees to freely associate, join unions, appoint employee representatives, and establish a works council. Our employees who engage as employee representatives are not disadvantaged.

2. Environmental Protection

Environmental management is one of the top goals of our corporate policy. The environmentally friendly use of all resources is crucial to ensuring the sustainability requirements of our customers.

Therefore, we operate the integration of environmental management based on ISO 14001 into our existing management system.

Active handling of environmental challenges; prevention of environmental and health damage

We pay particular attention to ensuring that our business partners also handle ecological challenges prudently and foresightedly. It is essential to prevent or minimize potential impacts on the health of employees and the environment. The company constantly monitors the status and continuous improvement of environmental indicators, such as overall energy consumption and greenhouse gas emission.

Products and processes with low resource consumption

All our products and processes require the efficient use of energy, water, and raw materials, minimizing environmental and health impacts.

Registration, assessment, and restriction of substances and materials

The company also requires the use of environmentally and health-safe substances and materials from business partners. We expect them to provide a list of all used substances in compliance with legal requirements.

Waste and Recycling

We recycle recyclable materials generated in the company and dispose of waste generated in the manufacturing process safely and environmentally friendly.

Quality and Safety

All products and services must meet the contractually defined criteria for quality and safety upon delivery and must be safe for their intended use.

3. Transparent Business Relationships

Commissioning of business partners and avoidance of conflicts of interest

For our corporate policy, transparent business relationships and partners who have convinced us solely through quality, integrity, and compliant behavior are essential.

Financial or personal interests, as well as personal relationships, are not decisive factors.

Our business relationships may only be initiated or maintained based on objective criteria, such as quality, price, technological or ecological standards, and the reliability of the business partner.

Commercial and personnel decisions or recommendations by employees must not be influenced by private interests and relationships or motivated by material or immaterial benefits. Even the appearance of unrelated considerations should be avoided. We expect our business partners to reject and prevent any form of corruption

4. Fair Market Behavior

Free Competition, Money Laundering, and Protection of Confidential Information

The company emphasizes fair market behavior and expects all business partners to adhere to fair and free competition in agreements and arrangements, as well as to refrain from unlawfully restricting competition. Consequently, we pursue our corporate goals while observing applicable competition rules. This expectation extends to our suppliers and other business partners.

Respect for the personality of our employees includes the protection of their personal data in terms of informational self-determination. We thus expect the collection, use, deletion, and protection of all information in accordance with the requirements of the Federal Data Protection Act and the EU General Data Protection Regulation (EU-GDPR), particularly for confidential content. Moreover, strict compliance with all applicable laws for import and export, as well as money laundering, is indispensable.

In collaborations with suppliers, customers, and other business partners, safeguarding confidential information, know-how, and trade secrets is of utmost importance. All employees are obligated to use data and information within the company's scope only within authorized frameworks. When sharing information within and outside the company, employees must verify the recipient's authorization. Depending on the significance of the information, additional security measures, such as confidentiality agreements, should be established. In return, the company respects and protects the confidential information of others. External knowledge and information not created by the company may only be used if lawfully acquired or known from publicly accessible sources.

5. Due Diligence for Promoting Responsible Raw Material Supply Chains

Our company is committed to fulfilling its due diligence in the procurement of relevant raw materials and, when necessary, taking measures against human rights violations, child or forced labor, or the promotion of armed conflicts.

6. Management, Information Security, Data Protection

Quality Management / Quality Principles at ROSI

Customer requirements regarding innovation, reliability, adherence to deadlines, and the price of products and services must be met. Each employee serves as both a supplier and a customer. Customer perception is crucial in evaluating the products and services.

The fundamental quality goal is "Zero Defects" or "100% accuracy." Quality is a collaborative effort of all employees. Each employee must strive to perform their tasks without errors.

Through inspections in all project phases, errors should be identified early. The PDCA cycle and the KVP (Continuous Improvement Process) aim to prevent the recurrence of errors. Leaders are responsible for the continuous improvement process (KVP).

Our work quality also depends on the quality of our suppliers. Therefore, the highest quality and the best value for money must be demanded from suppliers. We are committed to environmentally friendly practices and resource-efficient use.

Information Security

Information security is an integral part of our corporate strategy. All employees, as well as internal and external service providers, are highly obligated to manage the risks of information processing, such as data leakage, data manipulation, technical disruptions, or sabotage, and to reduce them to a reasonable level.

To achieve information security objectives, an Information Security Management System (ISMS) is installed and operated. This includes defined responsibilities, documented processes and regulations, as well as other organizational and technical measures.

The following principles are considered when creating information security policies and concepts and implementing measures:

Appropriateness:

Objectives of security measures and the required effort are in an appropriate ratio to each other. In addition to complying with legally required security requirements, security measures are always subject to an adequacy review in relation to the protective purpose.

Resources:

Adequate financial, personnel, and time resources are provided to achieve and maintain an appropriate level of security.

Employee Involvement:

Information security concerns every employee. Each individual must contribute to avoiding damage through responsible and security-conscious actions.

Information Classification:

All information processed within the scope of business processes is classified based on its protection requirements. This is a prerequisite for risk analysis and the implementation of appropriate protective measures.

Data Protection

The constitution of the Federal Republic of Germany ensures the right of citizens to fundamentally determine the use of their personal data. According to the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG Neu), the task of data protection is "to protect individuals from being affected in their right to privacy through the handling of their personal data."

The entire data protection law applies only to personal data, defined as "individual information about the personal or factual circumstances of a specific or identifiable natural person (data subject)."

Legal entities are not covered. With this policy, the principles of data protection are established within ROSI.

Objective and Purpose:

Protection of individuals to prevent any infringement of their right to privacy through the handling of their personal data.

Basis for the integrated data protection process at ROSI, as well as for all sub-processes of data protection.

7.Integration of Sustainability Requirements into Organization and Processes

Company Declaration and Documentation

Our company is committed to transparency and sustainability in processes and business relationships. This means that, like our business partners, we commit to a code of conduct and can provide associated documents and records to demonstrate the fulfilled duty of care.

Training and Education

We operate a training program to develop our employees in their respective roles, improving the establishment of policies, the implementation of processes, and the communication of expectations to our employees.

Code of Conduct

The company reserves the right to verify compliance with the standards outlined here in an appropriate manner, such as through audits, and to adjust them if necessary. In the event of

violations of laws and the standards defined here, we take consistent action, including the initiation of labor law measures or the termination of business relationships.

Legal violations result in significant disadvantages for the company, such as fines or damage claims. Additionally, there is the potential for reputational damage, which could significantly weaken the company as an established and respected development and research service provider. In many cases, even the mere appearance of a legal violation can negatively impact public perception and the stance of our reputable customers, suppliers, and other business partners.

By adhering to applicable legal regulations, each employee acts in the corporate interest of ROSI. Legal prohibitions and obligations must be observed, even if from an individual or corporate perspective, it may seem impractical or economically unfavorable. Legal conduct always takes precedence in case of doubt. Every employee can rely on this principle, even in the face of conflicting instructions from a manager or the management.

To protect our own employees and business partners, we pay special attention to the early detection and correction of misconduct.

The company places great importance on internal or external reports of potential violations of regulations and requirements and requests corresponding notifications to ensure a prompt investigation to prevent harm to individuals or corporate interests.

Umsetzung und Unterstützungsleistungen im Rahmen des Code of Conduct

Die Führungskräfte des Unternehmens sind innerhalb ihrer verantwortlichen Funktion verpflichtet, alle in ihrem Zuständigkeitsbereich tätigen Mitarbeiter/-innen in geeigneter Form über Inhalt und Bedeutung dieses Verhaltenskodexes einschließlich seiner maßgeblichen flankierenden Richtlinien zu unterrichten und zu sensibilisieren. Die Führungskräfte unterstützen ihre Mitarbeiter/-innen nach besten Kräften, rechtmäßig zu handeln. Nur kann im Unternehmen gewährleistet werden, dass die in diesem Kodex niedergelegten Grundsätze täglich gelebt werden und fest in unserer Unternehmenskultur verankert bleiben.

Die unmittelbar der Geschäftsführung nachgeordneten Führungskräfte berichten diesem umgehend über vorliegende Verstöße sowie zu geeigneten Präventionsmaßnahmen. Alle Mitarbeiter/-innen sind verpflichtet, bei Bedarf an der Berichterstattung aktiv mitzuwirken.

Contact Person:

or questions regarding sustainability and the code of conduct, feel free to contact our management at any time.

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