

Code of Ethics



Our code of ethics is a set of guidelines that represent the basis of our company culture. These guidelines shape the special character of CarMedialab in our daily work and decisions around the world.

Note on gendered references:

For better legibility the masculine formulation was chosen. This is objective and should not express gender discrimination or violate the principle of equality in any way.

Dear CarMedialab Team,

The dignity of all humans is unimpeachable. It is the duty of each individual to uphold and protect it. Our code of ethics describes our joint values and how we wish to work together today and, in the future, to fulfil our corporate vision and mission. Our code of ethics is a key factor for the success of our company.

To abide by the law is a matter of course for CarMedialab. Above and beyond adhering to legal requirements, the code of conduct urges us to act in an ethically correct manner and to follow the path of highest integrity. Our guidelines for conduct such as personal responsibility, openness and lawful and ethical behaviour provide trust, credibility and transparency, for our customers, business partners, employees and other interest groups.

We actively and continually strive to uphold our ethical code. The guidelines form a reliable foundation for our actions and ensure that CarMedialab as a company enjoys an excellent reputation. We don't just put value on reaching our goals, but on how we reach them. Which is why these guidelines apply to all CarMedialab employees without exception, regardless of team, level of hierarchy or country.

Violation of laws or other ethical guidelines may have legal consequences but also contradict our moral values, damage the reputation of the company and will not be tolerated.

We want to be proud of CarMedialab's public reputation. We want to be proud of how we run our company. We want to be able to look back with pride on our company's history which spans back to 2004. The responsibility for achieving this lies with each and all of us.

Therefore, dear CarMedialab team, we would like you each to read the code of ethics carefully. We call upon each individual to be a role model for others and to live by our rules of conduct on a daily basis.

Sincerely,



A stylized, handwritten signature in black ink, consisting of several overlapping loops and lines.

Henri Depe Tchatchu



A stylized, handwritten signature in black ink, featuring a prominent 'H' and 'B' followed by several loops.

Heiko Bauer

Introduction

Who we are ...

We are open-minded, forward thinking and passionate. We are motivated by our fascination for mobility. Our mission is to develop the mobility of the future in cooperation with our partners.

... and what we stand for.

Our focus is on remote vehicle testing, smart charging and mobility solutions for local public transport. Our products range from embedded systems for use in vehicles or charging infrastructure to overall system operation for telematics solutions.

The focus of our products has always been on innovative telematics. We are at the dawn of the “connected car” era and therefore perfectly placed and well-prepared for projects in the area of autonomous driving and electromobility.

Co-workers and Employees

Career and Family (Work-Life-Balance)

The individual and the family take centre stage. We actively support combining career and family by offering, for example, flexible working time arrangements. We strive to take the requirements and wishes of each individual into account.

Advancement and Career

We offer comprehensive further education options to our employees and promote their personal development and career advancement. We offer ideal conditions for a high level of autonomy and entrepreneurship. We include employees in making decisions and recognise differing opinions.

Equal Treatment and Non-Discrimination

During the course of our day-to-day dealings with one another, we show integrity, fairness and respect at all times. We advocate equal opportunity and condemn any form of discrimination based on gender, origin, age, colour, religion, ideology or political outlook, disability or sexual identity.

Human and Workers' Rights

We promote internationally recognised human rights and oppose any violations of them. In particular, we condemn any form of child or forced labour. We respect civil, political, economic, social or cultural legal claims.

Occupational Health and Safety

The safety and health of our employees is of great importance to us; economic considerations do not take priority.

All managers, employees, third-parties commissioned by CarMedialab and our business partners are obliged to comply with and implement our rules of conduct and to report any infringements. In particular, we will not tolerate violations of equal treatment, human or workers' rights, occupational safety or discrimination.

Business Environment

Responsibility

We behave as if we were the owners of the company and make decisions in our area of assigned responsibility. We don't make promises we cannot keep and we keep the promises we make. We support ethically sound behaviour, also with regard to our suppliers.

Customers and Business Partners

Our customers and business partners are the focus of our activities. We strive for long-term relations with our customers and business partners, based on trust, transparency and integrity.

Products and Quality

We repeatedly question conventional approaches and develop new solutions for the benefit of our customers. We put emphasis on the safety and quality of our products and services. Quality is the responsibility of each individual.

Intellectual Property

Our decades of experience and unique know-how is our greatest asset which we protect at all times from unauthorised access, loss, theft, manipulation and misuse.

Compliance with Laws and Regulations

Complying with laws and regulations is a matter of course for us. We observe country-specific prohibitions and obligations at all times, even if doing so has a negative impact on our company. Any violations have not only legal consequences but also harm our reputation and jeopardise the commercial success of our company.

Fair Competition

We operate in a manner which is tough but responsible, honest and fair. We commit to fair and open competition and do not make agreements with the intention of influencing unrestricted and diverse competition. We set ourselves apart by offering our exceptional integrated system of software and hardware solutions.

Company Property

We use company property and other financial assets only for their intended purposes and handle them responsibly at all times. We protect our resources from loss, theft, manipulation and misuse. We use electronic means of communication professionally and contribute to protecting these systems and devices from internal or external misuse.

All managers, employees, third-parties commissioned by CarMedialab and our business partners are required to ensure the high quality of our products and services, to meet the demands of our customers to their satisfaction and to acknowledge criticism and suggestions. Violations of regulations and laws will not be tolerated and may have legal consequences.

Knowledge and Information

Communication

We ensure the fast and efficient exchange of information within the company and pass on information in a correct and complete manner. Relevant knowledge may not be unlawfully withheld, falsified or selectively disclosed. Our communication is at all times fair, respectful and tolerant, regardless of position, origin, religion, gender, colour or other indicators of diversity.

Data Protection

We comply at all times with data protection regulations, in particular protection against misuse of data, the right to informational self-determination, the right to privacy and private life. We handle personal data in a sensitive manner at all times and record sensitive data only in such a way as is legally admissible or with the consent of the person concerned.

Confidentiality

We handle business and commercial secrets confidentially at all times, as well as sensitive information about our customers, suppliers and other third-parties. We protect information from theft, loss, manipulation and misuse.

Reporting

We transact business in a fair, honest and transparent manner. We value open and truthful reporting of our business activities to our customers, employees, shareholders, partners and other third-parties. Our reporting is always in accordance with legal requirements and regulations and is complete, accurate and timely.

Insider Information

Any employees who are in possession of specific information about circumstances which are not public knowledge, and which could affect the market or share price of our investor init SE if they were to be made public, do not trade with shares or other init-related financial instruments or pass on this information.

All managers, employees, third-parties commissioned by CarMedialab and our business partners are urged to maintain communication in an open and respectful manner and to ensure company and trade secrets, information and data are treated with sensitivity. We all commit to dealing with reporting in an honest and compliant manner.

Social Environment

Education and Employment

We aspire to grow our company in a sustainable and stable way to maintain jobs and hold on to our employees and co-workers for the long term. In addition, we support young people in their choice of career with a range of work experience, training and development and thesis topics.

Environment and Climate Protection

We actively promote environment and climate protection with our products. In our daily activities, we endeavour to avoid wasting resources and to ensure waste is separated properly, that fruit is sourced organically, that promotional gifts are sustainable. We help our employees to get to work in a convenient and environmentally friendly way by providing bicycle areas and electric vehicles.

Mobility

Our innovative and future-focused solutions help to support our customers in meeting the challenges of networked mobility.

Communication and Public Sphere

We respect the right to freedom of expression (without reprisals) but ensure that our appearance in public spheres, particularly in social media, does not infringe on the private life or right to privacy of others and does not damage our reputation. Harassment and intimidation are not tolerated in any form of communication.

Donations and Sponsoring

We take our responsibility to society seriously and encourage social commitment. We support local and international organisations and projects in social areas, supporting children, youth work, education, culture and sport in various ways.

All managers, employees, third-parties commissioned by CarMedialab and our business partners should support sustainable company growth in their decisions and avoid waste. We value and respect freedom of expression, but do not tolerate any discrediting of others or behaviour that could or will lead to harming another. We celebrate the social commitment of our employees.

Anti-Corruption

Gifts and Invitations

We do not allow our decisions or behaviour to be influenced by gifts or invitations and do not give or receive inappropriate gifts or offer or accept inappropriate hospitality.

Travel Expenses and Hospitality

We only assume travel and hospitality expenses or allow them to be assumed when these are within the framework and scope of normal hospitality and there are commercial or business reasons.

Conflicts of Interest

We do not allow our objectivity and reputation to be compromised by our personal relationships and activities, or by family members or other related parties. We avoid conflicts of interest and make our decisions in the interest of the company and the applicable laws.

Other Benefits

We do not tolerate any corruption or unfair commercial practices. Incentives, privileges, discounts or other advantages or benefits which, in the course of business dealings, could compromise the ability to remain objective and make fair decisions are not promised, granted, nor requested or accepted, either directly or via a third party. Our business dealings are always in accordance with the relevant regulations and transparent and appropriate in every way.

All managers, employees, third-parties commissioned by CarMedialab and our business partners may accept and offer appropriate and legitimate business benefits as part of their activity when it can be assured that there is no intention or expectation, or even the appearance of such, to influence the decisions or actions of the parties involved. We are all responsible for ensuring that any offer, promise, granting, requesting or accepting of benefits complies with country-specific laws, regulations and circumstances.

Guidance for Making Ethical Decisions

Take responsibility. Be aware. Think. Question. Be informed.

We strive to implement our rules of conduct actively and consistently. They apply without exception to all CarMedialab employees, regardless of team, level or country. We are all role models.

What should we do if we notice something that might be in breach of our ethical code?

- ▶ We can get advice from our direct manager or from executive management. Any information is strictly confidential.
- ▶ The following questions may help us to make ethically correct decisions.

1

Is my decision in line with applicable laws and our internal regulations?

2

Can I make my decision impartially, without conflicting personal interests, and in the interests of CarMedialab?

3

Am I protecting the reputation of CarMedialab as a law-abiding and socially responsible company?

4

Would my decision withstand critical scrutiny by a third-party?



If the answer to any of these questions is "no", please refer to the people mentioned above.



If you can answer all questions with "yes" then your decision is most likely acceptable.

Report Any Violations

We are all obliged to report any (potential) violations of our code of ethics. We can report to the people mentioned above or communicate the infringement via our CML complaints email address, complaints-cml@carmedialab.com. This also applies to violations by our customers, suppliers or other partners.

This is for informational purposes only and shall not effect any claims. CarMedialab reserves the right to revise the code of ethics at any time without stating reasons or further communication.

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