



CODE OF CONDUCT

for employees

Living Values together.

15 August 2024



PREAMBLE

Dear BODE employees,

At BODE, we are working together to shape access to the mobility of tomorrow with our innovative boarding systems worldwide. Every day, we make important decisions in Europe, America and Asia and are in constant contact with our customers, suppliers, service providers and partners.

Our success is largely based on the trust of our business partners. In order to secure this trust in the future, we need clear and harmonised guidelines to support us in our decision-making. This is why we have developed this Code of Conduct.

This code is not only a commitment to compliance with all legal and regulatory requirements. It also obliges us to fulfil our corporate responsibility by acting ethically, continuously improving our sustainability performance and treating each other with respect. We also require our suppliers and partners to comply with our standards.

It is our joint shared responsibility to implement these commitments in our day-to-day work and to actively live them.

If you have any questions, uncertainties or if violations of the Code are observed, you can contact your manager or a member of the compliance team at any time.

The management & your compliance team

| | |
|--|---|
| A. Scope | 1 |
| B. Expectations towards business partners | 1 |
| C. Company Principles | 1 |
| I. Ethical business management | 1 |
| II. Environmental protection | 2 |
| III. Product safety | 2 |
| IV. Honesty | 2 |
| V. Social commitment of the company..... | 2 |
| D. General requirements of conduct for employees and company | 2 |
| I. Competition and antitrust law..... | 2 |
| II. Corruption..... | 3 |
| III. Money laundering..... | 4 |
| IV. Compliance with import and export regulations | 4 |
| V. Conflict commodities..... | 5 |
| E. Conduct of the company towards its employees | 5 |
| I. Respect for human rights and equal treatment of all employees..... | 5 |
| II. Ban of child labour and forced labour..... | 5 |
| III. Qualification of employees | 5 |
| IV. Occupational health and safety..... | 5 |
| V. Appropriate pay and adherence to working hours | 6 |
| VI. Respect for personal rights, privacy and data protection | 6 |
| VII. Freedom of expression | 6 |
| VIII. Freedom of assembly and labour rights..... | 6 |
| F. Conduct of employees towards the company and third parties | 7 |
| I. Confidentiality regarding trade secrets and protection of corporate values..... | 7 |
| II. Conflict of interest | 7 |
| III. Ban of insider trading..... | 8 |

| | |
|---|-----------|
| IV. Duty regarding report integrity, data protection and information security | 8 |
| V. Conduct in public and in the media | 9 |
| VI. The use of company property and the internet | 9 |
| VII. Activity in political parties | 9 |
| G. Compliance implementation and control | 10 |
| I. Duties of executives and management | 10 |
| II. Whistle-blowing and protecting the whistle-blowers | 10 |
| III. Consequences of violations | 11 |

A. Scope

The Code of Conduct is applicable worldwide to all companies of the BODE Group as well as to all companies in which the BODE Group directly or indirectly holds a majority shareholding. In the case of minority shareholdings, the BODE Group will work towards the application of and compliance with these or comparable codes of conduct. The defined principles apply both within the BODE Group and to the conduct towards external business partners, suppliers and third parties.

All employees of the BODE Group, including our managers, are required to adhere to the provisions of this Code of Conduct and to refrain from violating any of its rules.

B. Expectations towards business partners

We expect our business partners and suppliers to also respect the principles of this Code of Conduct and to introduce similar principles within their own company. In particular, all business partners are required to ensure that they always act in accordance with the legal provisions and respect human rights and laws to prevent child labour, slavery and exploitation. We offer our business partners any assistance in achieving these aims.

C. Company Principles

In addition to the quality of the products and delivery reliability, the BODE Group bases its success above all on clear corporate principles. Responsibility, trust and reliability are the cornerstones of our self-image. These values are the basis of our daily dealings with each other and in our dealings with business partners, suppliers, customers and third parties. In addition, the BODE Group has also committed itself to aligning all its actions with strict principles in order to meet its responsibility towards society, its business partners and its customers.

The following corporate principles should be seen as an indispensable yardstick for all our actions and decisions.

I. Ethical business management

We base our actions on responsible corporate governance and also take into account the consequences of our business activities and decisions. We respect universal ethical values and principles, in particular integrity, mutual respect and openness. These principles shape the way we deal with our employees, business partners and third parties.

II. Environmental protection

The protection of the environment, including climate and natural resources, is a high priority for us. We therefore comply with the legal requirements and standards for environmental protection and align our production and business processes with the protection of natural resources. In product development, we also pay attention to environmentally friendly technologies, the responsible use of natural resources, the avoidance of environmental pollution and the promotion of climate protection.

III. Product safety

We stand for products of outstanding quality. In order to maintain this standard, we are constantly working to improve our products even further. We have high expectations for the safety of our products and comply with all legal requirements relating to these products.

IV. Honesty

It is important to us to be a reliable business partner and to only make promises that we can keep. We expect our employees to behave honestly at all times and to avoid misleading colleagues, business partners and customers. Professional and clear communication is both an important part of our appearance towards third parties and a cornerstone of our internal corporate dialogue.

V. Social commitment of the company

We are aware of our social responsibility and support social and charitable institutions. We therefore help to create new opportunities within our communities and maintain existing opportunities. We also encourage our employees to get involved in social issues and to get involved in society at all times.

D. General requirements of conduct for employees and company

We consider it our primary obligation to comply with all legal requirements of the countries in which we operate at all times and to observe internal company policies.

I. Competition and antitrust law

We comply with the provisions of fair competition and antitrust law. Our employees do not participate in illegal agreements on prices, conditions, capacities, margins, allocation of customers, territories or products, or on other factors that influence the competitive behaviour of companies. This also applies to informal discussions that have the object or effect of restricting competition. When participating in tenders, we observe the

applicable award conditions. It is also prohibited to gain competitive advantages by obtaining competitively relevant information through industrial espionage or bribery or knowingly spread false information about competitors.

II. Corruption

For the BODE Group, it is a matter of course that business deals are concluded solely on the basis of corporate decisions.

1. Bribery and corruption in business transactions

We face the competition for orders with the quality and price of our products and services. We strictly reject any form of corruption and similar business practices. We comply with the requirements of the OECD Anti-Bribery Convention, the UN Convention Against Corruption, the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act as well as all applicable national corruption regulations of the states in which we operate.

Employees of the BODE Group may not offer, make or accept benefits of any kind that are intended to obtain or retain orders or other unfair advantages in an unlawful manner or to influence decisions. Any behaviour that could even give such an impression is also prohibited. Any demand for bribes or other benefits must be rejected immediately. Nor are our employees allowed to demand or accept similar benefits themselves.

2. Influencing public officials and lobbying

In our dealings with public authorities, we comply with all applicable regulations, in particular their rules on the tendering of contracts and state procurement.

No monetary payments or other benefits may be made or promised in order to unfairly influence the decision of public officials or employees of public institutions or state-owned enterprises. The same rules apply particularly with respect to lobbying.

When defending the interests of the BODE Group in political dialogue, all employees must act in accordance with the ethical principles of this Code of Conduct and always behave with integrity. Any communication with contacts in politics must always be transparent and open.

3. Gifts and hospitality

The granting or acceptance of gifts, favours and hospitality is only permitted if this is in accordance with normal business practice and is appropriate. Acceptance is not permitted if the kind, value or circumstances of the donation could influence

the recipient's judgment or be understood as an attempt to influence or is otherwise inadmissible. In any case, the donation must be transparent, and it must not force the recipient into an obligatory dependency.

If the exchange of gifts is customary among business partners from certain cultures, the gift must be appropriate to the occasion and may have nothing more than a symbolic character.

4. Donations and sponsorship

The allocation of donations made in the name of or in relation to the BODE Group or one of its affiliated companies must always be transparent and must not be related to the placing of orders or the granting of other benefits. The recipient of the donation and its specific use must be known and transparently verifiable.

The BODE Group does not make any political donations or campaign support to political parties or similar organizations or candidates for political office. Donations to individuals or private accounts as well as donations to profit-making organisations are also not permitted. Likewise, no donation may be made to organisations whose goals or actions are not compatible with our basic principles. The same applies to donations that are likely to damage the reputation of the BODE Group due to their intended use.

Any donation must be accountable to the public at any time. Therefore, the reason and the intended use of a donation must always be sufficiently documented.

III. Money laundering

We only want to conduct business relationships with customers, suppliers and business partners whose business activities are in accordance with legal requirements and whose funding comes from legitimate sources. We always comply with anti-money laundering and counter-terrorist financing laws and encourage our employees to report suspicious behaviour or transactions that indicate money laundering or the financing of terrorism.

IV. Compliance with import and export regulations

We comply with all customs laws that apply in the respective countries in which we conduct business. All employees involved in the import and export of goods as well as cross-border services are required to comply with the respective regulations as well as import and export regulations, in particular embargoes and sanctions.

V. Conflict commodities

The BODE Group complies with all legal requirements and obligations regarding trade with conflict commodities in its supply chain.

E. Conduct of the company towards its employees

We owe the success of our company to the knowledge, experience and commitment of every single one of our employees, who we greatly appreciate.

I. Respect for human rights and equal treatment of all employees

We are committed to promoting of human rights at all times and respect the personal dignity of every individual. Discrimination or harassment of any kind will not be tolerated, neither against employees nor against third parties. We respect each individual, regardless of their origin, gender, skin colour, sexual identity or religious and social orientation. We are aware that we owe the success of our company precisely to the knowledge, experience and commitment of every single one of our employees. The BODE Group therefore grants all employees the same recruitment and promotion opportunities, it ensures that all employees can carry out their activities under the same working conditions and promotes diversity at all levels of the company.

II. Ban of child labour and forced labour

We observe the ban of child and forced labour, as well as slavery and exploitation, in accordance with the requirements of the International Labour Organization (ILO) and the United Nations.

III. Qualification of employees

A key component of our corporate strategy is the appropriate promotion of the qualifications and competencies of our employees. We offer every employee suitable options for further training and the further development of their skills.

Managers are responsible for their employees. They must earn their recognition through exemplary personal behaviour, performance, openness and social competence. The manager places trust in his employees and agrees on clear and realistic goals and gives his employees as much personal responsibility and freedom as possible.

IV. Occupational health and safety

The occupational safety and health of our employees are particularly important to us. Therefore, we take all measures to ensure a safe working environment and avoid risks for our employees as much as possible. Our employees must comply with the applicable

accident prevention regulations, regularly check the technical functionality of the work materials and carry out their activities prudently.

In order to avoid health risks for our employees, we are committed to organising their working environments in a health-oriented manner and taking preventive health measures.

V. Appropriate pay and adherence to working hours

We comply with applicable compensation laws and regulations, including local minimum wage regulations. In addition, we ensure that our employees are paid appropriately and fairly. Wages, including parts thereof, are not withheld in the BODE Group as a disciplinary measure.

We also comply with the legal regulations on permitted working hours. In the absence of such provisions, we at least ensure that

- working hours, including overtime, do not exceed the legally permissible maximum limits;
- weekly working hours, including overtime, do not exceed 60 hours, even in exceptional cases;
- employees have at least one full day off per calendar week.

VI. Respect for personal rights, privacy and data protection

We respect the personal dignity, personal rights and privacy of every employee and protect their personal data in accordance with the applicable regulations.

VII. Freedom of expression

Freedom of expression is a high priority in our company. We grant all employees the right to freedom of expression and protect it from any harm.

VIII. Freedom of assembly and labour rights

We respect our employees' right to freedom of association and assembly, as well as collective bargaining. It goes without saying that we do not hinder the formation of our employees' opinions, and we respect the formation of employee associations and/or memberships of councils. Employees who are active in employee organisations or trade unions are neither favoured nor disadvantaged. Employees are given the opportunity to communicate openly with the company management without fear of reprisals or harassment.

F. Conduct of employees towards the company and third parties

The behaviour of all BODE employees towards business partners, suppliers, customers and third parties must always be guided by integrity and loyalty in the interest of our company. Any inappropriate or unlawful behaviour can cause significant damage to the company.

I. Confidentiality regarding trade secrets and protection of corporate values

The BODE Group can only achieve corporate success if innovative ideas are protected and internal information is treated confidentially.

Patents, inventions and other know-how are the basis for the future success of the BODE Group. Our employees are therefore not allowed to pass on new findings or trade secrets to third parties in any form. Official documents and data carriers are protected from access by unauthorized persons. No employee is permitted to take pictures, video or sound recordings of operational processes or facilities or to copy, reproduce or extract files from the company network to others, in particular private storage media, without the consent of the company management.

All information that is not publicly available is subject to confidentiality and may not be disclosed by our employees to third parties during or after the termination of the employment relationship. The direct or indirect use of confidential business information for personal gain, for the benefit of third parties or to the detriment of companies of the BODE Group is also prohibited. Confidential information also includes internal reporting surveys and details of the company's organisation and pricing policy, including profit and sales. Such information is to be disclosed to third parties only if permitted by management.

We respect the development achievements and associated effective property rights of third parties. Unauthorised use will not take place at any time. Our employees will not obtain or use the secrets of a third parties without permission of those parties.

II. Conflict of interest

Employees of the BODE Group are obliged to align their job-related decisions and actions with the interests of the company. If there is a risk of conflict with personal interests, all employees are required to inform their managers accordingly.

It is not permitted to run a company or work for a company that is in competition or in a business relationship with the companies of the BODE Group in whole or in part, in addition to working for the BODE Group. Exceptions of this rule are secondary employment that can demonstrably have no influence on the work at the BODE Group.

Existing regulations on the notification of secondary employment remain unaffected by this.

It is also prohibited to directly or indirectly hold shares in a competitor of the BODE Group, insofar as this is associated with a significant influence on the business of the competitor company.

III. Ban of insider trading

Prior to publication, any information that is suitable for determining the stock exchange or market price of securities (particularly shares) in the event that it becomes known is subject to the shares) or other financial instruments, the strictest secrecy. Employees who, as a result of their work, receive such inside information with regard to companies of the BODE Group or securities or other financial instruments issued by them may neither pass on this information nor trade in the securities and financial instruments. The same applies to the disclosure of information relating to other companies, such as suppliers or business partners, which may influence the value of the securities or other financial instruments issued by them.

IV. Duty regarding report integrity, data protection and information security

Open and effective cooperation includes correct and truthful reporting to shareholders, employees, business partners, customers, the public and all government agencies. All records and reports must reflect the relevant facts accurately, completely, unambiguously and in a timely manner. This applies regardless of whether the reports are prepared only for internal purposes or disclosed externally. The principles of proper accounting must be observed. Violations of accounting rules or accounting offences are not tolerated in the BODE Group.

Our employees are aware of the sensitivity of personal data. Personal data is only collected, processed or used to the extent that this is permissible for specified, explicit and lawful purposes. The principle of data economy is observed. A high standard of data quality and technical protection against unauthorized access is guaranteed. The use of data will be designed in such a way that it is transparent to the data subjects; their rights to information, correction and, if necessary, to objection, blocking and deletion are ensured.

Information security is an essential part of our entrepreneurial thinking and actions. It includes the deliberate protection of information from unauthorized access, manipulation, loss or destruction. To ensure information security, we always ensure that information is only accessible to authorized persons, is available at all times, is complete and correct, and remains protected from digital threats.

V. Conduct in public and in the media

An important factor in the company's success is its reputation among business partners, customers and the public. This is shaped by the appearance and behaviour of all our employees. Therefore, every employee is required to respect and promote the reputation of the BODE Group and to refrain from any actions that could harm the company. When publicly expressing personal opinions, care must be taken to ensure that they do not appear as the opinion of the BODE Group. This applies in particular to the expression of opinions in social networks.

Furthermore, it should be pointed out that communication with the media in operational matters may only take place after consultation with the competent authorities. If enquiries are made to employees, they must be forwarded immediately to the Marketing & Communications department of Bode – Die Tür GmbH.

VI. The use of company property and the internet

All items owned by the BODE Group that are made available to employees as part of their employment relationship may only be used for operational purposes. Deviations are to be regulated separately in individual cases. Employees are required to always handle company property with care and to secure it against loss, theft and misuse. In particular, it is pointed out that the use of company property for illegal purposes will not be tolerated.

This also applies to the use of the internet and e-mail access provided by the company. In this context, it should be noted that no information that glorifies violence or crime may be accessed, sent or forwarded via the company's own internet and intranet. The same applies to news and web content that incites racial hatred, discriminates against people, or otherwise has incriminated or offensive content.

VII. Activity in political parties

Every employee of the BODE Group is expressly permitted to participate in political activities, as long as this takes place in their free time and is separated from their work in the company. However, this must not violate applicable laws. In particular, any participation in anti-constitutional groups or prohibited parties is prohibited.

G. Compliance implementation and control

This Code of Conduct is the basis for the actions of the BODE Group as well as our employees.

Each employee receives a copy and is asked to confirm that they have taken note of these regulations.

I. Duties of executives and management

In addition, it is the special task of managers to ensure that the employees entrusted to them are aware of and comply with the Code of Conduct. They fulfil their role model function by exhibiting impeccable behaviour that is measured against the standards of this Code of Conduct and by exemplifying these principles to their employees. Each manager must clearly communicate to employees the importance of the principles of this Code of Conduct and point out that violations will not be tolerated and may result in disciplinary consequences.

II. Whistle-blowing and protecting the whistle-blowers

In order for this Code of Conduct to actually be put into practice, we ask all our employees to report violations or suspicions of such violations. Information regarding possible violations should be directed to our BODE Compliance Team

Bode – Die Tür GmbH
Ochshäuser Str. 14
34123 Kassel
Phone: +49 561 5009 -0
E-mail: compliance@bode-global.com

In addition, employees and third parties can use BODE's whistleblower system to report violations of rules or justified cases of suspicion discreetly, in a protected and, if desired, anonymous setting. You can access the whistleblower system via the link

<https://www.bode-global.com/compliance/hinweisgebersystem>

We treat all information confidentially and ensure that the reporter does not suffer any professional disadvantages; this is especially the case if violations reported in good faith ultimately turn out to be incorrect. Excluded from this are consequences for one's own violations.

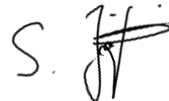
III. Consequences of violations

Suspensions of violations of the Code of Conduct are carefully investigated. If it is confirmed, appropriate consequences will be drawn. This can go as far as the termination of the employment relationship and the assertion of claims for damages. The further procedure is based on the labour law provisions. Employees who violate the law can expose themselves and the company to criminal and civil sanctions.

Kassel, den 15. August 2024

A handwritten signature in black ink, appearing to read "T. Giebisch".

Thomas Giebisch
CEO

A handwritten signature in black ink, appearing to read "S. Jagodzinski".

Sven Jagodzinski
CFO



Living Values together.

bode-global.com

