PTV Logistics
Code of Conduct

Policy owner	Legal & Compliance department, People & Culture department
Policy approved by	CFO and CHRO
Policy approval date	2026/04
Policy history	V1.1.0 dated 2026/01/23
Next review by	2028/04

© PTV Logistics GmbH 2026

Contents

1. Introduction 3
2. Definitions 4
3. Our expectations and your responsibilities 4
4. Fundamental requirements 4
4.1 Lawful conduct 4
4.2 Mutual respect and integrity 4
4.3 Responsibility for the reputation of PTV Logistics 5
4.4 Leadership and responsibility 5
4.5 Sustainable development 5
4.6 Speak up 5
5. Working with business partners and third parties 5
5.1 Fair competition and antitrust legislation 5
5.2 Combatting bribery and corruption 6
5.3 Gifts and corporate entertainment 6
5.4 Charitable donations and sponsorship 6
5.5 Financial and economic sanctions and export controls 7
5.6 Anti-money laundering and counter-terrorist financing 7
6. Avoiding conflicts of interest 7
7. Handling of information 7
7.1 Financial reporting and record keeping 7
7.2 Data protection and data security 8
7.3 Protecting PTV Logistics' and third parties' know-how and trade secrets 8
7.4 Using social media responsibly 8
7.5 Insider information and prevention of insider trading 9
8. Occupational health and safety 9
9. Compliance with the Code of Conduct 9
9.1 Compliance implementation and monitoring in PTV Logistics 9
9.2 Compliance Key Performance Indicators 9
9.3 Reporting of concerns, breaches and complaints 10
10. Review mechanism 10

© PTV Logistics GmbH 2026

1. INTRODUCTION

PTV Logistics GmbH and its affiliated companies (together "**PTV Logistics**" or "**we**") are committed to promoting mobility in the interest of the common good through products and services that fulfil individual needs, ecological concerns and the economic demands placed on a corporate group.

Our success depends on our customers and partners having confidence in our integrity. Our Code of Conduct is our guiding framework for how we do business in the PTV Logistics. It serves as a common guideline for our decisions and actions and combines current legal and company regulations.

The Code aligns with our values, which are integral to how we operate. We must all take responsibility to uphold the values and operate in line with this Code of Conduct. This policy applies to all Employees of the Company at all levels. PTV Logistics is a global undertaking and therefore this policy applies to all of the above, wherever they are located.

Our corporate values – what we stand for:

(1.) Market & Customer Focus

Our product portfolio enables our customers with smart solutions that are specifically tailored to their needs. Current market requirements are our priority.

(2.) Innovation & Efficiency

With a pioneering spirit, we develop intelligent mobility solutions and successful business models for today and tomorrow. We are open to new ideas and see changes and challenges as opportunities.

(3.) Open Mindedness & Transparency

We love trying new things, are open-minded and reflective. Therefore, we exchange ideas with each other and cherish transparent communication.

(4.) Respect, Honesty & Integrity

We are appreciative and friendly in our daily dealings. We maintain an honest, unbiased and respectful feedback culture.

(5.) Diversity & Inclusion

Diversity enriches our company. We meet at eye level and want to benefit from different perspectives and backgrounds.

(6.) Sustainability

Our efforts in our daily work and our solutions contribute to a livable planet and climate justice.

(7.) Passion

Smart mobility & logistics are our passion and purpose. We work with dedication and inspire others for our products.

(8.) Accountability

© PTV Logistics GmbH 2026

We are aware of our responsibility towards our customers, our owner, business partners and employees as well as towards society and act accordingly.

2. DEFINITIONS

For the purpose of this policy, the following definitions apply:

A Business Partner includes clients of PTV Logistics, as well as suppliers, and any other commercial party (including Third Parties), which PTV Logistics deals with on a regular basis in the context of its day-to-day business, under a contractual agreement to provide goods and services to, or to be provided by them.

Employee means a person who either under a contract of employment, as a party to an employment relationship, as an employee-like person or as a solo self-employed person (each as defined by the law in force in the respective country) is obliged to perform work or services for the Company. This includes inter-alia persons employed under full-time, part-time, permanent, fixed-term contracts, seconded staff, home workers, temporary agency workers, trainees, interns, volunteers, contractors, officers, trustees, board members and committee members at any level.

Third Party encompasses in the context of this policy any party which has been commissioned by the Company to act on behalf of PTV Logistics, such as authorised agents, contractors and representatives.

3. OUR EXPECTATIONS AND YOUR RESPONSIBILITIES

All Employees should ensure they read, understand, and, where relevant, comply with the information contained in this policy and any-cross-referenced policies, and undertake any training or other relevant required actions. All Employees will be required to confirm on a regular basis that they have read and acknowledged this policy. PTV Logistics expects all Employees to comply with applicable laws and requirements as discussed in this policy. All Employees of PTV Logistics must attend relevant training designed for their role and office location.

4. FUNDAMENTAL REQUIREMENTS

4.1 Lawful conduct

Obeying the laws of the countries in which we operate is a fundamental principle of PTV Logistics. Every employee must follow the applicable company guidelines and the provisions of the legislation within whose framework they are working. Unlawful behaviour may result in the imposition of significant penalties against PTV Logistics and its employees and may lead to enormous reputational damage.

Breaches of the law will not be tolerated by PTV Logistics and may result in disciplinary action, independent of any legal sanctions that may apply.

4.2 Mutual respect and integrity

We respect the personal dignity, privacy and rights of every individual. We work with individuals of different ethnic origins, cultures, religions and ages, regardless of disability, sexual orientation, beliefs, political opinion, social background, pregnancy or maternity or gender identity.

In accordance with our company principles and the laws of the countries in which we operate, we do not tolerate any form of discrimination, sexual harassment, bullying or any other personal attacks against individuals.

© PTV Logistics GmbH 2026

This applies both internally and in our engagement with external partners. Decisions concerning employees, suppliers, customers, business partners, etc. are exclusively based on objective considerations.

4.3 Responsibility for the reputation of PTV Logistics

We strive at all times to protect and enhance our brand and reputation. Every employee is required to cultivate, maintain and promote the reputation of PTV Logistics and not engage in conduct which will harm our reputation.

4.4 Leadership and responsibility

All managers shall support their employees in complying with the Code of Conduct. They bear a particular responsibility as role models. Managers are accountable for ensuring the Code of Conduct requirements are complied with within their area of responsibility and undertaking adequate supervision. Managers should take appropriate action to address unacceptable conduct, in line with company policies and procedures.

Managers place trust in their staff, supporting them in setting ambitious goals and recognising their achievements. Managers and staff should both work to keep each other fully informed about company matters in order to promote a good working relationship, take timely action and make informed decisions.

All managers shall create a safe environment for their staff and practice excellent listening skills in order to help and encourage their staff to speak up when needed.

4.5 Sustainable development

Responsibility for society also means being actively committed to sustainable development. We pledge our support for the UN Guiding Principles on Business and Human Rights and the Core Labour Standards of the International Labour Organization (ILO). We recognise the OECD Guidelines for Multinational Enterprises and are working towards their implementation. We take responsibility for the environment and strive to reduce our carbon footprint.

4.6 Speak up

We strongly encourage our employees to speak up if they become aware of any inappropriate behaviour or conditions at work. We take concerns raised by our employees seriously and will not tolerate discrimination or threat against anyone who has spoken up. Please refer to section 9.3 of this Code of Conduct to learn more about the possibilities of raising concerns.

5. WORKING WITH BUSINESS PARTNERS AND THIRD PARTIES

5.1 Fair competition and antitrust legislation

We are committed to fairness in our dealings with our business partners and with third parties, and support fair competition in accordance with competition laws and antitrust legislation.

Each and every one of our employees is obliged to comply with these rules. This means, for instance:

- none of our employees shall enter into any discussions with competitors at which prices or capacities are agreed upon;
- agreements with business partners and third parties on non-competition or on the submission

© PTV Logistics GmbH 2026

of phantom offers in respect of invitations to tender or on allocating customers, territories or production portfolios are prohibited; and

- improper preferential treatment or exclusion of contractual parties is also prohibited.

We expect our business partners to fully embrace their personal responsibility to ensure fair competition.

5.2 Combatting bribery and corruption

PTV Logistics does not tolerate corruption in any form. This means, for instance:

- Employees of PTV Logistics may not offer or grant nor attempt to offer or grant any unauthorised benefits in the form of payment or any other type of consideration, to any third party in connection with a business activity.

- PTV Logistics also adheres strictly to the relevant statutory requirements in its dealings with governments, authorities and public bodies.

- No third parties (for example, consultants, brokers, sponsors, representatives or other agents) may be used to circumvent such rules and regulations.

- PTV Logistics does not make facilitation payments or permit others to do so on its behalf.

- Employees must not use their position at PTV Logistics in order to obtain preferential treatment for themselves, their family members or any other persons with whom they enjoy a personal relationship.

- PTV Logistics employees may not use business connections to the detriment of the company.

PTV Logistics employees should seek advice or assistance in the event of suspicions or legal doubts regarding bribery, corruption or other inappropriate behaviour by contacting Team Compliance (compliance@ptvlogistics.com).

5.3 Gifts and corporate entertainment

Giving and receiving gifts and entertainment is a common feature of business relationships. However, unless this is managed appropriately there is a risk that they can be seen as bribes, or giving rise to conflicts of interest. Therefore:

- Employees may not accept any consideration (especially personal gifts or benefits arising from the business relationship with PTV Logistics) which could reasonably be construed to have an influence on business decisions or transactions. Monetary gifts and their equivalent are strictly prohibited.

- Invitations and entertaining must remain within the bounds of normal corporate hospitality.

- Employees should ensure that any acceptance or offer of gifts or entertainment is in line with local policies and regulations and seek guidance if unsure of what is appropriate.

5.4 Charitable donations and sponsorship

PTV Logistics is committed to serve and support charitable organisations and investment into the local communities. These include voluntary contributions in areas such as science and education, culture,

© PTV Logistics GmbH 2026

environment, sport and for social causes. Donations are made only to institutions and organisations which are registered charities or which have been granted special permission to accept charitable donations, assuming they are compatible with the company values.

We make donations and provide funds by way of sponsorship only within the limits permitted by prevailing legislation and in accordance with the relevant internal regulations.

5.5 Financial and economic sanctions and export controls

PTV Logistics acts in compliance with all applicable national and international foreign trade laws, in particular financial and economic sanctions regulations.

Such laws may prohibit, restrict or require reporting of transactions involving the movement of specific goods, technologies, services or capital across borders or amongst legal entities or individuals of different jurisdiction or citizenship. Violations of these regulations may constitute criminal offences.

5.6 Anti-money laundering and counter-terrorist financing

PTV Logistics complies with all anti-money laundering and counter-terrorist financing regulations of the countries in which they operate.

Money laundering is a term used to describe the many ways in which criminals disguise the original ownership and control of proceeds of crime by making the proceeds appear to have come from a legitimate source. Terrorist financing is a term used to describe the provision of monetary support for terrorist purposes and certain other types of involvement in the supporting of terrorist activities.

PTV Logistics is committed to combatting money laundering and terrorist financing. For this purpose, we remain vigilant in all our business activities. We only conduct business with suppliers and customers whose funds derive from lawful activities and are cautious not to engage with parties that might be involved in terrorist financing.

6. AVOIDING CONFLICTS OF INTEREST

In PTV Logistics, business decisions are made solely in the best interests of the company. Conflicts of interest with private interests, financial activities or any other type of activity, including those of relatives or otherwise closely associated persons or organisations, should be avoided from the outset.

Employees should not hold an interest in companies owned by competitors, suppliers or customers, or maintain business relations in a private capacity, if this could give rise to a conflict of interest. An interest in this context refers to any type of influential involvement in or commitment to competitors, suppliers or customers.

Everyone is expected to understand what a conflict of interest is, and help to identify and manage conflicts of interest to ensure that business is conducted in line with PTV Logistics' values. Any employee who is affected by any potential or actual conflict of interest must advise their manager so that the matter can be managed appropriately in line with the relevant internal regulations.

7. HANDLING OF INFORMATION

7.1 Financial reporting and record keeping

We are required to produce accurate and truthful reporting in line with applicable regulations. This applies equally to relations with investors, employees, customers, business partners, the public and all government bodies.

© PTV Logistics GmbH 2026

Reporting must be based on processes and internal control systems which ensure that accounts and records are complete and accurate, that transactions or expenditures are duly authorised and presented accurately, and are produced in good time and in accordance with the applicable regulations and standards.

All contractual documents, standard terms of business and agreements entered into by companies in PTV Logistics must be formally documented.

7.2 Data protection and data security

Use of the internet, electronic communications and IT systems present risks to privacy and data security. Effective management of these risks is an important aspect of our IT security strategy and management, and relies on appropriate conduct of every individual.

We only obtain, process or use personal data to the extent necessary for specific, defined and legal purposes. We ensure that the use of data is transparent for the persons concerned and that their rights in relation to this data are upheld.

All employees are obliged to observe the data protection provisions and the statutory and corporate regulations on information security, and to protect all confidential, secret and personal data entrusted to PTV Logistics from misuse.

All data processing activity must be suitably controlled so as to guarantee the confidentiality, integrity, availability and verifiability of sensitive information and to prevent any unauthorised internal or external use.

7.3 Protecting PTV Logistics' and third parties' know-how and trade secrets

The unauthorised disclosure of company or third-party knowledge can result in extensive losses for PTV Logistics, and the employee concerned may be punishable under employment, civil and criminal law. We are therefore committed to the following principles:

- The intellectual property of competitors and business partners is recognised and respected.
- PTV Logistics employees are strictly prohibited from disclosing information such as technical specifications, financial data, company data, customer information or any other information relating to PTV Logistics' business to any third party or using it for their own private purposes. This obligation remains in force even after the employment relationship has ended.
- Employees who have access to especially confidential information (such as from the fields of finances, human resources, law, corporate development or insider information pertaining to other companies) are obliged to maintain strict confidentiality in respect thereof (also internally).

7.4 Using social media responsibly

We expect every employee to be responsible and think carefully about how and when they use social media. This includes:

- Communicating with colleagues using appropriate methods, and not through social media.
- Not posting confidential information about work and PTV Logistics on social media.
- When using social media for personal use, acting in a way that is consistent with our values.

© PTV Logistics GmbH 2026

7.5 Insider information and prevention of insider trading

Insider trading is defined as the purchase or sale of securities traded on the stock exchange or of other financial instruments (e.g. debentures) on the basis of significant and not publicly available information about a company (so-called insider information). There are strict legal requirements regarding insider trading.

Employees who have insider information relating to PTV Logistics or another company, for instance a customer, supplier or joint venture partner, whose securities are admitted to trading on the stock exchange or an organised market are not permitted to trade securities or financial instruments of companies whose price depends, directly or indirectly, on the securities of these companies.

8. OCCUPATIONAL HEALTH AND SAFETY

Employees' health and safety is given high priority in PTV Logistics. Every one of our employees has the right to a safe and healthy working environment.

PTV Logistics observes the legal and technical requirements and standards relating to safety at work. Each employee must comply with health and safety regulations, and managers must support their employees in doing so.

9. COMPLIANCE WITH THE CODE OF CONDUCT

9.1 Compliance implementation and monitoring in PTV Logistics

The management of PTV Logistics actively supports worldwide communication of the Code of Conduct and ensures its implementation.

To this end, the executive management of an affiliated company in PTV Logistics is obliged, among other things, as follows:

- to keep up to date with PTV Logistics' current internal regulations;
- to verify in each case whether PTV Logistics' internal regulations can be implemented under local legislation;
- to suspend any rules which contravene PTV Logistics' regulations; and
- to implement internal regulations and take all steps necessary to ensure that PTV Logistics' regulations are complied with and that regular checks are carried out to guarantee compliance.

In the case of joint ventures and minority shareholdings, we also inform co-partners of PTV Logistics' compliance rules. A suitable agreement must then be drawn up in order to ensure that these regulations are complied with.

In some countries, business units or business divisions, laws or rules may apply which are stricter or more comprehensive than those contained in this Code of Conduct. In case that national laws or collective agreements provide for requirements that differ from the general guidelines set out in this Code of Conduct, these provisions shall prevail over the guidelines set out in this Code of Conduct.

9.2 Compliance Key Performance Indicators

Compliance key performance indicators (KPIs) allow PTV Logistics to measure the effectiveness of its compliance program. PTV Logistics also uses these KPIs as a monitoring tool to identify and

© PTV Logistics GmbH 2026

address early signs of non-compliance.

In relation to this policy, the following KPIs are defined:

- Reduce number of compliance issues opened to <10 by end of 2027.
- Train 100% of all new employees on business ethics by end of 2027.

9.3 Reporting of concerns, breaches and complaints

Any employee may make a complaint, report concerns and any breaches of the Code of Conduct to the Team Compliance (compliance@ptvlogistics.com), the Chief People Officer or a workplace representative.

(a) Anonymous reporting of a potential violation

Each employee can also report a possible breach of the Code of Conduct anonymously. For this purpose, we offer a Speaking Up service that provides for anonymous reporting and communication. The Speaking Up service is available at https://ptvlogistics.share-a-hint.com/.

(b) Where to go for help and support

All employees are encouraged to actively seek advice or help if they are uncertain about the interpretation of the Code of Conduct.

Enquiries can be sent to the Team Compliance (compliance@ptvlogistics.com).

The Compliance Team is responsible for conducting risk assessments, developing and implementing internal policies, and organizing training programs to ensure regulatory compliance. Additionally, the team monitors adherence to established policies, conducts investigations and audits as necessary, maintains thorough reporting and documentation, and serves as the primary liaison between the organization and regulatory authorities.

10. REVIEW MECHANISM

This policy shall be reviewed at least every two (2) years, or as required to reflect any changes in law, practice or risk.

© PTV Logistics GmbH 2026