

CODE OF CON DUCT

December 2025

CONTENTS

FOREWORD	2
1 GENERAL CONDUCT OF EMPLOYEES	3
2 WORKING ENVIRONMENT	3
3 PRODUCT INTEGRITY AND TECHNICAL COMPLIANCE.....	4
4 PREVENTING CORRUPTION	5
5 CONFLICTS OF INTEREST	6
6 FREE AND FAIR COMPETITION.....	6
7 INTERNATIONAL TRADE	7
8 PREVENTION OF MONEY LAUNDERING AND INTERNAL HANDLING OF FUNDS	8
9 DATA PROTECTION AND PROTECTION OF TRADE AND BUSINESS SECRETS.....	9
10 REPRESENTATION OF POLITICAL INTERESTS	10
11 CORPORATE RESPONSIBILITY.....	10
12 ENVIRONMENTAL PROTECTION AND SUSTAINABILITY	11
13 REPORTING SUSPECTED BREACHES	12
14 HELP AND INFORMATION	14

FOREWORD

To all our staff members,

At AVL, we strive to provide first-class products and services based on the highest quality and innovation. We have always placed emphasis on a pioneering spirit, customer focus, problem-solving expertise, responsibility and independence.

The principles of integrity, honesty and fairness are at the heart of everything we do. This is the only way we can maintain our good reputation in the long term and justify the trust our customers place in us.

In our increasingly complex everyday business lives, it is not easy to always do the right thing. We have therefore summarised our basic rules of conduct in this Code of Conduct. They are to be understood as binding minimum standards and apply to the management to the same extent as to each of our employees. We all base our day-to-day actions on these rules of conduct.

Any violation of this Code of Conduct can have considerable negative consequences for AVL and cause lasting damage to the company's good reputation. Violations of this Code of Conduct will therefore not be tolerated and may result in disciplinary action in accordance with applicable employment law.

Always be aware that compliance and integrity in business require the active cooperation of each and every individual. We are all urged to practise the values set out in this Code of Conduct. With this in mind, we continue to rely on your support: Always treat others as you would expect to be treated yourself: with honesty, fairness, integrity and sincerity.

Graz, 17.12.2025



Helmut O. List

Chair of the Board of Directors



1 GENERAL CONDUCT OF EMPLOYEES

We comply with the applicable laws and protect AVL's good reputation.

We expect our employees to behave professionally, lawfully and with integrity.

Existing laws (such as, in particular, laws against corruption and other criminal provisions, laws against unfair competition and restrictions on competition, copyright laws, data protection laws, environmental protection laws, export laws, tax laws, anti-discrimination laws, etc.) must be complied with and behaviour that could be interpreted as disregarding legal provisions must be avoided.

All employees must always be mindful of protecting AVL's reputation and of keeping the company's public image from harm. Employees may only comment publicly on a topic on behalf of AVL with prior approval. When dealing with business partners and third parties, care must be taken to ensure that the portrayal of AVL is in line with AVL's vision and values.

**Integrity of all
employees**

2 WORKING ENVIRONMENT

We treat each other respectfully, honestly, openly and fairly. We value the work of our employees and provide them with whatever support they need so that we can take the correct action together.

All our employees are recruited and treated without being subject to any discrimination based on gender, gender identity, race, skin colour, religion, age, disability, sexual orientation, nationality, political beliefs, trade union membership, social origin, ethnicity or any other forms of discrimination.

Our employees must also avoid any form of discrimination when dealing with colleagues. Sexual harassment or behaviour that could be interpreted as such is prohibited. This includes using inappropriate language, storing and displaying inappropriate materials in the work environment or accessing such materials via computers.

**Non-discriminatory
working environment**

Human dignity and respect for the individual are of paramount importance to us. We are committed to the principles of respectful, fair and loyal treatment of one another. All employees are offered equal opportunities in recruitment and their further personal development within the company.

We actively promote diversity and inclusion and create a working environment in which all employees have equal opportunities to develop.

We expect all employees to contribute to a productive and inclusive working environment by treating each other with tolerance, courtesy and consideration.

We are also committed to protecting the health and safety of our employees and complying with all applicable health and safety regulations.

**Respectful and fair
treatment for a
productive and
inclusive
working environment**

3 PRODUCT INTEGRITY AND TECHNICAL COMPLIANCE

We ensure that our products always fulfil the applicable requirements and that they are safe.

AVL is committed to meeting the highest quality and safety requirements for our products and services. Our goal is to ensure and maintain the highest possible level of trust and customer satisfaction with the AVL brand.

Compliance with relevant regulations and policies, particularly with regard to product safety, product liability and warranties, is a matter of course in this context.

We comply with the technical, legal and regulatory requirements when developing products and providing technical services. When interpreting technical and legal regulations, we observe the internal processes designated for this purpose. Internal technical guidelines are regularly reviewed to ensure they are up to date and adjusted if necessary.

**Compliance with all
product regulations**

4 PREVENTING CORRUPTION

We do not tolerate corruption.

AVL is committed to the principles of integrity, honesty and fairness. Our employees must refrain from any corrupt behaviour. This principle applies worldwide. Misconduct can cause major financial disadvantages to our company and cause lasting damage to its reputation. In most countries where AVL does business, corrupt practices result in criminal convictions for those involved and very high fines for the company.

The following principles therefore apply as a general guide:

- *Our employees must comply with applicable local anti-corruption laws when conducting business. Our employees may not offer or grant business partners any benefits of value in order to influence business decisions; nor may they request or accept such benefits. Particular care must be taken when dealing with public officials or representatives of authorities. In most countries, local law imposes stricter regulations on public officials/representatives of authorities than on representatives of private companies.*
- *Business is only conducted with reputable partners whose business practices are legally sound. When engaging third parties to work on behalf of AVL (e.g. agents, consultants and other intermediaries), information about their reputation must be obtained. When commissioning them, it is imperative to ensure that the partner has made a clear commitment to preventing corruption.*
- *Services must be lawful and remunerated according to their value. Payments may only be made if there is an appropriate, conclusive and meaningful description of the service provided.*

A detailed explanation of this topic can be found in our guideline on invitations, gifts and other benefits.

Corruption causes damage

Compliance with all legal requirements

Preventing corruption in the supply chain

5 CONFLICTS OF INTEREST

We act in the interests of the company when making business decisions and put personal interests aside.

Business relationships with all market participants are professionally maintained. Business decisions are based on the interests of AVL and may not be influenced by the personal interests or considerations of individuals. Conflicts between personal interests and the interests of AVL must be avoided.

Uninfluenced business decisions

Our employees are therefore not permitted to work for suppliers, customers or competitors of AVL or to provide services on their behalf.

All employees must disclose any financial interests in AVL's business partners (including customers and suppliers) if such interests could actually or appear to influence their decisions in the performance of their duties for AVL.

Obligation to disclose

Any situation that constitutes or could give rise to a conflict of interest must be reported to the relevant superior without undue delay. With regard to secondary employment, employees must comply with the applicable rules of their service contracts and local legislation.

Further details can be found in our policy for avoiding conflicts of interest.

6 FREE AND FAIR COMPETITION

We respect the principles of free and fair competition.

Our success depends crucially on refraining from any actions that restrict free and fair competition and on complying with all applicable competition and antitrust laws as well as other laws against unfair competition. Laws against restraints of competition serve to ensure healthy competition in a fair and appropriate business climate. These regulations generally apply to both the sale of products and the sale of services. Violations may cause considerable damage to AVL.

In this context, the following principles must be observed:

- *Unfair business practices that are likely to cause harm to consumers, competitors or other market participants are prohibited. Competition law protects the freedom of competition of our competitors, the information rights and freedom of choice of customers, and their economic interests. We support fair competition and will take all necessary steps to comply with the relevant rules, regulations and provisions against unfair competition.*
- *Antitrust laws prohibit agreements between companies that could lead to a restraint of competition. The most serious violations of antitrust laws include price fixing, production and purchasing cartels, and agreements to control product quality or divide markets according to customers, territories or products. We therefore do not enter into any such agreements with competitors.*

Fair competition

**Prohibition of
agreements restraining
competition**

You can find more detailed information and illustrative examples in our unfair competition guidelines and our antitrust guidelines.

7 INTERNATIONAL TRADE

We comply with all national and international import and export rules.

The applicable regulations and restrictions relating to international trade, including the export and import regulations of the country concerned at the relevant time, must always be observed. This applies in particular to countries that are subject to a trade embargo. In the case of international deliveries or orders, AVL must check whether the foreign business partner is named on applicable sanctions lists of governments and international organisations or is otherwise subject to a trade ban under relevant foreign trade regulations.

**Compliance with
customs and export
control regulations and
embargoes**

8 PREVENTION OF MONEY LAUNDERING AND INTERNAL HANDLING OF FUNDS

We condemn all forms of money laundering.

AVL avoids any involvement in money laundering and will do whatever is necessary to prevent it. Money laundering refers to the channelling of funds from illegal sources into or through legitimate financial channels in order to create the impression that these funds are legal. Due to its serious economic consequences, money laundering is a criminal offence in almost all countries worldwide and results in severe penalties for all parties involved. All employees are therefore required to be alert to possible warning signs (e.g. insisting on cash payment, withholding complete information) in all transactions. Business relationships should only be entered into with reputable business partners whose financial resources are of legal origin.

AVL also ensures transparency and openness by maintaining proper accounting records of its own cash flows. When preparing financial records, care is always taken to ensure that they are complete in accordance with applicable accounting principles.

Employees who have access to AVL funds in any form must comply with internal procedural regulations regarding the recording, handling and protection of funds.

AVL's funds and all other assets are to be used exclusively for the company's business purposes and not for personal use, unless expressly agreed otherwise.

**Prohibition of money
laundering**

**Compliance with
internal regulations
when handling funds**

9 DATA PROTECTION AND PROTECTION OF TRADE AND BUSINESS SECRETS

We treat all data entrusted to us and business and trade secrets with great care.

Compliance with data protection regulations is important to AVL. All employees who deal with personal data must comply with the applicable local laws.

Protection of
personal
data

Personal data refers directly or indirectly to natural individuals and in some legal systems also to legal entities. This includes not only the names, addresses and social security numbers of our employees and customers, but also photographs, videos and voice recordings. Stricter provisions generally apply to the handling of special personal data, such as criminal or other sensitive data (e.g. data concerning health).

Personal data are only collected, processed or used for specified, explicit and legitimate purposes and are stored or transferred securely. The use of the data is transparent for data subjects and safeguards their rights to information, to object, to blocking or to erasure.

We endeavour to obtain relevant information directly from the data subjects themselves and to use only reputable and reliable sources to obtain additional data.

When using personal data, we take appropriate training, organisational and technical security measures to ensure data security.

Innovation and technical advancement are decisive factors in AVL's success. We must therefore protect the value of our research and development activity and above all our trade and business secrets and our intellectual property to the best of our ability. Examples include AVL's technical, technological and business expertise as well as confidential information that we receive from our customers.

Protection of
business and trade
secrets

Business and trade secrets as well as confidential information of any kind relating to AVL must therefore be kept secret. For this reason, all employees must strictly adhere to the contractually agreed confidentiality

provisions. Information that is not public knowledge may not be passed on to third parties. This secrecy obligation continues to apply after the employment relationship with AVL ends.

AVL also respects and protects the intellectual property of others. We take great care not to infringe the intellectual property rights of third parties or to procure or use confidential information without appropriate authorisation.

10 REPRESENTATION OF POLITICAL INTERESTS

We represent our interests responsibly.

We represent AVL's political interests only in consultation with the management. Contacts with public officials and elected representatives are always conducted in compliance with all applicable laws and internal regulations. Our actions are guided by the principles of transparency, accountability and integrity.

Responsible and
transparent
representation of
interests

When representing political interests, AVL also attaches particular importance to taking into account the latest scientific findings, global environmental agreements and political framework conditions, in particular the goals of the Paris Climate Agreement, the EU Green Deal and the UN Sustainable Development Goals.

11 CORPORATE RESPONSIBILITY

We are committed to our corporate responsibility and act accordingly.

We respect human rights as part of our corporate social responsibility. We do not participate in the unlawful appropriation of land, forests and waters or in unlawful forced relocation, nor do we tolerate any harmful effects of our business partners' activities on the health, safety and livelihoods of the people affected by them, such as (local) minorities or indigenous peoples. The commissioning or deployment of private or public security forces must not result in human rights violations (e.g. injury to life and limb, torture).

Respect for human
rights, protection of
minorities and
livelihoods

We categorically reject any form of child or forced labour, as well as all forms of modern slavery, exploitation and human trafficking. AVL is also explicitly opposed to illegal employment and undeclared work – both at AVL itself and among our business partners. Taxes and social security contributions are paid on time and fair working conditions are created for all employees.

Prohibition of child or forced labour and illegal employment

Due to the significant impact on people and the planet, particularly in the case of the mining and trading of tin, tungsten, tantalum and gold, we also endeavour to procure our raw materials from conflict-free sources and, where possible, from certified smelters. Where appropriate, we make active use of industry initiatives to improve the traceability of conflict minerals and ensure compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as amended from time to time.

Responsible procurement of raw materials

12 ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

We are committed to sustainability and environmental protection in all our activities.

Sustainability in the sense of sustainable protection of people and the environment is therefore a central element of AVL's corporate philosophy. We are aware of the responsibility we bear for our environment. We aim to live up to this responsibility by adopting a consistent and ecological approach.

Protection of the environment and resources, protection of natural ecosystems

We ensure that our business activities protect natural ecosystems and do not promote the conversion of natural ecosystems (e.g. through deforestation), but instead contribute to the long-term protection of natural ecosystems.

Our products and services are designed to ensure the efficient use of energy and raw materials and to minimise waste and residual materials throughout the product life cycle. We do not use materials or processes that pose a risk to the environment or health if suitable alternatives are

Efficient and environmentally friendly use of energy and raw materials

available, and we take all necessary measures to prevent pollution or contamination of the air, water and soil by waste, chemicals or other hazardous substances.

We are committed to the Paris Climate Agreement. In line with this, we are taking effective measures to reduce our direct and indirect CO₂ emissions (decarbonisation) and switch to renewable energies wherever possible and economically viable.

**Climate change
mitigation and
renewable energies**

AVL regularly reviews and monitors the company's environmental performance and produces ongoing reports, paying particular attention to the assessment of potential risks associated with existing and future products, services and processes.

Our employees are required to fully support the company in this regard.

13 REPORTING SUSPECTED BREACHES

We report indications of possible compliance violations so that they can be investigated and remedied.

We expect all employees to strictly adhere to this Code of Conduct. Violations of applicable regulations can have far-reaching consequences not only for the individual but also for the entire company and will therefore not be tolerated.

**Cooperation of the
individual**

All employees

- *will therefore familiarise themselves thoroughly with the regulations and policies relating to their own position;*
- *will behave in accordance with the rules set out in this Code of Conduct; and*
- *will cooperate fully with investigations into violations of this Code of Conduct.*

Employees are expected to report any observed or suspected violations of applicable laws, this Code of Conduct or other internal rules of conduct of AVL to their superiors or via AVL's internal whistleblower system.

**Reporting suspected
breaches**

Reports via the internal whistleblower system can be submitted via

- the Integrity Line whistleblower tool (available at <https://avl.integrityline.com>),
- the email address set up for the whistleblower system (group-compliance@avl.com) or
- a personal meeting with the coordinator of the whistleblower system responsible for the report – who can be contacted via the Integrity Line whistleblower tool.

The internal whistleblower system ensures that reports are submitted securely and confidentially and that the reported facts are clarified quickly:

- Every report will be processed carefully and treated confidentially. The principles of due process, in particular the right to a fair hearing and the principle of proportionality, are observed and necessary follow-up measures are taken (e.g. clarification of the facts in the context of an internal investigation, elimination of the reported violation, disciplinary action against persons affected by the report in accordance with applicable employment law). The identity of whistleblowers is only disclosed to persons who are responsible for receiving and processing reports. The confidentiality of the identity of the persons affected by the report and other third parties named in the report will be maintained, unless the disclosure of information is necessary for follow-up measures to be taken.
- Whistleblowers do not have to fear retaliation or other disadvantages as a result of their report if the report was made in good faith. The rights of persons affected by a report are protected.

**Confidential treatment
of the report and
compliance with the
principles of due
process**

**No disadvantages for
whistleblowers**

Please see the policy on reporting breaches for further detailed information.

14 HELP AND INFORMATION

We will contact the relevant persons if we have any questions.

Employees who need help in applying this Code of Conduct, internal policies and guidelines or a specific legal provision, or who are unsure about this or need legal assistance, should speak to their superior and ask for support. Instead of their superior, they can also contact the managing director or local compliance officer. In addition, they can always contact the group compliance officer in Graz if they have a good reason for not contacting their superior or managing director.

Reimagining Motion

For a greener, safer, better world of mobility.

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