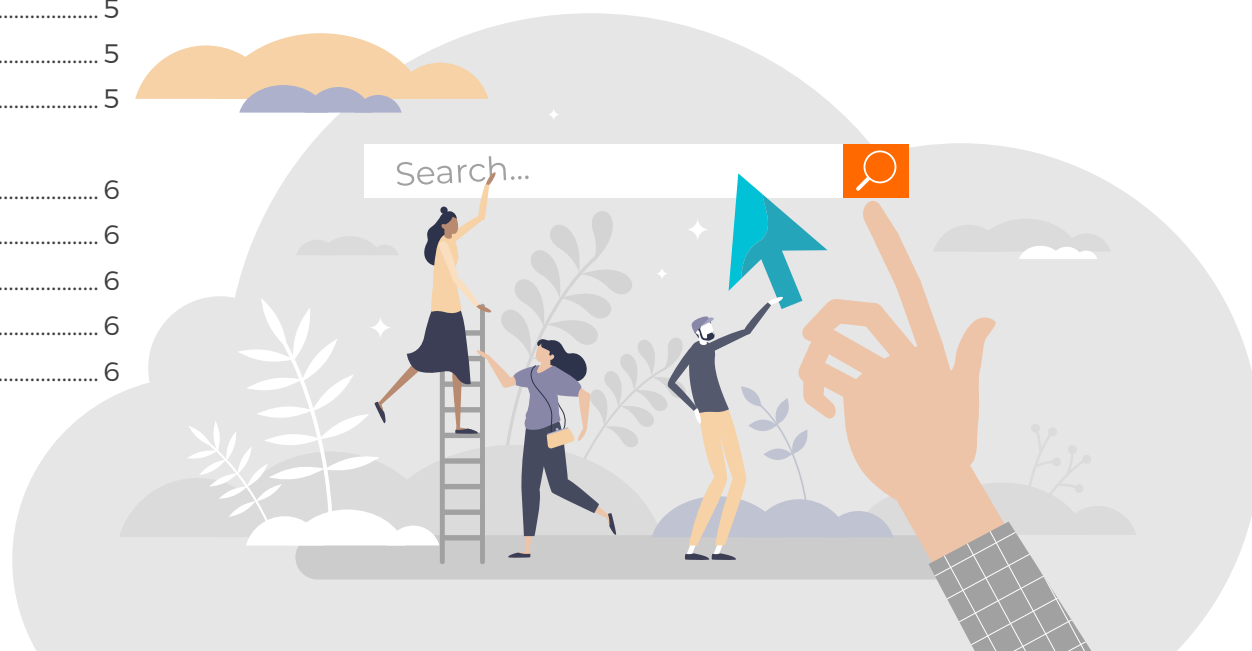


Code of
conduct



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1. FOREWORD

Dear employees

Our business partners, customers and suppliers place a great deal of trust in us and our work. This trust is indispensable for our daily work and our cooperation to ensure our long-term success. Therefore, each one of us contributes in our daily work to maintain this trust and to behave responsibly and respectfully in our day-to-day business.

This Code of Conduct provides guidance for all of us in our day-to-day work and actions in an increasingly complex and digitalized working world. Our corporate principles and clear adherence to standards, guidelines and specifications are clarified here to offer our customers the highest possible quality in our solutions and services.

This Code of Conduct is therefore binding and valid for all employees. It is the task of our managers to ensure compliance with this Code of Conduct at every level of the company and to openly discuss any potential for improvement that is identified. At the same time, we would like to encourage each of you to set an example of ethical behavior in the business environment.

True to our company motto:

Together we make Triovega even stronger!

Lübeck, 01.05.2023



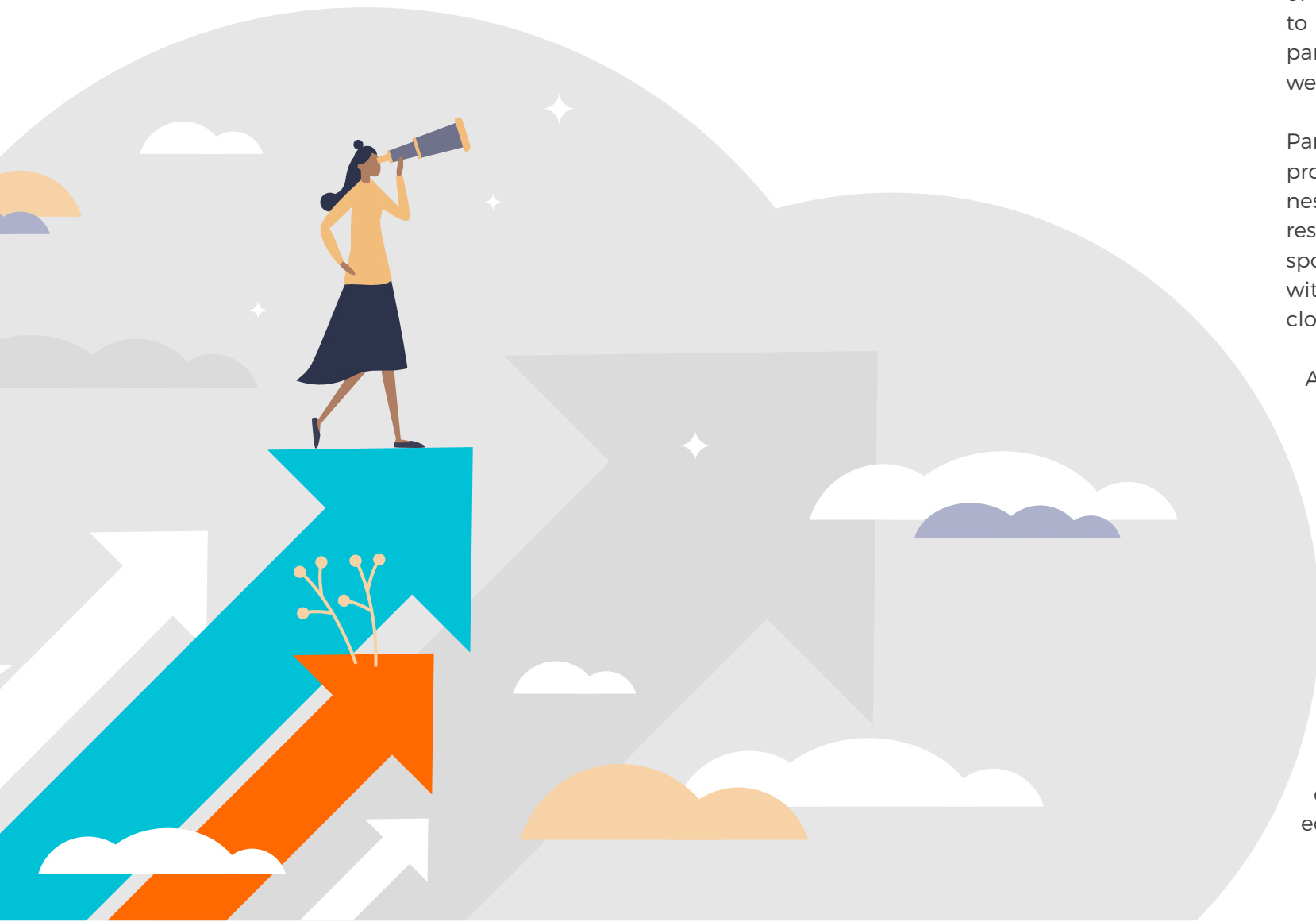
Benjamin Pieritz
Managing Director



Tobias Heitplatz
Executive Director
Automotive



Marcus Schulz
Director Professional
Services



2. SCOPE AND COMPLIANCE

This Code of Conduct contains binding principles of behavior for all employees of Triovega GmbH, which we adhere to in our cooperation with business partners, customers and suppliers as well as in our dealings with each other.

Part of our self-image as a premium provider of digital solutions is that business success, compliance with the law, responsibility for our employees, and responsible dealings with each other and with the resources available to us are closely interrelated.

Accordingly, we have defined clear, comprehensible principles of conduct for these areas as a benchmark for all employees, to which they must adhere. Attention must also be paid to compliance with legal, regulatory, self-imposed and contractual obligations relating to information security, and breaches of any security requirements must be avoided.

The validity of this Code of Conduct is reviewed at regular intervals, updated as necessary and communicated to all employees in a revised form.

3. OUR VALUES AT TRIOVEGA

The following five defined Triovega company values are the basis for our daily work and cooperation. They give us orientation in our daily work and shape our relationship with each other, our business partners, customers and suppliers. These values form the cornerstone of our corporate culture: a culture that is supported and lived by all employees. This shared understanding of values plays a key role in our long-term success. On the one hand, because it enables us to deliver excellent and consistent quality to our business partners, customers and suppliers. On the other hand, because it allows us to create a constructive working atmosphere for ourselves, in which everyone is encouraged to contribute to the overall success of Triovega.



SHOW RESPECT

At Triovega, we treat employees, business partners, customers and suppliers with equal respect. The opportunity to get to know different nationalities, cultures and ways of thinking within the framework of our cooperation is an enrichment for all employees. Tolerance and respect for one another are among the fundamental beliefs at Triovega.



TAKE RESPONSIBILITY

At Triovega, we are convinced that taking responsibility is an essential ingredient of success: success on a personal level, but also success on a corporate level. Taking responsibility means being courageous and at the same time acting in the interest of the overriding goals, questioning processes and making concrete decisions.



BUILD TRUST

At Triovega, trust is a fundamental building block of our cooperation. We trust in the knowledge and competence of our counterparts as well as in our own knowledge and actions to make decisions and to grow together on these decisions. In addition, our own actions create trust of others in ourselves, as well as ourselves as part of Triovega.



ACHIEVE GOALS

At Triovega, we set ourselves ambitious goals that we pursue together. To this end, we develop strategies and plans that we implement in a consistent and agile manner. In this way, we create a high level of customer value as well as a high level of customer satisfaction, which ensures our success for the long-term and profitable growth of Triovega.



BE EMPOWERED

At Triovega, we support everyone to be courageous and make bold decisions for the best possible results for the company. To do this, we support each other, because being courageous allows us to take and hand over responsibility for our decisions. We learn from mistakes that we make, in line with the principle „if you don't work, you don't make mistakes“.

4. FAIR CONDITIONS FOR EMPLOYEES

HUMAN RIGHTS

We respect internationally recognized human rights and are guided in our actions by the International Bill of Human Rights. Direct link here:

<https://www.ohchr.org/en/human-rights/universal-declaration/translations/english>

NO CHILD LABOR

At Triovega we do not tolerate any form of child labor. Adherence to this principle is in no way debatable for us.

SPECIAL PROTECTION FOR YOUNG EMPLOYEES

Young employees are in greater need of protection. The physical and mental health, as well as the promotion are for us here in the center. Employees under 15 years of age do not perform any work for us.

NO FORCED LABOR

At Triovega, any kind of forced labor is strictly prohibited. This also includes the prohibition of pressuring employees to continue working by withholding salary, social benefits, property or documents. Work at Triovega is on a voluntary basis. Before starting work, all employees receive a written employment contract. Employees have the right to terminate their employment at any time, subject to the notice period specified in the employment contract.

TOLERANCE AND EQUAL OPPORTUNITIES

The opportunity to become acquainted with different nationalities, cultures and ways of thinking within the framework of cooperation at the company is an enrichment for all employees. Tolerance and respect for one another are among the fundamental beliefs at Triovega. In addition, everyone is obligated to behave responsibly and ethically, respecting the dignity of each individual.



Mutual appreciation is based on inner conviction and is also expressed in the willingness to actively stand up for it. In this way, we at Triovega can develop and maintain an open, tolerant and cooperative working environment. Furthermore, a positive climate supports motivation and forms the basis for our sustainable business success.

At Triovega, we do not accept any form of discrimination; in accordance with Article 3 of the German Basic Law and Article 21 of the Charter of Fundamental Rights of the European Union, employees may not be discriminated against or given preferential treatment on the grounds of gender, origin, language, country of origin, religion, religious or political opinion or physical disability. This applies to the application phase as well as the period of the employment relationship.

WORKING HOURS AND TIME MANAGEMENT

The working hours at Triovega are deliberately designed so that everyone can integrate a large degree of flexibility into his or her daily work routine. For this reason, our daily working hours range from 6:00 a.m. to 11:00 p.m. from Monday to Friday. The start and end of working hours can be freely chosen, considering operational processes and necessities.

Any working hours exceeding this range must be requested from the relevant manager. In accordance with Section 139 of the ArbZG, work on Sundays and public holidays is generally prohibited. There must be at least 11 hours of uninterrupted rest between the end of a daily working period and the start of a new daily working period (§5(1) ArbZG).

During meetings, events, customer visits, jour fixes or other types of business gatherings, we respect each other's time. Therefore, each individual takes care to arrive on time before the respective appointment. For presentations, whether online or offline, technology must be checked in a timely manner. For online meetings, as a matter of courtesy, we turn on our webcams on. This shows mutual respect and contributes to an optimal working situation for all employees.

HEALTH AND SAFETY

We act in accordance with applicable laws and international standards relating to occupational health and safety and provide safe working conditions for our employees.

We are committed to creating and maintaining a safe, secure and healthy working environment, safe and healthy working environment. Our defined safety rules and practices apply to all Triovega employees and are transparently available on the intranet.

APPROPRIATE REMUNERATION

Adequacy of compensation is ensured at Triovega through legally binding minimum wages and social benefits. These measures ensure appropriate compensation for all employees. Wages are paid at regular intervals, but at least monthly. Wage deductions as a disciplinary measure are excluded at Triovega.



5. OUR RELATIONS

ETHICAL PRINCIPLES

At Triovega, all forms of bribery, extortion, embezzlement and corruption as well as acts of deception and attempted forgery are strictly prohibited. Our data processing and security is carried out in accordance with the applicable legislation and requirements, which we ensure and regularly verify through our ISO 9001, ISO 27001 and TISAX-certifications.

COMMUNICATION

At Triovega, we maintain an appropriate, factual and respectful tone towards each other. Therefore, we do not tolerate derogatory remarks about business partners, customers, suppliers and colleagues at any time. We resolve disagreements of any kind directly and respectfully with each other; we behave professionally in dealings with third parties and resolve any disagreements among ourselves afterwards.

EXTERNAL AND INTERNAL PRESENTATION

At Triovega, we communicate our professionalism and high-quality standards both internally and externally. We ensure this, in addition to appropriate dress for the situation, through the way we speak with our colleagues, business partners, customers and suppliers. In doing so, we are always businesslike and respectful in our dealings with each other.

WORKING AT TRIOVEGA

As already described in Section 4 under Health and Safety, we at Triovega are committed to creating and designing a safe, secure and healthy working environment. This includes, if desired, a fixed workstation in the office that is designed to meet ergonomic needs.

At annual intervals, we ensure safety awareness in one's behavior in the workplace through our company-wide safety and compliance training, regardless of whether work is done from the office or the mobile office. Training on topics such as fire safety, cybersecurity and data protection helps to create a healthy and safe working environment for all employees.



6. HANDLING OF DATA AND INFORMATION

DATA PROTECTION

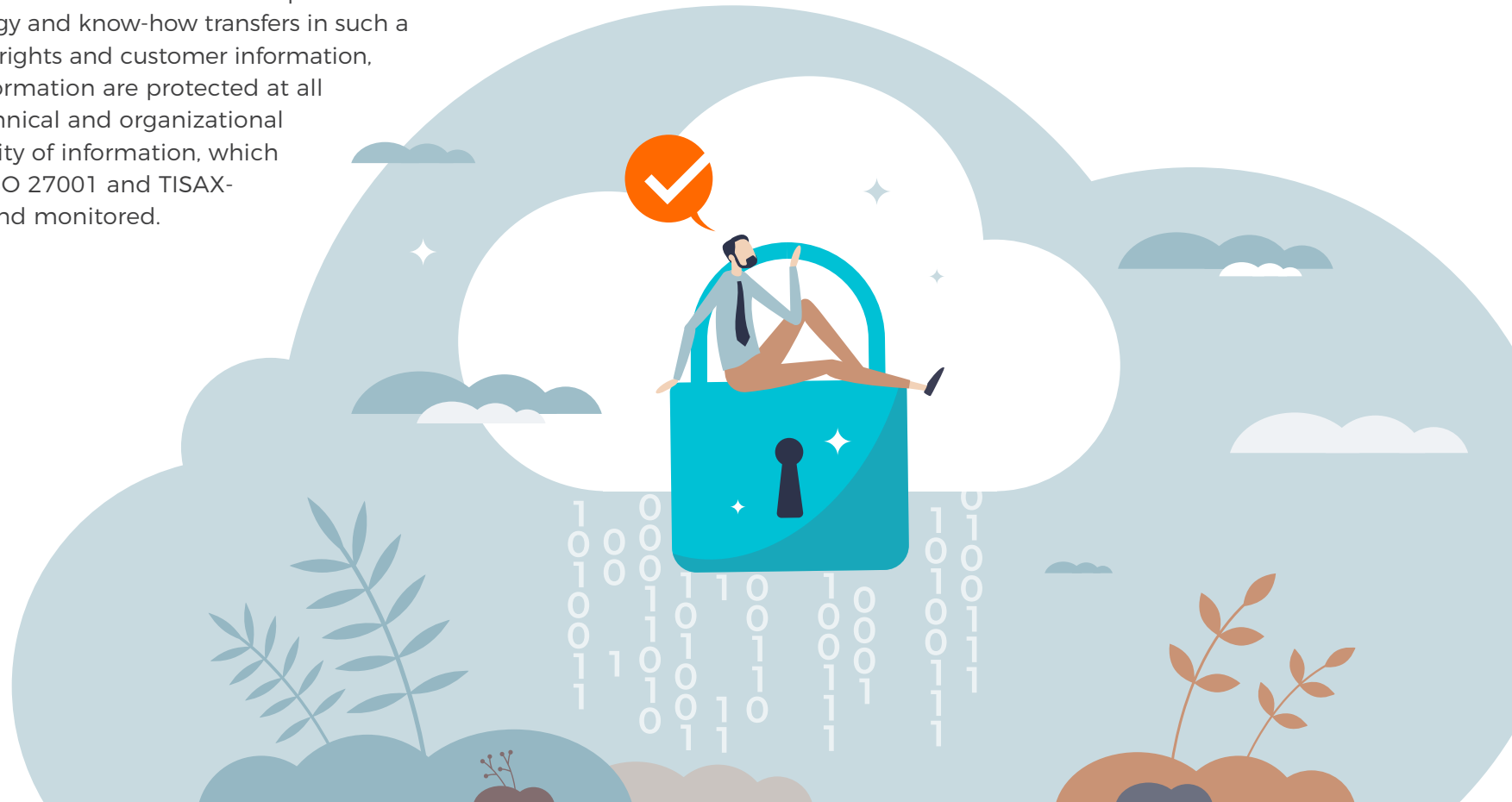
We protect personal data of our employees, business partners, customers and suppliers. Personal data is only collected, processed and used in accordance with the legal provisions as per GDPR. In doing so, we comply with data protection regulations and take into account the comprehensive rights of all persons from whom data is collected, processed and used.

INFORMATION SECURITY

At Triovega, we protect confidential information and respect intellectual property. We handle technology and know-how transfers in such a way that intellectual property rights and customer information, trade secrets and internal information are protected at all times. To this end we use technical and organizational measures to ensure the security of information, which are defined in our ISO 9001, ISO 27001 and TISAX-certifications, implemented and monitored.

SECURITY AND GENERAL CONFIDENTIALITY

We comply with the applicable laws on the protection of trade secrets and treat confidential information from our business partners, customers and suppliers with appropriate sensitivity and confidentiality. To this end, we have created suitable measures within the framework of information security at Triovega.



7. COMMITMENT TO OUR ENVIRONMENT

At Triovega, we align ourselves with the following purpose:

**„To protect valuable resources,
we digitize and secure products and processes
for a sustainable future.“**

Our goal is to keep the burden on the environment and people as low as possible. On the one hand, national and international legal regulations and environmental standards form the basis for a sustainable and resource-saving business at Triovega.

On the other hand, we also strive on a day-to-day basis at all Triovega sites to reduce the use of raw materials and, for example, the volume of waste, energy and water consumption. At each Triovega site, there is the option of separating waste; depending on the federal state, all employees are provided with various separate waste containers in which the appropriate waste can be disposed of.



8. COMPLIANCE

Triovega GmbH is committed to work in a resource and environmentally friendly manner, not to engage in corruption in any way, and not to permit employment in precarious working conditions or child labor.

Violations of laws, internal guidelines and other regulations can lead to considerable economic damage as well as consequences under criminal and administrative law for Triovega and its employees. It is therefore even more important to make serious misconduct known so that it can be dealt with appropriately and prevented in the future. Triovega consistently follows up on all indications and reports of possible misconduct. For this reason, we address rule violations directly when we identify them.

Questions about this Triovega Code of Conduct and information about a possible compliance situation can be directed to the respective direct manager at any time.

9. ENTRY INTO FORCE

This Code of Conduct shall enter into force with immediate effect.

Signed on 1st May 2023

Benjamin Pieritz, Managing Director
Tobias Heitplatz, Executive Director Automotive
Marcus Schulz, Director Professional Services



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