

## **Corporate Principles of Uebler GmbH**

Uebler GmbH is a family-run company. Within this framework, Uebler develops, produces and distributes high-quality automotive accessories, primarily bike carriers for tow-bar, tail-gate or interior space mounting. Customers predominantly include the automotive industry, car accessory suppliers as well as the bicycle wholesale and retail trade on a pan-European level. Since 2017, Uebler GmbH has also been offering innovative e-vehicles such as e-kickscooters and e-scooters with the specially created Si.o brand. With this, we want to successfully shape the change to e-mobility.

### **• Guiding Principles Regarding Humans**

The entire Uebler GmbH company's philosophy and policy is based on the guiding principle that "human dignity is inviolable".

Its key elements, such as respect for human rights, protection of women's rights, rights of minorities and indigenous peoples, human rights-based working conditions, minimum wages and occupational safety, as well as equal opportunities for women and men in all areas of the company, are a matter of course in this context.

Forced and child labor, just as discrimination and racism of any kind (based on gender, ethnic and national origin, race, skin color, religion, age, disability, sexual orientation as well as identity and other legally protected characteristics), do not only run counter moral and ethical principles but need to be actively prevented. Uebler does not only implement these principles in its own company policy but also imparts it to its complete supply chain. Thus, Uebler does not only check the effectiveness of the QM processes by means of supplier audits but also obtains a clear picture of the general and working conditions at its suppliers. Uebler's preferred supplier strategy is to establish partnerships with regional resp. national suppliers. Purchasing products from third and risk states from non-EU regions is avoided which ensures compliance with fundamental rights as well as a certain degree of sustainability.

Uebler does not co-operate with suppliers who don't adhere to Uebler's defined corporate principles.

### **• Guiding Principles Regarding Employees**

Uebler regards all employees as greatest company's "asset" and would therefore like to use their personal competences and involve them in the company's corporate development. No distinctions may be made between the sexes (female, male, diverse). Well-trained, experienced and committed employees are Uebler's key to success and continuity. Uebler promotes inclusion at work by providing an environment in which the employees' diversity is valued and accepted. Uebler's conviction that diversity and inclusion contribute to the company's success is a key pillar of this approach. Individual competence and qualification are the only factors that matter when selecting and developing employees.

Uebler also expects its employees to contribute to a positive working atmosphere with their mutual behavior. The opportunity of getting to know other cultures and ways of thinking when working together is an enriching experience for all employees. It also contributes to the employees' motivation and enthusiasm and is the basis for sustainable corporate success as well as for an increase in the company's value. The recruitment of new employees is based on a process of transparency, honesty, fairness and objectivity, with the aim of eliminating bias and discrimination in order to give every applicant a fair chance (ethical recruiting).

### **• Guiding Principles Regarding Customers**

Uebler treats its customers in an honest, fair and attentive manner. Customer satisfaction takes priority at all times - for this reason the entire organizational structure of Uebler is geared for meeting the customers' requirements, as the company's success is determined by the customer. Product quality and service are indivisible –comprising reliability with respect to deadlines, prices and design/quality.

- **Guiding Principles Regarding Environment**

Environmental protection, i.e. the reduction of emissions and consumption of natural resources as well as the prevention of environmental pollution, are in compliance with Uebler's quality and profitability targets. Uebler further commits itself to comply with the self-defined provision on environmental projects to make a contribution to reducing general climate change and its effects.

In general, Uebler GmbH uses all technical and economic possibilities to reduce emissions, to keep the waste volume as low as possible, to minimize water pollution by our waste water and to ensure a safe handling of the hazardous substances present in the company at any time. The observance of land, forest, and water rights, as well as the omission of evictions are also important points that must be respected.

Uebler considers environmental protection and sustainable use of energy and resources as a task for all employees. The executives are to provide the motivation to actively participate in the design of the company's environmental management and thus increase the sense of responsibility on all levels.

A functioning environmental management system should ensure that environmental protection and resource efficiency are put into practice. Internal audits are used to identify new potential for continuous improvement of the existing system. The resources required for this are provided by the company, taking into account the economic aspect. The key figures such as reduction of waste, greenhouse gas emission and energy saving (energy efficiency) are reported in the management review of Uebler GmbH and will be internally published.

- **Guiding Principles Regarding Management**

It's very important to the Uebler management that their personnel feel comfortable in the company and understand the business objectives in order to use their skills for the good of the company in return. All executive personnel are committed to exemplify the corporate principles and spread them throughout the company when reaching decisions, serving as constant role models for all employees.

- **Guiding Principles Regarding Statutory and Governmental Regulations**

Uebler is committed to comply with all applicable laws (such as: Working Hours Act (ArbZG); Federal Vacation Act (BurlG); Minimum Wage Act (MiLoG), Occupational Health and Safety Act (ArbSchG) and many more), standards and regulations also with regard to environmental aspects.

- **Guiding Principles Regarding Conflicts of Interest**

With regard to conflicts of interest, we expect every employee to act in an ethically impeccable manner. A conflict of interest exists if private activities or relationships could lead to or create the impression that it is no longer possible to perform tasks for Uebler GmbH in an independent and objective manner. Relevant relationships that may lead to conflicts of interest are, for example, family relationships, partnerships with business partners and competitors respectively holding shares of or investing in their companies.

Gifts, invitations and other benefits in everyday business can also lead to conflicts of interest and are only permissible if they are within the socially accepted, customary framework. They may not, in

particular, be suitable for influencing or creating the impression of influencing current or future business decisions. Gifts, invitations or other benefits may only be accepted if they clearly do not lead to any conflicts of interest and are in line with the standards of business ethics. If necessary, appropriate approvals must be obtained.

- **Guiding Principles Regarding Corruption or Bribery**

Uebler clearly and precisely opposes any form of fraud and corruption in all its commercial activities. All employees are expected to abide by the provisions of this code of conduct. Furthermore, it is also important to strictly avoid situations which do not constitute corruption or bribery itself but create the impression that the decisions of Uebler, customers, suppliers, officials or other third parties might have been guided by irrelevant considerations.

- **Guiding Principles Regarding Occupational Safety and Health Protection**

Uebler's safety and security management, especially with respect to occupational safety and health protection, is to protect its employees and partners against all possible damages. Personal injuries and damage to property are to be proactively identified and prevented. Safety also with respect to third parties needs to be ensured at any time.

- **Guiding Principles Regarding Resources and its Benefits**

For being able to create products which are compliant to the highest degree of quality and using the necessary processes and procedures Uebler needs to provide its employees with the appropriate framework conditions and resources (buildings, workplaces, devices, machinery etc.). Methods serving e.g. for the preservation of order and cleanliness resp. for the maintenance of buildings and machinery need to be applied by all employees. All employees are instructed to immediately report missing or damaged resources to the persons responsible and if possible, provide replacement in order to safeguard product and process compliance.

- **Guiding Principles Regarding Process Orientation and Improvement**

Important processes and procedures are made transparent and accessible to everybody, in the interest of the customers and corporate requirements. Processes are to be controlled by means of adequate parameters. They must be under constant critical surveillance of everybody and if possible, improved. Decisions by Uebler are always based on the analyzation of figures, dates and facts.

- **Guiding Principles Regarding Financial Responsibility (Accounting and Reporting)**

Accuracy and correctness of accounting and financial reporting records form the basis for our decision-making processes. We expect all business transactions to be disclosed in our bookkeeping and reporting system in a timely, accurate and complete manner in accordance with established procedures and applicable accounting standards. Documents and reports must contain the necessary information about the relevant transactions and must be properly archived in accordance with company policies, relevant laws and regulations. All anti-money laundering regulations and applicable laws must be complied with.

- **Guiding Principles Regarding Free Competition, Trade Regulations, Intellectual Property and Plagiarism**

Uebler complies with all applicable competition and antitrust laws. Fair competition represents the basis of free trade. Uebler respects and protects intellectual property. In case of use, the rights of the respective individual must be respected and the legal regulations (patent rights, etc.) are implemented. Plagiarism or suspected cases of plagiarism must immediately be reported to the appropriate office to ensure that appropriate measures may be taken by Uebler. Furthermore, Uebler complies with all applicable export controls, sanctions and customs laws and regulations, including prohibitions and restrictions.

- **Guiding Principles Regarding Information Protection and Data Security**

Networked business transactions and information transmissions place high demands on the security of sent and processed data with respect to preventing unauthorized use/ modification or disclosure. Uebler is aware of these requirements and takes measures to protect the data of all customers, suppliers and employees to the best possible extent, if necessary by using private or public security forces.

- **Guiding principle for the tariff alignment**

Uebler undertakes to develop the salaries / wages of its employees in line with the existing collective wage agreements of IG-Metall Bayern (Metal and Electrical Engineering Division) (salary / wage increases). This obligation is voluntary in all respects and can be revoked if there is an objective reason, in particular in the event of a poor economic situation. There is no collective bargaining obligation / compulsory collective bargaining or even a separate collective agreement. Uebler also defines the level of starting salaries / wages for the various occupational groups in the company itself.

Every employee has the opportunity to negotiate his salary / wage with the management of Uebler personally at any time, taking into account his performance, abilities and personal development.

- **Guiding principle for freedom of association**

The right to freedom of association remained unaffected.

Uebler GmbH  
Management

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Christoph Bülow