

Corporate ethics and code of conduct

Preamble

All employees and members of SAR's management are bound by the provisions of this Code of Conduct. It sets out the values, principles and practices that govern the business activities of SAR Elektronik GmbH (hereinafter referred to as SAR).

The aim of the company management is to comply with ethical standards and to create a working environment that promotes integrity, respect and fair behavior. A strict business policy that complies with the law and fundamental principles serves the long-term interests of the company.

This Code of Conduct has been adopted and approved by the management of SAR.

The values of SAR

Human

- Partnership-based, humane and fair relationships with customers and suppliers
- Collegial, respectful and fair interaction with employees
- Camaraderie, trusting and open cooperation within the team

Technology

- We reliably achieve our goals through flexibility, commitment and experience
- Our knowledge and our innovative, technical solutions ensure success

Compliance with laws and regulations at home and abroad

In all business decisions and actions, SAR endeavors to comply with the applicable laws and other relevant regulations in Germany and abroad. Integrity and honesty promote fair competition, also in relation to our customers and suppliers.

Those responsible for logistics at SAR ensure compliance with import and export regulations and economic sanctions.

Commitment of the company management

SAR is committed to acting in an economically, socially and environmentally responsible manner. SAR therefore endeavors to conduct its business competently and ethically and to protect fair competition in all markets in which it operates by complying with applicable laws on antitrust prohibitions, competition and restrictions on competition. Unfair advantages over customers, suppliers or competitors must be avoided.

Conflicts of interest

SAR expects its employees to be loyal to the company.

All employees must avoid situations in which their personal or financial interests conflict with those of SAR. It is therefore particularly forbidden to take an interest in competitors, suppliers or customers or to enter into business relationships with them in a private capacity if this could lead to a conflict of interest. SAR's interests must not be adversely affected by conflict situations.

Such conflicts of interest can arise in many situations: For example, no employee may accept benefits - in any form whatsoever - that could reasonably be expected to influence SAR's business decisions or transactions. Invitations must remain within the limits of customary business hospitality. Employees should not personally gain direct and/or indirect advantages through access to confidential information as a result of their position at SAR. All employees have a duty to promote the legitimate interests of SAR as far as possible. Any competitive situation with the company must be avoided.

Any actual or potential conflict of interest must be reported and discussed with the line manager concerned.

Prohibition of corruption and dealing with counterfeits

SAR is against corruption and bribery. Behavior in which business is conducted by improper means will not be tolerated. SAR employees may not offer, receive or accept any benefits from business partners that could lead to an impairment of an objective and fair business decision or even give the appearance of such.

Employees are instructed to report counterfeit components used at SAR immediately to their superiors and to the purchasing department.

Fair working conditions

All SAR employees must ensure a safe and healthy environment. Safety regulations and practices must therefore be strictly adhered to.

As a socially responsible employer, SAR considers its employees to be of great value. It demands great commitment from its employees and shares its business success with them in return. SAR's personnel policy contributes to offering every employee the opportunity for professional and personal development. Open exchange of opinions, criticism and ideas are encouraged.

SAR condemns unlawful discrimination or harassment of any kind.

Dealing with internal knowledge

All SAR employees are obliged to ensure a rapid and smooth exchange of information within the company. Information must be passed on correctly and completely to the departments concerned, unless in exceptional cases, in particular due to confidentiality obligations, there are overriding interests. Relevant knowledge must not be unlawfully withheld, falsified or selectively passed on.

Dishonest reporting within the company or to organizations or persons outside the company is strictly prohibited. All financial statements and annual reports, business papers and books of SAR must accurately reflect business events and transactions and comply with legal requirements and SAR's accounting policies and internal accounting procedures.

Handling of assets / financial responsibility

All SAR employees are responsible for the proper and careful handling of the company's property. Every employee is obliged to protect SAR's property against loss, damage, misuse, theft, misappropriation or destruction. Every employee has a duty to inform his or her superior immediately of any use of assets contrary to the above.

Confidentiality and data protection

Much of SAR's business information is confidential or legally protected, so there is a duty of confidentiality. This does not apply if publication of the information has been authorized by SAR or is mandatory due to laws or regulations.

The duty of confidentiality applies in particular to intellectual property. This includes business secrets, patents, trademarks and copyrights, but also business and marketing plans, drafts, business papers, salary data and all other unpublished financial data and reports.

All personal information about employees, customers, business partners and suppliers as well as other third parties is used carefully and treated confidentially at SAR in full compliance with data protection laws. The utmost care must be taken to protect this information.

Implementation and monitoring

The rules contained in this Code of Conduct form a core component of SAR's corporate culture. Uniform compliance with these principles is essential. Every employee is responsible for this.

If an employee has concerns or complaints about the points set out in this Code of Conduct or has knowledge of a possible breach of the conduct guidelines contained herein, they should immediately bring this to the attention of their line manager for clarification. This can also be done anonymously or in a confidential manner. If an employee is not satisfied with the resolution, they may raise the concern or complaint not only with their line manager, but also with the Legal Department or Human Resources. SAR does not permit retaliation for complaints made in good faith under this Code of Conduct.

“Whistleblowing” and protection from retaliation

SAR is committed to protecting whistleblowers from dismissal, harassment or other forms of retaliation.

Responsibility

All employees and members of SAR's management are bound by the rules of this Code of Conduct. Violations of this Code of Conduct will have consequences. In serious cases, this can lead to termination of employment.