



# Corporate Ethics and Code of Conduct

## Preamble

All employees and members of the management of SAR are bound by the provisions of this Code of Conduct. It sets forth the values, principles, and practices that guide the business conduct of SAR Elektronik GmbH (hereinafter referred to as "SAR").

The goal of management is to uphold ethical standards and create a work environment that promotes integrity, respect, and fair conduct. A strict business policy that adheres to laws and principles serves the long-term interests of the company.

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

## SAR's Values

### People

- Collaborative, humane, and fair relationships with customers and suppliers
- Colleague-oriented, respectful, and fair treatment of employees
- A spirit of camaraderie, trust, and openness within the team

### Technology

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

## Compliance with Laws and Regulations at Home and Abroad

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In all business decisions and actions, SAR strives to comply with applicable laws and other relevant regulations both domestically and internationally. Integrity and honesty promote fair competition, including in our relationships with our customers and suppliers.

SAR's logistics managers ensure compliance with import and export regulations and economic sanctions.

## Management Commitment

SAR is committed to acting in an economically, socially, and environmentally responsible manner. SAR therefore strives to conduct its business competently and ethically and to protect fair competition in all markets in which it operates by complying with applicable laws regarding antitrust, 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. In particular, it is prohibited to hold 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. Conflict situations must not compromise the interests of SAR.

Such conflicts of interest can arise in many situations: For example, no employee may accept benefits—in any form whatsoever—that, when viewed reasonably, could be expected to influence SAR's business decisions or transactions. Invitations must remain within the bounds of customary business hospitality. Employees must not use their position at SAR to gain direct or indirect personal advantages through access to confidential information. All employees have a duty to promote the legitimate interests of SAR to the greatest extent possible. Any situation of competition with the company must be avoided.

Any actual or potential conflict of interest must be reported and discussed with the relevant supervisors.

## **Anti-Bribery / Anti-Corruption Policy (ABAC)**

SAR expressly rejects any form of bribery and corruption. Employees must fully and promptly document all gifts, hospitality, or other benefits received or provided in the designated register. Business-related expenses may only be submitted for reimbursement if they are accurate, truthful, and accompanied by complete supporting documentation; the audit department reviews these expenses for potential violations of anti-corruption guidelines.

All employees are required to participate in ABAC training to ensure adequate awareness of risks and behavioral obligations. Reports or concerns regarding potential violations may be submitted confidentially at any time and will be carefully reviewed following a defined investigation process; retaliation against whistleblowers is prohibited.

## **Dealing with Counterfeits**

Employees are instructed to immediately report any counterfeit components used at SAR to their respective supervisors and the Purchasing Department.

## **Fair Working Conditions**

All SAR employees are responsible for ensuring a safe and healthy work environment. Therefore, safety regulations and practices must be strictly adhered to.

As a socially responsible employer, SAR values its employees highly. It expects a high level of commitment from its employees and, in return, shares its business success with them. SAR's human resources policy helps provide every employee with the opportunity for professional and personal growth. Open exchange of views, criticism, and ideas are encouraged.

SAR condemns unlawful discrimination or harassment of any kind.

This includes, in particular, the prohibition of any discrimination based on individual characteristics—whether in hiring, compensation, promotions, or access to benefits.

SAR is also committed to implementing measures to ensure equal opportunities for all employees, including initiatives to reduce pay and promotion gaps.



Likewise, SAR ensures that reasonable accommodations are provided for employees who require adjustments in the workplace to perform their duties under the same conditions as other employees.

## **Protection Against Forced Labor and Human Trafficking**

SAR is fully committed to upholding human rights and strictly opposes any form of forced labor and human trafficking. It is expressly prohibited to confiscate or withhold employees' identification documents, work permits, entry or travel documents, or passports. We also prohibit unreasonable restrictions on employees' freedom of movement and personal liberty. Breaches of contract may not be punished with financial penalties.

Furthermore, it is strictly prohibited to charge employees or potential employees recruitment fees or other costs associated with the recruitment process. SAR covers all reasonable and necessary costs incurred during the recruitment process to ensure that applicants and employees are not financially burdened.

To ensure legality and transparency, the identification documents of all employees must be properly verified. All work-related documents, including employment contracts and terms of employment, must be provided to employees in a language they understand. Furthermore, we ensure that all terms and conditions of employment are clearly and comprehensibly disclosed before an employment relationship begins.

## **Handling of Internal Information**

All SAR employees are required to ensure the prompt and smooth exchange of information within the company. Information must be communicated to the relevant departments accurately and in full, unless overriding interests exist in exceptional cases, particularly due to confidentiality obligations. Relevant information must not be unlawfully withheld, distorted, or selectively disclosed.

Dishonest reporting within the company or to external organizations or individuals is strictly prohibited. All of SAR's financial statements and annual reports, business documents, and accounting records must accurately reflect business events and transactions and comply with legal requirements as well as SAR's accounting principles and internal accounting procedures.

## **Handling of Assets / Financial Responsibility**

All SAR employees are responsible for handling company property properly and with care. Every employee is obligated to protect SAR's property against loss, damage, misuse, theft, embezzlement, or destruction. Every employee is required to immediately inform their supervisor of any use of assets that violates the above provisions.

## **Confidentiality and Data Protection**

Much of the SAR's business information is confidential or legally protected, and therefore subject to a duty of confidentiality. This does not apply if the SAR has authorized the disclosure of the information or if disclosure is required by law or regulation.

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

All personal information regarding employees, customers, business partners, suppliers, and other third parties is handled with care and treated as confidential by SAR in full compliance



with data protection laws. The protection of this information must be ensured with the utmost care.

## **Implementation and Monitoring**

The rules contained in this Code of Conduct form a core component of SAR's corporate culture. Consistent adherence to these principles is essential. Every employee is responsible for ensuring this.

If an employee has concerns or complaints regarding the points listed in this Code of Conduct, or is aware of a possible violation of the behavioral guidelines contained herein, they should immediately bring this to the attention of their supervisor for clarification. This may also be done anonymously or confidentially. If an employee is not satisfied with the resolution, they may submit the concern or complaint not only to their supervisor but also to the Legal Department or the Human Resources Department. SAR does not permit retaliation based on complaints raised in good faith under this Code of Conduct.

## **“Whistleblowing” and Protection Against Retaliation**

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

## **Responsibility**

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