



Code of Conduct

September 2021

Introduction

Dear colleagues,

Since its foundation in 2008, our company has grown at a tremendous pace. We are present in the most important markets in Europe and employ workers from a number of different countries, language regions, legal systems, and cultures.

That's why it's important to see growth and success not just in terms of numbers and balance sheets, but as something with a social, human, and highly personal dimension.

The question is: How can we grow and be successful together? How do we create a culture where every employee can develop, contribute, and thrive?

We believe that healthy, lasting growth can only be achieved with personal freedom combined with clear value-based guidelines.

That means we need to agree on the leeway for individual action, and binding rules for everyone.

The AUTODOC* Code of Conduct is the basis for this: it defines who and how we want to be and how we work and act together within the company as well as with customers and partners.

This code applies to the entire group of companies, and without exception to everyone who works for AUTODOC and those who wish to grow and be successful with us now and in the future, including our suppliers and other business partners, who agree to uphold our defined rules and values.

Thank you for your attention.

Your Board of Directors

* AUTODOC means Autodoc AG and its affiliated companies within the meaning of sections 15 et seq. of AktG (Aktiengesetz, German Stock Corporation Act).

Our values

Every successful company needs a strong foundation. We believe that long-term success is only possible if the concerns of all relevant stakeholders are heard and taken into account. For this, we need a culture that does not pit corporate goals and the interests of staff, customers, the environment, and society against each other but instead thinks and lives together.

A good corporate culture can only be achieved as a team. This means everyone has to do their bit: management as well as every employee. For a successful cooperation, it's essential that everyone knows and respects the rules of conduct.

I. Consideration and respect

Motivation and a desire to succeed belong to AUTODOC like an engine to a car. But success at any price has never been an option for us. That's why we treat our competitors, employees, customers and suppliers – in short, everyone we deal with – with respect. The same applies to our approach to laws and business ethics and standards, which we follow and respect, even and especially if they stand in the way of short-term commercial gains.

II. Fairness and error culture

We strive for perfection and try to improve every day. Part of this includes dealing calmly and constructively with things that aren't going perfectly. Addressing mistakes and errors openly and transparently is the first step in learning from them and continually improving

our procedures and processes. Instead of searching for "culprits", we search for new and better paths to our common goals.

III. Responsibility and trust

We are firmly committed to our role as a trustworthy partner for our employees, business partners, and customers. As a company, we act responsibly, keeping not only our corporate goals in mind, but also the well-being of the general public and the environment. With this in mind, we develop measures and processes that protect our natural resources and are consistent with our sustainability strategy.

IV. Team spirit and tolerance

An international company made up of people from 50 different countries depends on openness, tolerance, and team spirit. We treat our employees with respect and offer every one of them the same rights and opportunities regardless of age, nationality, ethnicity, religion, gender, or sexual orientation. We do not accept discrimination, harassment, or disrespect. We encourage everyone who works with or for AUTODOC to report any concerns or grievances and we investigate any reports or information about breaches of our rules with the greatest of care.

How we practise our values

How we work

Laws and fair competition

We follow local, national, and international rules, regulations and laws, as well as our own high ethical standards. When we do business on financial markets, we do so in accordance with the relevant regulatory requirements. AUTODOC conducts its business relationships fairly and expects its business partners to act with the same integrity. We do not engage in unlawful cartel arrangements, market manipulation, insider trading, or other unfair business practices.

Anti-corruption

The unlawful granting of benefits to third parties, such as public officials or employees of private companies, is prohibited at AUTODOC (except in cases of legal emergency to protect the life, health, or personal freedom of employees). This rule applies regardless of to whom, in which part of the world, or why someone wants to grant such benefits. The anti-corruption rule also means that we do not demand or accept, offer or grant any personal advantages in connection with our business activities.

IT security

As a leading e-commerce company, the protection of our IT systems and security of business and customer data are top priorities for us. That is why we develop stringent rules and processes to protect our company, our partners, and our customers from cyber attacks.

Financial reporting

Financial reporting is carried out in accordance with local and international accounting standards and reflects the actual circumstances of AUTODOC's assets, financial position, and earnings. We take all necessary measures to prevent money laundering within AUTODOC's sphere of influence.

Product safety and quality

Safety and quality are top priorities at AUTODOC. We have developed standards to be able to offer our customers safe, high-quality products. We investigate every indication of defects with the greatest care and are constantly working to further develop and improve our range of millions of products.

How we treat each other at work

At AUTODOC, we're convinced that our success is down to our employees. That's why it's so important for us to create a safe, healthy, and positive working environment where all our colleagues can feel at ease and flourish. This also includes a workplace that complies with all relevant occupational health and safety rules and regulations.

We are an employer who wants to not only provide a positive working atmosphere, but also space for personal growth. That means that we encourage diversity and make sure that the rights of each person are respected.

In concrete terms, that means:

- We treat each other fairly and with respect, regardless of where the other person comes from, how old or young they are, what they believe in, what gender they are, or who they love.
- We integrate people with disabilities and make sure that all colleagues can feel like equal members of the AUTODOC team.

As an international company, we benefit enormously from the diversity and pool of different experiences our staff bring with them. That is why we foster diversity and respect cultural

differences. We deal with disputes and differences of opinion respectfully.

What is expected from each employee:

- Professional and ethical behaviour
- Adherence to the principles set out in this Code of Conduct
- Reporting of violations of the principles of the Code of Conduct via the channels defined in this document

Special requirements for managers and employees in leadership roles:

- Acting as a role model and ambassador with regard to the Code of Conduct
- Instructing and guiding employees in compliance with the Code of Conduct
- Consulting the local human resources manager or the Compliance Office Berlin in the event of possible violations of the Code of Conduct.

How we handle our resources

Protection of property, company assets, and confidential data

The property of AUTODOC and of our business partners may not be used for personal benefit or the personal benefit of third parties.

We are all responsible for protecting AUTODOC's property. This includes:

- Warehouse stock – for example car and motorcycle parts and accessories
- Land and real estate and the associated equipment
- Vehicles
- Working materials for daily operations and, for example, tools and technical equipment of all kinds
- Computers, laptops, IT systems, telephones
- Information and financial resources
- Intellectual property and trademarks

The private use of company property is only permitted according to the relevant individual or company regulations and/or company practice. This also applies to knowhow and knowledge of confidential information that may not be disclosed without prior review and authorisation. Our employees and our business partners are obliged to maintain confidentiality. Information about and from AUTODOC may only be communicated to authorised external and internal recipients. When storing information, we comply with the requirements of data protection law and only use personal data of employees or custom-

ers for the intended and permitted purposes. We protect the personal data of customers, employees, and contractual partners in accordance with the relevant laws and our internal guidelines.

Conflicts of interest

Every employee is obligated to avoid situations in which their own interests and the interests of the company are in conflict. We act in the best interests of AUTODOC and uphold the company's reputation. Personal connections or private interests must not influence business activities or decision-making. Employees should immediately inform their supervisor about any circumstances outside the business environment that could influence their business decisions. In case of questions or doubts as to whether a conflict of interest exists or could arise, the local People Operations contact and the Compliance Office Berlin are available to advise employees.

Responsibility

Reliability and transparency

AUTODOC promotes a culture of transparency where concerns can be raised freely and confidentially without fear of negative consequences. Our customers, business partners, and employees can rely on us to do what we say and say what we do. We keep our promises and are committed to transparency and open dialogue. This is especially true when different opinions and interests need to be weighed up and reconciled.

Social media and the internet

The use of social media is an important element of our success. We therefore attach great importance to open, honest, and fair communication. These principles also apply to our employees, who know that AUTODOC does not tolerate discrimination, insults, or harassment on social networks. We also do not share confidential data or personal data via social networks.

We clearly distance ourselves from political extremism. For our online marketing, we have developed strict guidelines that determine which environments our advertising may and may not appear in. Violations of these guidelines, such as the placement of advertising on extremist websites, will not be tolerated by the company management.

Human rights and social standards

AUTODOC is firmly committed to human rights and ensures that social standards are defined and adhered to. Our aim is to provide every employee with a safe, healthy and non-discriminatory work environment where everyone is free to develop and grow together.

In addition, we regularly check our suppliers and only source our products from qualified (approved) partners who are committed to complying with human rights and social standards.

The future and the environment

AUTODOC also factors in the interests of future generations. That means: We do business with efficiency and moderation and we also align our corporate decisions with our sustainability strategy. The protection of our environment and the responsible use of natural resources are top priorities for us.

Practising and upholding the Code of Conduct

Scope of the Code of Conduct

Everyone is responsible for their own behaviour. The Board of Directors is obligated to create the necessary environment for compliance with the applicable rules and regulations effective control measures. Each individual employee is responsible for observing the relevant laws, guidelines, and this Code of Conduct in the performance of their tasks. Managers are obliged to help their employees with this. When implementing the Code of Conduct, business units in other countries must observe the relevant national laws and, on the basis of the law, the culture of the country.

The Code of Conduct is the framework for our day-to-day behaviour in our respective business environments. There are additional internal guidelines for special risks, such as

- the data privacy policy,
- the competition compliance policy,
- the export compliance policy,
- the anti-corruption policy,
- the anti-money-laundering policy.

In addition, we provide training in these areas at regular intervals. Further rules and instructions are available in the relevant departments and can be requested from the manager in charge.

Making decisions

No amount of rules and guidelines can foresee every possible situation or ethical issue. In our day-to-day work we often have to decide whether certain actions are appropriate or not. The following questions can help you make the right decision:

- Is my decision based on my good judgement, common sense, and our corporate values?
- Am I acting in the best interests of AUTODOC?
- Does my decision comply with legal and regulatory requirements as well as internal rules and regulations?
- Are the work processes safe and do they pose any danger to people or the environment?
- Is AUTODOC's reputation being protected?

If you're not sure about the answer to any of these questions, you should consult your manager, specialist departments, or the Compliance Office Berlin for support.

Reporting suspicious activity

We want to be a reliable and trustworthy partner for suppliers, customers, employees and shareholders and avoid risks that could harm our company. We see integrity and reliability as key to our company's success. AUTODOC therefore offers employees and third parties the opportunity to report potential violations of laws or policies and protects whistleblowers so they do not have to fear negative

consequences and/or retaliations. All reports and information are of course subject to confidentiality in accordance with legal provisions.

All reports are checked thoroughly, suspicious cases are investigated and, where necessary, consequences are applied accordingly.

Please provide information about possible violations through the following channels:

By email: tell-me@autodoc.eu

By telephone: +49 30 992114141

In person:

- Joanna Boj – Compliance Ambassador for Poland
- Maria Petrova – Compliance Ambassador for Moldova
- Sviatoslav Belei – Compliance Ambassador for Ukraine and Russia
- Iris Steyer – Vice President Compliance based in Germany

By mail:

AUTODOC AG
Personal/confidential
Iris Steyer VP Compliance
Kurfürstendamm 22
D-10719 Berlin

Violations and consequences

Violations of the Code, company policies and the law will not be tolerated and appropriately sanctioned. Every suspicion notification will be thoroughly investigated. Each of us is obliged to know the relevant legal provisions and should help to ensure that other employees and/or colleagues also know and observe them. Everyone in a leadership role is obliged to set a good example. AUTODOC employees can trust AUTODOC to respond appropriately to violations of internal policies, this Code of Conduct, or the law.

Entry into force

This Code of Conduct enters into force the day it is signed by the Chief Executive Officer of AUTODOC and is applicable to all employees of AUTODOC. It can be amended, supplemented, or revoked at any time without explanation.