



ATE Code of Conduct

Preamble

The trust of our customers and business partners in our company is our greatest asset.

With this Code of Conduct, ATE Antriebstechnik und Entwicklungs GmbH & Co. KG (hereinafter referred to as ATE) acknowledges its social, ecological, and economic responsibility toward society and the environment within the scope of its business activities.

In accordance with applicable laws and regulations (both national and international), the code is intended to ensure and promote compliance with global requirements for ethical and moral conduct, rules of conduct that are in line with competition law (compliance), and the responsible and sustainable treatment of nature and the environment.

This voluntary code of conduct serves as a binding rule of conduct for all employees at ATE and forms the basis of all our business activities.

This also requires our business partners to accept this code and act accordingly as the basis for trustworthy cooperation.

Compliance will be ensured and monitored through the conscious alignment of company processes.

Our behavior and actions in the spirit of togetherness should be based on mutual respect and consideration.

This Code of Conduct is made known and published internally (intranet) and is also available on our homepage: <https://www.ate-system.de/downloads>

Leutkirch, 01.10.2025



Stefan Heinz
CEO

Article 1

Global guidelines, commitment to the rule of law and compliant action

Internationally recognized human rights are expressly and consistently supported.

We reject child labor and any form of exploitation of children and young people, as well as any form of forced labor, modern slavery, human trafficking, and similar conditions.

Special requirements and requests from customers, suppliers or other business partners are only met within the framework of the applicable rules and laws.

Employee rights are guaranteed and respected. The legal regulations for ensuring health and safety at work, as well as working and rest times, are observed.

All business processes must be transparent and documented. In case of doubt, employees should contact their superiors.

Article 2

Fair competition

We are committed to compliance with legal and ethical standards and to free and fair competition, and expect the same from our business partners.

Unlawful agreements regarding prices or other conditions, sales territories, customers, and other unfair competition practices are prohibited, as are agreements to refrain from competition.

Article 3

Principles of Business Integrity

Bribery, corruption, money laundering, and terrorist financing are prohibited. We encourage and support global efforts to combat them.

We observe international embargoes and export regulations and act accordingly.

Any suspected cases indicating violations of these provisions must be reported immediately to a supervisor or management for investigation.

Conflicts of interest (personal relationships, private interests) must be actively prevented and must not influence our business decisions.

Employees must ensure that no personal dependencies or obligations arise with customers or suppliers. Violations by employees will generally be punished with disciplinary action.

Suspensions regarding business partners must be reported to the supervisor.

Data protection and IT security comply with applicable laws and regulations (GDPR) and are proactively and continuously developed and updated.

We respect and protect our trade secrets and intellectual property just as we do with those of our business partners. We assume reciprocity in these business relationships.

Article 4

Ethical, social and political principles

Every single employee, customer, supplier, or other business partner is to be treated with respect.

We reject any form of unethical behavior.

We are committed to diversity and condemn any form of discrimination based on skin color, national and ethnic origin, gender, sexual identity, disability, age, religion, party affiliation, or ideology.

Employees must not be subjected to sexual harassment, other intimidation, bullying, or any other form of workplace harassment.

We respect the right to freedom of expression, freedom of association, freedom of religion, and we actively support to human rights. The privacy of every employee is preserved and protected.

An ATE whistleblower system is installed, communicated, and available to every employee in accordance with the established usage rules (Whistleblower Protection Act).

ATE offers safe, healthy, and health-promoting working conditions that go beyond legal requirements.

ATE guarantees remuneration in accordance with applicable laws and regulations, covering normal living expenses for full-time employees, and rejects a low-wage policy.

Article 5

Climate change, sustainability and environmental protection

We ensure that all company activities comply with national and international legal requirements and regulations regarding the environment, sustainability, and climate protection.

Potential adaptation to the consequences of global warming – assessed in all directions – is an integral part of ATE's corporate strategy and is regularly reviewed.

In our internal processes and the design of the ATE infrastructure, we pay attention to the use of sustainable, environmentally and resource-saving methods/technologies or work on their improvement/efficiency.

Article 6

Compliance with the Code of Conduct

Management is responsible for communicating this Code of Conduct to employees and business partners and for monitoring compliance. Every employee is obligated to comply with the Code. Violations must be reported immediately (e.g., via the ATE whistleblower system) so that remedial action can be taken as quickly as possible.

If violations of the principles of this Code by business partners become known, we will respond with clear response measures and, if necessary, sanctions.