

Code of Conduct – the AVS Guideline.

Guidelines and rules for a corporate sustainable and ethical behavior
in the AVS Group.

Health protection Philosophy
Corruption Sustainability Trust
Profitability Prevention

Code of Conduct

Work safety Behavior Conflicts of interest
Ethics Responsibility Customer orientation
Progress Transparency Engagement



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Foreword

Dear colleagues,

In our working world, we are confronted with a wide variety of challenges on a daily basis. It can quickly happen that borders are unknowingly crossed. In order to meet the many and varied requirements and to ensure that our core values are always the yardstick for our actions, this Code of Conduct combines the fundamental principles and guidelines of our company with applicable legal regulations. It is intended to serve as a value basis for our actions and to raise awareness of potential misconduct.

Sustainable corporate success is not a matter for the boss. It is based on each individual* and their daily commitment to the AVS Group, which includes all affiliated companies. Only in this way we can jointly create a working environment that is characterized by trust and mutual appreciation, both internally and externally.

The Code of Conduct applies to all AVS Group employees regardless of their position. It serves as a guideline for the daily handling of difficult situations and should provide us with answers to the question: How do I behave correctly?

If you have any doubts when making decisions, you can contact your supervisor or our Compliance Officer at any time.

We have appointed Ralf Greßler as Compliance Officer, who will process all incoming inquiries and obtain legal advice if necessary.

The management board of the AVS Group

* The male form is mentioned gender-unspecifically (m/f/d).

General principles

The quality of our service as a competent service partner is the focus of our actions. We want to convince our customers and guarantee their long-term satisfaction. In order to guarantee this, we adhere to our principles:

A: Our success is based on quality, punctuality and integrity.

B: We always keep the customer benefit in mind.

C: Our actions are always in accordance with the applicable legal regulations.

We are convinced that acting in accordance with our principles ensures sustainable corporate success.

Behavior within the company

Behavior among each other

We are all responsible for the success of the AVS Group. We want to create an environment full of appreciation and respect in which every employee can contribute his or her individual strengths in the best possible way. Any form of discrimination, insult, intimidation or other harassment will not be tolerated and must be reported to the supervisor. Regardless of the position, we promote openness and honesty in communication. Conflicts and discrepancies should be dealt in a fair and objective way.

Labor and health protection

In our role as employer we endeavor to create an environment based on appreciation and a respectful cooperation within the company as well as to foster the general wellbeing of our employees ongoingly. Therefore, the requirements for occupational health and safety are mandatory and must be followed at all times. Our goal is to foster the physical and mental health of our employees in order to reduce illness and health rates and thus to serve you and the company sustainably.

Employees as representatives of the company

As an employee of the AVS Group, you are also the external representative of our company. Our values should also be respected outside the direct working environment. This applies to our cooperation with customers and suppliers as well as to business trips and private life. We therefore ask you to be aware of your representative function and not to endanger the reputation of the AVS Group by acting inconsiderately or making polemical statements, also when using social media channels. We are aware that management and executives are of particular importance. As strong role models, we would like to exemplify the values of the AVS Group and develop a motivating effect.

Protection of company property

The property of the AVS Group must be handled with care by everyone and has to be protected against loss, theft or misuse. This includes intellectual and material property of the AVS Group to the same extent. Consumables should be used sparingly. In principle, the use of company property for private purposes is prohibited unless otherwise agreed.

Behavior in business practice

Fair competition

The AVS Group undertakes to comply with the rules of fair competition. This includes in particular the omission of any agreements with competitors, suppliers and other business partners by the managing directors, executives and all employees of the group. Applicable antitrust and competition law must be complied with. In cases of doubt, the supervisor and, if necessary, the compliance officer should be consulted.

Besides, fair competition includes the omission of unfair competition methods such as competitive espionage or the spread of false information.

Avoidance of conflicts of interests

Business decisions are made exclusively in the spirit of the AVS Group. Private interests of individual employees are not allowed to play a role. Sideline activities, private investments or degrees of kinship, which can result in the appearance of potential conflicts of interest, must therefore be disclosed to the supervisor.

Corruption

We attach great importance to the fact that any corrupt behavior, no matter whether active or passive, is omitted. Already the appearance of bribery or granting of advantages is to be avoided. This applies to our dealings with business partners as well as with authorities and other government organizations. Violations of applicable anti-corruption laws can result in significant penalties for the AVS Group as well as for individual employees, including imprisonment.

Our success is driven by the quality of our products and services. We want to demonstrate this in particular through transparent business practices.

Business gifts and advantages

In no way business judgments or decisions must be improperly influenced on the basis of gifts or other advantages. The acceptance of high-quality gifts, monetary gifts or other financial benefits is not permitted. Standard business gifts or business invitations remain unaffected as long as there is no expectation of a counter-performance. At no time we request gifts or invitations from our business partners.

If you have any doubts about the appropriateness of invitations, gifts or other benefits offered to you by a business partner or that you intend to offer to a business partner, first contact the Compliance Officer to clarify your questions or seek advice from your supervisor.

Anti-money laundering

The AVS Group is obliged to comply with all applicable anti-money laundering laws. The unintentional participation in money laundering activities can also have criminal consequences for all parties involved.

We attach great importance to transparent and comprehensible payment flows and commit ourselves to enter into and maintain business relationships only with reputable partners whose activities are in accordance with the applicable laws and whose resources are of legitimate origin.

Data protection

The EU General Data Protection Regulation (GDPR) grants data protection a fundamental European right. We commit ourselves to the law-abiding and earmarked handling of personal data (e.g. name, address, bank data) within the AVS Group. We respect the right to information with regard to the purpose of collecting and processing transparent data as well as the statutory obligations to delete or retain data.

Data and information security

Our data and information are valuable assets. Therefore, your protection and confidential handling must always be guaranteed. Company-related information that is not publicly known may not be used for our own benefit or for the benefit of third parties. In particular, this refers to technical data, financial data or other operational information regarding business activities and future plans.

Tax compliance

We commit ourselves to comply with the applicable tax laws of the countries in which the AVS Group operates. All employees are required to design internal structures and processes so that taxes payable by the company are completed, correct and timely recorded and paid to the appropriate tax authorities.

Typical examples in this context are the deductibility of travel expenses and gifts to business partners or customers. Furthermore, the correct recording and settlement of services is of central importance for the AVS Group regarding the proper assessment of value-added tax.

Corporate responsibility

Sustainability

As part of the community, we are aware of our special social responsibility. Our economic success should be sustained and therefore always in accordance with ecological and social goals. We are aware of our impact on the environment and strive to further develop our services, products and processes to increase efficiency and conserve resources. In addition, we are committed to observing internationally recognized human rights. Thus, we reject all forms of child and forced labor and therefore, we are committed to fair working conditions within the AVS Group. We also demand the same from our suppliers and other business partners.

Diversity

The AVS Group is convinced that the diversity of our employees makes long-term success and growth possible. Therefore, we consciously promote the diversity of our workforce and are committed to eliminating any discrimination, exclusion or preference based on ethnic, national or social origin, gender, age, religion or belief, political opinion, disability or sexual orientation.

Social commitment

As an active member of society, we would like to play a positive role in shaping our environment through social commitment. To this end, we support employees in their activities, get involved in our own projects or provide financial support through donations or sponsoring.

Contact persons, information- and reporting channels

Validity of the Code of Conduct

This Code of Conduct applies to all employees of the AVS Group. It combines the basic principles and guidelines of the AVS Group with applicable legal regulations. All employees are obliged to comply with the principles described here. In addition, further legal or operational obligations may arise. Failure to comply with the Code of Conduct may result in civil or criminal penalties as well as consequences.

Information channel and contact persons

This Code of Conduct is available internally on Citrix or from your supervisor at any time. This also enables us the possibility to an open and transparent communication in accordance with our mission statement and the associated self-commitment and obligation that we express to third parties. If you have any doubts, open questions or comments, do not hesitate to contact the Compliance-Officer.

Reporting channel

Our values of quality, transparency, and integrity are of particular importance to us. In doing so, we not only implement applicable whistleblower protection law, but also ensure that we all pull together and work in an environment of integrity. The requirements of the Code of Conduct and the law are to be an integral part of our daily work within the AVS Group and in our external conduct.

If you have any indications of violations, we encourage you to report them either to your supervisor or to our Compliance Officer by mail, phone, fax or email.

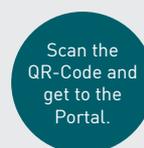
AVS Group
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compliance@avs-verkehrssicherung.de

However, we would also like to offer you the opportunity to report possible misconduct due to violations of this Code of Conduct or laws through a protected channel, this anonymously and without the risk of personal consequences. For these purposes, we have set up a whistleblower hotline and whistleblower portal with LegalTegrity, where any employee can report company-related legal violations. The content of the incoming reports is forwarded by lawyers to our Compliance Officer for clarification. Further measures will be decided there.

Whistleblower hotline:
+49 69 9999 8839

Reports can be submitted securely, confidentially and, if desired, anonymously by phone in German or English from Monday to Friday between 9 a.m. and 5 p.m.

Whistleblower Portal:
<https://app.legaltegrity.com/report/41062f1e-812c-4125-9a81-83133b9060b7>



The whistleblower portal is accessible from any internet-enabled device around the clock. Data protection and anonymity are guaranteed and it is not possible to technically trace reports.

We follow up on all reports about violations and treat them confidentially to the greatest possible extent. The AVS Group does not tolerate any discrimination against whistleblowers who report possible or actual violations – unless the reports were given intentionally in an abusive manner.



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