

# **DRÄXLMAIER Group**

## Code of Conduct



# Code of Conduct

## Preamble

We are convinced that long-term success is based on the trust of our customers in our competence, innovation, sustainability, and especially, in our integrity. This trust has been reflected in the reputation of our company for decades. It decisively depends on all employees being committed to the values and objectives of the company and acting according to these in their respective areas of responsibility. We expect all employees of the DRÄXLMAIER Group to comply with currently applicable legal regulations and corporate guidelines, to live our corporate values and respect the culture of individual countries. In particular, all managers are called on to lead and act as a role model. We are unconditionally committed to lawful and responsible conduct.

The Code of Conduct is based on our vision and our corporate values. This provides an insight into the corporate culture of the DRÄXLMAIER Group and is binding for all managers and employees. It contains the essential aspects of our policies and pretend the desired conduct of employees and external interest groups, e.g. suppliers, customers, applicants and important NGOs (non-governmental organizations). Further information can be found in the respective policies.

## Content

### People

#### Social Policy

The fundamental values of social responsibility, such as an open-minded approach to the world and tolerance of all peoples, cultures and religions are a matter of course for us.

We are convinced that the success of the DRÄXLMAIER Group is based equally on the social responsibility of our company and our employees. All employees of the DRÄXLMAIER Group are treated according to these principles –we guarantee this! All employees act according to these principles –we expect this!

The social values which we live on a daily basis have been anchored into our global Social Policy.

#### Leadership Policy

Our managers act as a role model through integrity, commitment and passion corresponding to our corporate values. Managers assume responsibility in terms of corporate objectives and decision-making for the long-term; hence they secure the sustainable success and independence of the DRÄXLMAIER Group.

They promote individual initiative and a result orientation; enabling employees in their teams to develop within the company. The specific conduct expected of our managers has been anchored into our Leadership Policy.

#### Corporate Behavior Policy

The values of the DRÄXLMAIER Group sets the framework for our corporate culture and the desired behavior of employees. At all times, our employees play a key role in shaping our internal culture. They characterize the external perception and represent the DRÄXLMAIER Group.

The way in which employees live our corporate culture and values, and the specific behavior which is expected of them has been anchored in our global Corporate Behavior Policy.

#### EHS-Policy: Safety and Health

We comply with applicable laws and standards on occupational health and safety. We act responsibly in accordance with our own rules, which often go beyond the legal requirements. In doing so, we adhere to the state of the art.

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## Environment

### EHS-Policy: Environmental protection

We expect our employees to handle the available resources and raw materials with care. We are actively looking for savings potential to reduce waste. We comply with legal environmental requirements.

### Energy Policy

We are committed to structurally and sustainably reducing our energy consumption and continuously improving energy efficiency. We achieve this through compliance with all relevant laws and regulations, the implementation of systematic energy management and regular review and refinement of our measures. All employees are requested to actively participate in the implementation of energy-saving measures and to support energy-efficient alternatives. Our energy policy applies worldwide and is also respected and recognized by our business partners.

## Economy

### Policy for fair Competition

The DRÄXLMAIER Group acts in accordance with the principles of fair competition in its business activities. This includes, in particular, that the management and the employees of the DRÄXLMAIER GROUP respect national and international laws and regulations of antitrust law as well as unfair competition and act accordingly in the course of trade. Agreements or concerted practices are to be omitted. Concerned are in particular prices, price components and other business conditions, allocations with regard market, customers or territory, business opportunities, orders and order intakes, capacities, production volumes and quotas, corporate strategies and future market behavior, for example sales strategies, current and future product developments, investments, boycotts, bids and tenders, and the conduct in connection with tenders or the submission of bogus bids.

If business partners or competitors approach employees or members of management in order to induce a behavior in contrast to these principles, the departments responsible for compliance must be informed immediately.

Suppliers are commissioned on the basis of objective and comprehensible criteria. Unobjective reasons must not play any role in the selection process.

### Corruption Prevention Policy

The DRÄXLMAIER Group does not tolerate any form of corruption in its business activities. This means, above all, that no advantages or benefits are offered or granted to employees, in particular from authorities, trade unions and business partners, in order to induce them to commit illegal or dishonest acts. The management and the employees of the DRÄXLMAIER Group make business decisions in the interest of the company and act accordingly. Personal reasons, personal relationships or personal advantages must not influence decisions and actions.

### Quality Policy

We are a competent partner to the automobile industry, understand the demands of the market and implement them for our OEMs throughout the processes. In times of increasing digitalization, we create innovative ideas and implement them for our customers in a timely manner. We consistently adhere to our global standards and continue to develop our excellent processes in every areas of the organization. By recognizing the need for differentiation and keeping an eye on the market, we increase the satisfaction of our customers and thus also our corporate success. Moreover, we require our partners and suppliers to adhere to the quality standards of our customers.

### Risk Policy

The corporate goals of the DRÄXLMAIER Group are subject to internal and external influences which undergo changes over time. These changes lead to deviations from the planned, future-oriented strategic and operative goal values. A risk is defined as an undesirable, negative deviation from a goal, while an opportunity is defined as a positive deviation. Risk management describes the process of identifying, assessing and communicating risks, followed by coordinated and economical use of resources to minimize the likelihood and impact of unwanted events and to maximize opportunities.

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## Corporate Security Policy

The primary purpose of Corporate Security is to protect the company and its employees from threats. The concept of protecting the company is based on the protection of individuals, information, products and values. Furthermore, Corporate Security is an integral part of emergency and crisis management within the organization and prepares the company for these scenarios in the best possible way. Together with the employees at regional and site level, Central Corporate Security in Vilsbiburg makes sure that these comprehensive tasks can be implemented consistently throughout the world. The activities of Corporate Security are based on the values of responsibility, trust and confidentiality. We are convinced that in our role as a reliable partner, these values will enable us to protect the safety of our employees and the company's economic success.

internationally recognized Responsible AI principles – including human oversight, technical robustness, privacy, transparency, fairness, and accountability – and comply with the EU AI Act and relevant standards. Our comprehensive governance framework ensures that AI systems are classified by risk, with strict controls on high-risk applications and a commitment to transparency and continuous improvement. All employees and business partners are expected to handle AI-related data and outputs with care, participate in ongoing training, and uphold these standards in daily work, including the use of general-purpose AI tools. This reinforces our commitment to innovation and sustainable value creation for our company, customers, and partners.

## Data / Information

### Data Protection Policy

We not only set high standards as a global supplier in the premium automotive segment, but also in complying with the various international data protection laws. In this context, it is important for us to ensure a uniform and globally valid standard in handling personal data.

### Information Security Policy

Responsible handling of company information as well as information from customers, partners and employees is an integral part of our actions. We protect all information appropriately considering its value and maintain the Information Security goals Confidentiality, Integrity and Availability. Specifically, we are protecting the intellectual property of the DRÄXLMAIER Group as well as that of our customers against unauthorized access, thus respecting the values of our clients. We ensure delivery capabilities by securing our IT-Systems against outage, attacks and misuse. Innovation & Information Security go hand in hand at the DRÄXLMAIER Group.

### Artificial Intelligence:

The DRÄXLMAIER Group is dedicated to the responsible, ethical, and lawful use of Artificial Intelligence (AI) in all business activities. We follow

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## Dealing with suspected cases and reporting channels

Compliance with legal regulations, policies and guidelines has the utmost priority, and this likewise applies to the observance of standards voluntarily set by us. Violations to these rules seriously damage the reputation of the DRÄXLMAIER Group. Therefore, we reserve the right to initiate labor law-related sanctions in cases of intentional non-compliance with applicable laws and guidelines.

Employees who become aware of or receive information about a violation of the law can immediately report this to their supervisor, the Legal Department or the Compliance Office.

The Compliance Office can be reached through the following reporting channels:

Email: [compliance-office@draexlmaier.com](mailto:compliance-office@draexlmaier.com)

Telephone: +49 1737547563

In addition, the DRÄXLMAIER Integrity Line [draexlmaier.integrityline.com](https://draexlmaier.integrityline.com) as an online-based reporting system is available 24 hours a day worldwide to both employees of the DRÄXLMAIER Group as well as third parties, who can submit a report there in several languages, even anonymously.

\*) For reasons of better readability, no distinction has been made between male, female and diverse language forms. All person designations apply to all genders.

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**Fritz Dräxlmaier**  
Chairman of the Board

**Stefan Brandl**  
Vice-Chairman and CEO

**Jan Reblin**  
CEO