



CODE OF CONDUCT
FOR SUPPLIERS

CONTENT

Integrity and compliance with the law	4
Promoting fair markets	5
Human rights and working conditions	5
Environmental protection and sustainability	6
Product safety	6
Protection of data and information	7
Binding nature and contact	8



Responsibility and integrity in cooperation

hGears stands for precision, innovation, and quality. Our success is based not only on technological excellence but also on integrity, transparency, and ethical conduct. We expect our suppliers and partners to share these values and to actively contribute to maintaining these standards.

Compliance as a shared responsibility

Compliance is a shared responsibility. We rely on your active participation. Together, we can establish a culture of integrity and responsible conduct that forms the foundation for sustainable success.

For this reason, this Code of Conduct forms an integral part of every business relationship and provides the basis for a trustworthy and long-term partnership. Where subcontractors are engaged, suppliers undertake to ensure compliance with this Code also within their own supply chain.

Objective

This Code establishes a common understanding of responsible and ethical conduct throughout the entire supply chain. It serves as a binding guideline to establish ethical, legal, and sustainability standards, to identify risks at an early stage, and to act responsibly.

Binding nature and responsibility

All suppliers are expected to actively respect the principles set out in this Code and to comply with applicable laws and regulations. If any requirements conflict with local laws or cannot be fulfilled, hGears must be informed without delay. The objective is to promote long-term trust, stability, and sustainable partnerships.

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Integrity and compliance are a shared responsibility. We rely on your commitment to jointly foster a culture of responsible conduct as the foundation for long-term and sustainable success.

Daniel Basok, CFO

INTEGRITY AND COMPLIANCE WITH THE LAW

Principle

hGears is committed to the highest standards of integrity, compliance with the law, and ethical conduct. Every business relationship is based on transparency, fairness, and compliance with all relevant national and international regulations, in particular with regard to anti-corruption, anti-money laundering, export controls, and sanctions regulations. Any unethical influence on business partners or decisions based on personal motives is strictly rejected.

WE THEREFORE EXPECT YOU AS A SUPPLIER TO:

Comply with all applicable national and international laws, standards, and regulations. Any form of corruption, bribery, or improper benefits must be avoided. No business transaction may unlawfully influence decisions.

Identify potential conflicts of interest at an early stage and disclose them transparently so that appropriate measures can be taken.

Implement effective measures to prevent money laundering and review your business transactions for potential risks.

Comply with applicable export control and sanctions regulations and ensure that products, services, or technologies are not supplied to prohibited countries or sanctioned individuals or entities.

Raise awareness among your employees regarding these standards and implement appropriate internal processes to ensure compliance.

PROMOTING FAIR MARKETS

Principle

hGears is committed to fair competition and the principles of a free market. Cartels, agreements on prices or markets, and unfair business practices are not tolerated.

We are committed to making decisions independently and transparently in order to ensure trust and integrity in all market relationships.

WE THEREFORE EXPECT YOU AS A SUPPLIER TO:

Promote fair competition and refrain from agreements or activities that could distort the free market.

Avoid unfair practices that may mislead customers or business partners or put competitors at a disadvantage.

Comply with all applicable competition and antitrust laws as well as relevant international regulations.

HUMAN RIGHTS AND WORKING CONDITIONS

Principle

hGears respects internationally recognized human rights and the core labor standards of the International Labor Organization (ILO). Fair, respectful, and safe working conditions are a key element of our supply chain policy.

Forced labor, child labor, discrimination, or harassment are not tolerated.

WE THEREFORE EXPECT YOU AS A SUPPLIER TO:

Commit to internationally recognized human rights and the ILO Core Labor Standards. Forced labor, child labor, exploitation, discrimination, or harassment must be strictly prohibited.

Ensure a safe, healthy, and respectful working environment and take measures to prevent workplace accidents.

Provide all employees with fair and appropriate remuneration in compliance with applicable legal requirements.

Identify risks within your company and along the upstream supply chain at an early stage and take appropriate measures to prevent or mitigate any such risks.

ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

Principle

hGears is committed to the responsible use of resources, the protection of the environment, and the promotion of sustainable business practices. We strive to minimize negative environmental impacts and focus on resource-efficient processes, products, and services. Sustainability is not only a guiding principle for our own actions but also a key criterion in the selection of our business partners.

WE THEREFORE EXPECT YOU AS A SUPPLIER TO:

Ensure that products and services meet all applicable legal safety and quality requirements and that potential risks are identified and minimized at an early stage.

Protect the health and safety of your employees as well as third parties and promote the responsible use of resources. Environmental regulations and the relevant international standards must be strictly observed, and negative environmental impact must be reduced.

Commit to passing on the principles of this Code to your own suppliers and monitoring their compliance.

PRODUCT SAFETY

Principle

hGears places the utmost importance on the safety, quality, and reliability of its products. We ensure that our products and services comply with applicable legal requirements as well as internal quality standards.

Our objective is to minimize risks to people and the environment and to ensure consistently high product quality throughout the entire product life cycle.

WE THEREFORE EXPECT YOU AS A SUPPLIER TO:

Comply with all relevant legal requirements regarding product safety and quality standards.

Ensure that products and services are carefully planned, manufactured, and tested. Risks must be identified, assessed, and minimized through appropriate measures.

Implement systems for the continuous monitoring of performance and for the traceability of products.

PROTECTION OF DATA AND INFORMATION

Principle

hGears protects confidential information, intellectual property, and personal data with the utmost care. The responsible handling of information is a key element of sustainable and trustworthy business relationships. We place particular emphasis on data security, confidentiality, and compliance with legal requirements when handling data and information in all areas of our business activities.

WE THEREFORE EXPECT YOU AS A SUPPLIER TO:

Treat all information received in the course of the business relationship as confidential and protect the intellectual property of hGears as well as that of customers and business partners.

Implement appropriate technical and organizational measures to protect information and data against unauthorized access.

Raise awareness among your employees regarding the careful handling of confidential information and ensure that internal policies on data protection and information security are observed.

BINDING NATURE AND CONTACT

REPORTING CHANNEL

At hGears, transparency and responsible conduct are of paramount importance. If you or your employees observe violations of applicable laws, this Code of Conduct, or generally recognized ethical standards, please report them to us without delay. Reports may also be submitted anonymously via our whistleblowing platform: <https://hgears.integrityline.com>.

All reports will be treated confidentially. Individuals who report concerns in good faith are afforded special protection against any form of retaliation.

CONSEQUENCES OF VIOLATIONS

Violations of this Code of Conduct may have serious consequences for the business relationship with hGears. Possible measures range from a formal warning and requests for corrective actions to the termination of the business relationship. Furthermore, we reserve the right to initiate civil or criminal legal action in cases involving legally relevant violations.

BINDING COMMITMENT

We hereby confirm that we have read and understood the hGears Supplier Code of Conduct. We commit to complying with the principles described herein and to communicating this commitment to our employees.

Place and date

Authorized signature

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