

odelo business ethics
& code of conduct



odelo 
Automotive Signal Lights



Dear Colleagues,

Thanks to the strong commitment of all employees, odelo implements sophisticated design into excellent products for its customers. We provide safety, style, identity and comfort for every generation.

odelo's achievement is based on the main values and corporate culture which we implement into our everyday live. As a global company, our success is founded on the high priority we focus on customer orientation teamwork, respect, loyal cooperation and innovativeness. The foundation of our activities is our integrity: honesty, respect and reliability.

Compliance, the adherence to all applicable laws and regulations, stands as a core value of odelo's corpora-

te culture. Our Code of Conduct sets odelo's standards of ethical business conduct, based on our commitment to adhere to odelo's values, internal guidelines and to comply with the law. This Code of Conduct was developed in order to raise awareness of legal risks and it applies to all locations of odelo. We expect our employees to follow this Code and comply with the regulations applicable to our company.

Please, read this Code of Conduct carefully and use it as a guideline in your daily work. By complying with it and the legal requirements, you will make an important contribution to the sustainable economic success of our company.



Ahmet Bayraktar

odelo Group Chairman of the Board

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1. INTRODUCTION



1.1 COMPANY CORE VALUES AND CULTURE

Our employees are the basis of our success. We maintain a corporate culture characterised by mutual respect, decency and confidence. We promote professional entrepreneurial thinking, commitment and team spirit and value the cultural differences characterising us as a global company.

1.1.1 Mission, Vision, Values



Our Vision is to be a Global Automotive Lighting System Supplier with leading technologies.

Our Mission

We build light with dedication. We provide safety, style, identity and comfort for every generation.

Our Values

Integrity and Prestige

We will continue to be honest, fair, reliable and respectful to our customers, employees, shareholders, partners, suppliers and to society. We will follow the compliance rules and continue to gain the recognition of society by working transparently, adhering to the law at all times while maintaining high standards of business ethics.

Team Work

As a member of the international business community with a global mindset, we will always respect cultural differences. We will always support each other to achieve success as a team.

Innovation

We will continue to develop new methods by continuing to be a pioneer and thinking outside the box. Innovation is key for our sustainable and continuous growth.

Proactivity

We take necessary precautions by determining problems and risks before they occur. We find the right solutions to avoid repetitive problems.

Customer Orientation

Creating value and satisfaction for our customer determine our daily activities, whether those customers are external or internal.

Empowerment and Support

Our employees work in the areas where their greatest strengths lie. We encourage and promote entrepreneurial thinking and personal commitment in order to realize success and performance.



7 / 24 LEADERSHIP



1. ROLE MODEL

Leaders set an example to others with their personal characteristics. They contribute to corporate development by enabling them to devote work themselves.

- Has a passion for success.
- Exemplary person with its fair, reliable, honest and ethical behavior.
- Disciplined, hardworking and self-sacrificing.
- Stable and consistent.



2. DETERMINES THE DIRECTION

They direct corporate development and create a culture of excellence with the vision, mission, strategy and values that they create and convey.

- Vision and strategy oriented.
- Flexible and lead change and development.
- Trust their intuition, see the potential problems.



3. COLLABORATE

They create an environment of cooperation and trust, enabling them to work together and more effectively.

- Create synergy with teamwork.
- Create and develop collaborations.
- Provide communication and motivation.



4. MANAGE THE BUSINESS

By effectively planning work, delegating responsibility, evaluating performance, and systems achieving results that will improve processes.

- Set priorities, plan and follow up (Pukö).
- Take initiative, make decisions.
- Process-oriented, create balanced results and ensure its development.
- Identify risks and take precautions.



5. CONTRIBUTES

They contribute to corporate success by using its own personal skills, experience and current potential.

- Know their job well and teach others.
- Good listeners, empathize
- Proactive and produce solutions.
- Inspire their employees and support a culture of ownership.



6. CONTINUOUSLY IMPROVE

Constantly question and develop systems and processes with inexhaustible energy.

- Constantly learn and teach.
- Innovative, creative and entrepreneurial.
- Idea, question, provide development.



7. TAKE RESPONSIBILITY FOR A SUSTAINABLE FUTURE

They consider sustainability in terms of social and natural environment not only in the workplace but also outside the workplace.

- Responsible to themselves, their families and society.
- Ensure efficient using of natural resources.
- Take part in social responsibility projects.

2. SCOPE OF APPLICATION



2.1 WHY DO WE HAVE A CODE OF CONDUCT?

The odelo Code of Conduct contains the basic rules of behaviour. It guides us in our daily work with colleagues, customers, suppliers, other business partners and third parties.

2.2 TO WHOM DOES THE CODE APPLY?

Our Code of Conduct is binding for our daily actions and valid for all employees in odelo Group in all odelo locations - managing directors, managers, employees, temporary employees as well as for consultants and third parties of odelo. In the event that the legal requirements in some countries with odelo locations are higher than those specified here, the higher requirements shall apply.

2.3 PERSONAL RESPONSIBILITY

We as odelo employees and especially employees with leadership roles have the personal responsibility to follow the Code of Conduct. Non-compliance with the guidelines established herein must be reported and will be dealt with.

The members of the management board, odelo's managers and employees as well as our temporary staff are obliged to inform ourselves about the relevant regulations for our tasks, be it laws, ordinances or our internal company guidelines, such as this Code of Conduct, and to comply with them in our daily work.

Managers have a special responsibility because they act as role models for employees. Through their legally sound conduct, they are demonstrating that it is important for us all to comply with the relevant legal regulations, this Code of Conduct and odelo's internal guidelines. This means that they have to make their employees also familiar with the contents of the Code of Conduct and explain them its significance for their area of responsibility.

Q&A

What should I do if my manager asks me to perform a task that I believe might violate our code or law?

Raise your concerns openly and honestly with your manager. If you are not satisfied, you should contact Speak Up – Ethical line on odelonet or your compliance officer. You should never knowingly violate our code, policy or a law even if a manager directs you to do so or because you failed to ask for guidance.

3. EMPLOYEES AND WORKING ENVIRONMENT

3.1 RESPECT FOR HUMAN RIGHTS

Based on the United Nations Charter and the European Convention for the Protection of Human Rights and Fundamental Freedoms, we see human rights as core values that must be respected and followed by all employees and stakeholders.

We reject any form of illegitimate discrimination and unfair treatment. Such practices are against the law and our Code of Conduct.

For each employee employed at odelo, the ILO Considering the Standards and Corporate Culture & Ethical Values by keeping; language, religion, race, gender, political discrimination is not made. The odelo group is actively working against the exploitation of child labor. Struggles, does not employ child labor in any way. Adopted ethical values cover employees at all levels.

3.2 WORK ANTI-DISCRIMINATION AND ANTI-HARASSMENT

At odelo, we believe that every employee has the right to fair treatment, courtesy and respect. odelo does not tolerate any form of insult or harassment against employees, suppliers, customers, minorities, local rights or others. Any verbal, physical, social or psychological abuse or hostile behaviour towards individual or group of individuals by your employer, another person or group of people at work, as well as showing continued disrespect and spreading rumours, are prohibited. If you notice that any of the above is happening, ask for support or report it over the Speak Up - Ethical line.

The odelo Group does not tolerate any form of discrimination, mobbing, harassment or malicious use of private or state security forces. odelo respects the rights of indigenous and tribal peoples and their social, cultural,

environmental and economic interests, including their connection to lands and other natural resources . Odelo respects the principles of free, prior and informed consent and participation to gain broad-based consent from indigenous and tribal peoples in its activities.

Managers are obliged to create a work environment that is free from discrimination, mobbing and harassment of our employees.

We expect our employees to treat others with dignity. That implies, among other things, that employees are not personally or sexually harassed or humiliated by words or gestures. Any use of psychological or physical pressure is to be avoided and has to be prohibited by superiors.

All managers must do their part to create a work environment free from intimidation and harassment, where all employees feel valued and respected for their contributions.

3.3 DIVERSITY AND INCLUSION

The internationality of our company and perceiving other cultures and approaches as enriching is one of our strengths. We are aware that diversity in our workforce is a valuable asset. Therefore discrimination, harassment or preferential treatment against a person based on his or her individual characteristics is unacceptable, be it gender, colour, religion, descent, nationality or race, sexual orientation or age or marital status and other legally protected characteristics of that person. This also applies to persons outside the company, such as applicants or employees of customers and suppliers.

We strive to provide an inclusive work environment in which different ideas, perspectives, and beliefs are respected. The behaviour of all odelo employees is characterised by mutual appreciation, fairness and openness.

Q&A

My new co-worker often tells me sexually oriented jokes and makes explicit comment about my appearance. What can I do?

Sexual harassment may consist of verbal, visual or physical conduct of a sexual nature that is unwelcome and that a reasonable person would find offensive. That can take many forms such as: requests for sexual favors or unwelcome demands for dates, sexually oriented jokes, pictures, texts or email messages, explicit or degrading comments about appearance, etc. If you or someone else is the subject of discrimination or harassment, speak up and report it.



3.4 PROHIBITION OF CHILD LABOR

As odelo group, we actively struggle against the exploitation of children employment. We by no means employ children and believe that their improvement period must not be prevented.

We expect our suppliers to respect minimum age for employment.

The basis for this minimum age are several conventions of the International Labor Organization (ILO) These conventions regulate internationally valid lower limits. If a higher minimum age of employment applies in the country where the supplier operates his permanent establishment, the stricter standard or law must be followed.

3.5 PROHIBITION OF FORCED LABOR AND TRAFFICKING IN HUMAN BEINGS

Forced labour and human trafficking are incompatible with our ethical standards and human rights. Therefore, we do not tolerate violations of this prohibition.

3.6 WORKING HOURS AND REMUNERATION

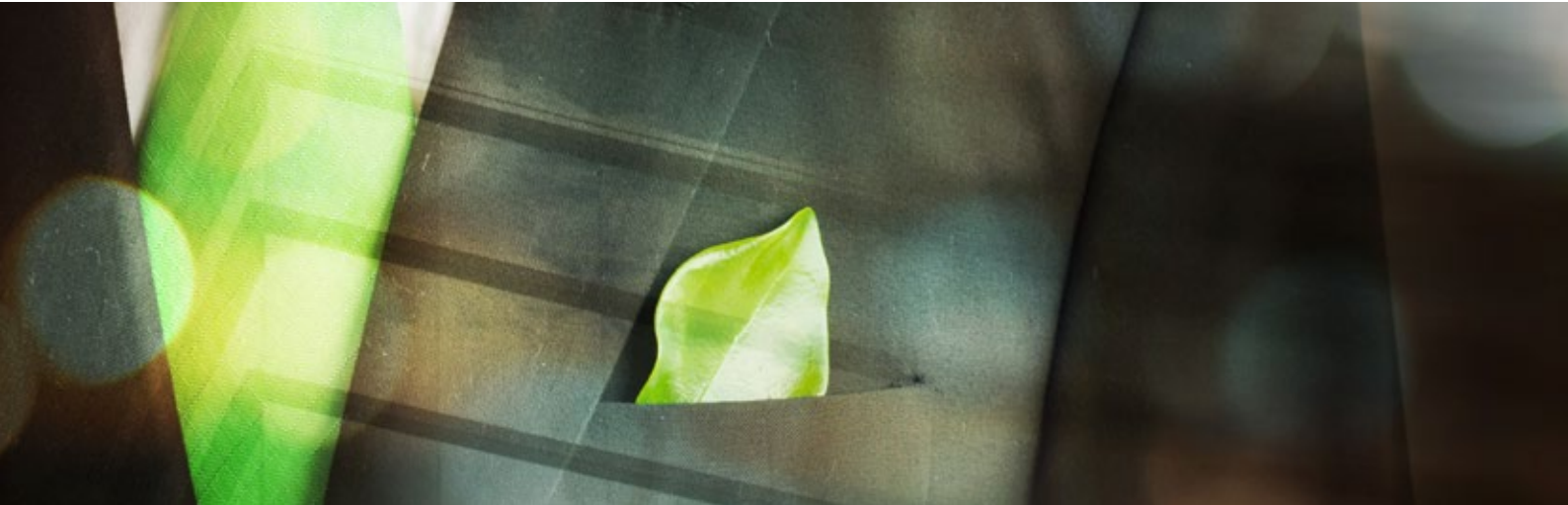
We ensure compliance with working time regulations. An appropriate wage has to be paid and must not be lower than the statutory or collectively agreed minimum wage.

Within the framework of international scope, we attach importance to abide by the principle of equal pay for work to which equal value is attributed, without discrimination on grounds of sex or marital status, with regard to all aspects of pay and conditions of remuneration.

3.7 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We support the right of employees to organise themselves into unions and representative bodies. No employee may be discriminated or given preferential treatment because of his or her membership or duties in such an organisation. This includes recognising the right to collective bargaining.

4. ENVIRONMENT, HEALTH AND SAFETY



As odelo, we are aware of our social responsibility and therefore regard the protection of our environment and safety at work as important components of our corporate philosophy, which is oriented towards sustainability. Compliance with environmental and occupational safety regulations is the minimum requirement of our activities. In this direction, we act in accordance with the Environment, HSE and Sustainability policies.

Environmental and occupational safety must be everyone's responsibility. We are all expected to perform our work safely and with minimal impact on the environment, no matter what our job is.

4.1 OCCUPATIONAL SAFETY

We comply with our corporate responsibility by observing the strict legal requirements that occupational safety regulations impose on the safety of our workplaces. For this purpose, we work together with the responsible authorities, institutions and business partners. Protecting the health of our employees is our obligation. It applies to each individual and is an integral part of our sustainability policy. In this way, we actively contribute to the prevention of accidents at work and occupational illnesses.

In addition, all employees are responsible for observing safety and health rules, for taking appropriate precautionary measures and for reporting unsafe or hazardous conditions to our supervisors and/or Health and safety department at each location.

4.2 PROTECTION OF THE ENVIRONMENT

Our products are manufactured in the most environmental friendly way. That is valid both for an economical use of resources and for the emissions generated during the manufacturing process, including the resulting waste materials. We regularly check whether the environmental compatibility of our products and their manufacturing

processes can be further improved. During production, a policy that respects the environment, land, forest and water rights is followed, and good environmental practices are used that prevent deforestation and protect against the conversion of natural and critical habitats to biodiversity loss.

4.3 SUSTAINABLE AND SAFE PRODUCTS

Our products comply with legal environmental protection standards and have the lowest possible environmental impact during their life cycle. We ensure that environmentally harmful substances are handled in a safe manner throughout the product's service life, right up to their recycling or disposal.

4.4 CONFLICT RESOURCES

We do not finance directly or indirectly armed groups by purchasing raw materials for the production of our products grown or promoted in conflict or high-risk areas. In areas of this kind, the applicable and international law are often suspended and are regularly characterised by widespread human rights violations.

5. FAIR BUSINESS PRINCIPLES



5.1 OUR CUSTOMERS

We convince our customers with the quality of our innovative products and services. The long-term economic success of odelo therefore depends on our innovative strength and customer orientation as well as on a free and fair competition. As a performance-oriented company, we stand for compliance with legal regulations, which form the legal basis for our economic success.

We therefore reject any form of bribery regarding our relation with other companies as well as with authorities or public officials. Any form of collusion with competitors that hinders the market is also unacceptable.

5.1.1 Relationship with Customers

We establish long-term partnerships with our customers that can be characterized by openness and sincerity. In our relations with our customers, we consider the following: even in favour of the customer, a transaction must not be made without the knowledge of the customer, and even in favour of the company, customer weaknesses must not be exploited, and no profit motive can be sought by giving incomplete or incorrect information to the customer. Whatever our customers' demands, we take it as our mission to find solutions that are not only safe and effective, but also provide sustainable added value for our customers. However, we only establish business partnerships that do not contradict our

core values. This ensures our long-term economic success.

5.1.2 Quality of Products

As odelo Group, our aim is to meet the highest criteria in terms of quality, function and design. In this direction, our quality management is an integral part of all our activities. The quality and safety of our products is our priority. For this reason, our products are subject to strict quality control. We are constantly advancing in product development, following the tradition of our company. Each of our employees is aware of the importance of their job and they act in accordance with the company's zero-defect strategy.

5.1.3 Positive Handling of Complaints

Possible complaints or notifications of quality defects are dealt promptly and impartially in accordance with relevant rules and laws. In this context, it is our ultimate goal to reach an amicable agreement with our customer.

5.2 OUR SUPPLIERS

We consider our suppliers as our partners. Therefore, all our employees approach each supplier of the company in a polite, open, respectful and recognizable manner, and work is always initiated and implemented with sincerity. Our suppliers play a vital role in our operations and our ability to provide products and development services for our customers. We try to make business relations as beneficial as possible for both parties. We take decisions in line with realistic and economically reasonable dimensions. In return, we expect the highest level of competence from our business partners in terms of quality, cost, innovation and reliability.

In addition, we expect our business partners to act in accordance with the guidelines consistent with the Code of Conduct for odelo. **To ensure that our suppliers and service providers uphold the same key standards, we have summarized the expectations to our suppliers in the Code of Conduct for suppliers and service providers, accessible on the odelo official web page.**

5.3 FAIR COMPETITION

It is extremely important for the long-term success of our company that our conduct protect free and fair competition. Every employee is therefore obliged to comply with the provisions of the competition law.

It is a matter of course for us that odelo's customers and the public only receive accurate, complete and truthful information that enables them to make informed decisions.

odelo employees are also strictly prohibited from participating in any form of anti-competitive collusion with other companies.

odelo employees shall not enter into any agreements with competitors regarding prices, market shares or sales volumes. It is also forbidden to divide customer groups between competitors or to agree terms and conditions of business for customers. Informal discussions in the background of a conference or trade fair are sufficient to violate these competition law requirements. It is also sufficient if the purpose of the discussion is to restrict competition.

Particular care should therefore be taken at trade fairs and association meetings in particular, in order to avoid the impression that a reckless statement might have the objective of reaching an anti-competitive agreement with a competitor.

The same applies to benchmarking studies conducted jointly with competitors or market analyses carried out by an industry association, for example.

Frequently, anti-competitive agreements are brought to the attention of the competent authorities by a participant in the cartel, the so-called "key witness".

The sanctions for participating in such a cartel could jeopardise the existence of our company and thus endanger our jobs. The antitrust authorities may impose fines up to 10% of the annual turnover of the odelo Group. They can also confiscate the illegally earned profit. In addition, our customers could assert civil law claims for damages.

The involved parties to a cartel agreement face high fines as well as consequences under labour law. In addition, you will be confronted with claims for damages under civil law. In other countries, fines and imprisonment may be imposed for persons involved in a cartel infringement.

The evaluation of a situation under competition law is very complex. We have therefore put together information for you in an antitrust guideline to raise your awareness of the substantial risks involved. In addition, this guideline provides you with instructions on how to avoid the appearance of being anti-competitive in critical situations.

5.4 AVOIDING CORRUPTION

Bribe puts free and fair competition out of force and damages the economy as a whole.

The use of bribes to achieve business goals or personal gain by accepting unfair benefits is contrary to our values and represents a criminal offence.

The company can be subject to high fines and the confiscation of profits generated by a business based on bribery. In addition, the reputation of the company would suffer from considerable damages and the trust of our customers, built up over decades, and thus our business relationships would be destroyed.

Therefore, corruption at odelo is in no way tolerated and is punished by all existing legal means.

As an employee of our company, you may not accept any benefits in the course of your business activity or grant any benefits to others that exceed the socially recognised scope of appropriate and customary business practice. Our conduct should not even give the impression that we want to influence a fair and proper decision by granting - or accepting - an inappropriate benefit.

It does not matter whether it is a question of financial benefits, invitations, entertainments or other privileges that the employee claims for himself/herself or the persons close to him/her, such as family members.

Although it may be customary in other regions of the world to consider such benefits as part of normal busi-

ness practice, this does not justify infringing criminal law provisions. The same is valid for negotiations in which we are asked to make illegal payments, for example, in order to receive an order. Even if the situation can be compared with extortion, it does not justify the payment of bribes or other benefits. Paying bribes is a criminal offence.

Payments of bribes lead to conflicts of interest for the person concerned. If you are unsure about the appropriateness of a donation that you wish to share with a business partner or that has been offered to you, please contact your superior and make the matter transparent.

Further details are set out in an anti-corruption guideline. It also contains further information with regard to the appropriateness of gifts, invitations and entertainment and explains the particularities of dealing with representatives of authorities.

5.4.1 Officials

Particularly strict regulations apply to representatives of authorities, so-called public officials. As a rule, they may not accept donations that are still considered appropriate and customary in relation to business partners. Our actions must under no circumstances give the impression that we want to influence the correctness of state decisions by offering unreasonable advantages in our favour.

That applies just as much to the so-called “facilitation payments”. These are small benefits to a public official, e.g. a customs officer, so that he/she complies with an official act to which he/she subject.

It is prohibited to make payments, give loans or provide other cash-value advantages to public officials in order to provide business or advantage for affiliates or other persons, by using the company, its sister organizations or the person’s own means. Managers and employees may not give or offer to give money or anything of value to government employees, employees of international public organizations, political candidates or political parties to obtain or retain employment at odelo.

All of our employees, especially our managers, are aware that they represent the company with their behaviour and therefore affect its name outside the company and its culture within the company.

5.4.2 Offering and Accepting Benefits (gifts, dinner...)

odelo employees cannot accept or give gifts directly or indirectly from individuals or institutions related to our company’s activities. They cannot have a debt/credit relationship with individuals or institutions that are affiliated with our company.

odelo employees may be invited to professional group events by suppliers if approved by the General Manager.

Q&A

Our business partner sent me a gift for my birthday. Should I take it?

All gifts must be returned to the sender with an explanation that it is our policy that you are not allowed to accept gifts.



5.5 CONFLICT OF INTEREST

5.5.1 Business Partners and competitors

We do not allow any private business relationship with odelo business partners or competitors if it results in a professional conflict of interest.

We expect all our employees to maintain an impartial relationship with customers and suppliers and to act only in the best interests of the group.

We make our business decisions based on factual criteria in the best interest of odelo. It is therefore up to you as our employee to avoid making decisions where your personal or financial interests overlap those of the company.

This may be the case if, for example, relatives or

close friends work for a potential business partner or competitor of odelo or if you have a financial interest in a certain purchasing decision.

If you find yourself in such a situation, you are required to make it transparent to your superior, senior manager or HR. This enables you to make an objective decision and to avoid being accused of corruption. Any such agreements in the employee's interest should be documented.

Additionally, secondary side-line activities that you want to carry out in addition to your employment at odelo have to be approved by odelo in accordance with your employment contract. Participations in third-party companies are only permissible if they do not involve any conflict of interest with odelo. Otherwise, the participation is to be omitted.

Q&A

A supplier invited me to a football game with very expensive tickets. Is this a potential conflict of interest?

This can be an opportunity to strengthen business relationships, but the gift can create a perception that you need to give this supplier preferential treatment and inevitably create expectations in the supplier. You should avoid situations that will create such a perception and expectation in the supplier.

5.6 DONATIONS AND SPONSORSHIPS

These are some examples for our company's other assumes, social responsibilities; by e.g. financially or materially supporting charitable or cultural purposes.

Donations made by odelo must always be transparent, on a voluntary basis as a social commitment and without expecting anything in return. All donations must be transparent, the recipient must be identified, and the purpose of the donation must be legally justifiable. odelo Group does not make direct donations to political organisations, parties or individual politicians.

Decisions on donations are made exclusively by the members of the management. Cash donations are made exclusively in the form of a bank transfer, i.e. neither in cash nor by cheque. All donations must be documented.

In order to fulfil our social responsibility, we support individual projects with donations or assume the function of a sponsor. We develop these activities exclusively on an altruistic basis. Only the management of odelo reserves the right to decide whether and to what extent a project is eligible for support.

In all cases, payments are cashless and must be documented in a special register like any other monetary benefits.

Unlike donations, sponsorship provides a return service for odelo Group, for example in the form of communication or marketing activities. Sponsorship measures should be transparent and should be based on only written agreements. In addition, there must be a reasonable balance between the cost of sponsorship and the cost of advertising.

5.7 ANTI-MONEY LAUNDERING

Money laundering is a process in which individuals or organizations try to hide illegal money or give the impression that the money in question is legitimate. At odelo, we do not accept, facilitate or support money laundering.

In accordance with international standards, payments for goods or services delivered or performed by our customers cannot be accepted as cash, traveller's checks, third party payments or postal orders. We expect our customers to transfer payments from bank accounts opened in the name of the customer receiving the invoice.

5.8 EXPORT CONTROL, CUSTOMS DUTIES AND TAX LAW

It is obligatory to comply with the foreign trade regulations and the specifications of other countries in which our company operates. In the context of the import and export of products, care should be taken to ensure accurate documentation and proper customs clearance. Relevant local applicable tax laws must be complied with. This may include the tax laws of other countries in international business transactions.



6. PROPER USE AND PROTECTION OF COMPANY RESOURCES

The ownership of odelo forms the basis of our economic activity. This applies both to our company's corporate property and to the intellectual property of our company.

6.1 PROTECTING ASSET VALUE OF ODELO GROUP

You are obliged as our employee to treat the company property and other objects owned by odelo with care. This includes any property and resources you are provided with to do your job, from tools, equipment, products, semi-finished products, documents, computers, vehicles and other property of odelo. odelo property may only be used for odelo business purposes and in a targeted, efficient and cost-conscious manner. It is your task to protect the property of odelo from loss, destruction, damage, misuse, theft and misappropriation. The property of odelo may not be removed from the company area or used for personal use without prior approval.

6.2 PROTECTING INTELLECTUAL PROPERTY, TRADE SECRETS AND CONFIDENTIAL INFORMATION

The success of our company depends on our innovative strength. We, as an odelo will only be economically successful in the long term if we can convince our customers of our products and services by means of new and sophisticated technologies and product ideas.

The know-how we have as odelo is our capital. For this reason, we protect our intellectual property and inventions from unauthorized use, because with these elements we secure our competitiveness and therefore our future.

Examples of Intellectual property include:

- Patents, trade secrets, trade names, internet domain names, copyright, among others, whose license is exclusively owned by odelo.

The protection of our **trade secrets** is particularly important. As an employee of our company, we are therefore obliged not to disclose confidential business information or trade secrets. Before passing information on to third parties, it has to be checked whether they are entitled to receive the information. Any unauthorised disclosure

may result in criminal penalties and civil lawsuits for damages.

Confidential information is any information about odelo that has not been made public by odelo.

For example:

- Revenue information, Profit information and projections, Information regarding potential acquisitions and investments, new product information, design and development plans personal information about employees, manufacturing processes etc.

Employees and managers should not discuss confidential information with any individual who is not obligated to maintain the information in confidence, and should be careful to avoid discussing confidential information in public places.

In addition, information that the employee has for the reason in the company cannot be used for the personal benefit of the employee or anyone else.

The protection of odelo's intellectual property and confidential information is one of the most important responsibilities of employment with odelo. This obligation continues even after employment ends.

Protecting intellectual property also means respecting confidential information, trade secrets and industrial property rights such as patents, designs or trademarks of our business partners. For this reason, we only use third-party know-how if we have access to it from generally accessible sources or if the owner authorised us to use it.

7. INFORMATION HANDLING AND COMMUNICATION

7.1 DATA PRIVACY

The use of data is becoming increasingly important in the efficient organisation of business processes. It is all the more important for odelo to respect the legitimate interests of our employees and business partners in protecting their data.

Therefore, we consistently comply with the data protection regulations (such as GDPR) regarding their personal data. We collect, process or use such information only to the extent permitted by law or with the prior consent of the person concerned. The storage of personal data is limited to a necessary minimum. Stored data is regularly blocked or deleted on the basis of appropriate data protection concepts. This ensures a uniform data protection concept for odelo.

For more details, please see our Privacy policy (available at odelo.net).

7.2 INFORMATION SECURITY

Modern information technology has become an integral part of our operative business processes. This makes it all the more likely that attacks on our IT systems from outside will endanger not only those systems but also the operational work of odelo.

We support the security of information, information systems, data and computing processes with technical and organizational measures. All employees must contribute individually to data protection and information security. We expect our employees to always pay attention to this issue.

All employees are therefore obliged to follow IT security policy and handle the IT equipment entrusted to them with care. That includes not opening unchecked e-mail attachments or disabling virus protection installed on computers and mobile phones for business use. It is also prohibited to install programs or applications that have not been checked by the IT department for their safety on the before mentioned devices.

7.3 EXTERNAL COMMUNICATION

External communication requires a prudent approach

and a thorough understanding of legal and media issues, therefore official statements on behalf of the odelo Group or a odelo company may only be done by employees, who are authorized for this. Media inquiries are answered exclusively by the press office of odelo (media representatives). Taking independent measures is prohibited.

7.4 USING SOCIAL MEDIA

In principle, public statements made by odelo employees are subject of the right to freedom of expression. However, our employees must always take care that their standing in society does not damage the reputation of odelo Group. In private opinion statements, no reference can be made to the role or activity of the person in the company. Our employees are aware that they must comply with legal requirements when using social media. We expect a professional attitude from all our employees in this regard.

For more information on this topic please see odelo Social Media Standards Guide.

7.5 ACCURATE RECORD KEEPING AND CORRECT REPORTING

odelo is committed to provide complete, accurate, timely, truthful and understandable disclosure of information, including financial information in reports and in other public communications, in accordance with applicable laws, rules and regulations.

Financial books, records and accounts must be maintained in reasonable details, accurately reflect transactions and events, and conform to applicable legal and accounting requirements.

We require honest and accurate recording and reporting of business information, data and transactions, including audit reports, quality, safety and personnel data records, as well as financial transactions and records. Falsification of any record or financial report, such as quality and safety data, time reports or expense reports, will result in disciplinary action.

8. HOW TO SEEK GUIDANCE AND REPORT VIOLATION?



All odelo employees are responsible to ask questions, raise concerns and speak up when compliance issues arise. If you are not sure about certain issue you should seek guidance. And if you are aware of a violation of our Code or policies or law, you must speak up and report it.

In odelo you have several channels to seek guidance or make a report:

- For general matters, you should always contact your first superior or next level superior or Human Resources responsible. These are issues, such as workplace violence, employee health and safety, food safety, co-worker issues, discipline disputes, promotion opportunities, issues related to the work environment...
- For issues involving actual or potential Code or legal violations, you should contact the Managing Director, the Plant Manager, or another member of odelo

Management team. Some examples of these issues include: fraud, theft, bribery and other corrupt business practices, human rights violations, illegal discrimination or harassment, actual or potential conflicts of interest...

- If you wish to disclose an information about potential Code or legal violations or compliance risks completely anonymously, you can also use the Speak Up – Ethical Line on odelonet or contact the compliance officer at your location.

8.1 SPEAK UP - ETHICAL LINE

Speak - Up Ethical Line enables employees to anonymously report any violations of our Code of Conduct, related internal regulations and policies or the laws, as well as any kind of unethical behaviour.

All employees can make notifications from their own computers or shared computers without user login (registration, name, etc.). **The Speak – Up Ethical line is based on whispering policy. Personal information is not shown by reporting and the employee can track the situation of the issue with the code given by the system.** Ethical issues are forwarded to the location HR manager and Plant Manager. That is ensured that faster and easier action is taken regarding the issue.

All reports made in good faith are taken seriously and will be investigated thoroughly. The Speak - Up Ethical Line may not be used to make false accusations, and any abuse of the Ethical Line is prohibited.

8.2 NOTIFICATION OF ETHICS AND ENVIRONMENTAL VIOLATIONS BY NON-odelo EMPLOYEES

Ethical and environmental complaint notifications made by people who are not odelo employees (outside company, etc.) can be made in writing to the info e-mail addresses used for Ethical and Environmental Violation Notifications on our website.

Violation notifications are sent to the top executive e-mail addresses at odelo locations.

8.3 INVESTIGATING MISCONDUCT AND DISCIPLINARY ACTIONS

At odelo, we cannot and may not tolerate any infringement of laws and our internal guidelines. Violations will therefore be punished by means of the legally available instruments. These measures may include labour law measures which, in the worst case, may include the termination of employment. In addition, a legal violation may also result in civil lawsuits for damages, depending on the circumstances of the individual case.

Irrespective of the sanctions available to odelo, misconduct can also have criminal consequences.

8.4 RETALIATION IS PROHIBITED

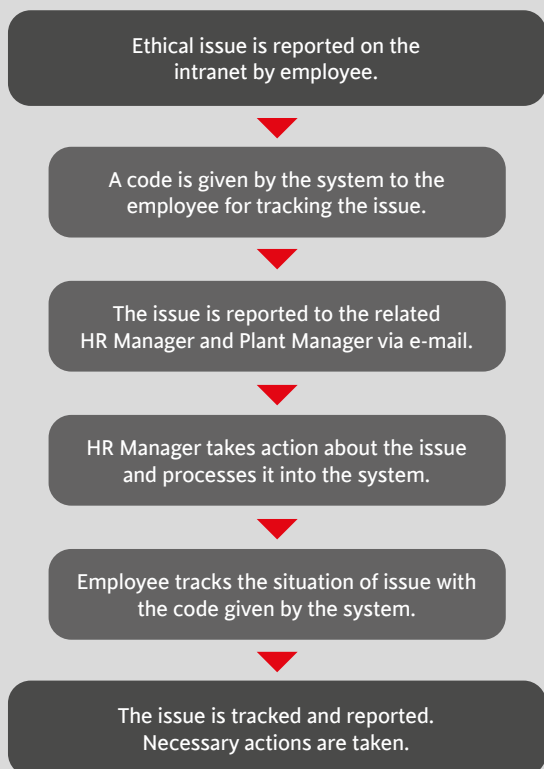
None of our employees will face negative situations as a result of a reporting action performed in good faith, either through one of the reporting means described in our Code or to government authorities. The investigation of the reported cases takes place in a completely confidential manner.

8.5 CONTACT INFORMATION

If you have any queries after reading this Code of Conduct or if there is a legal risk that you have identified in your daily work, please contact your superior or Human Resources department or the compliance officer at your location.

By doing so, you will play an important role in preventing possible legal infringements.

HOW CAN I REPORT AN ISSUE?



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Operational Headquarter

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