



WashTec Code of Conduct.



Wash



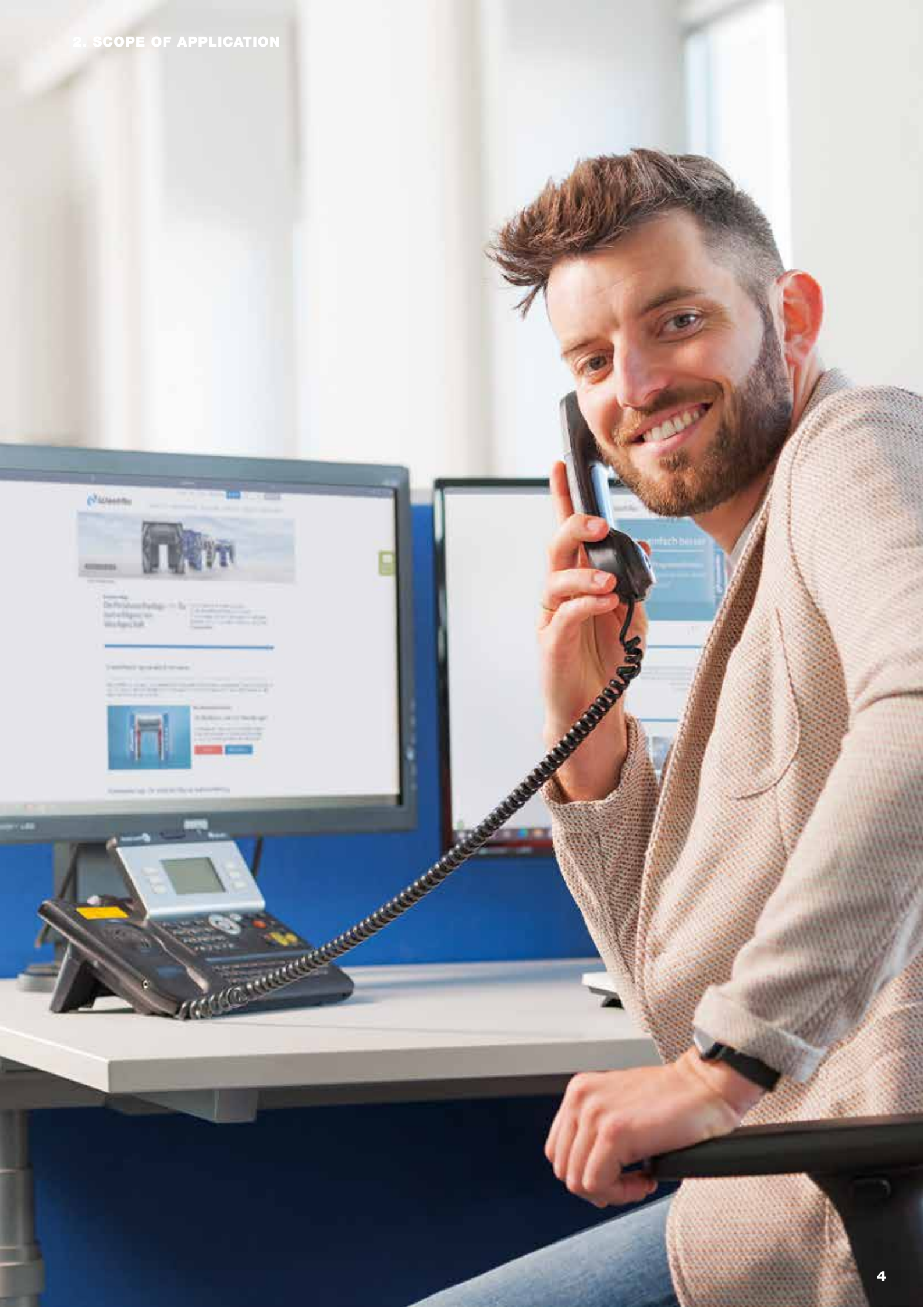


1. Preamble

Our long-term success requires strict compliance with all applicable laws and regulations and the maintenance and development of high ethical standards in our business activities. The trust of our customers, suppliers, shareholders and business partners in our company and our products is our greatest asset.

The Management Board of the WashTec Group¹ (hereinafter also referred to as “**WashTec**” or “**we**”) has therefore adopted this **WashTec Code of Conduct**. It defines our basic requirements for the principles of conduct in business life and helps ensure that risks are promptly identified and minimized or completely avoided.

¹ “WashTec” refers to WashTec AG and the WashTec Group companies it controls





2. Scope of application

The Code of Conduct is binding for all employees, governing bodies and managers worldwide, regardless of whether other conduct is customary or tolerated in a particular country. It is based on applicable law, generally accepted ethical principles and moral integrity in business conduct. Everyone at WashTec is personally responsible for ensuring that the requirements and principles set out in the Code of Conduct are observed in their working environment. If in doubt, please seek advice and assistance from the appropriate sources (see Section 6).

We expect the same from our suppliers and service providers, who are subject to a corresponding [Supplier Code of Conduct](#).

Our corporate philosophy

The WashTec mission statement:

We offer the highest possible benefit to people who wash vehicles professionally.

OUR IDENTITY as the inventor of automated vehicle washing:

We are specialists because we know that we serve our target audience most effectively by focusing all our efforts on their most important needs and solving their problems better than others.

We are a winning team because, as world champions, we are constantly improving and innovating.

We are product and service leaders because we guarantee the best possible technology and quality at a reasonable price. We are the clear leader in innovation.

We are sustainable because we demand and implement environmental as well as economic sustainability, both in the entire life cycle of our products and in all our thinking and actions.

We believe in customer benefit because we know that higher customer care leads to better business results. Sales and profits are not the objective, but the results of our activities.

Tasks and objectives in dealing with our customers and suppliers:

We connect closely with our target audience; we are part of their world and know their requirements and needs better than anyone else.

We are delighted with every customer contact. Every contact is a positive experience for our customers. We inspire our customers by exceeding their expectations.

We offer our suppliers a long-term and reliable partnership. In return, we expect loyalty, quality, commitment, flexibility and innovation.

All of this also applies to our internal customer and supplier relationships.

Responsibilities and objectives of our employees:

We are open, genuine and honest. Trust, fairness and learning shape our actions. We expect everyone to perform, to have a sense of responsibility and to be loyal.

Everyone sees themselves as an entrepreneur at WashTec, sets high standards for themselves and constantly develops their skills, makes decisions in their area of responsibility and takes responsibility for them.

We clearly assign tasks and responsibilities and hold each other accountable. Our managers create the right climate for the best possible personal and professional development of our employees.

We live social sustainability and promote further development and training. We stand for all people living together in a spirit of respect.





4. Rules for WashTec as corporate citizen

WashTec sees it as part of its social responsibility to respect the well-being of people and the environment as a valuable asset and to contribute to their protection as far as possible. This leads to the following rules of conduct:

Human rights

Respect for internationally recognized human rights is fundamental to all activities at WashTec. We respect and protect the dignity of every human being, reject all forms of forced and compulsory labor, slavery and human trafficking, and respect and protect the rights of children and young people.

Protecting the environment

WashTec attaches great importance to environmental protection. Compliance with applicable environmental laws and other environmental regulations is of central importance to us. We also aim to minimize negative environmental impacts of our business activities and as far as possible to conserve natural resources and avoid adverse effects on biodiversity. When using hazardous substances, we consider the risks to people and the environment, minimize those risks where possible and manage the residual risks

appropriately. As far as reasonably possible, we avoid or reduce waste in production and over the product life cycle.

Product conformity and product safety

We are committed to high standards of product quality and safety. In the development and manufacture of our products, we comply with all applicable rules and regulations. We immediately investigate any concerns regarding the quality and safety of our products.

Data protection

WashTec attaches great importance to the responsible management of data. When collecting, storing and processing the personal data of our employees, business partners and other third parties, we consistently comply with applicable laws and regulations and with the principles of integrity and confidentiality.

Lobbying

We remain neutral and comply with the applicable legal regulations in our dealings with policymakers.





5. Rules for WashTec as business partner

Integrity, transparency and fairness are crucial for credible, trust-based business relationships with our business partners. This leads to the following rules of conduct:

Fair competition and antitrust law

WashTec is committed to fair competition and operates in compliance with competition and antitrust law. In particular, we do not engage in price fixing, market sharing agreements, capacity agreements or bid rigging with competitors, do not divide sales territories or assign customers or operate any fixed-price regime in violation of antitrust law, and do not abuse any dominant market position.

Anti-corruption

WashTec bases its business activities on the highest standards of integrity and transparency. We avoid even the appearance of improper business conduct and carefully review any giving or acceptance of inducements, if necessary with the assistance of the Compliance Officer. Inducements include payments, gifts, invitations, donations or sponsorships.

WashTec corporate bodies and employees must never, either directly or indirectly through third parties, offer or give inducements to public officials or elected representatives, such as civil servants or members of parliament, for the performance of their duties. In our dealings with business partners, we also do not give any inducements that are intended to improperly influence business conduct or that could give the appearance of doing so. Conversely, we do not accept any inducements from business partners that are intended to influence specific business decisions or that exceed usual and appropriate levels.

Foreign trade regulations

We comply with the applicable rules and regulations on foreign trade, customs and sanctions. In particular, we ensure strict compliance with all applicable laws on the import and export of goods and services.



Anti-money laundering, terrorist financing and tax evasion

We ensure compliance with the applicable laws, rules and regulation for the prevention of money laundering and terrorist financing. Before entering into new business relationships, we perform the legally required due diligence in this connection. We strictly refuse to engage in any transaction that enables or facilitates tax evasion..

Accounting and financial reporting

Correct accounting and financial reporting serve our integrity and credibility. We record our business transactions carefully, precisely, promptly and correctly in our books, records and documents, thereby ensuring proper accounting and financial reporting in compliance with the legal framework. It is prohibited to falsify books, records or documents, destroy relevant information or intentionally provide misleading information.

All employees, including, in particular, those responsible for preparing annual financial statements or who provide information for this purpose, must comply with the internal accounting guidelines and processes. We pay particular attention to adequate transparency, control measures and documentation. Our reports are prepared in such a way that they are complete, accurate, timely and easy to understand.





6. Rules for WashTec as employer

WashTec attaches great importance to the well-being of all employees. Conversely, WashTec expects employees to conduct themselves in the interests of the Company at all times. This leads to the following rules of conduct:

Equal treatment and equal opportunities

WashTec is proud of the diversity of all employees. We are committed to a working environment which is characterized by mutual trust and respect and in which unjustified unequal treatment (discrimination) has no place. We take a clear stance against discrimination based on ethnic origin, gender, age, religion, disability or sexual identity. Harassment and bullying in the workplace will not be tolerated.

Employee representation

WashTec expressly recognizes the right of employees to freedom of association and collective bargaining. Employees may form or join employee representative organizations within the framework of the applicable laws, without suffering any disadvantages as a result.

Avoidance of conflicts of interest

WashTec expects employees to always act in the best interests of WashTec and to avoid situations in which personal interests conflict with those of WashTec. No one may abuse their position in the company to gain an improper advantage for themselves or others or for improper personal gain.

Occupational safety, working hours and health protection

We all contribute to a safe work environment and always comply with regulations regarding occupational safety and health, legal working hours, overtime, breaks, regular vacations, health protection and statutory minimum wage requirements.

Communication and external image

It is important for us to present a uniform image to the outside world. Media enquiries to employees must be forwarded to the Marketing department, who will take care of responding, either themselves or through the relevant specialist departments. We use social media responsibly



and, in particular, refrain from making unauthorized statements that could be construed as being made on behalf of WashTec.

We also refrain from making inaccurate or misleading statements about our products and services, and advertise and label them completely and correctly.

Dealing with confidential information and business secrets

We ensure that WashTec’s confidential information and business secrets are only disclosed to those for whom they are intended. We ensure that confidential information and business secrets are protected through appropriate security precautions, including with IT systems, and appropriate training. In particular, business secrets may not be published, passed on to third parties or made available in any other form without authorization.

Particular caution is required in cases where confidential information is capable of significantly influencing the price of WashTec shares. Insider information of this kind may not be used to conduct transactions, either in person or via third parties.

We comply with the legal requirements for ad-hoc publicity at all times.

Protection of corporate assets

We protect the corporate assets of WashTec. Work equipment, premises and other items must be used responsibly and appropriately. We respect and protect WashTec’s intellectual property, such as know-how and inventions, just as we do the intellectual property of third parties.





7. Application of the Code of Conduct

WashTec's Code of Conduct combines basic ethical values with the expectation of compliant conduct from employees. By asking questions and speaking up when something is not right, we work together to protect the company and its people. WashTec relies on the support of each individual.

Questions to check for compliance

If you are unsure whether your conduct as an employee is in line with this Code of Conduct, the following questions can help you check this in each case:

1. Did you take all relevant considerations into account in your decision and exclude all extraneous considerations?
2. Do you believe that your decision is in line with legal and internal requirements?
3. Would you tell your line manager about your decision?
4. Do you think it is right for all similar cases to be decided the same way throughout the Company?
5. Do you stand by your decision if WashTec has to defend it in public?

6. Would you accept your own decision if you were affected by it?
7. What would your family or friends say about your decision?

If you can answer all questions 1-6 with "yes" and the answer to question 7 does not cast any doubt on the decision, there is a strong indication that it is in line with this code of Conduct. In case of doubt, please consult the points of contact below.



Points of contact

Questions about this Code of Conduct or reports of violations can be directed to your line manager. Further points of contact are the HR department and the Legal and Compliance Department. Their contact details are as follows:

- Human Resources:
hr@washtec.com
- Legal and Compliance Department:
legal@washtec.com

Whistleblower system

In addition to the above, an electronic whistleblower system is available, and can also be used by external parties. Information can be submitted confidentially and, if desired, anonymously on the whistleblower system website. A [grievance and reporting procedure](#), available on our website at <https://ir.washtec.de/en/corporate-governance/>, describes the whistleblower system and ensures proper investigation of any suspected human rights or environmental risks or violations within the meaning of the German Supply Chain Act, other violations of applicable law and the requirements of this Code of Conduct or of other internal stipulations. This procedure is standardized for the entire WashTec Group.

