

COMPLIANCE

OUR CODE OF CONDUCT

VERSION 3.0
FEBRUARY 2026

cotedo
Wir sind die Autohaus-Experten



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Often he who does nothing does wrong.
Whoever does not forbid wrong
when he can, commands it.

Marcus Aurelius

Welcome to the cotedo Code of Conduct!

This Code provides the framework for how we work together every day and for respectful conduct towards employees, customers, business partners and society. At cotedo, we attach great importance to everyone living our shared values and making a responsible contribution to the company.

Management has appointed a responsible person for each of the areas of environment, social responsibility (human rights/working conditions) and compliance/integrity.

This Code of Conduct is intended to serve as a guide. It is addressed to all of us, from new team members to management, and is intended to help create a positive, successful working environment and to preserve cotedo's good reputation.



Our Values and Corporate Responsibility

The following guidelines are intended to serve as a navigational aid in our day-to-day work. They help us to stay on the right course, even in hectic times. Managers at cotedo have the task of setting an example of our values and promoting them.

At the same time, all employees are called upon to actively contribute to a culture shaped by these principles. By committing to our guidelines, we create a working environment we can be proud of.

All employees receive training on the content of the Code at least once a year. New employees receive corresponding training as part of their onboarding.

Values-Based Leadership

Who does the cotedo Code of Conduct apply to?

The literal translation of the term compliance is “acting in accordance with existing rules”. However, the term is not limited to merely observing requirements. It also includes the organisational measures necessary to ensure that such rules are actually complied with. Our employees and everyone who works for and on behalf of cotedo are obliged to act responsibly, correctly and sustainably, regardless of where and in which area they work.

Our managers are the most important drivers and the first point of contact for all questions relating to this Code of Conduct. We expect them to actively set an example of the principles of our mission statement and of this Code of Conduct as role models, and to communicate and enforce them with their employees.

Compliance with applicable law

Our employees are obliged to comply with this Code of Conduct. It can only ever supplement applicable statutory provisions and never contradict them. Managers must ensure that it is observed in their area of responsibility and are obliged to inform their employees about the content and significance of this Code.

Respecting and upholding our core values is the basis of our success

We are committed to acting sustainably. Our employees are encouraged to seek advice and help if they are in doubt about the right course of action and to openly raise compliance concerns or suspected violations of the cotedo Code of Conduct. Open communication is the key to our shared success. Complaints – regardless of whether they relate to the economic, environmental or social dimension of sustainability or concern other matters – can be sent by email to compliance@cotedo.de. Anonymous reports to this email address are also possible, both from employees and from external parties. In every case, cotedo guarantees the person making the complaint that the matter will be treated confidentially. Management leads the review, the response and the continuous, at least annual, evaluation of the complaints process. Complaints will under no circumstances be penalised and will not be to the detriment of the person making the complaint.

Sanctioning of violations

Indications of legal violations must be consistently followed up. Culpable violations of the law or disregard of our Code of Conduct may result in sanctions under employment law for the employees concerned, up to and including termination of employment. If violations of the law cause damage, this may also result in personal liability on the part of the employees. Penalties or fines may also be imposed within the legal framework.

Mission Statement



Since 2007, cotedo has been developing flexible and tailor-made solutions for international corporations and medium-sized companies. We help customers all over the world to increase their competitiveness and profitability.

As a profit-oriented company, we are convinced that our integrity, now and in the future, forms the basis for sustainable and successful business activities and for our corporate culture.

Respect for the individual and commitment to responsibility

The basis for responsible and correct conduct is respect. This respect is also shown to cotedo's employees, because we believe that the success of our company depends on the sum of the skills and achievements – and thus on the commitment – of all employees.

We always respect the individual and expect all employees to respect the rights and dignity of others. We want our employees to be able to develop their talents and abilities and to realise their full potential. We expressly support the exchange of information and open dialogue. We recognise individual achievements and contributions to cotedo's success, and we promote diversity and equal opportunities so that all employees can work under optimal health and safety conditions.

We support employees and managers who are characterised by initiative and empathy and who:

- combine professional expertise with a leadership style that motivates employees to perform at a high level
- are open-minded, understand the needs of the company and have the courage to question the status quo
- have the flexibility needed to broaden their horizons
- put our corporate principles into practice in their decisions and actions

Human Rights

Prohibition of discrimination under the European Convention on Human Rights

cotedo thrives on motivated and competent employees. Each and every one of them is respected as an individual. Our interactions with one another and with prospective customers, customers, suppliers and authorities are therefore characterised by appreciation, mutual understanding, openness and fairness.

The prohibition of discrimination forbids treating people unequally on the basis of certain characteristics if this leads to discrimination, i.e. to the disadvantage or disparagement of individuals, without any objective justification.

In particular, neither sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth nor any other status may be used as distinguishing criteria. cotedo disapproves of any form of discrimination.

We are committed to the principles of ethical recruitment: our employees are hired lawfully, in accordance with international labour standards and in a fair and transparent manner that respects human rights.

Fair and equal treatment for all employees

cotedo is committed to treating all potential and existing employees fairly and equally and to applying the principles of equal treatment in training and further education as well.

cotedo is committed to the UN Charter of Human Rights. We clearly distance ourselves from any disregard for human rights. We reject discrimination, child labour and forced labour. We respect and promote the right to freedom of expression, the right of assembly and the right to personal self-determination.

Sexual harassment is illegal, as are all other forms of harassment in the workplace. Every manager has a role-model function here and must ensure a working environment free of discrimination and harassment in their area of responsibility.

We are committed to fair remuneration and ensure that the statutory minimum wages and social benefits are exceeded at all times.

The dignity of each and every individual is inviolable.



Our Working Environment and the Protection of Our Corporate Assets

We want to protect what is valuable to our customers, our company and our team: the visible working environment and the invisible values.

At cotedo, TRUST comes first. Correct conduct and trust form the foundation of our business relationships.

Occupational Health and Safety



Minimising hazards, promoting health, stabilising processes

In order to avoid health hazards, occupational health and safety regulations must be observed at all times and without exception. Occupational accidents are documented and evaluated. We pursue a “zero accidents” target. Personal protective equipment (PPE) is, of course, provided and used. In this way, we reduce the risk of accidents and ensure smooth processes. Our managers act as role models and ensure that all employees receive careful instruction on occupational health and safety every year.

All employees should ensure safety and health protection in the workplace to the best of their knowledge and in accordance with their skills and experience. Considerations of safety, health protection and workplace ergonomics are integrated into everyday work.

Regular employee appraisals and surveys ensure that risks under employment law are identified and addressed.

Work-life balance

It goes without saying that we comply with the statutory regulations on working hours. At cotedo, work is generally organised flexibly and individually. Among other things, we offer mobile working and flexible working hours. Overtime is always worked on a voluntary basis.

Our managers pay attention to a healthy work-life balance for their employees and to compliance with the German Working Hours Act within their team. Concerns regarding safety and health protection should be reported to the managers.

Protection of Corporate Assets

Protection of our own and third-party innovations and brands

Innovations and the entirety of a company's knowledge and experience are the basis for developing and producing attractive services and products. This applies to cotedo, but also to our customers.

To secure a competitive edge, these innovations and capabilities must be protected as effectively as possible. Innovation is protected, for example, by industrial property rights such as patents, registered designs or trademarks. Before a product is developed or new brands and names are introduced, existing property rights must be carefully researched.

Confidential information and intellectual property

cotedo works together with customers, suppliers, agencies and other business partners. Our employees have access to confidential information in many ways, for example on development projects, business plans, financial data, marketing and sales strategies or the market launch of new products.

The protection of confidential information and trade secrets is an inseparable part of our work. We respect the confidential information of third parties.

Data and information that come into the company in the course of business may only be used within the permitted scope. Any disclosure inside or outside the company must be checked in advance to ensure that it is authorised. Where necessary, additional security measures such as non-disclosure obligations must be agreed.

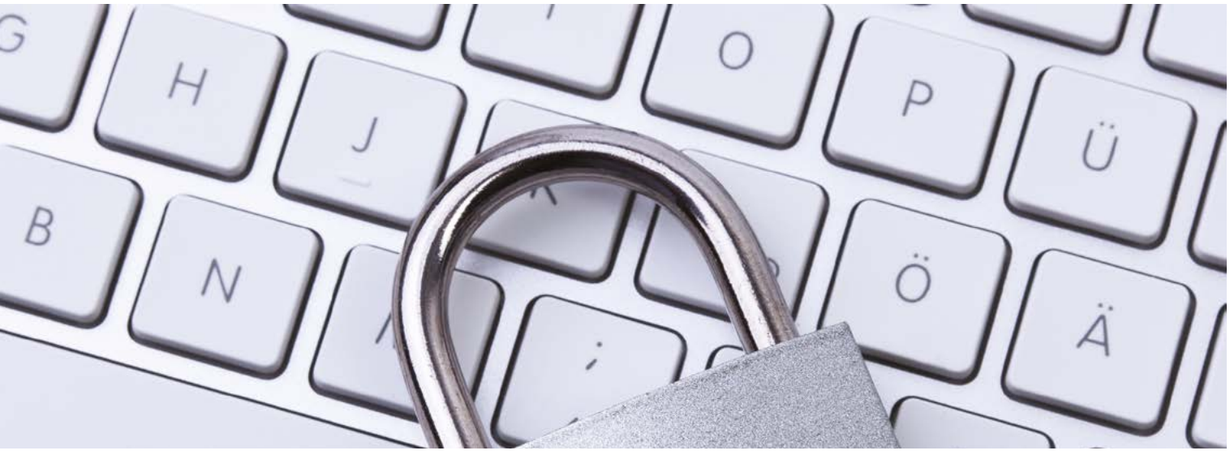
Non-disclosure agreements are part of our employment and supplier contracts and remain in force even after the employment or supply relationship has ended.

cotedo respects the intellectual property rights of third parties and expects all employees to observe them in their daily work.

Company property

All employees are responsible for protecting the company property and all corporate assets of cotedo. Employees have a duty to protect work equipment and other items against loss, theft, damage or misuse. By means of rules such as multi-factor authentication and central administration, we always ensure data security, including when working remotely.

Security Awareness in IT



Careful handling of electronic means of communication and networks

Electronic data processing is an indispensable part of our infrastructure and that of our customers. However, IT also opens up opportunities for the illegal appropriation of knowledge and data.

We therefore use electronic means of communication and networks with the greatest possible care. Permanent, professional administration and maintenance of our infrastructure ensure the best possible protection of our data and systems as well as of the data and systems made available to us. All employees are obliged to exercise the greatest possible caution. Email attachments, downloads from the internet or files brought in on storage media must therefore not be opened or installed without being checked.

Use of Artificial Intelligence

AI is changing our everyday work

Artificial intelligence promises benefits for everyone involved – in our case, among other things, more efficient services and higher productivity, which can save costs and increase sustainability.

However, AI also entails risks. We are aware that AI-generated content must never be adopted without review and that AI is used only as a support. AI is never the sole decision-making authority.

AI Regulation of the European Commission

We are committed to the European regulation on artificial intelligence. Among other things, the regulation addresses possible risks of AI to health, safety and fundamental rights.

Innovation and Quality





We strive for the highest quality standards in everything we do

To be successful, we must adapt to changing market conditions. On the basis of efficient business processes, we offer outstanding and advanced products and services that set us apart from our competitors. This is the goal of our quality management, which is also responsible in particular for the continuous monitoring and improvement of business processes and products.

Innovation is crucial for improvement and increasing quality. That is why we continuously question our thinking and our actions. Our ISO 9001:2015 certification ensures that the high expectations our customers place on us with regard to the quality of our products and services are fully met.

Protection of Personal Data

Transparency of data processing and data minimisation

A relationship of trust with our customers and employees requires careful handling of the information and data of these people and companies. We are committed to the principles of data minimisation in the storage of personal data and to transparency in data processing.

Minimal data collection, careful handling

cotedo ensures that personal data is processed with all due care, only for the specified legitimate purpose for which it was collected, and only in accordance with the applicable laws. We never collect more personal data than we need for a specific, defined purpose. Personal data is stored only for the shortest possible period and only for the purpose for which it was collected.

These principles, developed by cotedo in the interest of data protection, are consistently observed for every processing of personal data within the company and by business partners.



Business Relationships and Social Commitment

We take responsibility for society and are committed to sustainability in order to actively help shape a positive future.

By addressing our economic, social and environmental challenges holistically, we create long-term value.

Personal Integrity

Conflicts of interest

Personal interests must not unduly influence our professional judgement.

cotedo employees must avoid situations in which personal interests conflict – or even appear to conflict – with the interests of cotedo. The activities of relatives and close associates can also lead to conflicts of interest.

Our employees must not misuse their employment with cotedo to obtain unjustified personal advantages or advantages for relatives or persons close to them. Possible conflicts of interest must also be carefully examined before taking up any secondary employment.

If there is a possibility of a conflict of interest, the manager or company management must be informed.

Business contacts based solely on objective criteria

When new business relationships are initiated or existing ones maintained, only objective criteria such as quality, price, technological standard and the reliability of the business partner are decisive. Commercial and personnel decisions, consulting services or recommendations by our employees also follow these criteria exclusively.

Bribery, gifts and improper advantages

cotedo does not tolerate corrupt business conduct. This applies to every form of corrupt business conduct, for example bribery (public, private, active or passive), embezzlement, fraud, theft and the granting of improper advantages.

Improper advantages are, in particular, inadmissible discounts, bribes, kickbacks and under-the-table payments. Improper advantages can relate to any assets, including payments, meals, gifts, entertainment, travel expenses and sham agreements.

The same applies accordingly to offering such benefits and gifts: cotedo employees may neither directly nor indirectly grant or promise improper advantages to individuals or organisations in order to obtain new orders or retain existing ones, nor may they demand or accept such advantages. Particular restraint is required with regard to public officials.

Handling of gifts

Gifts can be misunderstood or perceived as an attempt to exert undue influence. cotedo employees may not accept any gifts or entertainment that could raise doubts about their personal integrity or the integrity and independence of cotedo.

Unsolicited gifts or entertainment may only be accepted if they arise in the normal course of business, are not lavish and remain within reasonable limits. Financial and other benefits that exceed the scope of customary and appropriate business practice must therefore be declined.

Competition Law

We believe in performance through success

Competition and antitrust laws serve to protect free competition. They prohibit business conduct that aims at or results in the prevention, restriction or distortion of competition. This includes, for example, price fixing or the allocation of market segments or customers.

cotedo is committed to the principles of the market economy and fair competition. We therefore always observe the applicable competition rules and expect our competitors and business partners to do the same.

No market-relevant agreements with competitors

We always observe the most important basic rule of antitrust law: there must be no market-relevant agreements with competitors. This applies above all to prices, offers and terms and conditions. It is irrelevant whether this is an agreement or informal conversations – including outside official occasions.
Any form of deliberate coordination of conduct is illegal if it leads to a restriction of competition. Even the mere appearance of a violation must be avoided.
Association meetings, trade fairs and other industry gatherings involve particular risks. Personal encounters and discussions must not be used as an occasion to exchange confidential market and company information.

Selection and management of supplier relationships

Our services and products sometimes require highly complex processes based on a division of labour, which make cooperation with suppliers and development partners necessary. When managing such relationships, the freedom of the parties involved to select business partners or to determine terms and conditions must not be unduly restricted.

We are guided by the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz). When selecting suppliers, we make a point of preferably involving partners who actively practise environmental management and demonstrably implement sustainable products and processes. Our purchasing policy aims to promote environmentally sound procurement processes within the company. By taking ecological criteria into account when purchasing products and services, the environmental impact is to be reduced and our sustainability goals supported.

Consequences of violations of competition law

Violations of competition and antitrust law and of anti-corruption rules in particular entail considerable economic risk. Civil liability claims and considerable damage to reputation can also be the result.

Trade Relations

We observe the rules of foreign trade, tax and customs law

In all our activities worldwide, we observe the rules of foreign trade, tax and customs law.

All transactions, regardless of whether they take place across borders or within the same country, may be subject to national and international customs and trade regulations and/or export controls.

We respect all customs, trade and export control regulations. We recognise the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. Employees entrusted with these matters have access to the current requirements, ongoing further education opportunities and training.

We do not accept cash transactions and comply with all applicable regulations for the prevention of money laundering and terrorist financing.

Dealing with public authorities

Our cooperation with public authorities is characterised by mutual trust and appreciation on the basis of applicable procedural rules. cotedo strives for a cooperative and transparent relationship with all competent authorities.

Environmental Protection and Sustainability

Sustainable business practice is the foundation for lasting corporate success

By consistently implementing a sustainability strategy, we make the best possible contribution to sustainable development and exploit the value creation potential arising from positive economic synergies. Sustainable resource management – in particular the aspects of reuse and recycling – and a holistic approach are therefore part of everything we do. All employees are called upon to always consider the long-term effects of their actions.

We report transparently every year on our sustainability performance (environmental indicators, working conditions, compliance) in a sustainability report, which can be externally audited if required. In the medium and long term, the continuous improvement of our work processes and their environmental compatibility is a prerequisite for effectively reducing costs while at the same time conserving resources and energy.

Our ISO 14001:2015 certification

As an important step in our commitment to sustainability and environmental protection, we obtained ISO 14001:2015 certification in October 2023.

By implementing an effective environmental management system, we are sending a clear signal of our sense of responsibility and our commitment to the environment and our future.

Implementation of Corporate Social Responsibility

Our Corporate Social Responsibility team works continuously on the contribution we can make to sustainability. We classify the measures arising from our CSR commitment according to the ESG criteria, thereby making them tangible.

Environmental

As a first step, we aim to reduce CO_2 emissions per kilometre driven by 25 % by 2027 (base year: 2022). As a second step, we are gradually expanding the recording of our carbon footprint along our business processes. From 2026, the insights gained will serve as the basis for prioritising and implementing further measures.

Social

cotedo promotes social sustainability through various measures, including the working time account, company health insurance for all employees and the JobRad bicycle leasing scheme.

Governance

We have always believed in sustainable business practices, open communication and fair conditions for all stakeholders.



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AI-translated and designed. The German version prevails.