

## **Diversity and Anti-Discrimination Policy**

### **1. Preamble**

#### **1.1. Aim and purpose of the Policy**

The PIERER Mobility Group places emphasis on ensuring that all employees are treated with fairness and utmost respect. Diversity and uniqueness of our employees play an essential role in the performance and innovative strength of the PIERER Mobility Group. We value the diversity that is reflected in the origin, gender, nationality, age, physical and mental limitations and unique qualities, culture, religion, language, and ideas of the employees. Our corporate culture is based on welcoming, respecting and valuing all colleagues. In this environment, all employees should have the opportunity for success and well-being. This Diversity and Anti-Discrimination Policy ("**Policy**") provides a global framework that defines how we live and encourage diversity within the Group and how the Group prevents, recognizes and responds to all forms of discrimination and harassment.

#### **1.2. Scope**

This Policy applies to all employees, managers and board members worldwide. It also applies to all legal entities, offices, and other workplaces of the company. For the purposes of this Policy, the term workplaces also includes work-related settings or contexts which employees visit or in which they participate as part of their work, e.g. sports events or celebrations, brand launches, photo or video shoots, work-related travel or transport activities, as well as all other places or settings in which the PIERER Mobility Group is commercially active.

Harassment and discrimination can also occur online, including via e-mail and through other electronic communication channels or means. This Policy applies irrespective of the communication medium and may be supplemented by local policies that establish further prerequisites or distinct procedures for conducting investigations. It is imperative to interpret this Policy in alignment with the relevant local laws, encompassing local labour laws, anti-harassment regulations or anti-discrimination statutes. Insofar as the content of this Policy conflicts with applicable local laws or regulations, the latter shall take precedence in the respective jurisdiction.

### **2. Policy**

#### **2.1. Content of the Policy**

All employees have the right to work in an environment that is safe, fair and respectful, fostering equal opportunities while prohibiting harassment, bullying and discrimination. Colleagues can unlock their full potential, skills, creativity, and talents in an environment that is both positive and conducive to professional growth.

PIERER Mobility Group's Code of Conduct clearly states that the Group values and promotes the diversity of its employees. The Code of Conduct prohibits all forms of harassment, bullying and discrimination within the workplace or in any other work-related context. This strict prohibition applies

universally, regardless of the source of the harassment, bullying or discrimination and the target. A (non-exhaustive) list of examples illustrating actions that may contravene this Policy can be found in point 2.2. below.

Any employee found to have clearly breached this Policy should anticipate appropriate corrective and/or disciplinary action to be taken aligning with local legislation. These measures may include coaching, verbal or written warnings, demotion, suspension, termination of contract or immediate dismissal.

## 2.2. Definitions

**Discrimination** An unobjective, unjustifiable refusal to offer equal treatment or equal opportunity in relation to work and employment conditions or privileges. This includes, but not exclusively, a violation of the principle of equal treatment and equal opportunity in recruitment, dismissal, promotion, disciplinary action, training or remuneration.

Discrimination occurs, for example, when unequal treatment is based on the following characteristics:

- nationality, skin colour, ethnicity or nationality;
- gender, sexual orientation;
- religion;
- age;
- worldview, culture;
- state of health or
- other aspects regulated by local legislation.

**Bullying** Austria does not have a specific law governing workplace bullying ("Mobbing"). Depending on the nature of the incident, however, other legal frameworks, such as civil law, criminal law, or administrative law, may apply. Bullying may constitute a criminal offense if the conduct involves, for example, bodily harm, insult, coercion, defamation, or slander. Bullying is a serious issue that can occur in various environments, including the workplace. It refers to behavior in which an individual or group **repeatedly and over an extended period** seeks to harass, intimidate, humiliate, disadvantage, or threaten another person. The internal guideline on bullying must be observed.

### **Bullying can take many forms, including:**

- **Verbal:** Insults, humiliation, persistent unjustified criticism, or mockery.
- **Physical:** Infliction of physical violence or threats of violence.
- **Psychological/Emotional:** Hostility, manipulation, exclusion, psychological harassment, ignoring, belittlement or under-challenging, and the spreading of rumors.
- **Cyberbullying:** Harassment or attacks carried out online, such as via social media, email, or messaging services, are considered cyberbullying.

**Typical bullying behaviors include:**

- Offensive or demeaning comments or humiliations, often repeated, both in the presence and behind the back of the bullying victim;
- Withholding tasks, information, or resources necessary for the proper performance of work;
- Unjustified attribution of mistakes or failures, or constant, exaggerated criticism of the victim's work, even when the quality of the work is objectively good;
- Spreading false claims;
- Assigning meaningless tasks;
- Other forms of mistreatment;
- Threats of violence;
- Social exclusion or systematic exclusion from workplace communications and social activities or
- Ongoing, inappropriate criticism of an individual or their actions that amounts to tyranny or inhumane or reckless behavior.

**Sexual harassment** is the touching of a body part associated with the sexual sphere that violates the dignity of the other person, such as the intentional touching of the breasts, buttocks, or genital area.

**Violation of sexual self-determination**

A person's sexual self-determination is violated when they are coerced into sexual acts, for example through a criminal offense, deception, threats, or by someone abusing their position of power, such as a supervisor.

**Inappropriate behavior**

Even if the threshold for criminal or civil liability has not (yet) been reached, certain behaviors and statements may be perceived by the affected person as inappropriate, disrespectful, or crossing boundaries, and may, in individual cases, result in employment-related consequences. This includes, among other things, conduct that violates human dignity or is intended to do so, and that is unwanted, inappropriate, or offensive to the affected person.

**Examples of sexual harassment and other inappropriate behavior include:**

- Unwanted physical contact (regardless of the body part involved);
- Intrusive behavior (e.g., frequent, unjustified attempts to make contact);
- Suggestive, inappropriate, and/or ambiguous or sexually charged remarks or jokes that are not explicitly welcomed or accepted, such as those about sexual characteristics, sexual behavior, or sexual orientation;
- Intrusive looks or gestures and other non-verbal behavior of a sexual or obscene nature;
- Creating, sending without consent, displaying, or otherwise distributing or publishing inappropriate content, including sexually suggestive images, videos, music, or messages;

- Harassment in person, via social media, or through messaging;
- Implying professional advantages or threatening disadvantages in connection with sexual availability;
- Inappropriate comments, e.g., about appearance, body, gender, private life, or clothing;
- Downplaying behavior (e.g., "It was just a joke") as an excuse for not obtaining the affected person's consent;
- Requests for sexual favors, including those offered in exchange for hiring, promotion, or career advancement;
- Derogatory remarks, inappropriate nicknames, slurs, inappropriate jokes and pranks, mockery, or insults;
- Threatening or intimidating comments or behavior or
- Non-verbal conduct, including intimidation, harassment, stalking, or inappropriate staring that is threatening or could reasonably be perceived as threatening by another person.

### **3. Reporting violations**

#### **3.1. How should alleged violations or other concerns be reported?**

It is the responsibility of every employee to contribute a secure and open working environment, where harassment, mobbing or discrimination. To ensure that this can happen, all employees can report any violations or suspected violation of this policy to their direct line manager or to the competent office for compliance issues by e-mail ([compliance@pierermobility.com](mailto:compliance@pierermobility.com)), phone, post or in a face-to-face conversation. In addition, employees and third parties (e.g. business partners) can make an anonymously report of violations of this policy through the [whistleblower system](#). The internal guideline in cases of sexual harassment must be observed.

#### **3.2. Confidentiality and protection against discrimination**

We take concerns of our employees and third parties seriously and treat all reports under this policy as confidentially as possible. As part of the process of clarifying any allegation, it may be necessary to involve third parties as well, but this will only be done as part of a discretionary decision if it is absolutely necessary. The PIERER Mobility Group endeavours to ensure complete confidentiality when engaging third parties.

No employee of the PIERER Mobility Group will suffer any disadvantage if, in good faith, he or she reports a violation within the meaning of this policy. In this regard, it is completely irrelevant whether the allegation of the violation is substantiated or not.

However, any employee must expect disciplinary action if they take or attempt to take retaliatory measures against a colleague who has reported or intended to report a suspected violation of this policy in good faith. Retaliatory measures include, for example, exerting pressure or threatening an employee to prevent them from reporting the suspected violation. Likewise, any employee who makes a report with malicious intent must expect disciplinary action.

### **3.3. Handling complaints**

The Legal Department conducts a comprehensive investigation of all reported violations of this policy in collaboration with the Human Resources Department. For each reported case, an investigation team will be formed, consisting of employees from the Legal Department and the Human Resources Department, as well as, if necessary, other internal colleagues and third parties. All members of the investigation team are subject to confidentiality and may only disclose information regarding complaints to third parties when necessary for the clarification of the matter. No individuals who are biased or otherwise unable to handle the matter fairly and impartially may be part of the investigation team. In countries where a works council exists, it will be involved in investigations in accordance with its legal mandate.

*For better readability, the PIERER Mobility Group uses the generic masculine form in its texts. Terms referring to individuals apply - unless otherwise indicated - to all genders.*