

# Diversity and Anti-Discrimination Policy

## 1. Preamble

### 1.1. Aim and purpose of the policy

We, the PIERER Mobility Group, attach great importance to all employees being treated with fairness and respect. The diversity and uniqueness of our employees are the engine that drives the performance and innovative strength of the PIERER Mobility Group. We value the diversity that is reflected in the origin, culture, language, and ideas of the employees. This diversity and anti-discrimination policy provides a global framework that defines how we want to encourage diversity within the group and how the PIERER Mobility Group prevents, recognizes and responds to all forms of discrimination and harassment.

### 1.2. Scope

This policy applies to all employees worldwide. It 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 take place online, including by e-mail and via other electronic communication channels or other communication paths. This policy applies irrespective of the communication path. This policy may also be supplemented by local policies which set out additional requirements or specific local procedures for carrying out investigations. This policy should be read in accordance with the respectively applicable local laws, including any local labor, anti-harassment or anti-discrimination laws. If and to the extent that the content of this policy clashes with applicable, binding local laws or legal regulations, the latter shall apply in this specific jurisdiction.

## 2. Policy

### 2.1. Content of the policy

We believe that all employees have a right to work in a safe, fair and respectful environment that promotes equal opportunity and prohibits harassment and discrimination. It is only in a positive, inclusive workplace that everyone can benefit from colleagues being able to fully display their potential, skills, creativity, and talent.

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

harassment or discrimination originates from and against whom it is directed. A list, which is not exhaustive, of examples of actions that may constitute a violation of this policy is provided under point 2.2.

Any employee who has demonstrably violated this policy must expect appropriate corrective and/or disciplinary action to be taken in accordance with the local legislation. These actions 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 in particular, but not exclusively, a violation of the principle of equal treatment and equal opportunity in relation to recruitment, dismissal, promotion, disciplinary action, training or remuneration.

Among other situations, discrimination arises when the unequal treatment is based on the following, proscribed characteristics:

- race, ethnicity or nationality
- gender and sexual orientation
- religion
- age
- state of health or
- any other aspects covered by local legislation

This is not an exhaustive list.

### Harassment

Conduct that negatively affects or is intended to negatively affect the dignity of a person and is unwelcome, inappropriate or offensive to the person concerned.

Harassment may include the following:

- snide remarks, nicknames, slurs, jokes, tricks, mocking or insults;
- creating, sharing or publishing derogatory or in some other way inappropriate written content, pictures, electronic messages, videos or pieces of music;
- threatening or intimidating comments or behaviors and
- nonverbal behaviors, including intimidation, stalking or inappropriate staring that is threatening or may be perceived as threatening for another person

### Sexual harassment

Conduct within the sexual sphere that negatively affects or is intended to negatively affect the dignity of a person, and is unwelcome, inappropriate or offensive to the person concerned; and

- (i) creates or is intended to create an intimidating, hostile or humiliating working environment for the person concerned; or
- (i) the situation where the person concerned rejects or tolerates conduct within the sexual sphere on the part of the employer or from line managers or colleagues that is explicitly or implicitly made the basis for a decision that has impacts on this person's access to professional training, employment, further employment, promotion or compensation or the basis for another decision in the world of work.

Sexual harassment may include the following:

- unwelcome sexual advances or requests for sexual favors, including those with an implicit expectation of benefits in return in relation to recruitment, promotion or professional advancement;
- creating, sharing or showing inappropriate written content, pictures, electronic messages, videos or pieces of music which by their nature can be interpreted to be sexual or obscene;
- unwelcome comments on a person's personal or physical features which by their nature can be interpreted to be sexual or obscene; and
- other nonverbal behaviors of a sexual or obscene nature such as unwanted physical contact, leering or inappropriate staring.

### 3. Reporting violations

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

It is the responsibility of every single employee to help to create a safe and open workplace in which there is no place for harassment 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, starting from the 2021 financial year, the PIERER Mobility Group will be implementing a whistleblower system in stages to allow employees to report violations of this policy anonymously.

#### 3.2. Confidentiality and protection against discrimination

We take our employees' concerns 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. Complete confidentiality cannot therefore be guaranteed.

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. On the other hand, any employee who takes or attempts to take retaliation against a colleague who, in good faith, has reported or intends to report an alleged violation of this policy will be subject to disciplinary action. Retaliation includes, for example, pressuring or threatening an employee so that they do not report the alleged violation. Any employee who is found to have made a report with malicious intent will be subject to disciplinary action.

### **3.3. Handling complaints**

The Legal Department will work with Human Resources to fully investigate all alleged violations of this policy that are reported. For each case that is reported, the Legal Department along with Human Resources will assemble an investigation team which may comprise employees from these two functions as well as other internal or external resources if necessary. All members of the investigation team are obliged to maintain confidentiality and may only share information in relation to complaints with third parties if this is absolutely necessary for clarifying the facts and circumstances. The investigation team may not include any people who are biased or for some other reason would not be able to apply themselves to the matter in a fair and impartial way. In countries in which there is a works council, the works council will take part in the investigation process in accordance with its legal mandate.