

# Declaration on modern slavery and human trafficking

## **Preamble**

The purpose of this declaration is to outline all the actions the entire PIERER Mobility Group has taken and will take in the future to prevent modern slavery and human trafficking within the group and the supply chain.

The PIERER Mobility AG is Europe's leading manufacturer of powered two-wheelers, offering a premium brand range for global markets - including high-performance motorbikes, top-class bicycles, high-performance components, e-mobility innovations and high-performance sports cars. As of December 31, 2021, the PIERER Mobility Group employed 5,249 people, of which 4,361 were employed in Austria and 888 abroad.

By implementing local procurement strategies for the production sites in Munderfing and Mattighofen, we try to boost our own region and create environmentally friendly supply chains by having shorter transport distances. Furthermore, due to the high legal standards in Austria regarding workers' rights, the risk of modern slavery and human trafficking in Austria is low. Nevertheless, the PIERER Mobility Group is heavily dependent on suppliers abroad; around 90.5% of the components for series production are sourced from suppliers in Europe, 6.9% from Asia and around 2.6% from America.

Given this level of dependence on other countries, the increasing pace of globalization and ever more complex value and supply chains, we are aware of the global responsibility to defend human rights. For us, global compliance with sustainability standards in the areas of human rights, labor and health protection, environmental protection and tackling corruption is a prerequisite for doing business successfully with our business partners, suppliers, customers and advisors. Only by working with our series suppliers and other business partners is it possible to ensure compliance with sustainability standards and therefore contribute to the implementation of the Sustainable Development Goals (SDGs) of the United Nations.

# **Declaration on respect for human rights**

People who work directly or indirectly for the PIERER Mobility Group are entitled to have their human rights within the meaning of the UN Universal Declaration of Human Rights observed, and to be treated with fairness and respect. The PIERER Mobility Group expects its board members, managers and employees to respect human rights and to protect them in their everyday activities. As human rights risks may exist in principle as a result of the cooperation with partners along the value chain, we similarly require our business partners, suppliers, customers and advisors to respect the human rights in the Code of Conduct.

The PIERER Mobility Group regards it as particularly important for all employees to be treated with fairness and respect. The aim is to create a working environment characterized by mutual trust in which each individual is treated with dignity and respect, and in which people from diverse cultures and with





different personal backgrounds are respected and employees feel comfortable. As an international Group, we value the diversity that is reflected in the origin, culture, language, and ideas of our employees. We therefore do not accept any discriminatory behavior toward employees, business partner, suppliers, customers and advisors, nor do we tolerate any form of sexual harassment.

Board members, managers and employees are able to contact the competent office for general compliance issues at any time if they have questions regarding observance of human rights, and to report indications of possible human rights violations within the company at comliance@pierermobility.com or to the anonymous whistleblower system (see point 3.1. of the Diversity and Anti-Discrimination Policy of the PIERER Mobility Group). Such indications will be investigated in any case, and measures are taken to resolve possible grievances, if required.

## Internal measures

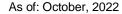
# Code of Conduct

The PIERER Mobility Group revised its Code of Conduct, which defines the ethical principles, general principles and minimum standards of the company, in 2022. New contractual relationships of the PIERER Mobility Group in the supplier sector and when concluding import contracts will be subjected to the Code of Conduct as standard. In the coming years, the conclusion of significant investment contracts (investment amount exceeding EUR 300,000.00) will be gradually subjected to the principles of the Code of Conduct.

The Code of Conduct is permanently available to all employees on the intranet and also to third parties on the internet on the website of the company. The Code of Conduct is also highlighted on the homepage of the intranet of the Group on an annual basis. The Code of Conduct is handed out along with a welcome pack to new employees. In addition, training is provided by the PIERER Mobility Group on the content of the Code of Conduct and to raise awareness of compliance issues. Ostensibly, managers and employees from particularly vulnerable areas (Human Resources, Purchasing, Sales, Research and Development, Marketing, Quality Management) as well as executive board members and general managers receive training.

## Whistleblower system

Every employee can report any rule violations, for example human rights violations or a suspected violation, to the competent office for compliance issues by e-mail, phone, post or in a face-to-face conversation. The PIERER Mobility Group in December 2021 has implemented an anonymous whistleblower system, allowing employees to report rule violations anonymously. In order to protect the anonymity of the whistleblower and the confidentiality of future reports as best as possible, a system of an external, independent provider was implemented for this purpose. The whistleblower system is currently available 24/7 to all employees of the European-based subsidiaries of the PIERER Mobility Group in English as well as in the respective national language of the whistleblower and complies with the requirements of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting infringements of Union law ("EU Whistleblower Directive").





The anonymous whistleblower system guarantees the highest possible protection for whistleblowers and those affected. When dealing with and investigating suspicious cases, the principle of objective clarification as well as strict confidentiality and secrecy applies. If a suspicious case is confirmed, the PIERER Mobility Group will take appropriate measures depending on the severity and relevance of the rule violation. The exchange of information and messages with the legal department takes place via a secure mailbox maintaining the anonymity and protection of the whistleblower. All reports are treated as strictly confidential. All information is examined and, if a suspicious case is confirmed, appropriate measures are taken to remedy and eliminate possible grievances. Whistleblowers do not need to fear any sanctions from the PIERER Mobility Group from a report of a suspicious case which is submitted to the best of their knowledge and belief, and absolutely no discrimination against whistleblowers will be tolerated.

In addition to information about the classic reporting channels, the link to the whistleblower system as well as explanations on how it works and on the principles of confidentiality, protection of the anonymity of the whistleblower and protection against reprisals are permanently available to employees on the intranet site of the legal department and are also posted on the "notice boards" at the production sites in Mattighofen and Munderfing. In the course of completing the e-learning tool "Compliance and Code of Conduct", the various options for reporting compliance violations are pointed out.

# Measures in the supply chain

## Demands placed on contractual partners regarding sustainability

The revised Code of Conduct is applied as an element of all new contracts. Every contractual partner that wants to do business with the PIERER Mobility Group must now accept and comply with the ethical principles, general principles and minimum standards of the Code of Conduct.

For the purpose of enforcing respect for human rights, the PIERER Mobility Group takes the following steps:

- 1. **Prevention:** The Code of Conduct is applied as an element of all new contracts. Respect for human rights is thus an integral part of the contract and must be observed by the contractual partners.
- Investigation: If the PIERER Mobility Group learns of alleged human rights violations or other violations of the Code of Conduct from tip-offs, reports in the media or in some other way, the allegations will immediately be investigated.
- 3. Response: If the internal investigation identifies human rights violations or other violations of the Code of Conduct, the PIERER Mobility Group will take the appropriate measures. The central goal is to remedy and prevent violations and to actively and effectively improve the sustainability performance of business partners, suppliers, customers and advisors. In serious cases or in the event of refusal to take action, the PIERER Mobility Group reserves the right to terminate the current business relationship and block it for new project assignments.