



**Code of Conduct**  
**July 2024**

**Our vision** is to be the leading  
tech ecosystem connecting  
the automotive aftermarket.

# Introduction

## **Dear colleagues,**

Since its founding in 2008, our company has grown at a tremendous pace. We are present in the most important markets in Europe and employ workers from a number of different countries, language regions, legal systems, and cultures.

As a future-oriented organisation, AUTODOC<sup>1</sup> is committed to safeguarding human rights, promoting the dignity and well-being of our employees, as well as workers in our value chain, and fostering positive relationships with the communities in which we operate. At AUTODOC we see growth and success not just in terms of numbers and balance sheets, but also in a social, human, and highly personal dimension.

The question is: How can we grow and be successful together? How do we create a culture where every employee can develop, contribute, and thrive? We believe that healthy, lasting growth can only be achieved with personal freedom combined with clear value-based guidelines. We are convinced that holistic thinking and action, taking into account social, ecological and economic challenges, form the fundamental basis for sustainable growth. This also includes our clear commitment to human rights and environmental and social standards. This commitment applies both to our business activities, our global supply chains, our employees, and our business partners.

This means to agree on the scope for individual action and binding rules for everyone. The AUTODOC<sup>1</sup> Code of Conduct is the basis for this: it defines who and how we want to be and how we work and interact within the company as well as with customers and partners, and outlines our human rights strategy. This Code applies to the entire group of companies, to everyone who works for AUTODOC, and to those who wish to grow and be successful with us now and in the future, including our suppliers and other business partners, who agree to uphold our defined rules and values. Upholding human rights and environmental standards is an integral part of our daily work.



**Dmitri Zadorojnii**  
**CEO**



**Lennart Schmidt**  
**CFO**

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<sup>1</sup> AUTODOC means Autodoc SE and its affiliated companies within the meaning of sections 15 et seq. of AktG (Aktiengesetz, German Stock Corporation Act)

# Our values

Lasting success requires a solid foundation. To build it, we need a culture that respects its employees, customers, society, and the environment, and strives to understand their needs and address their concerns. A healthy corporate culture can only be achieved as a team, fuelled by our individual perspectives, regardless of our job title. It is up to us to embrace and uphold these values.

## 1. Customer Centricity

**We provide high-quality products and services that exceed expectations by understanding and anticipating our customers' needs.**

Customer experience is the driving force behind our business decisions. Customers don't need us, we need them. By putting them at the centre of everything we do, we develop solutions that turn customers into lifelong fans. It's all about earning their trust.

## 2. Empowerment

**Everyone is responsible for their words, actions, and results. We have the authority and accountability to make decisions and trust each other to take ownership.**

We welcome challenges as opportunities to excel and enjoy making bold decisions with conviction and strong commitment. We are not afraid of making mistakes because we understand that they are part of the learning process. We ensure we always have all the information and data we need to back our decisions and take responsibility for our work. We lead by example. No matter the job title, we guide and inspire through our behaviour, encouraging others to do the same.

## 3. Collaboration

**We can only achieve extraordinary things when we work together as a team towards a common goal/purpose.**

We are committed to breaking down silos, honouring our commitments, and building trust through responsible actions and honest relationships. We thrive when we recognise each other's needs, strengths, and positive contributions, helping and supporting each other towards a common goal.

## 4. Inclusion

**We strive to create a culture in which everyone can feel safe and supported. We promote the value of diversity and individual differences to create an open, respectful, and inclusive workplace, both locally and globally. Diverse perspectives make us stronger.**

We treat each other with respect. We do not accept discrimination or harassment. We treat and value everyone as individuals with unique talents, needs, and challenges, to create an environment where people feel they belong. Everyone has the same rights and opportunities regardless of age, nationality, ethnicity, religion, gender, or sexual orientation.

How we practise  
our values



# How we work

## **Human rights and the environment**

We are aware of our corporate responsibility: not only with regard to compliance with applicable laws and internationally recognised standards, but also in particular to protect human rights and the environment within our own business activities and in our global supply chains. Human rights belong to everyone, and we do not tolerate human rights violations in any form. AUTODOC's principles are communicated in this Code of Conduct which all employees and business partners of AUTODOC must follow. AUTODOC expects its employees and business partners to support human rights and comply with established standards and laws in their daily work.

## **Laws and fair competition**

AUTODOC complies with the applicable local, national, and international rules, regulations and laws, as well as its own high ethical standards. AUTODOC conducts its business relationships fairly and expects its business partners to act with the same integrity. We do not engage in unlawful cartel arrangements, market manipulation, insider trading, or other unfair business practices and operate in financial markets in accordance with the relevant regulatory requirements.

## **Data privacy**

Data privacy and data protection compliance is self-evident and a shared task for all AUTODOC employees. The personal data of our customers, employees, and users is handled responsibly and carefully. AUTODOC processes personal data transparently and exclusively within the scope of our authorisation. If the data is no longer needed, it is deleted or anonymised. AUTODOC complies with requests for deletion from data subjects without delay.

## **Trade compliance**

Trading goods, services, and technologies is regulated by national and international laws. In the cross-border purchase or sale of products, services, and technologies, AUTODOC complies with trade and customs laws. This includes complying with the applicable trade embargoes, sanctions, customs, import and export regulations.

All imports and exports must be declared correctly and transparently to the authorities. Lawful conduct of import and export business must be evaluated in advance by the experts responsible for foreign trade based on the applicable regulations.

## **Anti-money laundering**

AUTODOC is committed to complying with all applicable anti-money laundering laws. Money laundering refers to disguising the origin of criminal money or assets to make them appear as if they came from a legal source. An essential part of anti-money laundering precautions is the business partner due diligence process to identify counterparties, proper financial recordkeeping, and continued monitoring of the payment processes.

**Anti-corruption**

The unlawful granting of benefits to third parties, such as public officials or employees of private companies, is prohibited at AUTODOC (except in cases of legal emergency to protect the life, health, or personal freedom of employees). This rule applies regardless of who, in what part of the world, or why someone wants to grant such benefits. The anti-corruption rule also means that employees of AUTODOC do not demand, accept, offer, or grant any personal advantages in connection with AUTODOC's business activities.

**Business partner due diligence**

Integrity starts with us and is also expected of our business partners. We comply with the applicable legislations that affect our operations and follow high ethical standards. We expect the same from everyone who does business with us. To meet these requirements, and to mitigate the risk of becoming involved in illegal activities or negative publicity, we need to know who we are doing business with. This includes our customers, agents, suppliers, and other business partners. All our business partners must be selected with care.

**IT security**

As a leading e-commerce company, the protection of our IT systems, and the security of business and customer data are top priorities for us. That is why we keep up with the latest developments in the field and apply stringent rules and processes to protect our company, our partners, and our customers from cyber attacks.

**Financial reporting**

Our financial reporting is carried out in accordance with local and international accounting standards and reflects the current condition of AUTODOC's assets, financial position, and earnings. In addition, taxes and tax-like charges must be reported and paid in accordance with applicable laws.

**Product safety and quality**

Product safety and quality are top priorities at AUTODOC. We have developed standards to provide our customers with safe, high-quality products. We investigate every indication of defects with the utmost care and are constantly working to further develop and improve our range of millions of products.

# How we treat each other at work

At AUTODOC, we're convinced that our success is due to our employees. That's why it's so important for us to create a safe, healthy, and positive working environment where all our colleagues can feel at ease and flourish. This also includes a workplace that complies with all relevant occupational health and safety regulations.

We are an employer who wants to provide not only a positive working environment but also room for personal growth. That means that we encourage diversity and make sure that the rights of each individual are respected.

## **In concrete terms, this means:**

- We treat each other fairly and with respect, regardless of where the other person comes from, how old or young they are, what they believe in, what gender they are, or who they love.
- We integrate people with disabilities and make sure that all colleagues can feel like equal members of the AUTODOC team.

As an international company, we benefit enormously from the diversity and wealth of experiences our employees bring with them. That is why we foster diversity and respect cultural differences.

We deal with disputes and differences of opinion respectfully.

## **What's expected of every employee:**

- Professional and ethical behaviour.
- Adherence to the principles set out in this Code of Conduct.
- Reporting violations of the principles of the Code of Conduct via the channels defined in this document.

## **Special requirements for managers and employees in leadership roles:**

- Acting as a role model and ambassador for the Code of Conduct.
- Instructing and guiding employees in compliance with the Code of Conduct.
- Consulting the local human resources manager or the Compliance Office Berlin in the event of possible violations of the Code of Conduct.

# How we handle our resources

## Protection of property, company assets, and confidential data

The property of AUTODOC and our business partners may not be used for personal benefit or the personal benefit of third parties.

### **We are all responsible for protecting AUTODOC's property. This includes:**

- Warehouse stock – for example, car and motorcycle parts and accessories.
- Land and real estate and the associated equipment.
- Vehicles.
- Daily working materials, such as tools and technical equipment of all kinds.
- Computers, laptops, IT systems, and telephones.
- Information and financial resources.
- Intellectual property and trademarks.

The private use of company property is only permitted according to the relevant individual or company regulations and/or company practice. This also applies to know-how and knowledge of confidential information that may not be disclosed without prior review and authorisation. Our employees and our business partners are obliged to maintain confidentiality. Information about and from AUTODOC may only be communicated to authorised external and internal recipients.

## Conflicts of interest

Every employee is obligated to disclose situations in which their interests and the interests of the company conflict. We act in the best interests of AUTODOC and uphold the company's reputation. Personal connections or private interests must not influence business activities or decision-making. Employees should directly inform their supervisor about any circumstances outside the business environment that could influence their business decisions. If employees have any questions or doubts about whether a conflict of interest exists or may arise, they should consult their local People Operations contact and the Compliance Office in Berlin.



# Responsibility

## **Reliability and transparency**

AUTODOC promotes a culture of transparency where concerns can be raised freely and confidentially without fear of negative consequences. Our customers, business partners, and employees can rely on us to do what we say and say what we do. We keep our promises and are committed to transparency and open dialogue. This is especially true when different opinions and interests need to be weighed and reconciled.

## **Social media and the internet**

The use of social media is an important element of our success. We therefore attach great importance to open, honest, and fair communication. These principles also apply to our employees, who know that AUTODOC does not tolerate discrimination, insults, or harassment on social networks. We also do not share confidential data or personal data via social networks. We clearly distance ourselves from political extremism. For our online marketing, we have developed strict guidelines that determine in which environments our advertising can and cannot appear. Violations of these guidelines, such as the placement of advertising on extremist websites, will not be tolerated by the company management.

## **Human rights and social standards**

AUTODOC is firmly committed to human rights and ensures that social standards are defined and adhered to. Our aim is to provide every employee with a safe, healthy, and non-discriminatory work environment where everyone is free to develop and grow together. In addition, we regularly assess our suppliers and business partners and only source our products from qualified (approved) partners who are committed to respecting human rights and social standards.

AUTODOC acknowledges that certain rights face greater risks due to the specific characteristics of AUTODOC's operations in retail, the automotive industry, and logistics. To manage the risks related to human rights and the environment, we developed a comprehensive risk management system, that includes risk identification, analysis and assessment, implementation of risk-appropriate preventative, remedial, and mitigating measures as well as risk monitoring and reporting which enables us to review and adapt our human rights strategy annually.

## **The future and the environment**

AUTODOC also integrates the interests of future generations into its decision-making. This means: The protection of our environment and the responsible use of natural resources are top priorities for us. We are committed to implementing due diligence practices based on environmental risks regarding both our business area and our supply chain. We do business with efficiency and align our corporate decisions with our sustainability strategy taking into consideration the type and risk factors of the business activity and their potential impact on the environment.

# Practising and upholding the Code of Conduct

## Scope of the Code of Conduct

Everyone is responsible for their behavior. The Management Board and Executive Leadership Team are obligated to create the necessary environment for compliance with the applicable laws and regulations and to maintain appropriate and effective control mechanisms. Each employee as well as each of our business partners is responsible for acting within the relevant laws, guidelines, and this Code of Conduct in the performance of their tasks. Managers are obliged to guide their employees and act as role models for their teams. When implementing the Code of Conduct rules, the business units in other countries must also respect the relevant national laws and the culture of the country.

The Code of Conduct is the foundation for our day-to-day behaviour in our respective business environments. AUTODOC has developed further internal policies and guidelines addressing particular special risk areas, such as the:

- Data Protection Policy,
- Export Compliance Policy,
- Anti-Corruption Policy,
- Anti-Money Laundering and Counter-Terrorism Financing Policy, and
- Antitrust Policy.

We also provide training in these and other crucial areas at regular intervals. Further instructions and standard operating procedures are available in the respective departments. These can be found in AUTODOC's intranet or requested from the manager in charge.

## Making decisions

No amount of rules and guidelines can foresee each and every possible situation or ethical issue. In our day-to-day work, we often have to decide whether certain actions are appropriate or not. The following questions can help you make the right decision:

- Is my decision based on my good judgment, common sense, and our corporate values?
- Am I acting in the best interests of AUTODOC?
- Does my decision comply with legal and regulatory requirements as well as internal rules and regulations?
- Are the work processes safe and do they pose any danger to people or the environment?
- Is AUTODOC's reputation being protected?

If you're unsure of the answer to any of these questions, you should consult your manager, the relevant departments, or the Compliance Office Berlin for support.

## Reporting suspicious activity

Being a reliable and trustworthy partner for suppliers, customers, employees, and shareholders as well as avoiding risks that could harm our company are key to our success. AUTODOC therefore offers employees and third parties the opportunity to report potential violations of laws, policies, or concerns about AUTODOC's human rights practices. Whistleblowers are protected, so that they do not have to fear negative consequences and/or retaliation. All reports and information are kept confidential according to legal requirements.

All reports are checked thoroughly, suspicious cases are investigated, and appropriate action is taken where necessary.

**Please provide information about possible violations through the following channels:**

**1. via TELL-ME, our anonymous whistleblowing platform**

**2. In-person by contacting**

- Joanna Boj – Compliance Ambassador for Poland and Czechia
- Maria Petrova – Compliance Ambassador for Moldova
- Oleksandr Tselevych – Compliance Ambassador for Ukraine and Kazakhstan
- Corporate Compliance Team for all other locations.

**3. By mail:**

AUTODOC SE  
Personal/confidential  
VP Compliance  
Kurfürstendamm 22  
D-10719 Berlin

## Violations and consequences

Violations of the Code, company policies, and the law will not be tolerated and will be appropriately sanctioned. Every suspicious report will be thoroughly investigated. Each of us is obliged to know the relevant legal provisions and should help to ensure that other employees and/or colleagues also know and comply with them. Everyone in a leadership role is obliged to set a good example. AUTODOC employees can trust AUTODOC to respond appropriately to violations of internal policies, this Code of Conduct, or the law.

# Entry into force

This Code of Conduct enters into force the day it is signed by the Chief Executive Officer of AUTODOC and applies to all AUTODOC employees. It can be amended, supplemented, or revoked at any time without notice.

 **AUTODOC**