ATEK Drive Solutions GmbH
Siemensstrasse 47
25462 Rellingen | Germany
Phone +49 4101 7953-0
info@atek.de | atek.de

CODE OF CONDUCT

PREAMBLE

ATEK Drive Solutions GmbH stands for **high-quality, customised solutions** along the drive train with **brakes, gearboxes and motors.** In Rellingen, just outside the Hanseatic city of Hamburg, we develop and manufacture with a young, flexible and digital team. We are united by a p**assion for technology, enthusiasm for the highest quality and the joy of solution-orientated exchange** with our customers and partners. In the best Hanseatic sense, we are **down-to-earth, unconventional and always reliable.**

Our well-developed customer service, centred around a highly qualified team of engineers, technicians and business people, enables us to provide **full-service consulting** for even the most demanding projects. We can supply everything required up to commissioning from a single source. A **repair and maintenance service** rounds off the concept.

We bear responsibility not only towards our customers, but also as a member of society. Our behaviour towards business partners and the public, but also in a collegial environment, is reflected in the perception of our company. The misconduct of individuals can cause great damage to the entire company. By behaving with integrity and honesty, we strengthen the trust of our customers and business partners in us and our products.

With this in mind, we have worked out a **mission statement** together with our employees, in which the values we share and want to be guided by today and in the future are set out. We see this mission statement as a **guideline for all employees to ensure responsible, ethically correct and sustainable behaviour within the company.** The basis for this is knowledge of and compliance with the legally applicable regulations as well as the internally applicable rules, which are explained in more detail below. We would like to ask all colleagues and our business partners to read this Code of Conduct carefully and to implement it in their everyday business. Please do not hesitate to contact the management if you have any questions or suggestions. Our shared values, our collective togetherness, form the strong foundation that has led Elephant Brakes to success for over 60 years and will continue to do so in the future.

Rellingen, 17th September 2026

Ralf Domgörgen
General management

Axel Schwab
General management

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PERSONAL RESPONSIBILITY

At **ATEK Drive Solutions GmbH,** we understand this term to mean not only behaviour that complies with the law. As a member of society, we believe that it is incumbent on every responsible individual to take responsibility for his or her own actions. This also includes questioning the behaviour of others and not tolerating misconduct. For us, following ethical and moral principles and demanding them from our fellow human beings is part of our personal, social and corporate responsibility.

Responsible action by each individual forms the basis of our integrity.

EMPLOYEES

Equal treatment & equal opportunities
We treat all employees equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religious affiliation or world view. We support equal opportunities and prevent discrimination in hiring, promotion or the promotion or granting of training and further education.

Safety at work & Health care
Healthy and satisfied employees are an important foundation of any company. The safety and health of our employees are on the same level as the quality of our products and the achievement of our economic goals.

Our employees are regularly trained internally and externally to be able to comply with the safety of their working environment in accordance with the regulations. Supervisors are required to instruct their employees accordingly and to support them in implementing the regulations.

Equal treatment, health & safety of our employees are important to us.

INFORMATION & PRIVACY

We always strive for transparency. Open and truthful communication with our employees, customers and business partners as well as the public and authorities regarding our business transactions strengthens the trust placed in us.

Confidential information and business documents of our partners are treated with the utmost care. We ensure that all information and data are always protected from access and insight by third parties – including colleagues who are not involved.

Personal data is only collected by us if it is relevant for the performance of the respective activity or if it has to be collected due to legal requirements.

Truth & clarity and protection of confidential information is ensured.

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BUSINESS PARTNERS

We expect our business partners, suppliers and subcontractors to comply with all the principles summarised in this document. This also applies to all companies affiliated to them through cooperation or concentration, regardless of whether their registered office is in Germany or abroad. Violations will not be tolerated.

We expect compliance with the principles set out in this Code of Conduct.

GIFTS & INVITATIONS

We only accept or grant gifts, invitations and hospitality if these are provided within an appropriate framework and relationship. We strictly reject benefits that are intended to gain advantages or to influence business decisions. In case of doubt, our employees are encouraged to consult their superiors or the management and to hand in the gifts and have them documented for their own protection and that of the company.

We accept gifts, invitations & hospitality only in reasonable proportion.

SOCIETY & ENVIRONMENT

The protection of human rights as well as sustainability, environmental and climate protection areimportant to us. When selecting our business partners, we also attach great importance to sustainablymanufactured products that are produced from raw materials whose extraction protectspeople and the environment to the greatest possible extent.

The protection of human rights, environment & climate are important corporate goals.

CONTACT PERSON

If you have any questions or suggestions regarding this Code of Conduct, your supervisor is thefirst point of contact. If you have further questions, you can contact the management.

Gender Note: For better readability, the masculine form is used in this document. The abbreviated form of language is for editorial reasons only and does not imply any valuation.

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DECLARATION OF CONSENT EMPLOYEES

I hereby confirm that I have received and fully read my personal copy of the Code of Conduct of **ATEK Drive Solutions GmbH.**

I acknowledge the contents stated in the Code of Conduct and undertake to implement them to the best of my knowledge and belief.We will pass on the contents of the Code of Conduct to our suppliers and subcontractors and encourage them to implement it.

Name, first name

Place, date

Signature

Please return the completed form to us by letter or e-mail. Of course, you can also hand in the form personally to your supervisor or to the administration.

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DECLARATION OF CONSENT BUSINESS PARTNER

We hereby confirm: We have received and fully read the Code of Conduct of **ATEK Drive Solutions GmbH.**

In addition to our contractual agreements with **ATEK Drive Solutions GmbH,** we undertake to respect and comply with the points set out in the Code of Conduct. Furthermore, this obligation applies to all our domestic and foreign branches and subsidiaries.

We will pass on the contents of the Code of Conduct to our suppliers and subcontractors and encourage them to implement it.

Company name

Name and title of the signatory

Place, date

Signature

Please return the completed form to us via letter or e-mail.