



# CODE OF CONDUCT

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## 01. ABOUT THE CODE OF CONDUCT

The Code of Conduct describes our basic principles and standards, such as what BMW TechWorks Romania S.R.L. values in conducting its business, and the manner in which Employees of BMW TechWorks Romania S.R.L. should conduct our business activities.

It is the responsibility that each of us understands, observes, and implements the Code.

In addition, we expect all business partners (including persons and entities who are in business relationships, such as service providers, consultants, distributors, contractors, vendors, suppliers and other third parties) who engage in business with BMW TechWorks Romania S.R.L. to comply with the Code.

## 02. ETHICAL & RESPONSIBLE BUSINESS ACTIVITIES

BMW TechWorks Romania S.R.L. complies with applicable laws and regulations in the countries and regions where it does business, and have zero tolerance for any form of corporate criminal offences and illegal misconducts.

These are our fundamental principles of behaviors necessary for BMW TechWorks Romania S.R.L. to gain trust from society, enhance our company values, and safeguard our own sustainable development.

We engage in our day-to-day business activities always in accordance with our fundamental principles.

## 03. RESPECT FOR HUMAN RIGHTS

BMW TechWorks Romania S.R.L. endeavors not to cause or exacerbate any negative impact on human rights in the course of our business activities, and will not tolerate any forced labor or child labor.

Further, BMW TechWorks Romania S.R.L. endeavors to introduce and implement human rights due diligence procedures to identify and take measures on the risks concerning human rights, and to take serious action to resolve negative consequences to human rights.

## 04. DIVERSITY, EQUITY & INCLUSION

BMW TechWorks Romania S.R.L. believes DEI (Diversity, Equity and Inclusion) is essential, because promoting and realizing DEI will bring about innovation in the world and lead to the sustainable growth and development of society.

DEI is an environment in which people with diverse personalities, backgrounds, perspectives and values respect each other (Diversity), work under fair opportunities and conditions according to their circumstances (Equity), and each person makes the most of themselves to work in cooperation with each other (Inclusion).

We respect all people (such as clients, business partners and Employees) with diverse personalities, backgrounds, perspectives, and values. BMW TechWorks Romania S.R.L. Romania S.R.L. will endeavor to foster a society where Employees can utilize their respective talents, share their wisdom, and thrive through cooperating with all people.

## 05. GLOBAL ENVIRONMENTAL ISSUES

BMW TechWorks Romania S.R.L. endeavors to do its part with respect to global environmental issues for the benefit of all people and future generations through the company's businesses and corporate initiatives.

We will create a sustainable environment by working together with various stakeholders for achieving goals including circular economy and nature conservation.

## 06. RESPONSIBLE VALUE CHAIN

We endeavor to contribute to realizing a sustainable society by sufficiently communicating with our clients and business partners and building a responsible value chain by evaluating the impact on society of the products and services we procure and the solutions we provide.

## 07. EQUAL OPPORTUNITY

BMW TechWorks Romania S.R.L. believes that human resources are the most valuable assets for its business in a business environment where the globalization of business activities is accelerating and the demand for new IT services is growing.

BMW TechWorks Romania S.R.L. believes that it is important to secure a more diverse range of perspectives and abilities within the company and provide equal opportunities and fair treatment in recruitment, employment, training, compensation, benefits, staff placement, and promotion, in accordance with each individual's abilities and regardless of race, nationality, marital status, ethnicity, place of birth, citizenship status, age, ancestry, social status, language, religion, creed, gender, sexual orientation, gender identity or expression, disability, veteran status, family structure, or lifestyle.

We are committed to actively working towards creating a vibrant and open work environment where human resources with diverse values can maximize their abilities and play an active role.

## 08. ANTI-HARASSMENT

BMW TechWorks Romania S.R.L. believes that harassment is a serious problem that unreasonably undermines individual dignity, impairs the working environment and inhibits personal performance.

BMW TechWorks Romania S.R.L. is committed to treating everyone with dignity and respect and does not tolerate any kind of harassment, irrespective of job title or position and whether the person is a BMW TechWorks Romania S.R.L., client or business partner.

We strive to maintain a safe and productive professional working environment that is free from harassment, and will not harass or engage in harassment against anyone.

## 09. HEALTH & SAFETY

BMW TechWorks Romania S.R.L. aims to create an environment in which Employees are healthy, and each Employee can continue to work safely while increasing their motivation and energy.

The safety of Employees is a top priority and BMW TechWorks Romania S.R.L. is committed to providing a safe workplace to Employees.

We will implement safety measures in the working environment in accordance with applicable laws and regulations. We will not work under the influence of alcohol, illegal drugs or controlled substances; and we will not engage in any act that is a threat to the health, safety and work environment, such as gambling, possessing or using firearms or other dangerous objects, transporting or using illegal drugs, and acts of violence or intimidation.

## 10. CORPORATE ASSETS

The assets of BMW TechWorks Romania S.R.L. are important property that should only be used for the legitimate business purposes of the Company. Assets include both the tangible and the intangible, such as information assets (all information and information systems used in the execution of business, including confidential information, intellectual property, know-how, and software), equipment and brands.

## 11. CYBERSECURITY

BMW TechWorks Romania S.R.L. believes any cyberattacks could impair or leak important information assets belonging to our clients or the Company, which may result in loss of credibility of BMW TechWorks Romania S.R.L., as well as social disruption due to the suspension of social infrastructure systems. This is due to the fact that there has been a rapid increase in recent years in the number of sophisticated targeted cyberattacks aimed at enterprises and government agencies, cyberattacks targeted at vulnerabilities of information assets, and cyberattacks that use ransomware aimed at monetary extortion.

The appropriate use of information assets and ensuring cybersecurity are the key to maintaining BMW TechWorks Romania S.R.L.' trust with all its stakeholders and supporting vital infrastructure for the society.

We endeavor to use information assets appropriately and implement cybersecurity in order to protect important information assets belonging to our clients and the Company from cyberattacks.

## 12. CONFIDENTIAL INFORMATION

BMW TechWorks Romania S.R.L. believes that confidential information is one of our most valuable information assets and a source of competitiveness.

We are responsible for protecting confidential information belonging to our clients, our business partners, as well as ensuring that confidential information is only used for the purposes and scope deemed necessary for the company's business operations; and we never disclose or divulge information to any third party without proper consent by the appropriate disclosing party.

Confidential information refers to all information (including information related to third parties) not in the public domain that is generated or acquired by Employees of BMW TechWorks Romania S.R.L. in the course of their business operations and that must be treated as confidential. Confidential information includes undisclosed corporate information, design documents, source code, personal data, trade secrets and sensitive information.

## 13. DATA PRIVACY

BMW TechWorks Romania S.R.L. believes that the social demand for protection of personal data and privacy is rising under the situation where an increasing number of countries and regions have been strengthening their laws and regulations to protect personal data and privacy.

BMW TechWorks Romania S.R.L. ensures that all personal data and privacy are handled appropriately for each business, in accordance with applicable laws and regulations regarding the protection of personal data and privacy in each country or region.

## 14. INTELLECTUAL PROPERTY

BMW TechWorks Romania S.R.L. believes that intellectual property is one of our most valuable information assets and a source of competitiveness.

We actively protect intellectual property belonging to BMW TechWorks Romania S.R.L., including copyrights, patents, industrial designs, trademarks, and trade secrets, and work to maximize the value of these assets. We also respect valid intellectual property rights belonging to third parties and take necessary measures, such as conducting reasonable investigations, to avoid infringing any such rights (for example, having unauthorized access to, downloading, and copying third-party software without an official license).

## 15. RELATIONSHIPS WITH CLIENTS & BUSINESS PARTNERS

In order to earn the trust of clients and business partners, BMW TechWorks Romania S.R.L. carries out business activities in a highly ethical manner in accordance with the Code of Conduct and implements the Code of Conduct even in a challenging, competitive environment.

We are committed to engaging in fair business practices, entering into appropriate agreements with our clients and in providing services to clients in accordance with such agreements. We endeavor to communicate sincerely with our clients, to meet their expectations and to understand and solve their problems.

When we procure products and services from business partners, we endeavor to provide our business partners with opportunities to compete

fairly, and comprehensively assess their quality, price, delivery dates, and stability of supply, and procure competitive products and services that meet our business needs based on economic rationale.

## 16. ANTI-MONEY LAUNDERING & EXCLUSION OF ANTI-SOCIAL FORCES

BMW TechWorks Romania S.R.L. takes a firm stance against anti-social forces, refuses to accede to unreasonable demands, will never maintain a relationship with any such forces, and will not facilitate or engage in money laundering.

When conducting business with clients or business partners, we will comply with laws and regulations prohibiting money laundering and the provision of funds for terrorist activities, and will take necessary measures such as requiring the elimination of dealings with anti-social forces.

## 17. ENTERTAINMENT & GIFTS

Providing or receiving entertainment or gifts by BMW TechWorks Romania S.R.L. beyond the scope of social norms, even if permitted under relevant applicable laws and regulations, may exert an improper influence over the decision-making by the recipient.

When providing entertainment or gifts, we will do so appropriately for legitimate business purposes only. We will not directly or indirectly offer, promise or provide any illegal, improper or inappropriate entertainment or gifts to anyone including public officials and private individuals, whether or not it is intended to benefit the Company.



We will not, under any circumstances, provide any entertainment or gifts that is illegal, improper or inappropriate to influence the behavior of others.

We also will not demand, approve or receive entertainment or gifts beyond the scope of relevant applicable laws and regulations or social norms.

Entertainment or gifts refers to providing a tangible or intangible benefit of value to a third party (including to their relatives and associates).

## 18. ANTI-BRIBERY & ANTI-CORRUPTION

BMW TechWorks Romania S.R.L. does not tolerate bribery or corruption of public officials in any way. We do not offer, promise or provide any illegal, improper or inappropriate entertainment or gifts to public officials, and do not engage in bribery.

In order to prevent the risk of bribery, we will always pay adequate attention to the risk of bribery and other corrupt practices when dealing with business partners. We will take appropriate measures such as examining the risk of bribery in advance and entering into contracts that include anti-bribery and anti-corruption provisions.

We do not make facilitation payments (generally, small payments to public officials to facilitate the performance of regular public services), regardless of the customs of the country or the region.

## 19. POLITICAL CONTRIBUTIONS & CHARITABLE DONATIONS

Support for political organizations and candidates for public offices and support for charitable organizations by BMW TechWorks Romania S.R.L. must be for appropriate purposes and be carried out with adequate transparency and in any case in compliance with applicable laws and regulations.

## 20. FAIR COMPETITION

BMW TechWorks Romania S.R.L. will conduct business in a fair and free competitive environment in compliance with competition laws.

Therefore, we will not engage in conduct that impedes fair competition, whether with competitors, business partners or any other third party.

In addition to the above, we must be extremely cautious when contacting and communicating with our competitors. We will not propose or agree to the aforementioned agreements in any form, nor will we exchange competitively sensitive information with our competitors, such as information relating to price and cost or information relating to business partners and clients, in order to avoid suspicion of such arrangements.

## 21. TECHNOLOGY ETHICS

BMW TechWorks Romania S.R.L. believes that it is necessary to deepen our understanding of the characteristics of new technologies, constantly explore them, and pursue research and development activities, utilization, and implementation of new technologies to society with high ethical standards such as respect for human rights and consideration for nature.

In particular, Artificial Intelligence (AI) will become more prevalent in society and will affect people's behavior and decision-making. For the purpose of reducing the number of negative incidents potentially arising from AI, and realizing a human-centered society in which humans and AI truly coexist, BMW TechWorks Romania S.R.L., as a position to promote research, development, operation, and utilization of AI, will promote the development activities and application of AI technology to business in accordance with applicable laws and regulations.

## 22. TAX

BMW TechWorks Romania S.R.L. complies with applicable tax laws and regulations in the countries and regions in which it conducts business activities, and pays taxes accordingly. BMW TechWorks Romania S.R.L. is committed to maintaining and enhancing its tax compliance processes and controls to mitigate tax risks.

We understand and comply with applicable laws and regulations related to taxation.

## 23. CORPORATE CITIZENSHIP

Our social contribution activities do not end at the workplace. BMW TechWorks Romania S.R.L. encourages Employees to be actively involved in local communities through volunteer and pro-bono activities.

## 24. DECISION MAKING & AUTHORIZATION

When making a Company decision, we will make the best and most appropriate decisions for the Company based on necessary information.

We do not enter into any kind of contract, including verbal commitments binding the Company, sign any document, or engage in any other transaction, beyond the scope of the Company's decision-making and delegated authority.

## 25. ACCURACY OF RECORDS & REPORTS

We maintain internal controls, accurately record information related to Company transactions and operations in reports and other documents, and store them with appropriate supporting information.

We do not create misleading or false records and do not maintain off-the-book accounts for any purpose. We reflect the true nature of transactions in our books and records.

## 26. INVESTIGATIONS & AUDITS

We will cooperate in good faith with any investigation or audit as requested by the Company, including preservation and submission of necessary information. Retaliation against anyone who makes a good faith complaint of improper conduct, or who cooperates with an investigation into such conduct, will not be tolerated.

## 27. CONFLICT OF INTEREST

In our daily activities, we may face situations where our personal relationships and financial interests conflict with the interests of the Company. Even in these situations, we will act in the best interest of the Company in conducting our business and will not engage in activities that conflict with the interests of the Company. Furthermore, even if there is no intention to pursue one's own interests at the expense of the Company's interests, a suspected conflict of interest alone may undermine trust in the fairness of BMW TechWorks Romania S.R.L. business and adversely affect it.

In the event of a transaction or relationship in which a conflict of interest is reasonably expected, we will take appropriate measures, such as reporting to the Company and obtaining the necessary approval.

## 28. PUBLIC RELEASE

For appropriate information dissemination, BMW TechWorks Romania S.R.L. provides consistent, accurate, and transparent information through newspapers, magazines, TV, websites, social media (including but not limited to Twitter, Facebook, LinkedIn, YouTube, Instagram and blogs) and other media.

Even when we communicate information personally, we understand our statements and views may have a negative impact on brand and reputations of BMW TechWorks Romania S.R.L.. We take personal responsibility for our own statements and views.

# BMW TechWorks Romania