



CODE OF CONDUCT
Integrity in Action – Trusted by Heroes

(April, 2025)



A Message from Our Chief Executive Officer

Dear Colleagues,

at MAGIRUS, Compliance is more than simply adhering to the law; it represents our collective commitment to ethical behavior and integrity in every aspect of our business. Compliance is not just the responsibility of a select few—rather, it involves all of us: employees, managers, and business partners alike. How we each behave daily has a significant impact on our company, our customers, and our community.

As we continue our journey as an autonomous company, it's crucial that we maintain the highest ethical standards, conducting our business openly, honestly, and transparently at all times. With this in mind, we have outlined clear guidelines in our Code of Conduct. These guidelines provide practical orientation for our everyday actions, particularly when facing challenging or uncertain situations.

We are committed to fostering a company culture in which following these guidelines feels natural, and where everyone feels comfortable speaking openly about questions or concerns. Compliance at MAGIRUS is not just a word; it's our daily responsibility. As a team, we are fully committed to these ethical standards, setting an example through our actions and ensuring everyone at MAGIRUS shares this commitment.

Together, we will continue to strengthen MAGIRUS as a company that makes us proud, driven by integrity, trust, and shared responsibility.

Thank you all for your continued dedication.

Sincerely,

Thomas Hilse

Chief Executive Officer

A handwritten signature in black ink, appearing to read 'Thomas Hilse', written over the printed name and title.

Why do we have a Code of Conduct? Our Code of Conduct is intended to provide each individual at Magirus with guidance on how best to act. It therefore includes the most important rules of conduct for everyday professional life. By providing this information, the Code of Conduct looks to ensure that everyone at Magirus conducts themselves in an ethical and responsible manner.

Who does the Code of Conduct apply to? Everyone at Magirus – no matter what role they have in the company, no matter where in the world they are based – they must adhere to the principles of conduct. In addition, all managers must provide their employees with guidance and support so that they can all make the right decisions and conduct themselves lawfully.

I. OUR PURPOSE AND VALUES

MAGIRUS's Purpose and Values are a source of energy, creativity, and unity for all of us working for and with the Company as we continue on our shared journey of growth. Our Purpose is the cornerstone of our business: it reflects the reason our Company exists and shows how our products and services positively impact our customers, stakeholders, and the communities where we operate. MAGIRUS has adopted three core Values that guide our actions and the way we work, helping us fulfil our Purpose.

These core Values are:

We Take Pride in Responsibility

MAGIRUS's success is built upon responsibility—toward customers who rely on us in critical situations and colleagues who count on us daily. We approach our work with integrity, accountability, and pride.

What this means for us:

- ✓ We consistently uphold the highest ethical standards across our entire organization.
- ✓ We prioritize human rights, safety, and environmental responsibility in our daily actions.
- ✓ We ensure our products and services contribute positively to society, particularly in the areas of emergency response and public safety.

We Lead by Example

MAGIRUS sets the benchmark for excellence in emergency vehicles and innovative mobility

solutions. Through exceptional standards in quality, reliability, and integrity, we inspire trust in customers, communities, and partners around the world.

What this means for us:

- ✓ We consistently demonstrate industry-leading performance in everything we do.
- ✓ We take initiative and show integrity in challenging situations, inspiring confidence internally and externally.
- ✓ We actively pursue improvements and set high standards, serving as a role model in our market.

We Succeed through Teamwork

At MAGIRUS, collaboration is fundamental to our success. Diverse perspectives and strengths make us stronger and more effective. We believe collective effort and open dialogue are key to achieving our ambitious goals.

What this means for us:

- ✓ We foster inclusive teams where diverse opinions are valued and respected.
- ✓ We build strong partnerships internally and externally, enhancing our ability to innovate and respond quickly to market needs.
- ✓ We celebrate collective achievements, knowing our shared efforts advance the MAGIRUS mission.

MAGIRUS Purpose: *“Empowering exceptional people with innovative vehicles and technologies to drive progress.”*

II. LIVING THE CODE

MAGIRUS is committed to the highest standards of integrity in all its operations—always and everywhere. These standards are outlined in our Code of Conduct, a living document that guides us to conduct business in accordance with all applicable laws and ethical principles, in alignment with our Company Purpose and Values. Our Code of Conduct supports us in acting responsibly for the collective benefit of our Company, our stakeholders, and our communities.

Scope

The Code of Conduct is an important part of our governance framework. It applies to all employees of MAGIRUS and its subsidiaries. It guides our behaviour and, in principle, also applies to anyone acting for or on behalf of the Group.

In addition to this Code of Conduct, MAGIRUS has established various Company Policies that supplement the Code and are an integral part of it. These Policies may apply to your specific job and responsibilities. All such documents are available on the MAGIRUS website (www.magirusgroup.com) and on the Company intranet, or you can consult your local Human Resources representative for access.

We all—and in particular our leaders and managers—play a critical role in leading by example. Our everyday decisions and behaviours should exemplify adherence to the Code of Conduct and embody the true essence of our Purpose and Values.

MAGIRUS also endorses the United Nations Universal Declaration of Human Rights, the relevant International Labour Organization (ILO) Conventions, and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. Accordingly, this Code and the related Policies are intended to be consistent with these international standards.

III. BUSINESS CONDUCT

MAGIRUS is committed to conducting business and behaving in a manner consistent with our core Values. We have implemented Company Policies to promote high standards of integrity through honest and ethical behaviour. These principles apply to all our dealings with customers, suppliers, partners, service providers, competitors, employees, and anyone else we interact with in the course of our work—ensuring that we always do what is right.

IV. WE PROMOTE COMPLIANCE WITH APPLICABLE LAWS

Everyone working for or with MAGIRUS must comply—both in letter and in spirit—with all applicable laws, rules, and regulations in every place where the Company operates. We may not be expected to know every detail of these laws, but we have a responsibility to be aware of the major laws that affect our duties. When in doubt, our Legal and Compliance department is available to answer questions or provide clarification.

The consequences of failing to comply with laws can be severe. Legal violations may result in fines, imprisonment of the individuals involved, and the loss of business privileges or licenses. In addition, failure to follow the law can seriously damage our Company's reputation.

V. WE AVOID AND MANAGE ACTUAL OR POTENTIAL CONFLICTS OF INTEREST

Everyone working for or with MAGIRUS is responsible for safeguarding the integrity of the Company's business decisions by ensuring those decisions are made solely in the best interests of the Company, without improper influence from personal interests. A conflict of interest arises whenever our personal interests might divide our loyalties or improperly influence our judgment in fulfilling our obligations to MAGIRUS. An actual conflict of interest is never acceptable. We must also avoid situations that create a potential conflict of interest or even the appearance of a conflict. In practical terms, this means we may not use others (such as family or friends) to do indirectly what we are not allowed to do ourselves—for example, making a prohibited investment through a family member or friend.

We are all capable of recognising when a personal conflict of interest exists. We are required to disclose any actual or potential conflict of interest before undertaking any activity or decision related to that conflict. This allows the Company to determine the best way to address the situation.

VI. WE DO NOT ENGAGE IN BRIBERY OR CORRUPTION

We must comply with all applicable anti-bribery and anti-corruption laws, as well as related Company Policies. These laws generally prohibit offering, promising, giving, or authorising (directly or indirectly) any payment or anything of value to any government official, political party, party official, or candidate for public office in order to influence an official act or decision

to obtain or retain business or secure an improper advantage. Many anti-corruption laws go further and prohibit such payments to anyone, including private parties in the business context. It is also against the law (and Company Policy) to ask or permit a third party to pay a bribe, kickback, or other improper payment on our behalf.

Some of the anti-corruption laws that apply to MAGIRUS include: the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions; Italian Legislative Decree 231/2001; the U.S. Foreign Corrupt Practices Act; the UK Bribery Act; France's *Loi Sapin II*; and Spain's *Ley Orgánica 10/1995*. All MAGIRUS personnel and partners must adhere to these laws.

VII. WE COMPLY WITH ANTI-MONEY LAUNDERING LEGISLATION

Money laundering is the process of taking proceeds from criminal activity and making them appear legitimate. Money laundering facilitates crimes such as fraud, drug trafficking, and terrorism; it harms the global economy, and it is strictly illegal. Everyone working for or with MAGIRUS is prohibited from engaging in or assisting with any activity that involves money laundering or that could give the appearance of aiding money laundering. We are responsible for complying with all applicable anti-money laundering laws and related Company Policies.

VIII. WE RESPECT ECONOMIC SANCTIONS, EMBARGOES, AND INTERNATIONAL TRADE LAWS

As a global company, MAGIRUS engages in international trade that is subject to various laws and regulations. We are committed to performing all such activities in compliance with applicable economic sanctions, embargoes, and export/import control laws. These laws and regulations are complex, often fact-specific, and can change quickly based on world events. We must exercise due diligence and consult our Legal and Compliance department to ensure we remain in compliance with the current trade restrictions wherever we do business.

IX. WE COMPETE FAIRLY

MAGIRUS recognises the critical importance of open and fair competition in the marketplace and is committed to full compliance with all applicable competition (antitrust) laws. We do not engage in practices that violate these laws—such as forming cartels, price-fixing, market allocation, output restrictions, tying arrangements, or improper sharing of competitive information. When gathering market intelligence, we must do so ethically: we will not obtain competitors' confidential information through improper means, nor will we knowingly infringe on any third party's intellectual property rights.

While we stay informed about market trends and opportunities to guide our commercial strategies, we always put integrity first. Similarly, we expect our suppliers and customers to uphold the principles of fair competition. In all our business relationships, we require full compliance with competition laws and we conduct ourselves with honesty and transparency.

X. WE DO BUSINESS WITH REPUTABLE THIRD PARTIES

MAGIRUS conducts appropriate background checks on prospective third parties (including reviewing available financial information) before establishing any business relationship. This is to ensure that the person or entity is reputable, qualified, and engaged in legitimate business activities. In many areas of our business, we work with third parties such as consultants, agents, or distributors who act on our behalf or represent our interests. We require our third-party representatives to follow the same high ethical standards that we practice ourselves.

Illegal or unethical conduct by third parties can damage MAGIRUS's reputation and create legal risks for the Company, including potential penalties. Because these third parties represent MAGIRUS in the marketplace, we take a risk-based approach to their selection and oversight. We perform initial due diligence and periodic reviews of all key third parties. These partners are required to provide timely and accurate information during our vetting process, and to update us if any relevant information changes over time. Our agreements with third parties also obligate them to uphold our ethical standards and comply with applicable laws.

XI. PEOPLE

MAGIRUS is home to unique people who are motivated, engaged, and highly professional. Recognising and welcoming everyone's diverse contributions makes our workplace more

inclusive and our practices more innovative and comprehensive. We see this diversity as a key enabler for maintaining competitiveness, creating long-term value for stakeholders, and ensuring customer satisfaction.

The following principles, which are consistent with the United Nations Universal Declaration of Human Rights and the relevant ILO conventions, confirm the importance of respect for the individual, ensure equal treatment, and forbid any form of discrimination. MAGIRUS supports the protection of fundamental human rights in all our operations.

XII. WE DO NOT TOLERATE CHILD LABOR, FORCED LABOR, HUMAN TRAFFICKING, OR SLAVERY

MAGIRUS strictly prohibits the use of child labour. We do not employ anyone younger than the legal working age in the country where the work is performed, and in any case we do not employ anyone under the age of 15 (unless an explicit exception is provided by international conventions and local law). Furthermore, we will not establish or maintain business relationships with third parties that utilize child labour.

Likewise, the Company does not tolerate the use of any form of forced or compulsory labour, slavery or servitude, involuntary or coerced labour, or human trafficking (including sex trafficking). Such practices are entirely unacceptable in our operations and supply chain.

XIII. WE RESPECT FREEDOM OF ASSOCIATION

Employees are free to choose whether or not to join a trade union or similar employee representative organisation, in accordance with local laws and the rules of those organisations. MAGIRUS recognises and respects employees' rights to be represented by trade unions or other representatives (in accordance with local legislation and practice), including the right to engage in collective bargaining. When dealing with employee representatives, the Company seeks a constructive relationship and approach to negotiations.

XIV. WE TREAT OTHERS WITH RESPECT AND DO NOT DISCRIMINATE

MAGIRUS does not accept any form of discrimination against employees or others. We value each individual's differences. All employment decisions—such as recruitment, hiring,

assignment, compensation, and promotion—must be based on qualifications, skills, performance, and experience. We are committed to providing equal opportunities in all aspects of employment and career advancement. Unacceptable bases for discrimination include, but are not limited to: age, ethnicity, gender, gender identity, sexual orientation, physical or mental ability, religion, socio-economic status, or any other personal characteristic. Every employee deserves to be judged on their merits, and nothing else.

XV. WE FOSTER AN INCLUSIVE WORKING ENVIRONMENT

MAGIRUS takes all necessary steps to maintain an inclusive and engaging work environment in which the dignity of each individual is respected and everyone can contribute their unique strengths. Our culture is grounded in behaviours that promote equity and make everyone feel welcome, included, and valued—so that all individuals have the opportunity to fulfil their potential.

In particular, everyone is expected to:

- Ensure that all colleagues can access and benefit from the resources, opportunities, and facilities available.
- Model inclusive behaviour and language, and avoid any behaviour that might create an intimidating or offensive atmosphere for others.
- Refrain from working while under the influence of alcohol or drugs. Also, comply with laws and Company rules intended to protect others from the effects of secondhand smoke.

XVI. WE DO NOT TOLERATE INTIMIDATION OR HARASSMENT

MAGIRUS prohibits—and will not tolerate—any type of harassment. For example, harassment on the basis of race, sex, or other personal characteristics that has the purpose or effect of creating a hostile work environment or violating a person’s dignity is completely unacceptable. Similarly, any demand for sexual favours in exchange for a workplace benefit (such as a promotion or to avoid a negative consequence like termination) is strictly prohibited. These standards apply whether such behaviour takes place inside or outside the workplace.

XVII. WE USE COMPANY ASSETS AND RESOURCES RESPONSIBLY

Everyone working for or with MAGIRUS is required to use Company assets and resources efficiently and in a manner that protects their value. These assets and resources should be used solely to achieve MAGIRUS's business goals and only for the purposes intended.

We are all responsible for protecting Company assets and resources from loss, theft, unauthorised use, damage, or destruction. Any use of assets that is contrary to the Company's interests or inconsistent with their intended use is prohibited. We must follow all MAGIRUS Policies and guidelines regarding information technology, security, and privacy when using Company resources.

XVIII. WE PROTECT OUR REPUTATION

MAGIRUS's reputation is a precious asset that can be damaged or destroyed very quickly by a careless act. Our corporate image, our culture, and the long history of our brands are assets to be cherished and vigilantly protected by all of us. By living the spirit of our Purpose and Values and abiding by our Code at all times, we each help to protect and strengthen the Company's reputation.

XIX. WE RECOGNISE AND RESPECT PERSONAL PRIVACY

In MAGIRUS's ordinary business operations, we may collect personal data through lawful means. When collecting personal data, we are committed to safeguarding each individual's right to control when, how, and to what extent their personal data is collected, maintained, and processed by our Company. This commitment applies to all individuals whose data we handle—employees, prospective employees, end customers, and individuals working for our business partners (such as dealers and suppliers). Everyone working for or with MAGIRUS is held to this same standard.

We comply fully with applicable privacy laws and with our Company's Data Privacy Policy. We also ensure a robust level of security in the selection and use of information technology systems that collect, store, and process personal data.

XX. ENERGY, ENVIRONMENT, HEALTH & SAFETY

MAGIRUS firmly believes in creating and maintaining workplaces that are safe for everyone, where our processes include strong environmental protections, and where the products and services we design, test, and develop respect the health and safety of ourselves and others. Sustainable work practices and life-cycle thinking are at the core of our operations. We measure our performance and continuously improve the way we do business in order to advance a more sustainable society.

XXI. WE PROTECT THE HEALTH AND SAFETY OF OTHERS AND OURSELVES

MAGIRUS recognises that health and safety in the workplace are fundamental rights of employees and key elements of our sustainability efforts. All of our business decisions give proper consideration to the health and safety of our employees. We have adopted (and continually improve) an Occupational Health and Safety Policy that implements preventive measures—both at the individual and collective level—to minimise potential health and safety risks in the workplace.

We are also committed to ensuring industry-leading working conditions, adhering to principles of workplace hygiene and industrial ergonomics in our operations. MAGIRUS actively promotes a culture of accident prevention and risk awareness among all workers, providing training and information to support this culture. Every one of us is personally responsible for following the health and safety precautions established by MAGIRUS (communicated through specific directives, instructions, information, and training). No employee should ever expose themselves or others to dangers that could cause injury or illness. We each take ownership of safety and should never compromise our own health or the safety of our colleagues.

XXII. WE IMPLEMENT ENVIRONMENTAL PROTECTIONS IN OUR PROCESSES

Environmental protection is a critical consideration in MAGIRUS's approach to business and long-term value creation. We are committed to continuously improving the environmental performance of our operations and to complying with all applicable environmental laws. This includes developing and maintaining an effective, certified Environmental Management System (EMS) based on the core principles of reducing environmental impact and optimising the use of

resources. We actively put these principles into practice by sharing relevant information and providing regular training on environmental topics.

XXIII. WE PRODUCE SAFE AND ENVIRONMENTALLY FRIENDLY PRODUCTS

MAGIRUS designs, produces, and sells products of the highest standards in terms of safety and environmental performance, and always in full compliance with applicable laws. Moreover, we develop and implement innovative technical solutions to minimise the environmental impact of our products while maximising their safety. We also encourage the safe and eco-friendly use of our products by providing customers and dealers with information on proper use, maintenance, and end-of-life disposal of our vehicles and other products.

XXIV. Community and Society

MAGIRUS is committed to engaging with all stakeholders with loyalty, fairness, transparency, and due respect for our core Values. Respect for others is the foundation of our relationships, and our business practices are designed to ensure we deliver products and services that meet customers' needs while contributing to a more sustainable society. By going beyond the obvious and partnering with like-minded organizations, MAGIRUS makes a positive difference in the communities where we operate and in society in general.

XXV. WE AIM TO DELIVER THE HIGHEST VALUE TO OUR CUSTOMERS

MAGIRUS strives to go beyond expectations to meet the needs of our customers. Our goal is to exceed customer expectations and continuously improve the quality of our products and services, all while making it easy to do business with us.

We work toward this goal by developing profitable, long-lasting relationships with our customers and by offering superior safety, service, quality, and value—supported by continuous innovation. All of our customer relationships are managed fairly and without discrimination. We do not misuse any dominant position or bargaining power to gain an unfair advantage or to disadvantage our customers.

XXVI. WE OBJECTIVELY SELECT OUR SUPPLIERS

MAGIRUS views suppliers and service providers as partners, and we build these relationships on three key pillars: resilience, efficiency, and sustainability. Our supply chain and our suppliers play a fundamental role in ensuring MAGIRUS's overall competitiveness. To achieve the highest levels of quality and customer satisfaction, we evaluate and select suppliers using objective, appropriate methods. Key considerations include the quality, innovation, cost, and service provided, as well as the supplier's social and environmental performance and adherence to the principles outlined in our Code. We seek to establish and maintain stable, transparent, mutually beneficial relationships with our suppliers, encouraging open communication and ongoing dialogue.

Because our suppliers represent MAGIRUS and reflect how we do business, the Company uses a risk-based approach for both initial vetting and ongoing due diligence of suppliers. Suppliers are required to provide timely and accurate information to MAGIRUS as part of this vetting and diligence process, and to update any information that becomes outdated or inaccurate.

Moreover, all Company suppliers must abide by the ethical standards set forth in our Supplier Code of Conduct. The Supplier Code of Conduct applies to all persons and entities who sell goods or services of any kind to MAGIRUS or any of its subsidiaries.

XXVII. WE MAINTAIN TRANSPARENT RELATIONS WITH PUBLIC INSTITUTIONS

MAGIRUS promotes and supports active dialogue and cooperation with authorities and institutions at the international, national, and local levels. Relations with public institutions are managed only by duly designated departments and authorised individuals. All such interactions must be transparent, conducted in accordance with our Values, and in full compliance with applicable laws. We engage with public officials and institutional stakeholders only where permitted by law, and always in strict observance of the law, this Code, and any relevant Company Policies.

We aim to contribute positively to the development of policies, regulations, and standards in the industries in which we operate. We also work to advance a more sustainable society by collaborating with public institutions, universities, and other organisations on research and development of innovative, sustainable solutions and technologies.

MAGIRUS fully cooperates with regulatory and governmental bodies during their legitimate activities and inspections. Whenever a public institution is a customer or supplier of a MAGIRUS company, we act in strict compliance with all laws governing the procurement of goods and services by or from that public entity.

XXVIII. WE PARTICIPATE IN PUBLIC MATTERS IN AN APPROPRIATE MANNER

MAGIRUS's relationships with trade unions, works councils, political parties, and their representatives and candidates are conducted with the highest level of transparency and fairness, and in strict compliance with applicable laws. Contributions of Company funds or resources (whether money, goods, services, or other benefits) to any of these organizations or individuals are prohibited, unless required by law or expressly permitted by law and authorised by the appropriate Company representatives. Any political contribution or activity made by employees of the Company is considered to be a personal and voluntary contribution, not one made on behalf of MAGIRUS.

XXIX. WE ARE ACTIVE MEMBERS OF THE COMMUNITIES IN WHICH WE OPERATE

MAGIRUS is aware that our decisions can have significant direct and indirect impacts on the local communities where we operate. Accordingly, we take all reasonable steps to inform those communities of relevant Company actions and projects, and we promote open dialogue to ensure that their legitimate expectations are considered. Moreover, we contribute to the social, economic, and institutional development of local communities through targeted programmes. We act in a socially responsible manner at all times, respecting the cultures and traditions of each country and community in which we operate, and conducting ourselves with integrity and good faith to earn the trust of the community.

XXX. WE ARE FAIR, HONEST, AND OPEN IN OUR COMMUNICATIONS

MAGIRUS recognises that communication and external relations influence the development of our Company both directly and indirectly. It is therefore essential that these activities be managed with clear and consistent standards, taking into account the needs of different business lines, our Company's economic and social role, and all applicable legal requirements.

Communications and disclosures to financial markets and supervisory authorities must be accurate, complete, fair, clear, and timely, and must always comply with applicable laws. Only those officers and employees with specific authorisation and responsibility for external communications may engage in them, and always in strict compliance with this Code and the relevant Company Policies.

Social media is an important channel of communication, but information disclosed on social platforms cannot be taken back and may have significant unintended consequences. Our Code and related Policies apply to all communications we make through social media that relate to, or could impact, MAGIRUS or any of its employees. Sharing confidential or non-public information via social media about the Company, co-workers, competitors, customers, or those acting on our behalf is a violation of our Code, our Policies, and possibly the law.

XXXI. INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM

We promote and maintain a robust Internal Control and Risk Management System based on best practices, to ensure that risks which could compromise sustainable long-term value creation are promptly identified and properly managed.

This Internal Control and Risk Management System is a set of policies, procedures, and processes established by the Company to provide reasonable assurance that all operations are carried out effectively, efficiently, and ethically; that the Company's assets are safeguarded; that financial and non-financial reporting is accurate; and that we comply with all applicable laws and regulations.

In practice, controls are carried out by the employees who manage and coordinate operational activities (for example: purchasing, logistics, production, sales), and these controls follow the principles of Separation of Duties and Delegation of Authority. Company guidelines and monitoring activities are overseen by specific departments and corporate functions such as Finance, Human Resources, ICT, Legal & Compliance, and Enterprise Risk Management (ERM). The Internal Audit function provides an additional, independent layer of control. Internal Audit's role is to review the adequacy and effectiveness of our Internal Control and Risk Management System, ensuring that the overall set of controls works properly and that risks are mitigated to an acceptable level for the organisation.

XXXII. WE HAVE ADOPTED PROCESSES FOR FINANCIAL REPORTING, ACCOUNTING, AND TAX COMPLIANCE

MAGIRUS is committed to the highest level of transparency and best practices in all our financial transactions and records. We have implemented rigorous processes to ensure that all transactions and business records are:

- Duly authorised, verifiable, and legitimate.
- Promptly and accurately recorded, with proper documentation, in accordance with relevant accounting principles and best practices.

We recognise that effective disclosure controls, procedures, and internal controls over financial reporting are of prime importance to the management and success of our Company. Accordingly, the MAGIRUS Board of Directors and senior management have established processes and Policies to ensure that employees receive the necessary training and experience to build and maintain effective disclosure controls and internal financial reporting controls.

Accuracy and transparency in every recorded transaction are vital to our success. The Company therefore requires true, accurate, timely, and detailed reporting from all employees for all financial and business transactions. All such transactions must be recorded truthfully and maintained with appropriate supporting documentation.

Improper bookkeeping or accounting is a violation of this Code and is illegal in almost all jurisdictions. It is strictly forbidden to engage in any behavior (or omission) that could result in false or incomplete financial records, including:

- Recording fictitious or misleading transactions.
- Misrepresenting the nature of transactions or recording transactions without adequate documentation.
- Failing to record liabilities or commitments (including guarantees or buy-back obligations) that could create obligations for MAGIRUS.

Additionally, MAGIRUS is committed to ensuring full, timely compliance with all applicable tax laws in every country where the Group operates. We have implemented a Tax Control Framework, as part of our overall internal control system, to identify, evaluate, and mitigate tax risk (defined as the risk of operating in violation of tax regulations or principles). By integrating the Tax Control Framework with our internal financial controls, MAGIRUS ensures that our tax affairs are managed consistently with our low tolerance for tax risk. We also promote a cooperative and transparent relationship with tax authorities.

XXXIII. WE HANDLE “INSIDE INFORMATION” LAWFULLY AND APPROPRIATELY

All employees are required to comply with applicable insider trading laws. In particular, no one working for or with MAGIRUS may make use of, or disclose to any unauthorised person, material information that is not public and that was obtained through their role at MAGIRUS, for the purpose of trading (directly or indirectly) in the securities of MAGIRUS or any other company. In other words, insider information gained through our work must never be used for personal gain or to benefit others. We also must comply with Company Policies regarding regular and special “blackout” periods during which trading in MAGIRUS securities is prohibited.

XXXIV. WE SAFEGUARD OUR CONFIDENTIAL INFORMATION

MAGIRUS considers its proprietary information—its know-how, trade secrets, copyrights, and other forms of intellectual property—to be assets of the utmost value. It is mandatory for everyone working for or with MAGIRUS to safeguard these valuable resources. We are strictly prohibited from sharing, disclosing, or using any confidential information about the Company for personal benefit or for the advantage of any third party, unless required by law or explicitly authorised by a MAGIRUS company.

These confidentiality obligations remain in effect even after the termination of an employment or business relationship with MAGIRUS. Employees must utilise appropriate measures to protect confidential information, for example by using secure storage, implementing password protection, and employing encryption when applicable.

In addition, MAGIRUS companies may receive confidential information from third parties. As part of our commitment to maintaining the highest level of confidentiality, we are responsible for safeguarding all such third-party information. This responsibility is typically formalised through agreements such as confidentiality or non-disclosure agreements with the third party.

Examples of confidential information include:

- Customer lists
- Inventions or product designs
- Contract terms and conditions
- Pricing details and cost structures
- Manufacturing costs and production volumes
- Technical product information

- Software source code or proprietary documentation
- Manufacturing processes

XXXV. A CULTURE OF COMPLIANCE AND ETHICS

A “speak-up” culture is an essential part of a healthy workplace. We want everyone to feel safe sharing ideas and concerns, reporting misconduct, and informing the Company about potential ethics or compliance violations. MAGIRUS expects good behaviour at all levels, which means staying informed about the Policies and regulations contained in this Code of Conduct and taking ownership of our actions.

XXXVI. WE ENCOURAGE SPEAKING UP

We understand that speaking up may sometimes be difficult. However, when a concern is not raised and addressed, it can harm our reputation, our employees’ health and safety, our brands, our customers, our communities, and our shareholders. The sooner a concern is brought to the Company’s attention, the sooner it can be investigated and corrected. Any employee who, in good faith, has reasonable grounds to suspect a violation of a law, this Code of Conduct, or a Company Policy—or who has knowledge of any other improper activities at MAGIRUS—is required to report the situation promptly, without fear of retaliation.

Reports can be made through the Company’s Integrity Line at <https://magirusgroup.integrityline.com>, which allows anonymous reporting where permitted by law. Alternatively, concerns may be reported to a manager, a Human Resources representative, or a member of the Legal and Compliance function.

All reports will be investigated promptly, thoroughly, and confidentially by trained staff, in compliance with all applicable laws. Any form of retaliation against someone who has in good faith reported a possible violation of the law, this Code, or a Company Policy (or who has sought guidance on applying the Code) is itself a violation of our Code. MAGIRUS will not tolerate retaliation of any kind.

Confirmed violations of the Code may result in disciplinary measures and other consequences (including legal action). In the most serious cases, a breach of the Code can lead to termination

of the employment, contract, or other business relationship with MAGIRUS, along with any contractual and legal consequences under applicable labour laws.

XXXVII. WE FOSTER CONTINUOUS LEARNING

MAGIRUS makes this Code of Conduct available to all employees and all other individuals who are subject to it. The Code can be accessed and downloaded from MAGIRUS's website (www.magirusgroup.com) and from the Company intranet. Printed copies of the Code are posted on bulletin boards at all our sites. It is also possible to obtain or consult the Code through your local Human Resources representative.

MAGIRUS has an extensive education programme designed to reinforce our Company culture and Values while fostering a culture of continuous learning. Among these offerings are courses dedicated to raising awareness about the Code of Conduct, related Company Policies, and legal requirements. All employees have a duty to complete any mandatory training courses. Likewise, all managers have a duty to ensure their team members complete such required training. Additional online courses as well as in-person educational opportunities are available; please contact a Human Resources or Legal & Compliance representative for more information.

The Code of Conduct cannot cover every situation or answer every question that may arise. This Code and the Company's other Policies are intended to serve as guides. If you are ever unsure about the proper course of action or have questions about interpreting the Code, you should discuss these concerns with your manager, a Human Resources representative, a member of the Internal Audit function, or a member of the Legal & Compliance function. Guidance can also be sought through the Compliance Integrity Line by using the "Make a report" feature.

The Code, and any subsequent updates to it, are approved by the MAGIRUS Board of Directors. Exceptions or waivers to the Code can only be authorised by the Board of Directors, and then only for extraordinary and well-justified reasons. Any such exception or waiver will be disclosed in accordance with applicable requirements.

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