



GT MOTIVE CODE OF CONDUCT

Enabling digital collaboration and transformation

A message from Ángel

At GT Motive, we proudly enjoy an exceptional best-in-class reputation developing solutions for the automobile claims processing. With over 40 years of history, our purpose and our strategy have always been connected by integrity. Collectively and individually, doing business the right way has been and is our way.

Not only GT Motive, but also the society we want to operate in have zero tolerance towards unethical business. Only by observing the highest standards we can ensure integrity in all our actions with clients, partners, investors and fellow employees.

As part of the Allianz Group, we are happy to share uncompromising ethics in everything we do. This Code reflects our common set of principles and shows that we discern right from wrong with the same judgement.

Thank you for taking the time to read this document and please speak up if you have questions or concerns. We live this Code every day as we hold ourselves accountable for clean business. No success is worth the cost of compromising the trust we build every day.

Yours,

Ángel Martínez
Chief Executive Officer



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How to use this document

This is an interactive brochure. It is designed with interactive elements such as pop ups and hyperlinks so that you can get the most out of the presented content.

Interactive symbols as well as bold text indicate spots where you can interact and discover additional information – either by clicking or by rollover.

Let's go and start exploring the Code of Conduct!

Watch out for interactive symbols



Our code



At GT Motive we are defined by our purpose. of enabling digital collaboration and transformation. Since our founding in 1971, we have been focused on providing our customers with the technology for achieving the best outcomes and restoring normality after a car accident or mechanical breakdown.

We achieve this purpose by conducting business in a way that makes us proud to say we work for GT Motive and makes our customers and partners proud to say they do business with us.

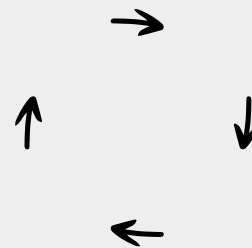
The GT Motive Code of Conduct reflects our values and principles and thus gives our employees guidance in their actions and decisions. This is particularly valuable in situations where our own policies or standards do not provide specific guidance, for example when we are confronted with competing priorities and conflicting demands.

Each of us has a responsibility to live by the principles contained in the Code as well as an expectation that other employees will do the same, be they directors, officers, executives, temporary employees, interns or trainees.

Finally, we are all expected to promptly report any known or suspected violations of the Code, corporate rules, or applicable laws and regulations. In such cases, we should contact our manager, a trusted leader, our local Human Resources or Compliance function, or we can raise our concerns via the dedicated reporting channels.



We are committed to operating in a culture where:



We treat each other fairly and respectfully

At GT Motive, we are stronger together.

How we act, how we operate, and the decisions that we make are focused on caring for each other and treating everyone fairly and with respect. The strength of our culture will be the decisive factor in enabling digital collaboration and transformation.



Inclusion and diversity



The diversity of our workforce enables GT Motive to truly understand our equally diverse customers and their needs. Fostering an inclusive company culture benefits our business and helps us be considered a credible, trustworthy partner. We believe in equality of opportunity and are committed to creating a fair environment where people can succeed regardless of gender, age, ethnicity, disability, religion, sexual orientation or cultural background.

We welcome diverse minds and abilities as they make us more innovative, more resilient and better equipped for the future.

Creating an inclusive company takes commitment from each of us in our daily work.

We respect and value each other's differences and ideas.



Learning aid: A matter of inclusion.

David and Tania are part of the Human Resources team and are working on implementing new work-life balance measures to benefit employees. Tania describes some of the challenges that single parents can face in the workplace, such as trying to balance taking care of their children and working usual office hours. David dismisses Tania's comments with a shrug and says, "Well, I've worked with single mothers and single fathers, and they seem to do just fine. Maybe when you have as much experience as I do, you'll understand this a little better."

Is David upholding GT Motive's commitment to inclusion?

No discrimination

Our commitment to diversity and inclusion does not allow for any kind of mistreatment of any individual, in any form, based on a personal characteristic. Discrimination contradicts the benefits that diverse views, ideas, and experiences bring to the table.

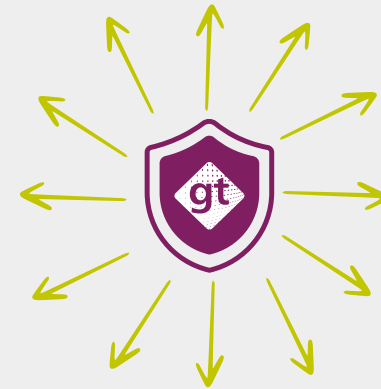
At GT Motive, we do not tolerate any form of discrimination, including racism.

Each of us will always treat our coworkers, business partners, and customers respectfully, without regard for any personal characteristics. At GT Motive, we are judged on our merit and skills, not on our background, beliefs, or other characteristics.

GT Motive supports an environment of trust, integrity, and respect.



E Protected characteristics



Discrimination contradicts the benefits that diverse views, ideas, and experiences bring to the table

No bullying or harassment

We all deserve to work in an environment free from bullying and harassment. We all agree that we would never want to be treated in a way that makes us feel uncomfortable, intimidated, or humiliated. We want to protect ourselves and others from such behavior.

Bullying and harassment are unacceptable to us because they run contrary to our values.

» **Bullying** means seeking to harm, coerce, or intimidate someone through abusive language, threatening conduct, and/or other actions that attempt to instill fear in others.

» **Harassment** is any unwelcome or hostile behavior that creates a negative work environment, makes someone feel threatened, or negatively affects someone's work performance.



Examples include:

Intimidation of any kind



Bullying and harassment are never acceptable at GT Motive at any time or for any reason.

If you experience or observe bullying or harassment, consider speaking to the person responsible and letting them know their actions are not acceptable. If you don't feel comfortable speaking to them or if the behavior continues, document it and discuss it with your manager, your Human Resources function, a trusted colleague or another company representative (such as a works council representative, or an Occupational Health Counselor).

Bullying and harassment are unacceptable to us because they run contrary to our values.

Health and safety



Health is more than not being sick. We believe that we need to create a compassionate and empathetic work environment and consistently address our mental, emotional, physical and social health in order to maintain and improve wellbeing. We understand that an empathetic work environment is more resilient, engaged, healthy, and collaborative.

At GT Motive, wellbeing is key to our success. If we aren't taking steps to stay healthy and live a balanced life, we can't do our best work or keep our promises to our co-workers and our customers. GT Motive encourages all of us to balance our work, personal lives, and health to make sure that we bring the best versions of ourselves to do our best work.

GT Motive also wants to ensure that we are always safe and secure – in our facilities and when traveling on GT Motive business.

Make sure you follow safety and security guidelines, avoid situations that could cause harm, and always be mindful of your surroundings.



We act with integrity



Enabling digital collaboration and transformation means being there for our customers and communities for years to come.

The reputation and brand we have built up over decades will continue to help us achieve this. Both of these pillars stand on a strong foundation: our integrity. Integrity is the core principle of how we choose to conduct business.

At GT Motive, we are committed to complying with the laws, regulations and other external rules that govern our operations, in all jurisdictions in which we operate. The same applies to our internal rules. Non-compliance can expose GT Motive and its employees to severe consequences, such as reputational damage, financial losses, or regulatory and criminal sanctions.

We do not engage in any business activities that attempt to directly or indirectly breach or circumvent laws or other rules that apply to us.

If you have observed or suspected violations of laws, regulations or GT Motive's internal rules, you are expected to speak up using the guidance provided in the Code's chapter "**We are transparent and we tell the truth**".

At GT Motive, we go above and beyond simply following the law and hold ourselves to a much higher standard: we strive to do the right thing, in every situation. When we're not sure of how to do that, it's always ok to ask questions and get advice.



Managing conflicts of interest

It could happen to any of us! One day, we could find ourselves in a business situation that affects our personal interests, or those of our family members or friends. These interests may be contrary to the interests of the company. It could also happen that we are involved in tasks or functions in our company that are connected with potentially conflicting interests.

Such situations are not only uncomfortable for both the employee and the company, but they can result in poor business decisions.

It is important to recognize that conflicts cannot always be avoided. Also, they may not always cause problems.

However, even if we act absolutely correctly in a conflict situation and make the “right” decision, this may not necessarily be clearly visible from the outside. Suspicion can still arise that “wrong” actions have been taken.

Therefore, transparency is the key. It is important for employees to disclose any conflict or potential conflict of interest to their line manager or superior at an early stage and get direction on how it should best be addressed.



Refer to typical situations that could potentially lead to conflicts of interest:

- » An employee of GT Motive, together with members of their family, runs a company that has a business relationship with GT Motive
- » An employee of GT Motive takes on a new job within the organization. Their first project in the new role is to examine the profitability of their previous department, where they worked for a long time



A family business:

Your team recently completed an important project, and your manager has asked you to organize a lunch to celebrate. Your brother runs a great catering company, and you know he would give you a discount.

Can you hire him to cater the lunch?

Free and fair competition

GT Motive is committed to promoting free and fair competition. Free and fair competition is vital to offering our customers the best possible solutions. All employees are therefore expected to comply with applicable antitrust and competition law at all times. This includes, among other things, making decisions about pricing and product and service offerings individually based on our experience and market intelligence and bidding on contracts fairly and independently.



A CLOSER LOOK: ATTENDING INDUSTRY CONVENTIONS AND TRADE MEETINGS

If you attend industry conventions or meetings, you should take special precaution. In these situations, you may find yourself discussing sensitive topics with competitors.

If you are concerned about a conversation you've had with a competitor, especially at an industry conference, raise your concern with your manager, or the Legal Department.

Free and fair competition is vital to offering our customers the best possible solutions to secure their future.

These hints might help you to better assess the situation:

- ☒ Meeting agendas should be known beforehand.
- ☒ Your line manager should know about your participation and approve it.
- ☒ You should never share information that is market relevant or confidential.
- ☒ Do not discuss pricing strategies or any other market-relevant data de mercado.

Preventing financial crime



Financial crime represents a breach of existing laws. It takes an enormous social and economic toll on the lives it touches and, thus, endangers people's future. GT Motive does not tolerate financial crime and has implemented measures to prevent, detect and react appropriately to such activity.

Financial crime includes, but is not limited to, corruption, bribery, money laundering, terrorist financing, fraud, tax evasion, and balance sheet falsification

GT Motive does not tolerate financial crime.



Adhering to economic sanctions

The main purpose of implementing economic sanctions is to bring about change in another nation's behavior or foreign policy, protect human rights, avoid using military force, or prevent the proliferation of nuclear weapons or weapons of mass destruction.



Gifts & Entertainment



We think carefully before we offer or accept **gifts** or **entertainment** to or from customers, business partners, government officials or other individuals or organizations GT Motive deals with.

To avoid the appearance of impropriety, we should always have a business reason for offering or accepting gifts and entertainment – doing so should never look like an attempt to influence a business decision.

Gifts & entertainment are an acceptable manner to foster professional relationships. In some parts of the world, not only are they acceptable, they are an essential business practice. GT Motive is committed to respecting local cultures and norms as long as gifts and entertainment provided and received are neither lavish nor excessive and are in no way a bribe or any form of inducement to influence a business decision. It's just not how we choose to do business.



Learning aid: An invitation to dinner.

Take a look at this scenario and think about the question.

Your team was looking for a company to complete a large IT project, and you received bids from several companies. The company that eventually won the bid has invited your team to a nice dinner at an upscale local restaurant to celebrate the start of the project and to get to know each other better.

Would it be wise for you to accept the invitation?

Observing rules around inside information



As an employee of GT Motive, you may have access to non-public information. This information must be treated confidentially and may only be shared with persons who need to know it for legitimate business purposes.

We may never use this information to benefit ourselves and our investment decisions. Moreover, we may never share such information with anyone else so they can use it to make decisions about buying or

selling stocks or any other financial instruments. Doing so would be unethical, illegal and unfair to GT Motive and would raise questions about the integrity of our company.

If you have questions about how to handle inside information, speak to the Compliance Department.

“Follow the need-to-know principle”



Holding business partners to our standards



We seek to work with business partners and others who share our values and work to the same high standards as ourselves.

The best way to achieve this goal when establishing new or building up on existing business relationships is to:

- » Involve the Compliance function at an early stage
- » Ensure that the principles of integrity, fairness, impartiality and discretion are fully met in the selection process

- » Apply thorough due diligence on potential business partners
- » Have business partners commit to abide by our Code of Conduct as well as by other important GT Motive standards and rules

“Follow the need-to-know principle”



Ask yourself:

We are transparent and we tell the truth



Honesty is one of the cornerstones of GT Motive's way of doing business – it supports everything else we do. We are honest with our customers, our shareholders, and the world around us. This helps us provide solutions that fit to the specific needs of our customers in the automotive market, and helps us ensure our company will be around for years to come.



Open and honest feedback



It all starts with being honest with each other. At GT Motive, we encourage an open exchange of opinions. We are willing to give and receive feedback, even if it involves difficult messages, without fear of retaliation. Feedback is a gift. When we receive feedback from others, we have the opportunity to act to positively improve experiences. This, in turn, helps GT Motive improve its products and business practices.

Likewise, we openly deal with our own mistakes and share lessons learned to prevent others from making the same mistakes. By sharing our experiences of mistakes, we help to improve the organization and make it more resilient.

While all of us are actively involved, our people managers have a key role to play by encouraging everyone within their organization to freely express their views, participate in decisions, and speak up when they believe something is not right.

It all starts with being honest with each other.



Correcting your boss.

During a meeting with a client, your manager accidentally misstates GT Motive's pricing for a certain solution. You don't think it was intentional, and you don't want to make your boss feel uncomfortable – but it's important for clients to have accurate information.

What should you do?

Voicing concerns

GT Motive will always listen to you if you feel you need to address an issue. If you have any kind of concerns, start by talking to your manager or to the Human Resources function. Most likely, your manager or HR will know the most about your work, can help you answer any questions, resolve something that doesn't seem right, or know where to go in order to get resolution.

GT Motive does not tolerate retaliation in any form. As long as your concern is raised in good faith, even if it turns out you were mistaken, you will not face negative consequences for speaking up. When we raise a concern about something that doesn't seem right, GT Motive will take action. The company will investigate concerns promptly and appropriately through trained personnel following appropriate procedures including a formal investigation process. If it turns out that a misconduct has occurred, GT Motive will take appropriate action against the people responsible.



If you're not comfortable speaking to your manager or HR, or if your manager or HR were not able to address your concern, you can also speak to any of the following resources:

- » A trusted leader.
- » A compliance function.
- » GT Motive's Ethical Channel:
speakup@gtmotive.com



Learning Aid: Select the correct answer.

You work in the financial department, and you've noticed on several occasions that one of your colleagues, Julia, often has overpriced expenses—more than she should, according to policies. When you asked Julia about it, she said, "It is the company's money, so I don't see what the problem is." You also mentioned the situation to your manager, who told you to let it go. Nothing has changed, and you're worried that she may be abusing expense reports.

What should you do?

- A** Tell another colleague and trust that they will do something about it.
- B** Report your concerns to your manager's manager, contact Compliance or make your report using the tools that are available for confidential employee reports.
- C** Nothing; you've done everything you can.

Transparent products and services



Being fair and transparent with our customers about our products and services, including their limitations is the best guarantee to enjoy our customers' long-term trust.

Therefore, we strive to adhere to clear principles throughout the entire life cycle of our products, from the initial idea for a new product, to marketing and sales activities.



These principles ensure that our products and services...

- 1 Are easy to understand and simple to handle



ommunication



A large white hashtag symbol (#) is centered on a blue background. A hand is visible at the bottom left, pointing towards the symbol. The word "ommunication" is partially visible at the top left, suggesting the full word is "Communication".

forum, we should never share any confidential information, information that hasn't been made public yet, or content that is meant for internal purposes only.

On our personal social media accounts, we should make clear that opinions are our own, and that we are not speaking on GT Motive's behalf.

A stylized illustration of a hand holding a smartphone. The phone's screen shows a yellow paper airplane icon flying over a blue shadow, with horizontal lines representing text above and below. Surrounding the phone are various colorful social media icons: a red heart in a speech bubble, a blue thumbs up, a pink Instagram camera, a yellow person icon, a green thumbs up, a blue Twitter bird, a red heart with the number 3, a blue circle, a red heart, a yellow heart, a green thumbs up, a blue thumbs up, and a red play button. The background is white with a light blue rectangular area in the top right corner.

Keeping proper books and records



Properly documenting our work helps each of us perform at our best. Any books and records that we create or work on for GT Motive need to be accurate, complete, timely, and truthful. This way we ensure that we comply with the relevant laws on record keeping. It also helps us make good decisions and keep our shareholders informed about how GT Motive is doing.



Click to see examples of books and records:

1 Expense reports.



Cooperation with regulators



GT Motive aims to maintain respectful and cooperative interactions with governments, regulators and supervisors. This refers to every touchpoint, i.e. regular contacts as well as particular requests, examinations or investigations. We strive for diligent and timely responses which provide a true and fair view.



We take ownership and responsibility



Since GT Motive printed its first paper-based estimating guide in 1971, the world has changed tremendously. However, one thing that has stayed constant for us during this time is our commitment to conducting business in a sustainable manner and supporting our customers and communities in their quest for lasting success.

That will not change going forward – we will continue to enable digital collaboration and transformation, sustainably.

Taking ownership doesn't just mean taking responsibility for the work we do for GT Motive – it means that we also take responsibility for our power to make an impact in the world.



Corporate responsibility / sustainability



Guided by our commitment to the principles of corporate social responsibility, we embed environmental and social concerns in all of our business activities. This ranges from integrating these issues across our organization to guiding our interactions with stakeholders beyond GT Motive. We offer sustainable products and services to our customers to transition to a low-carbon

economy and use natural resources responsibly. As a company we want to foster and enable self-sustained livelihoods of next generations.

**As a company we want to
foster and enable self-sustained
livelihoods of next generations.**



Respect for human rights



GT Motive is committed to respecting a wide range of international human rights standards and to integrating these into our business. We expect GT Motive employees, business partners, subsidiaries, vendors and suppliers to support and adhere to the different forms of human rights in alignment with international standards.

Our support and engagement in this regard includes an active stance against modern slavery and human trafficking, including child and forced labor through our operations and supply chain.



GT Motive is committed to respecting a wide range of international human rights standards

Responsible data management



Our clients, partners and colleagues trust us with a wealth of personal information and details of their lives.

We handle **personal data** ⓘ responsibly, transparently, with due care and in a fair and lawful manner. We use it only for specified and legitimate purposes and only keep it as long as needed. We never share it with anyone who isn't authorized to know it.

In order to ensure **confidentiality** ⓘ we apply proper security controls.

Beyond the safeguarding of confidential and personal data, GT Motive is aware of the challenges created by Big Data and Artificial Intelligence ("AI"). Therefore, we are committed to the responsible usage of Big Data Analytics and AI in all of our business activities. We fully adhere to the applicable laws and are committed to implementing them in a way that fosters and ensures a human-centric approach in our usage of AI systems.

We handle personal data responsibly, transparently, with due care and in a fair and lawful manner.

Protecting GT Motive's assets



We feel as responsible for the **assets** ⓘ of GT Motive as for the assets that belong to us personally. We protect them in the same way.

- ✓ We use the company's assets responsibly. This helps GT Motive succeed and helps us do our best work for our customers and communities.
- ✓ Intellectual property that we create or use to do our job, must never be shared with anyone who doesn't need to know it.
- ✓ We are equally careful with other companies' intellectual property. We never use it without permission.
- ? If you have questions about using intellectual property correctly, speak to your manager or contact your company's Legal function..

Living the code



As we said in the beginning, sometimes it can be challenging to do what is right. If you find yourself in such a situation, use our Code as a guide to stay on the right track.

courage to our customers and communities for what's ahead.

Enabling digital collaboration and transformation– Let's strive to do it right – with passion, every day.

Let's all contribute to enable digital collaboration and transformation by making good decisions and giving

You are empowered!

You can do a great job, deliver great service, and have confidence in knowing that GT Motive supports you in doing the right thing.

You take ownership and responsibility!

You do your job independently, bring in your own ideas and take responsibility for the results of your work.

You can trust your inner values!

If you are unsure of what to do in a situation, trust your inner voice and let the Code guide you.

Voice your concerns!

If you think something is really wrong, then bring it up.

You have support!

You can always ask for help. Turn to someone you trust and discuss your situation.





www.gtmotive.com

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GT MOTIVE, S.L.
Calle Teide, 3 – 28703, San Sebastián de los Reyes, Madrid.