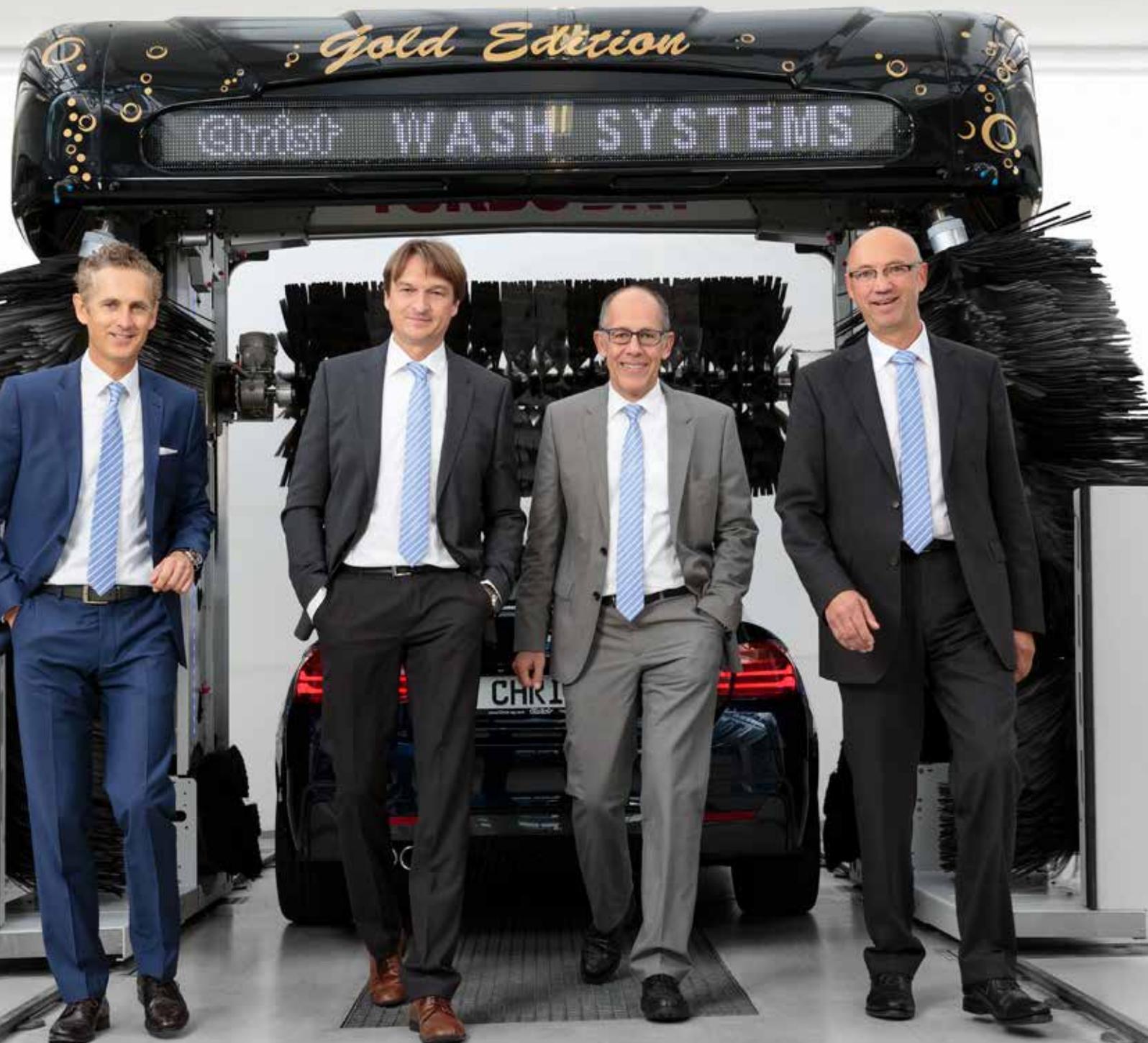


COMPLIANCE handbook
of the **CHRIST** Group



Christ



Alexander Christ

Markus Christ

Otto Christ

Engelbert Haggemüller

Foreword by the board of directors

Together in one direction

Since 1963, Otto Christ AG has grown to become one of the leading manufacturers of car washes in Europe. To support continuous growth, clear guidelines on our business practices and our ethical conduct must be drawn up.

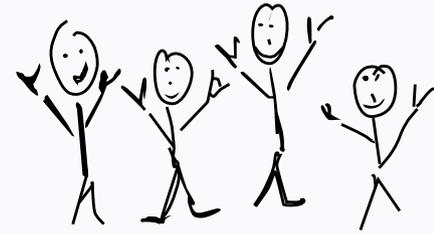
With this compliance handbook, Otto Christ AG commits itself to a binding set of rules intended to help us behave in accordance with applicable laws and generally accepted ethical standards. The aim is to prevent situations that call the integrity of our employees' behaviour into question.

In this context, the compliance handbook provides guidance and encourages every single employee to take responsibility for their own actions.

This compliance handbook, supplemented by specific legal provisions, regulations and internal instructions, applies uniformly to all business units and employees of the Christ Group.



**„WHETHER EMPLOYEE, TEMPORARY WORKER OR MANAGER - PERSONAL
COMMITMENT TO ETHICS AND COMPLIANCE IS IN THE HANDS
OF THE INDIVIDUAL. WE BEAR RESPONSIBILITY.“**



1. 1. Behavioural expectations and handbook

Safety and security

1.1 Lawful conduct

Compliance with laws and guidelines is a matter of course for Otto Christ AG. Each employee is therefore responsible for finding out for themselves which laws, regulations and internal instructions must be observed in their field of activity and responsibility.

You are responsible for following the guidelines in this handbook. If you know or suspect that anyone is breaching the guidelines in this handbook, you are required to report it and not to conduct any investigations of your own. Everyone in the company has to bear the consequences of non-compliance. This is the only way can we ensure that everybody is treated in a fair and responsible manner.

1.2 Shared responsibility for the reputation of Otto Christ AG

The reputation of Otto Christ AG is essentially shaped by the demeanour and behaviour of each individual. The illegal or inappropriate behaviour of even one employee can cause significant damage to the company.

Every employee is required to respect, maintain and promote the company's public image.

1.3 Environmental protection

Otto Christ AG is committed to protecting the environment and conserving natural resources. From the very first stage of selecting resources and production processes, the most environmentally friendly materials and processes are determined in order to reduce the impact on the environment when developing, using and subsequently disposing of or recycling products.

Our goal is to minimise the environmental impact caused by waste, waste water and emissions, and thereby to continuously improve our contribution to environmental protection.

Our employees are requested to protect the environment and avoid unnecessarily wasting resources (e.g. energy, paper or other raw materials) in their daily work as well.

*For better legibility, the masculine form is used for personal names and personal nouns. Corresponding terms apply in principle to all genders for the purpose of equal treatment. The abbreviated language form has only editorial reasons and does not imply any valuation.



„TREAT OTHERS AS YOU WISH TO BE TREATED“

2. Interaction with colleagues and employees

Respect and fairness

2.1 Leadership culture

Members of the board of directors and all managers are committed to demonstrating exemplary behaviour and ensuring that the content of this handbook is actively implemented. You are responsible for making sure that everyone in your particular area observes the listed rules.

Managerial responsibility also includes enhancing individuals' performance, fostering team spirit and motivating employees. Employees in turn undertake to promote Otto Christ AG in a dedicated and purposeful manner, as well as to contribute to the continuous improvement of work processes and results.

Misuse of one's position for personal gain and/or for the benefit of third parties or to the detriment of other employees will not be tolerated.

2.2 Equal treatment and mutual respect

We respect and protect the personal dignity, privacy and rights of every individual. We do not tolerate any discrimination on the grounds of sex, age, skin colour, culture, ethnic origin, sexual identity, disability, religion or belief. We also refuse to tolerate any form of harassment (unwanted advances, violation of dignity, threats), personal insults or bullying.

This applies in particular to interactions with colleagues, employees and business partners, as well as to the recruitment, promotion and dismissal of employees.

2.3 Fair working conditions

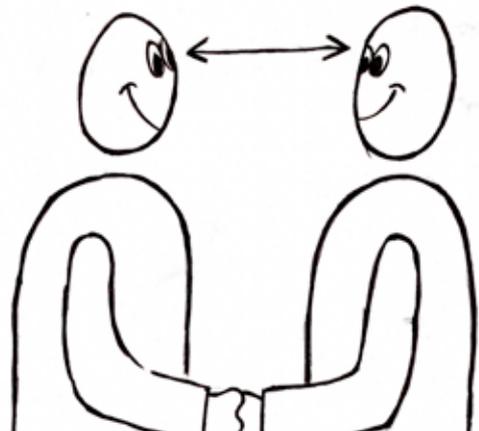
Otto Christ AG pays heed to appropriate remuneration and fair working conditions, complying with all statutory requirements. We do not tolerate any form of child labour or forced labour.

We expect our suppliers to likewise offer their employees fair working conditions. This includes complying with national regulations on working hours, as well as the right to appropriate remuneration based as a minimum on the respective statutory or collectively agreed minimum wage. We also require that our suppliers do not tolerate any form of child labour or forced labour within their company either.

2.4 Health and safety in the workplace

In the interests of the health and safety of all employees and visitors, each employee must comply with the applicable laws, regulations and standards on occupational safety at their workplace.

Every employee is requested to closely observe occupational safety, call attention to (or, as the case may be, take direct action to remedy) shortcomings and submit any suggestions for improvement to their manager or the designated contact for occupational safety.





3. Interaction with business partners and third parties

Honesty for the public good

3.1 Fair competition

Otto Christ AG respects the principles and rules of fair competition. Each employee is therefore obliged to comply with the applicable legislation of competition law and antitrust law.

In general, the legal provisions prohibit any form of consultation (written or oral) with competitors with regard to prices, terms and conditions, market sharing, customers or production capacities. Specification of resale prices and infringements of thirdparty industrial property rights (patents, trademarks, copyrights) are also not permitted.

Suppliers and customers must be selected according to objective and transparent criteria (e.g. quality, performance, price and suitability of the products and services offered). Bribery, corruption and personal gain by employees will not be tolerated.

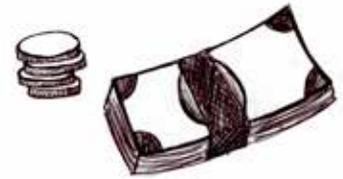
3.2 Gifts, invitations and other benefits

We avoid accepting and offering gifts or invitations for the purpose of obtaining business opportunities, services or confidential information, or to influence a decision in our favour. Events organised by the Christ Group itself, such as trade fair events, customer events and networking activities, are exceptions to this rule.

3.3 Donations

Donations are made in the form of cash and non-cash contributions to support cultural, social, religious, scientific, political or charitable objectives. Recipients, intended purposes and donation confirmations are documented to ensure transparency. Donations may not be made to individuals, private accounts and organisations whose goals are not compatible with those of Otto Christ AG.





Care must always be taken to ensure that there is no impression of influence on the part of the company. The entire board of directors decides on admissible applications for donations.

3.4 Sponsorship

With sponsorship, a service is provided in return for something, e.g. in the form of communication or marketing activities. Care must always be taken to ensure that there is an appropriate balance between the support and the agreed service in return. Furthermore, all sponsorship activities must be transparent, documented in writing and intended for a legitimate business purpose.

3.5 Compliance with the principles of foreign trade

Otto Christ AG observes current trade controls and complies with the import and export control regulations and economic embargoes valid in the respective countries of its business activities. All employees involved in importing and exporting goods and services are required to comply with all applicable economic

sanctions regulations and all guidelines and processes related to their business activity.

3.6 Anti-money laundering

Money laundering is the transfer of assets (not just cash) resulting from crime into the regular financial and economic cycle.

Otto Christ AG is opposed to any form of money laundering. No employee, either alone or in cooperation with a third party, may take any action that violates the applicable anti-money laundering laws. We pay particular attention to clear identification of our business partners, the traceability of payment methods and the identity of the paying party. Suspicious behaviour on the part of customers or business partners must be reported immediately.



**„THE GOAL OF A CONFLICT OR DISPUTE
SHOULD NOT BE VICTORY BUT PROGRESS.“**

Joseph Joubert

4. Avoiding conflicts of interest

We keep our personal and professional lives separate



4.1 Principle of avoidance

A conflict of interest arises when business decisions are influenced by private (personal or familial) interests.

Every employee is obliged to separate their private and business interests and to make impartial decisions in the best interests of the company. Employees must immediately notify their manager of any potential conflicts of interest in connection with the performance of their professional duties.

4.2 Private benefits from business relations

Conflicts of interest may arise if business relations are to be entered into with family members, relatives or close friends, or if business is conducted where these persons are significantly involved. Business relations with these persons should be avoided and are only permitted in justified exceptional cases with the approval of the relevant manager.

4.3 Secondary employment

Before taking up secondary employment, each employee must notify the company about this in writing (type, location, hours) and obtain prior written approval from the company. Secondary employment requiring approval includes work that is paid or unpaid, in both a freelance and employed capacity.

Approval can be refused if pursuing the secondary employment violates legal regulations, if the secondary employment interferes with the contractually agreed goods and services, or if the employee intends to work for a competitor.

4.4 Holdings in third-party companies

Direct or indirect holdings in non-listed companies that compete in whole or in part with Otto Christ AG are not permitted. Employees who wish to hold or already hold shares in a company that is a business partner of Otto Christ AG must obtain written permission.

Holdings in listed companies and in the form of equity funds or similar investments, where there is normally no opportunity for investors to exert influence, are excluded from the above provisions.



5. Protection of company property

Asset handling

Assets belonging to Otto Christ AG, such as office and business equipment, fleet vehicles, software, company data, tools and other work equipment may only be used for operational purposes unless private use by the employee has been expressly permitted in writing or within the framework of internal instructions. This applies in particular to the use of telephones, computers (e.g. installing third-party software) and the Internet, as well as to the sending of emails.

Unless otherwise stated, business trips are permitted by company car (pool vehicle), train or aeroplane. All employees, together with their managers, are responsible for ensuring that the type and scope of business trips are always proportionate to the trip's purpose and that trips are planned and carried out economically in terms of time and cost.

Business trips must be logged in the workflow.



„BE SURE OF WHAT YOU ARE DOING“

6. Information handling

Handling data and confidential knowledge



6.1 Information flow

Every employee has the right to complete and unbiased information needed for their field of work. This applies equally to oral, written, internal and external information. Employees are therefore obliged to ensure that information flows quickly and smoothly within the company.

This requires information to be documented, filed, stored and archived such that any decision-making employee can find the relevant information within a reasonable period of time.

6.2 Records and reports

All records and reports (internal and external) must be accurate and truthful. According to the principles of proper accounting, collections of data and other records must always be complete, accurate, timely and system-compatible. The requirement to provide truthful information also applies to expense and travel cost statements.

Minutes of all essential meetings, especially with third parties, must be drawn up during or immediately after the meeting and, if possible, signed by the participants.

6.3 Confidentiality

Confidential company information that has not been disclosed to the public must be kept secret. It must not be passed on to third parties without authorisation or made available in any other way. This includes, for example, details about the organisation of the company and its facilities as well as its manufacturing processes, distribution channels, customer lists, company software and calculation bases.

Secrecy must also be maintained with respect to all confidential information of our business partners, unless the disclosure or use of such information has been expressly permitted. The obligation of maintain confidentiality will continue to apply even after termination of the employment relationship.

6.4 Data protection and security

The protection of personal data belonging to our employees, customers and business partners is of special importance to Otto Christ AG. We collect, process and use personal data only if this is necessary for specified, explicit and legally permitted purposes or if the data subject has consented. The security of the data and processing operations is ensured by appropriate technical and organisational measures.

Every employee must observe the relevant data protection rules for their area of activity with the necessary care. Furthermore, all employees are obliged to take necessary measures to ensure the security of IT systems against threats and internal or external misuse (e.g. improper handling of login details or downloading of software).

6.5 Behaviour towards competitors

Competition law must be observed. Prices, quantities and conditions may not be negotiated with competitors. Market sharing agreements with competitors are not permitted. Contact with competitors must be limited to a strict minimum.



7. Implementing the compliance handbook

How should I deal with guidelines and violations?

Every employee is obliged to call attention to violations of the law or violations of the compliance handbook and other internal instructions. This should generally be done by reporting violations to their manager. If this is not possible in individual cases due to special circumstances, every employee has the right to contact the next higher level.

The matter will be thoroughly investigated and treated confidentially in accordance with legal regulations. If necessary, appropriate measures will be taken. Violation of this Code of Conduct may result in significant consequences, such as internal disciplinary action (e.g. a warning), termination of employment or the lodging of a criminal complaint.



Christ

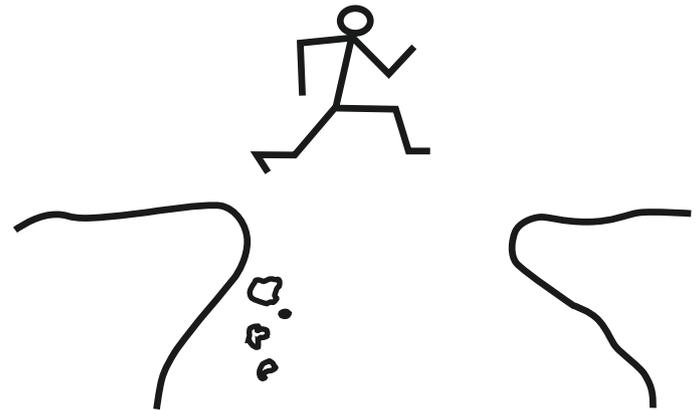
www.christ-ag.com

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Enjoy experiencing the future together!

VISION of the Christ Group!



Imprint

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Made by people for people

Competence | Motivation | Vision

This is what drives us.

