

CARGUARD Technologies GmbH

Corporate Policies

Code of Ethics and Conduct · Anti-Corruption and Bribery Policy · Human Rights Policy · Environmental Policy · Sustainability Policy

Dortmund, Germany

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Introduction

CARGUARD Technologies GmbH designs, imports and distributes vehicle electronics (navigation systems, driver-assistance camera systems, AI-based pedestrian detection for trucks, buses, motorhomes and construction/industrial vehicles) and household goods across the European Union and, on a growing basis, internationally. This document sets out the principles that govern how we conduct business, treat people, and manage our environmental footprint. It is published to give customers, partners and suppliers a clear, verifiable statement of our commitments and applies to all employees, management, and — where stated — to our supply chain partners.

1. Code of Ethics and Conduct

This Code of Ethics and Conduct defines the standards of integrity we expect from everyone acting on behalf of CARGUARD Technologies GmbH, including management, employees, and contractors.

1.1 Integrity in business dealings

- We compete fairly and do not engage in misleading advertising, false product claims, or deceptive sales practices toward customers, marketplaces (e.g. Amazon), or business partners.
- Product listings, technical specifications and safety certifications (e.g. CE, UN R159, RoHS) are represented accurately and kept up to date.
- Conflicts of interest between personal interests and company decisions are disclosed to management before a decision is made.

1.2 Fair treatment of employees and partners

- Decisions on hiring, pay and advancement are based on qualifications and performance, not on personal characteristics unrelated to the role.
- We expect the same standard of respectful, non-discriminatory conduct from every supplier and logistics partner we work with.

1.3 Confidentiality and data protection

- Customer and partner data is handled in accordance with the EU General Data Protection Regulation (GDPR).
- Business and trade information shared by partners is treated as confidential and is not disclosed to third parties without consent.

1.4 Reporting concerns

Employees and business partners who become aware of a breach of this Code are encouraged to raise it directly with management (info@carguard.de) without fear of retaliation.

2. Anti-Corruption and Bribery Policy

CARGUARD Technologies GmbH has zero tolerance for bribery and corruption in any form, in line with German law (§§ 299, 331–335 StGB) and the OECD Anti-Bribery Convention.

2.1 Prohibited conduct

- No employee, manager, or intermediary acting for the company may offer, promise, give, request or accept any bribe, kickback, or improper payment to influence a business decision — whether from customers, suppliers, freight forwarders, customs agents, certification bodies, or public officials.
- This applies equally to cash, gifts, hospitality, or any other benefit that goes beyond what is reasonable, proportionate and customary in normal business practice.

2.2 Gifts and hospitality

- Business gifts and hospitality must be modest, occasional, and never made with the intent or expectation of influencing a decision.
- Facilitation payments to speed up routine customs or administrative processes are not permitted.

2.3 Third parties

- Manufacturing partners, freight forwarders, and sales agents acting on our behalf are expected to comply with the same anti-corruption standard as a condition of doing business with us.

2.4 Consequences

Violations of this policy result in disciplinary action up to and including termination of employment or business relationship, and may be reported to the competent authorities where required by law.

3. Human Rights Policy

CARGUARD Technologies GmbH respects internationally recognised human rights, as set out in the UN Guiding Principles on Business and Human Rights and the core conventions of the International Labour Organization (ILO), and supports the objectives of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG).

3.1 Our own operations

- We do not employ child labour or forced labour in any form.
- Working hours, rest periods and compensation for our employees comply with applicable German and EU labour law.
- We provide a workplace free from harassment and discrimination and support employees' right to freedom of association.

3.2 Our supply chain

- The majority of our products are manufactured by third-party production partners, predominantly in Asia. We select manufacturing partners with a preference for those holding recognised social-compliance certifications (e.g. BSCI, SA8000, or equivalent factory audit reports) and request such documentation as part of supplier onboarding.
- We reserve the right to request audit reports, conduct supplier reviews, or end a manufacturing relationship where credible evidence of forced labour, child labour, or unsafe working conditions arises.

3.3 Grievance channel

Concerns about human rights impacts connected to our operations or supply chain can be raised at info@carguard.de and will be reviewed by management.

4. Environmental Policy

As an importer and distributor of electronic products, CARGUARD Technologies GmbH recognises its environmental responsibilities across product compliance, packaging, and logistics.

4.1 Product compliance

- Electronic products we place on the EU market comply with RoHS (restriction of hazardous substances), WEEE (waste electrical and electronic equipment) registration and take-back obligations, and REACH chemical-safety requirements, as applicable to each product category.
- We maintain the required EU market compliance documentation (CE declarations, technical files) for our own-brand products.

4.2 Packaging and waste

- We work to reduce excess packaging material in outbound shipments and favour recyclable packaging where commercially viable.

- We participate in national packaging-recycling compliance schemes (e.g. German Verpackungsgesetz / LUCID registration) where required.

4.3 Logistics and energy

- Fulfilment through Amazon FBA consolidates shipments through Amazon's logistics network, which reduces the number of individual last-mile deliveries compared with direct-to-consumer shipping.
- We favour sea freight over air freight for inbound goods from manufacturing partners where lead times allow, to reduce the carbon intensity of our logistics.

4.4 Continuous improvement

We review packaging, freight mode and supplier choices periodically with the aim of reducing environmental impact as our business grows.

5. Sustainability Policy

This policy describes how CARGUARD Technologies GmbH approaches sustainability across product design, supplier selection and long-term business practice.

5.1 Product durability and safety

- Our driver-assistance and camera systems are designed to improve road and workplace safety (e.g. pedestrian detection for trucks, forklifts and construction machinery under UN R159), extending their value well beyond the point of sale.
- We favour durable components and offer spare parts for our product lines to extend product lifetime and reduce replacement waste.

5.2 Responsible sourcing

- We work with a limited, vetted set of manufacturing partners rather than opportunistic sourcing, allowing for closer quality and compliance oversight over time.
- Supplier relationships are reviewed periodically against quality, compliance, and — where available — social and environmental certification status.

5.3 Governance of this policy

- This Sustainability Policy, together with the other policies in this document, is reviewed at least annually by management and updated as our business and applicable regulation evolve.
- Version history and the current version are maintained by the Managing Director and made available on request to customers and partners.

5.4 Contact

Questions about any policy in this document can be directed to info@carguard.de.