

Code of Conduct

of the

Bajaj Mobility-Group

effective from September 2026

MOBILITY
AG

Status: September 2026

Code of Conduct of the Bajaj Mobility Group

I. GENER AL PRINCIPLES AND SCOPE

II. COMPLIANCE REGUL ATIONS IN DETAIL

- A) Human rights, respect, diversity, ethical recruitment, fair working conditions, health protection, occupational safety
- B) Aspects of sustainability, protection of the environment and climate, animal welfare, and supply chain compliance
- C) Handling of conflict minerals, chemicals, pollutants
- D) Fair competition, prohibition of cartels
- E) Corruption, bribery, invitations, gifts
- F) Money laundering, financing of terrorism, export controls
- G) Taxes, tax strategy, tax compliance, international tax guidelines
- H) Conflicts of interest, prohibition of insider trading, political activities, donations, sponsorship
- I) Handling of company property, corporate assets, business and trade secrets, data protection, intellectual property, artificial intelligence
- J) Speak-up culture, whistleblower protection, integrity

III. FINAL PROVISIONS

Status: September 2026

I. GENER AL PRINCIPLES AND SCOPE

The Bajaj Mobility Group endeavours to ensure high professional and ethical standards in everything it does and all the actions it takes as a business. Adherence to the rule of law, honesty, ethical conduct, reliability, respect, and trust form the foundation and the universal basis for good collaboration and stable business relationships at every location where the Bajaj Mobility Group operates around the world. The focus is on strictly complying with the applicable laws, regulations, and guidelines. In particular, the "OECD Guidelines for Multinational Enterprises on Responsible Business Conduct", which are available online, apply.

The Bajaj Mobility Group seeks to build long-lasting business relationships with its stakeholders, as defined in the non-financial statement, and to maintain these relationships in a reliable and satisfactory manner over the long term. This is why the Group wants to actively protect its stakeholders from any kind of vulnerability and thus gain their trust in an honest way. On the one hand, it accomplishes this objective through direct, punctual, and transparent communication. On the other hand, it guarantees that its products and services adhere to the highest standards concerning safety, health, environmental protection, and quality and comply with applicable legal requirements. Certified management systems, including the Quality Management System according to ISO 9001:2015 and the Environmental Management System according to ISO 14001:2015, serve as the foundation for coordinating, monitoring, and documenting the processes within the Bajaj Mobility Group. The objective is to maintain equilibrium among social factors, the economy, and the environment across the entire value chain, while continually enhancing them.

This global Code of Conduct of the Bajaj Mobility Group (hereinafter referred to as the "CoC") defines the culture and values on which the Bajaj Mobility Group bases its business activities and sets comprehensive and clear rules for all employees, managers, and board members as well as its business partners, suppliers, customers, and consultants (hereinafter referred to jointly as "Business Partners"), unless reference is made to the exclusive compliance of the Bajaj Mobility Group or the Business Partners. Business Partners are expected to introduce comparable ethical principles and uphold these standards themselves, while ensuring compliance of their affiliated companies. Affiliated companies, as defined in this CoC, include those in which the Business Partner directly or indirectly holds more than 50 % of the shares or voting rights, as well as all companies under the management or control of the Business Partner.

Furthermore, Business Partners will communicate all principles and standards defined in this CoC to their subcontractors and suppliers throughout the supply chain and encourage them to act accordingly. Business Partners will also take this into account when selecting their subcontractors.

Status: September 2026

II. COMPLIANCE REGUL ATIONS IN DETAIL

A) Human rights, respect, diversity, ethical recruitment, fair working conditions, health protection, occupational safety

The Bajaj Mobility Group and its Business Partners:

1. do not endorse any violation of human rights, ensure respect for human rights in the conduct of their business, and do not accept discriminatory behaviour toward any employees or Business Partners. The Bajaj Mobility Group and its business partners ensure that applicants and employees are assessed and treated free from discrimination, prejudice, deception, or any other form of unfair treatment. Internationally recognized human rights are respected and upheld.

2. foster cooperation based on fairness, trust, and respect. The working environment that is created is characterized by mutual trust and wellbeing in which each individual is treated with dignity and respect and people from diverse cultures and with different personal backgrounds are valued. The diversity expressed in the origins, cultures, languages, and ideas of its employees is appreciated. The corporate culture is based on welcoming, respecting and valuing all colleagues. This creates an environment where everyone has the opportunity to succeed and freely express their opinion. The right to freedom of expression is particularly valued and respected.

3. respect the personal dignity and privacy of each employee. All people are respected, regardless of their age, gender, nationality, skin color, religion, culture, ethnic origin, worldview, any disability, sexual orientation or origin. Equal opportunities and equal treatment are respected and encouraged.

4. prohibit discrimination, bullying and harassment, in particular any form of sexual harassment, such as improper advances, derogatory comments, inappropriate jokes, demeaning expressions, suggestive gestures, or the display of explicit material in any form (e.g., written, verbal or digital). In the event such incidents occur, colleagues encourage each other to address such cases and report them anonymously and confidentially through various company channels. The provisions of the Bajaj Mobility Group's "Diversity and Anti-Discrimination Policy", which is available online, apply to Business Partners accordingly.

5. comply with all existing and applicable regulations under labor law in the respective labor markets, for example regulations on working hours, minimum wages, hygiene, works agreements, the works council or freedom of assembly. Significant importance is placed on ensuring that employees have an appropriate, decent standard of living. The salary policy aims for equal, market-standard, and fair compensation for equal performance.
   Reference is made to the "Explanations on the implementation of the provisions of the core labour standards of the International Labour Organization (ILO) in Austria and within the Bajaj Mobility Group" that can be accessed online. These standards are also expected to be upheld by Business

Partners. The Bajaj Mobility Group, along with its Business Partners, commits to employing only those individuals who have attained the minimum working age as mandated by the relevant national legislation. Moreover, the Bajaj Mobility Group and its Business Partners pledge to comply with the convention of the International Labour Organization (ILO C138), which stipulates a minimum age for employing children. In accordance with this, the employment of children under the age of 13 is not tolerated in any case. The full "legal text of the ILO (C138)" can be viewed online. Reference is also extended to the adherence to the "Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (ILO 182)", which can be viewed online.

6. strictly reject any use of forced or compulsory labor as well as any form of modern slavery or human trafficking, bonded labor, involuntary or exploitative prison labor or other forms of exploitation in their companies or at (sub-)suppliers. Employment relationships are voluntary and can be terminated by employees at their own will and by giving reasonable notice. No private or public security personnel are engaged in situations where there is a threat of violating the ban on torture, causing harm to individuals' lives or physical well-being, or infringing upon freedom of association and coalition. Reference is made to the "Declaration on Modern Slavery and Human Trafficking" of the Bajaj Mobility Group, which can be viewed online. These commitments must likewise be adhered to by our Business Partners. We also highlight compliance with the "Forced Labour Convention (ILO 29)", and the "Abolition of Forced Labour Convention (ILO 105)", both of which are available for reference online.

7. ensure that the right to join associations and trade unions is respected and that the rights to freedom of association, collective bargaining, and strike action may be exercised freely.

8. comply with the applicable national laws and regulations governing health protection and occupational safety and maintain appropriate occupational safety management. This includes preventive measures such as ensuring a safe workplace, providing protective clothing, preventing, and reducing excessive noise exposure, conducting training and safety briefings for employees to minimize and prevent workplace safety risks, and striving to prevent work-related accidents and occupational illnesses to the best of their ability. Reference is made to the "Occupational Health and Safety and Employee Health Policy" of the Bajaj Mobility Group, which is available online. Business Partners are expected to observe these principles accordingly.

B) Aspects of sustainability, protection of the environment and climate, animal welfare, and supply chain compliance

The Bajaj Mobility Group and its business partners consider human rights and environmental risks in all their business activities and implement appropriate measures to address and mitigate such risks. These measures include initiatives aimed at environmental protection, the preservation of natural resources, the decarbonization of transportation, and climate protection. In their operations and production processes, they strive to reduce negative environmental impacts and prevent irreversible environmental

harm. The Bajaj Mobility Group's "Environmental Policy", available online, provides the framework for its environmental management system.

Companies are increasingly required under applicable laws and international standards, as part of supply chain compliance obligations, to uphold human rights and environmental requirements and to implement defined due diligence obligations, including fair payment terms for suppliers. This may contribute to compliance with social standards, such as the payment of fair wages throughout the supply chain. The core elements of these due diligence obligations consist of the identification and assessment of ESG risks and, where necessary, the implementation of preventive and remedial measures. The Bajaj Mobility Group and its business partners are required to identify human rights and environmental risks and to actively work towards their prevention and reduction.

In the event of a potential risk of a violation or an actual violation of international social and environmental standards, appropriate preventive or remedial measures shall be taken to minimize or prevent such violation. Business partners shall immediately inform the Bajaj Mobility Group of any actual violation within the supply chain or within their own organization, disclose all relevant details relating to the violation, respond fully and without undue delay to any inquiries from the Bajaj Mobility Group, and take all necessary steps to eliminate or mitigate the violation.

The Bajaj Mobility Group and its business partners are committed to identifying significant adverse environmental impacts arising from their activities and products, taking into account the product life cycle and their respective ability to influence such impacts, and to implementing appropriate measures for their prevention or reduction. Such measures may include, in particular, the conscious use of materials and raw materials, the segregation and reduction of waste, the lawful and environmentally sound treatment and disposal of waste, chemicals and wastewater, the reuse and recycling of materials, the monitoring, prevention and reduction of harmful air and noise emissions, the protection of water quality and the prevention of water pollution, the reduction of water consumption, and the responsible use of water. Furthermore, decarbonization is a focus of the Bajaj Mobility Group. The minimization of harm to the environment and human health is taken into account. Principles relating to animal testing, including replacement, reduction and refinement, as well as the avoidance of unnecessary suffering, are likewise observed. Corresponding conduct is also expected from business partners. The impacts of land use on the environment, biodiversity and ecosystems must be taken into account, and appropriate measures must be implemented to prevent or reduce such impacts. All applicable environmental laws and regulations must be complied with. Unlawful forced evictions, unlawful clear-cutting, and the unlawful deprivation of land, forests or water resources are prohibited. The customs and culture of indigenous peoples must be respected, and all applicable land, forest and water rights must be observed. Within the scope of their respective capabilities, the Bajaj Mobility Group and its business partners contribute to the reduction of CO_2 emissions, air pollution, soil contamination and other harmful soil changes, as well as deforestation. The Bajaj Mobility Group and its business partners place particular emphasis on measures to increase energy efficiency, reduce energy consumption, promote the use of renewable energy sources, and prevent overconsumption

C) Handling of conflict minerals, chemicals, pollutants

The Bajaj Mobility Group and its Business Partners are obligated to comply with all applicable legal regulations regarding conflict minerals and prohibited or declarable substances. The Bajaj Mobility Group and its business partners are obliged to comply with all applicable legal regulations relating to conflict minerals and prohibited as well as declarable substances. When using conflict minerals and other critical or strategic materials, due regard shall be given to sustainability and transparency shall be maintained. It shall furthermore be ensured that applicable prohibitions or restrictions concerning chemicals, such as mercury or persistent organic pollutants (POPs), are complied with. International agreements, such as the Stockholm Convention, as well as national regulations governing the handling of chemicals, shall be observed and relevant requirements shall be implemented. Responsible chemicals management must be ensured. In addition, the provisions regarding the import and export of hazardous waste in accordance with the Basel Convention, as well as the information obligations relating to substances referred to in REACH Regulation (EC) No. 1907/2006, shall be complied with. Business partners (in particular suppliers) are obliged to provide the Bajaj Mobility Group, on an annual basis, with information regarding conflict minerals on the basis of the Conflict Minerals Reporting Template (CMRT) of the Responsible Minerals Initiative (RMI), in its respective current version. Business partners (in particular suppliers) must ensure that materials are sourced responsibly throughout their value chain and that no human rights are violated.

D) Fair competition, prohibition of cartels

Fair competition serves as the ultimate benchmark for any company operating on an international scale. The Bajaj Mobility Group, alongside its business partners, is steadfast in its commitment to adhering to the laws, rules, and regulations governing competition, particularly antitrust laws, across all their markets. They are dedicated to establishing a level playing field as mandated by their obligation. Every business endeavor is carried out with integrity, transparency, and a commitment to fairness. The company consistently upholds ethical standards and treats all market participants with respect and honesty. The Bajaj Mobility Group and its Business Partners refrain from engaging in antitrust agreements and avoid any exploitation of market dominance. They diligently follow the pertinent guidelines outlined by the Organization for Economic Cooperation and Development (OECD) for multinational enterprises, thereby mitigating potential anti-competitive effects. These OECD guidelines include preventing the abuse of market dominance, avoiding market sharing, bid rigging, production limitations, and price manipulation.

E) Corruption, bribery, invitations, gifts

The Bajaj Mobility Group and its Business Partners fully adhere to the respective national and international regulations for combating corruption (e.g., UNCAC, U.S. Foreign Corrupt Practices Act, UK Bribery Act, OECD Guidelines for Multinational Enterprises) and anti-bribery provisions. They unequivocally oppose all forms of corruption and bribery and commit to doing everything within their

power to combat corruption and bribery. This includes compliance with global sanctions in accordance with the relevant authorities and internal directives. They also share responsibility for detecting, preventing, and reporting such criminal cases. No form of corruption or bribery is tolerated. The Bajaj Mobility Group attaches great importance to raising awareness among its employees, which is ensured through the implementation of clear directives and policies to prevent corruption, bribery, and the unlawful acceptance of benefits. The mandatory annual completion of a corresponding e-learning program by all employees further reinforces these measures.

The Bajaj Mobility Group and its Business Partners, along with all their employees, executives, and members of the organization, do not accept gifts, invitations, entertainment, or other advantages or benefits from other Business Partners. Exceptions are only made for those that fall within socially accepted and reasonable boundaries, where accepting them would not reasonably be expected to influence business decisions or actions. Invitations, gifts, other offerings, or benefits must never be misused for the purpose of exerting undue influence. Accepting cash is prohibited. Gifts, invitations, entertainment, other advantages, or benefits must not be actively solicited. Within the Bajaj Mobility Group, in cases where declining a gift, invitation, or hospitality could be perceived as impolite or offensive due to local customs and cultural practices, employees must consult their direct supervisor or the designated contact for compliance matters before accepting such gift, invitation, or hospitality. Gifts, invitations, entertainment, or other benefits related to authorities, offices, courts, experts, or officials, and the like, must always be clarified and coordinated with the compliance team responsible for such matters within the Bajaj Mobility Group before acceptance.

F) Money laundering, financing of terrorism, export controls

The Bajaj Mobility Group and its business partners are obliged to comply with the applicable laws relating to the prevention of money laundering and terrorist financing, as well as global sanctions and embargo regulations, and shall neither directly nor indirectly participate in activities associated with money laundering and/or terrorist financing. They pledge to abstain from direct or indirect involvement in activities associated with money laundering and/or the financing of terrorism. Both the Bajaj Mobility Group and its Business Partners are dedicated to taking every possible measure to combat these illicit activities and share responsibility for their detection, prevention, and reporting. They unambiguously reject all forms of money laundering and the financing of terrorism. All business transactions are conducted exclusively with reputable partners using funds derived solely from legal sources. As a result, they categorically disapprove of any involvement in money laundering or the financing of terrorism.

The Bajaj Mobility Group and its Business Partners strictly adhere to national and international regulations governing the import and export of goods, services, technology and information to prevent violations of export control laws (such as Dual Use Regulation, EAR, ITAR). They also carefully observe embargoes and sanction lists related to countries, assets, or individuals. They require their Business Partners to similarly comply with national and international export control laws. Business partners are obliged to independently obtain all export control authorizations, permits, and approvals required for

their products, services, or transactions. Furthermore, they shall immediately inform the Bajaj Mobility Group in writing if their goods, services, or other transactions are subject to any trade restrictions or export control regulations. Business partners further undertake to take appropriate measures to verify end-use and end-users and to comply with the applicable export control and sanctions regulations at all times.

G) Taxes, Tax Strategy, Tax Compliance, International Tax Guidelines

The tax policy of the Bajaj Mobility Group and its Business Partners ensures that taxes and duties are declared and remitted in the prescribed amount and within the required deadlines in accordance with the applicable tax laws. All tax obligations shall be complied with. Through exemplary conduct, the Bajaj Mobility Group seeks to contribute to the economic and social functioning of the respective states. The departments responsible for tax matters within the Bajaj Mobility Group and its Business Partners strive to maintain cooperative, objective, and transparent relationships with tax authorities. When necessary, external tax advisors with expertise in specialized areas are engaged to ensure compliance with legal requirements and fulfill tax obligations. Both direct taxes (such as income tax, capital gains tax, and corporation tax) and indirect taxes (VAT, mineral oil tax, etc.) are diligently paid to the relevant tax authorities in compliance with applicable laws. The group companies of the Bajaj Mobility Group currently form, to the extent possible, a group within the meaning of corporate income tax law with Bajaj Mobility AG, Mattighofen, as well as a fiscal unity for VAT purposes. Appropriate group taxation and tax transfer agreements regulate the specifics. The overall tax burden within the group is based on the countries and tax rates in which the group and its Business Partners operate.

The Bajaj Mobility Group and its Business Partners endorse the OECD principles regarding the avoidance of the planned reduction of tax bases and profit shifting by multinational corporations, commonly known as "BEPS" (Base Erosion and Profit Shifting). The Bajaj Mobility Group maintains its legal domicile only in countries contributing to its business activities, and it does not engage in any tax structures lacking economic substance or non-tax business purposes. Additionally, the Bajaj Mobility Group does not operate in countries classified as "tax havens."

Transfer pricing within the Bajaj Mobility Group and Business Partners (subject to compliance requirements) is determined following OECD guidelines and EU national laws and regulations. The transfer pricing concept consistently adheres to the arm's length principle. Furthermore, an internal group guideline within the Bajaj Mobility Group ensures compliance with the required documentation for the transfer pricing policy. In accordance with specific requirements, documentation is prepared as both a local file and a master file. The country-by-country reporting is annually disclosed to the tax authorities of the jurisdiction of residence as of 31 December for the preceding financial year.

H) Conflicts of interest, prohibition of insider trading, political activities, donations, sponsorship

The professional conduct of each employee of the Bajaj Mobility Group is governed exclusively by the legitimate interests of the Bajaj Mobility Group. Their actions are aimed at avoiding any conflicts of interest that could adversely affect the company. The Bajaj Mobility Group avoids situations where personal or financial interests may conflict with the interests of the company by promptly addressing such situations. The Bajaj Mobility Group does not create conflicts of interest that could harm its Business Partners. Employees of the Bajaj Mobility Group are prohibited from engaging in financial, business, or other activities or employments that could impair their performance or availability at the Bajaj Mobility Group or lead to an unauthorized conflict of interest. Approved secondary activities may not utilize the facilities and resources of the Bajaj Mobility Group.

Business Partners are obligated to make decisions related to their business activities with the Bajaj Mobility Group solely based on objective criteria. Any form of conflict of interest, particularly involving personal interests or economic actions, including any conflict of interest related to family members or other affiliated natural or legal persons, must be avoided. The Bajaj Mobility Group and its Business Partners reject any attempts to influence their business activities through personal relationships or interests. Therefore, business decisions are made exclusively on a well-founded basis, with comprehensive expertise, and following the principle of objectivity.

The Bajaj Mobility Group and its Business Partners handle insider information responsibly and in accordance with legal regulations. They do not disclose such information to third parties and adhere to legal requirements regarding securities trading. Consequently, the misuse of insider information, as well as insider trading itself, is prohibited. The Bajaj Mobility Group and its Business Partners comply with applicable laws, rules, regulations, and internal guidelines.

Engaging in political activities on the premises, with resources, or in the name of the Bajaj Mobility Group is strictly prohibited. This means that the Bajaj Mobility Group is not only barred from engaging in political activities, but also third parties are prohibited from conducting political activities using the premises or resources of the Bajaj Mobility Group. The Bajaj Mobility Group is explicitly prohibited from supporting political parties, candidates, officeholders, other interest groups and religious communities. Necessary communication with official representatives of a state and its regions and municipalities by individuals authorized by the Bajaj Mobility Group for corporate governance purposes is not affected by this restriction.

Donations and sponsorship funds may only be awarded by the Bajaj Mobility Group and its Business Partners in compliance with applicable legal regulations.

Status: September 2026

I) Handling of company property, corporate assets, business and trade secrets, data protection, intellectual property, artificial intelligence

The staff of the Bajaj Mobility Group and its Business Partners handle the property of the Bajaj Mobility Group, its Business Partners, and their respective partners with the utmost responsibility, care, and conservation. This includes both tangible assets and intangible assets, such as business-related information, trade secrets, know-how, intellectual property, or industrial property rights. All employees of the Bajaj Mobility Group protect the assets entrusted to them by the Bajaj Mobility Group against loss, damage, misuse, and theft. Any loss, damage, misuse, or theft must be reported immediately. All equipment (company vehicles, IT equipment, mobile phones, etc.) must be used with due diligence and in strict accordance with internal guidelines. Additionally, any suspected or actual misuse of trademarks, logos, or other intellectual property must be promptly reported to the responsible departments.

The Bajaj Mobility Group and its Business Partners treat each other's trade secrets, as well as other confidential information and business information of any kind that is accessible or made accessible in any way, whether or not marked as confidential, confidentially and do not disclose them. They commit to protecting this information, using it ethically, and not publishing it or making it accessible to third parties in any form or for any purpose other than the agreed purpose without prior written consent. This does not apply if information must be disclosed on the orders of a court or authority or pursuant to applicable law or regulation.

The Bajaj Mobility Group and its Business Partners fully commit to complying with data protection. The processing of all personal data takes place in compliance with all applicable legal and contractual data protection regulations (including the European General Data Protection Regulation EU 2016/679). By implementing appropriate technical and organizational measures, the Bajaj Mobility Group and its Business Partners ensure an adequate level of information security.

The use of Artificial Intelligence (AI) may have significant implications for fundamental rights, health, safety, the environment, and the broader social and economic context. Accordingly, diligence shall be exercised in the handling and deployment of AI systems. The use of AI shall be strictly in compliance with all applicable legal requirements, in particular the EU Regulation on Artificial Intelligence (“AI Act”), as well as the internal policies and guidelines of the Bajaj Mobility Group. Prior to the use of any AI system, its risk category shall be clearly identified in accordance with the AI Act. For systems classified as high-risk, appropriate technical and organizational measures shall be implemented. Under no circumstances shall AI systems be used that are deemed prohibited under the AI Act. AI serves to support human decision-making and does not replace the responsibility of the respective employees. Responsibility for decisions, actions and work results shall at all times remain with the persons responsible. AI-generated content must be critically reviewed and appropriately verified prior to its use or dissemination. Human oversight shall be ensured throughout the entire use of AI. To ensure the responsible use of AI, employees of the Bajaj Mobility Group shall be made aware of the relevant requirements through trainings and guidelines. Business Partners shall ensure the implementation of equivalent standards within their own operations.

Status: September 2026

J) Speak-up culture, whistleblower protection, integrity

Integrity, transparency and responsible conduct form the foundation of the sustainable success of the Bajaj Mobility Group. The Bajaj Mobility Group promotes an open speak-up culture in which employees and third parties are encouraged to raise and report concerns, violations or other misconduct at an early stage. Every report can help identify risks, prevent harm and continuously improve existing processes. The reporting of potential misconduct is expressly welcomed and is regarded as an important contribution to a strong compliance culture. The Bajaj Mobility Group considers reports to be a valuable source of information for the continuous improvement of its compliance and risk management systems.

Reporting channels and complaint mechanisms: The Bajaj Mobility Group provides employees and external persons, including business partners within the supply chain, with various reporting channels and complaint mechanisms. Employees are generally encouraged to first contact their respective supervisor, who can provide support regarding questions and concerns and initiate the necessary steps. If this course of action does not appear appropriate, reports may be submitted at any time through additional reporting channels. These include, in particular:

- the established compliance mailboxes (compliance@bajajmobility.com),
- personal or telephone contact with the Legal Compliance Team, and
- the Group-wide Whistleblower System.

The Whistleblower System is available online to employees and external persons 24 hours a day and also enables anonymous reporting. Each employee is required to report any known or suspected violations of laws and/or internal requirements. A report may also be made where there is merely a reasonable suspicion of a potential violation.

Fair and independent case handling: All reports received shall be handled in accordance with a uniform and structured investigation process. Within the Bajaj Mobility Group, every report received shall be carefully reviewed, regardless of whether it constitutes a report that is specifically protected by law or not. This includes, in particular, reports relating to compliance, legal, integrity, human rights, sustainability, data protection or other misconduct-related matters. Each investigation shall be conducted in accordance with the principles of fairness, objectivity, proportionality, confidentiality, documentation and traceability. Where necessary, appropriate corrective, improvement and preventive measures shall be derived and implemented.

Early Identification of Risks and Legal Violations: Reporting mechanisms serve, in particular, to identify potential risks and possible violations at an early stage, to investigate such matters, and to derive appropriate preventive or corrective measures. This applies in particular to the areas of anti-corruption and bribery prevention, human rights and fair working conditions, supply chain compliance, competition and antitrust law, export control and sanctions, ESG and sustainability compliance, financial integrity, and conflicts of interest.

Protection of whistleblowers and confidentiality: The protection of whistleblowers is of the highest priority within the Bajaj Mobility Group. All reports shall be handled with the utmost confidentiality. Information shall be made accessible exclusively to those persons who strictly require such information for the proper handling of the respective case.

Whistleblowers shall not fear any negative consequences, provided that, at the time of making the report, they could reasonably assume in good faith that the reported information was accurate. The deliberate submission of knowingly false reports is not compatible with the principles of this CoC. The Bajaj Mobility Group does not tolerate any form of retaliation against whistleblowers or persons supporting investigations. This applies both during and after the completion of an investigation. Managers bear a particular responsibility for creating a working environment in which reports can be made without fear of negative consequences.

Shared Responsibility: A strong speak-up culture depends on the active contribution of all employees and business partners. The Bajaj Mobility Group promotes a culture in which questions may be asked, concerns may be raised, and potential misconduct may be addressed openly. Reports are taken seriously, retaliation is not tolerated, and investigations are conducted fairly, consistently and confidentially. The Bajaj Mobility Group also expects its business partners to adhere to high standards of integrity and compliance. Business partners are encouraged to report actual or suspected violations relating to the Bajaj Mobility Group without undue delay through the designated reporting channels. Risks in the areas of anti-corruption, sanctions, human rights, supply chain compliance and ESG frequently arise with the involvement of third parties. Therefore, effective complaint and reporting mechanisms constitute an essential element of responsible business conduct. Only through openness, mutual respect and the willingness to report potential misconduct can integrity, compliance and sustainable business success be ensured in the long term.

III. FINAL PROVISIONS

The implementation and adherence to the regulations described herein are ensured by providing each employee of the Bajaj Mobility Group with a copy of this CoC upon commencement of employment, as well as through regular in-person training and e-learnings. Organ members and executives have a special role to act as role models and bear the responsibility for conveying, promoting, and enforcing these principles. The Bajaj Mobility Group commits to regularly reviewing this CoC and announcing any changes. This ensures that all principles and standards of the Bajaj Mobility Group are incorporated and aligned with current legal requirements. Additionally, fundamental developments for the Business Partners of the Bajaj Mobility Group should be reflected in this CoC.

Violations of this CoC may result in significant economic disadvantages for the Bajaj Mobility Group (prosecution, fines, loss of contracts, etc.) and may also lead to potential reputational damage. If the Bajaj Mobility Group becomes aware of violations within the organization (by employees, executives, and/or organ members), these violations will be consistently sanctioned (termination, dismissal, legal

prosecution, civil liability, etc.). This applies not only to those who violate the rules but also to their respective supervisors and anyone who was aware of the violations but did not report them. Apologies for violations of the CoC will not be accepted, regardless of the intent behind them. Any violation by Business Partners of the principles and requirements stated in this CoC constitutes a material breach of the contractual relationship. In the event of non-compliance or suspicion of non-compliance with the principles and requirements of this CoC, the Bajaj Mobility Group reserves the right to request all relevant information from Business Partners and, at the sole discretion of the Bajaj Mobility Group, to not enter into future business relationships, take appropriate measures to prevent the respective misconduct, or terminate one or all contracts with the respective Business Partner without notice, if the CoC is not complied with or if measures to rectify the misconduct are not taken and implemented despite reasonable deadlines.

Questions and feedback regarding this CoC can be directed to compliance@bajajmobility.com.

Mattighofen, September 2026

The Executive Board of Bajaj Mobility AG

Gottfried Neumeister (CEO)

Petra Preining (CFO)

Status: September 2026

APPENDIX: LINK OVERVIEW

Occupational Health and Safety Policy	https://www.bajajmobility.com/api/assets/227745612708380?type=inline
Diversity and Anti-Discrimination Policy	https://www.bajajmobility.com/api/assets/227745123887496?type=inline
Explanations on the implementation of the provisions of the core labour standards of the International Labour Organization (ILO)	https://www.bajajmobility.com/api/assets/228009471893083?type=inline
Declaration on Modern Slavery and Human Trafficking	https://www.bajajmobility.com/api/assets/227745237678502?type=inline
Legal text of the ILO (C138)	https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB%3A12100%3A0%3A%3ANO%3A%3AP12100_ilo_code%3AC138
OECD Guidelines for Multinational Enterprises on Responsible Business Conduct	https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html
Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour	https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ilo_code:C182
Abolition of Forced Labour Convention	https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB%3A12100%3A0%3A%3ANO%3A%3AP12100_ilo_code%3AC105
Forced Labour Convention	https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB%3A12100%3A0%3A%3ANO%3A%3AP12100_ilo_code%3AC029
Environmental Policy	https://www.bajajmobility.com/api/assets/227745317071295?type=inline