

BUGATTI
Code of Conduct

Foreword by the BUGATTI management

Dear colleagues,

Every BUGATTI is unique, as unique as each of our international customers – extraordinary personalities with extraordinary demands. Working for BUGATTI is not only a privilege, but also an obligation, not least towards our customers. This is why the BUGATTI brand stands for integrity, fairness and sincerity.

This offers both orientation and support: the Code of Conduct gives our employees scope for manoeuvre and a sense of security in their day-to-day tasks, decisions and dealings with one another. Reliability, sincerity and an open, honest exchange of information are our guarantee for sustainable economic success.

It goes without saying that we operate in compliance with the law, regardless of position or function within our company. Errors and violations of the rules must be actively addressed, and must not be ignored or even tolerated.

On this basis, we as the senior management – representing each and every employee within our company – are clearly and unambiguously committed to these principles. Whether management or staff – together we take responsibility for the BUGATTI brand.



Greeting from the BUGATTI Compliance Office

Dear colleagues,

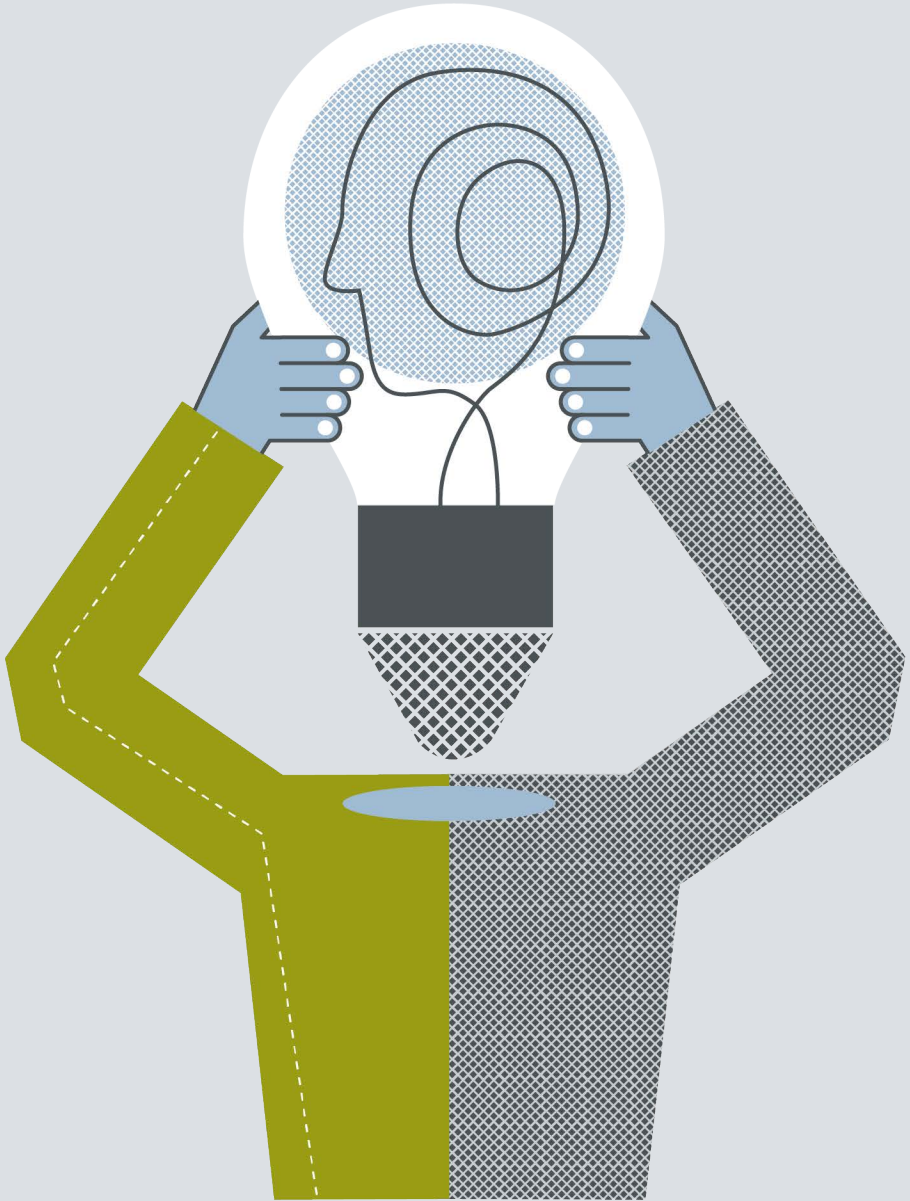
The Code of Conduct summarises what we take for granted here at Bugatti. We share a responsibility for talking about things that are not right, correcting mistakes and not allowing violations of the rules. This is how we protect our brand and ourselves from the consequences of misconduct, such as fines and damage to our image.

The Code of Conduct acts as a guideline on a day-to-day basis. It offers security, clarity and practical information for day-to-day work. Each point contains the relevant company principle and is supported by background knowledge and an example. Bugatti colleagues share one common value: if they are not sure about something, they talk about it and transparently ask for advice.

If you are not sure about something, there is one thing you should not do: say nothing.

Bugatti has structures in place to act as contact points for potential compliance concerns: team leaders, department heads, shop stewards, a compliance officer and a works council.

In addition, the whistleblower system makes it easy for every employee to report misconduct or serious violations- anonymously if so wished. Whistleblowers are legally protected.



2 Our responsibility for compliance

One building block of the success of our Company is that all employees — no matter if management or staff members— act with honesty, integrity and in an ethical manner. This also means that our internal and external reporting and communications are truthful, comprehensive and timely. Our shared goal is to fulfill our responsibility to our Company and to protect the reputation of our brand. Sustainability requires awareness of our responsibilities for our economic, social and ecological impact of all actions. Such conduct also means that we all respect and regularly review all rules, regulations and guidelines. Our senior management bear special responsibility in this context: they act as role models and prevent non-compliant behavior.

This Code of Conduct highlights potential areas of risk and conflict, explains their significance for the Company using illustrative examples. The information contained in this Code of Conduct is divided into three main sections:

- **Our responsibility as a member of society**
- **Our responsibility as a business partner**
- **Our responsibility in the workplace.**

The Code of Conduct serves as a binding guideline in day-to-day business. It is supplemented by internal guidelines and provisions in employment contracts. It goes without saying that Bugatti also complies with national and international laws and regulations. This means that Bugatti does not take part in any activity that relates to fraud, misappropriation, extortion, theft, embezzlement or any other deliberate damage to the assets of customers, society or any third party. Failure to abide by the Code of Conduct can result in considerable damage, not only for the Company, but also for employees, business partners and other stakeholders. That is why the Code of Conduct is binding on all employees of Bugatti.

Violations of the Code of Conduct have consequences: depending on the seriousness of the violation, they can range from action under labor law to claims for damages under civil law, and may even extend to penalties under criminal law.

Our goal is to ensure that every Bugatti employee gets familiar with our core values as set forth in this Code of Conduct, and to integrate those values into our daily behavior so that the Code of Conduct becomes a key element of our decision making process.

When in doubt, we simply seek advice.

3 Our responsibility as a member of society

Our social responsibility means that we have a duty to comply with the law under which we operate in all business decisions we make.

BUGATTI employees are aware of their social responsibility, particularly with regard to the well-being of people and the environment. **BUGATTI's** responsibility as a member of society is described hereafter:



Human rights

BACKGROUND

The Declaration of Human Rights adopted by the United Nations and the European Convention for the Protection of Human Rights and Fundamental Freedoms state the expectations and requirements for respecting human rights.

CORPORATE PRINCIPLE

We respect, protect and promote all regulations to protect human rights and children's rights (hereinafter called human rights) as a fundamental, worldwide requirement. We reject all use of child labor and forced or compulsory labor as well as all forms of modern slavery and human trafficking. This applies not only within our Company but also in our relationships with third parties and especially business partners.

MY CONTRIBUTION

As an employee, I can make my contribution to respecting human rights. I regard human rights as a fundamental guideline of my daily work and decision making. I remain vigilant about human rights abuse happening around me. If I have concerns regarding human rights abuse in my professional surroundings, I prevent and/or stop it forthwith whenever I can. Where necessary, I inform my supervisor or I get in touch with any of the contacts listed in chapter 6.

EXAMPLE

You are responsible for purchasing specific goods and receive information that a supplier with which your Company does business uses children in their production process, or that employees work in inhumane conditions (e.g., exposed to health risks). Take the necessary steps and inform your supervisor and the manager in charge of sustainability in supplier relations. Bugatti will review the relationship with this business partner and take actions, and if necessary, terminate them.

Equal opportunity and equal treatment

BACKGROUND

Equal opportunities and equal treatment are key cornerstones of a fair, unprejudiced and open approach. BUGATTI stands for respectful cooperation, diversity and tolerance. We believe that this gives us competitive and innovative edge and boosts creativity - the recipe for our success.

CORPORATE PRINCIPLE

We offer equal opportunities for everyone and do not accept discrimination on the grounds of ethnic or national origin, sex, religion, views, age, disability, sexual orientation, skin color, political views, social background or any other characteristics protected by law and our moral values. We live diversity in our every day routines and actively encourage inclusion to create an environment that fosters each employee's individuality in the interests of the Company. We share a core belief that drives our recruiting: employees are selected, hired and developed based on their qualifications, skills and performance.

MY CONTRIBUTION

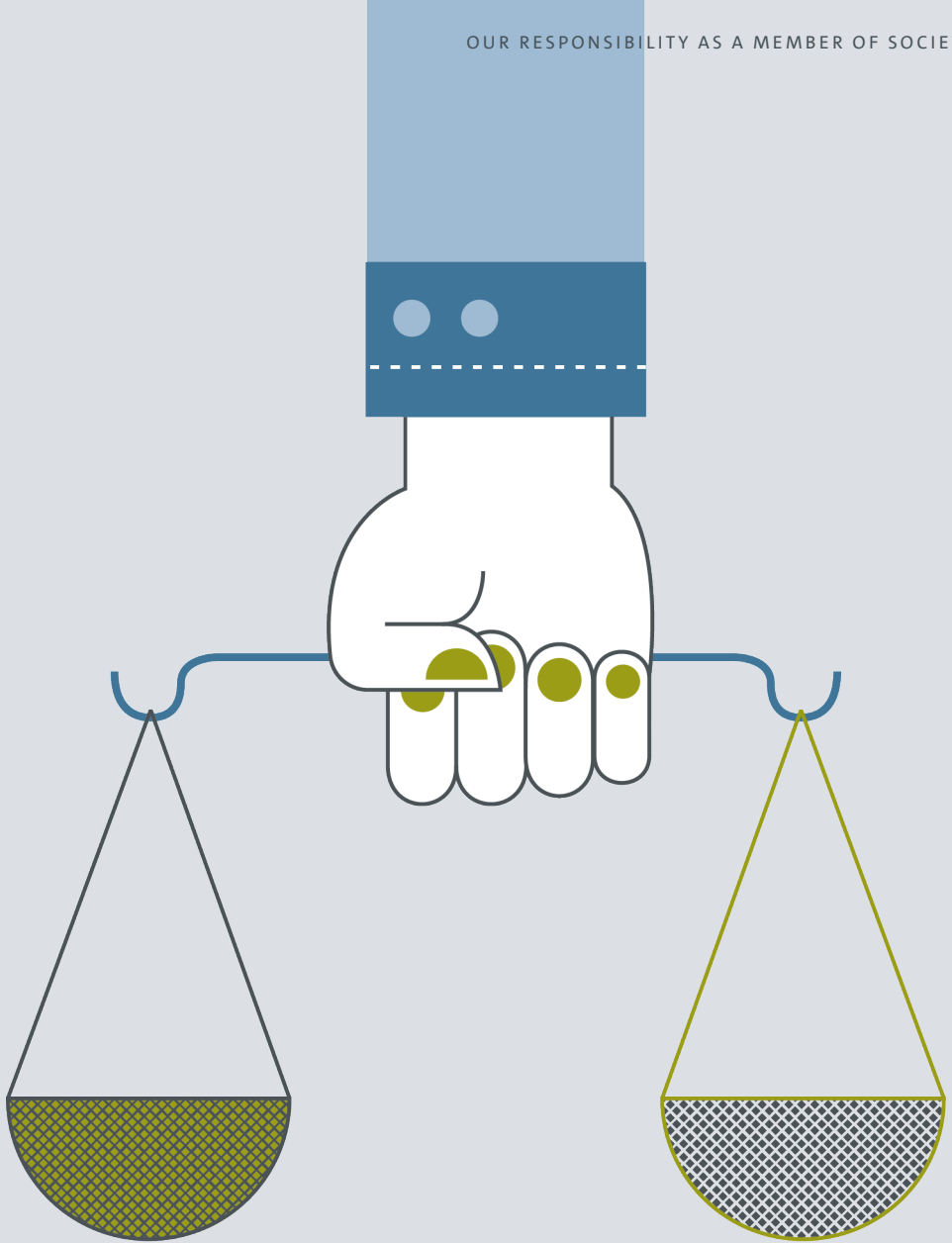
I act with regard to the principles of equal opportunity and equal treatment and encourage people around me to do the same.

If I witness any contravention of the principles of equal opportunity and equal treatment (disadvantagement, harassment or mobbing), I make the individuals involved aware of their misconduct. If I am not in a position to influence the events directly, I notify the human resources department of the incident or get in touch with any of the contacts listed in chapter 6.

EXAMPLE

You find out from a colleague who is a friend of yours that an applicant in his department was rejected because of the color of his skin, although he was the best candidate for the advertised job.

Help clarify the situation by reporting the case to the relevant human resources department so that appropriate steps can be taken.



Product conformity and product safety

BACKGROUND

Countless people come into contact with BUGATTI products and services on a daily basis. BUGATTI has a responsibility to prevent, as much as reasonably possible, any risks, detrimental effects and hazards to the health, safety, environment and assets of customers or third parties arising from the handling and use of BUGATTI products and services.

CORPORATE PRINCIPLE

For us, this is far more than a statutory duty - we believe that it is a sine qua non for every company to deserve to become and remain a trustworthy partner for customers, society, business partners and other stakeholders. It is simply the right thing to comply with the laws, regulations and the internal standards that apply to our products. Yes, BUGATTI products are truly outstanding, unique and far beyond standard! But when it comes to development and production of our vehicles, we accept the challenge of creating unique masterpieces that are fully in compliance with the legal requirements. We monitor this continually and systematically through processes, structures and product surveillance under real field conditions. We do not compromise on that. We ensure that suitable measures are ready at hand in the event of any failure.

MY CONTRIBUTION

If I notice or have concerns that one of our products could create risks or hazards or that regulations are not being followed, I initiate an internal, open and transparent discussion together with the product safety managers and ask for ways to solve the issue.

EXAMPLE

A customer reports technical problems with a vehicle to you. Initially, it is unclear whether they are due to a customer's mistake when using the product or due to a manufacturing or construction defect.

We clarify the matter based on in-depth analyses. We aim to understand the root cause of it all so that BUGATTI can solve all issues for which it is liable.

We believe that we can also learn from incorrect product usage by customers in that we understand how we can optimize product security even for unexpected situations (e.g., by modifying operating instructions or user training).

Environmental protection

BACKGROUND

BUGATTI develops, produces and distributes vehicles, services and mobility solutions worldwide. In pursuing its mission as a global supplier, the Company is aware of its specific environmental responsibility.

CORPORATE PRINCIPLE

As citizens of the world, BUGATTI employees bear responsibility for the environmental compatibility and sustainability of our products, locations and services. We focus on environmentally friendly, advanced and efficient technologies, which we optimize throughout the entire lifecycle of our products. Starting with the early phases of development and production, we manage natural resources carefully and steadily reduce the environmental impact to comply with environmental protection laws and regulations. Furthermore, we constantly reassess the environmental footprint of products and manufacturing processes, optimizing these wherever it is possible and feels right.

We are a member of society and a partner for politicians and do so out of inner conviction. We keep an ongoing open dialog with these partners on our activities and how to shape an ecologically sustainable development.

MY CONTRIBUTION

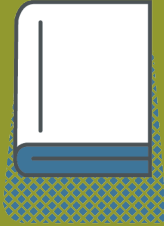
During my daily work, environmental protection and a sustainable, economic and efficient use of resources comes naturally because I believe that this is the right thing to do - also in my private life. I make sure that my activities have the smallest possible impact on the environment and that they comply with applicable environmental protection laws and regulations.

EXAMPLE

You notice that there is a leak in a tank and that significant amounts of chemicals are seeping into the ground.

Instantly inform one of the employees who has been trained to handle chemicals and ask to solve the problem straightaway. At BUGATTI, we do not look away - we act.





Donations, sponsorships and charity

BACKGROUND

BUGATTI makes donations (contributions on a voluntary basis with no expectation of a consideration in return) and grants sponsorship funding (contributions based on a contractually agreed consideration) to achieve a positive impact in terms of our reputation and public perception. We value transparency and aim to avoid conflicts of interest. We have therefore created internal regulations on how we want to handle donations and sponsorships at BUGATTI and have based them on legal requirements.

CORPORATE PRINCIPLE

We make monetary donations and donations in kind to support science and research, education, charitable causes, sports, and culture. We grant donations only to recognized non-profit organizations or organizations that are authorized to accept donations. Most importantly, we only address recipients that fit to our core values and beliefs as stated in this Code of Conduct.

MY CONTRIBUTION

If I know of a sponsorship that could be worthwhile the consideration at BUGATTI, I hand over the idea to the communications and marketing department for further evaluation.

The granting of donations is transparent: purpose, recipient of the donation, and donation receipt are documented and verifiable. I suggest donation recipients that share the beliefs and values of BUGATTI.

EXAMPLE

A local politician asks you, a successful BUGATTI employee, for a cash donation from the Company for the election campaign.

Thank the politician for his trust in and politely inform him/her that at BUGATTI, donations may only be granted after going through predefined internal approval processes. In this specific case, the donation may not be approved because BUGATTI does not grant donations to political parties, party-affiliated institutions and politicians.

Communication and marketing

BACKGROUND

BUGATTI believes that there is only one right way - open, transparent, honest and timely communication with employees, business partners, investors, the media and other stakeholders. BUGATTI employees are aware that all internal and external actions and even their inactions send communication signals. BUGATTI puts high value on the communication of a unified and consistent image. Our employees recognize the achievements of those partners they engage with and respect their professional and personal reputation.

CORPORATE PRINCIPLE

BUGATTI ensures that our communication is clear, consistent and respectful to keep the confidence of customers, investors and other stakeholders and to be fair with valued competitors. We involve our communication experts from the marketing department before committing to and executing any communication or marketing measures or making public statements in the name of BUGATTI.

MY CONTRIBUTION

I issue public statements for my Company in collaboration with the experts from the communications department. I am aware that comments at public, trade or cultural events or on the Internet may have far reaching implications. I consult the Company's social media guidelines for advice on proper conduct in social networks and only issue statements after prior consultation with the experts.

EXAMPLE

You read a comment on the Internet from someone who criticizes production methods in Asia. You believe that the accusations are unfounded.

Even if you are tempted to correct the misrepresentation straightaway, contact the communications department first. They will collect all required information and respond in a well-informed, appropriate and professional manner.



Political Decision Making

BACKGROUND

Politics and legislation exert influence on the economic framework for business processes. BUGATTI's participation in commercial trade means that it also has an impact on society and can specifically promote its interests during decision-making processes.

CORPORATE PRINCIPLE

BUGATTI is aware that the ability to shape decision making comes along with high responsibility. We provide recommendations for political decision making in line with the principles of openness, accountability and responsibility. Our interaction with political parties and interest groups is based on the principle of neutrality. We do not accept dishonestly influencing policymakers and governments.

MY CONTRIBUTION

I do not attempt to intervene in political decisions on behalf of the Company. I continuously monitor internal guidelines and external regulations during the performance of my duties. In case I notice changes in regulations or need to make recommendations for policy makers, I initiate an internal discussion by involving the expert departments.

EXAMPLE

A friend of you is a member of parliament. You contemplate contacting him/her to explain BUGATTI's interests in connection with a legislative proposal that is currently being discussed in parliament.

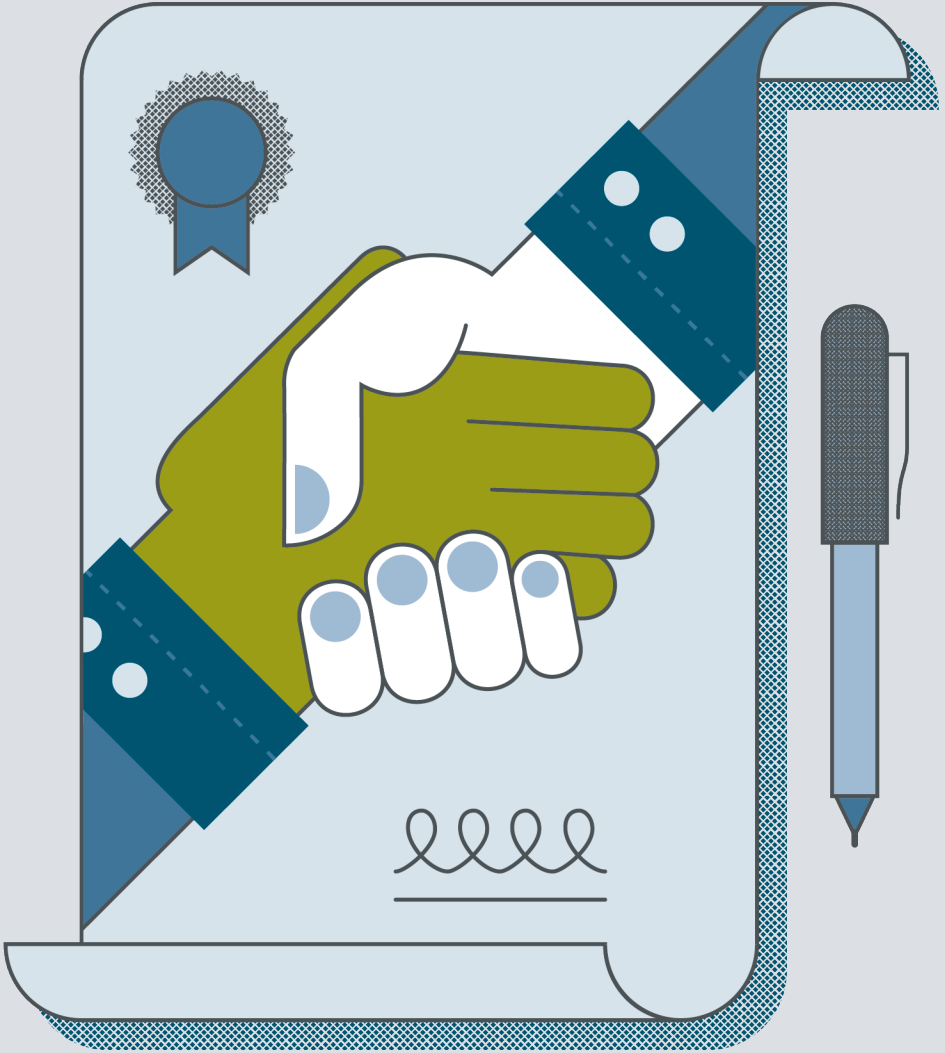
BUGATTI does not engage in self-interest guided political decision making. BUGATTI employees open and transparently discuss imminent legislative amendments and share their recommendations via centrally coordinated representatives of external relations/communications, so as to engage in a transparent exchange of opinions with political decision makers.

4 Our responsibility as a business partner

Integrity, transparency and fairness are key to creating credibility and trust in business practice.

This is why BUGATTI is keen to communicate its guidelines and corporate values clearly. This also includes distributing our products and services exclusively through our authorized distribution partners.

BUGATTI's responsibility as a business partner is explained hereafter :



Conflicts of interest

BACKGROUND

Potential conflicts of interest may arise if private interests of employees deviate from the interests of BUGATTI. These conflicts of interest can arise particularly as a result of secondary employment. If an employee places his/her personal interests above those of the Company, it could damage the Company.

CORPORATE PRINCIPLE

Bugatti respects personal interests and private lives of its employees. At Bugatti, our decisions are exclusively made on the basis of objective criteria but we are aware that conflict of interests may arise in the course of the business. We train our employees to recognize these conflicts and actively indicate that they seem to be in a conflict of interest situation so that an unaffected, neutral colleague could take over.

MY CONTRIBUTION

I try to avoid conflict of interest situations and report actual conflicts of interest to my team leader and/ or the HR department. We jointly seek for solutions that are not detrimental to the Company's interests.

EXAMPLE

Your department head asks you to review bids from several suppliers of plastic components. You discover that one of the most favorable bids is from the company of a good friend.

Inform your department head about the situation and hand over the decision-making process to another procurement colleague to avoid a conflict of interest.

Gifts, hospitality and invitations

BACKGROUND

Benefits in the form of gifts, hospitality and invitations are prevalent in business relationships. These benefits are not a cause for concern as long as they are within reason and do not contravene any internal or statutory rules. If such benefits exceed reasonable amounts and are mis-used to influence third parties, those involved may be liable to prosecution.

CORPORATE PRINCIPLE

Our internal guidelines on handling gifts, hospitality and invitations describe what benefits are appropriate and the steps to accept and grant benefits.

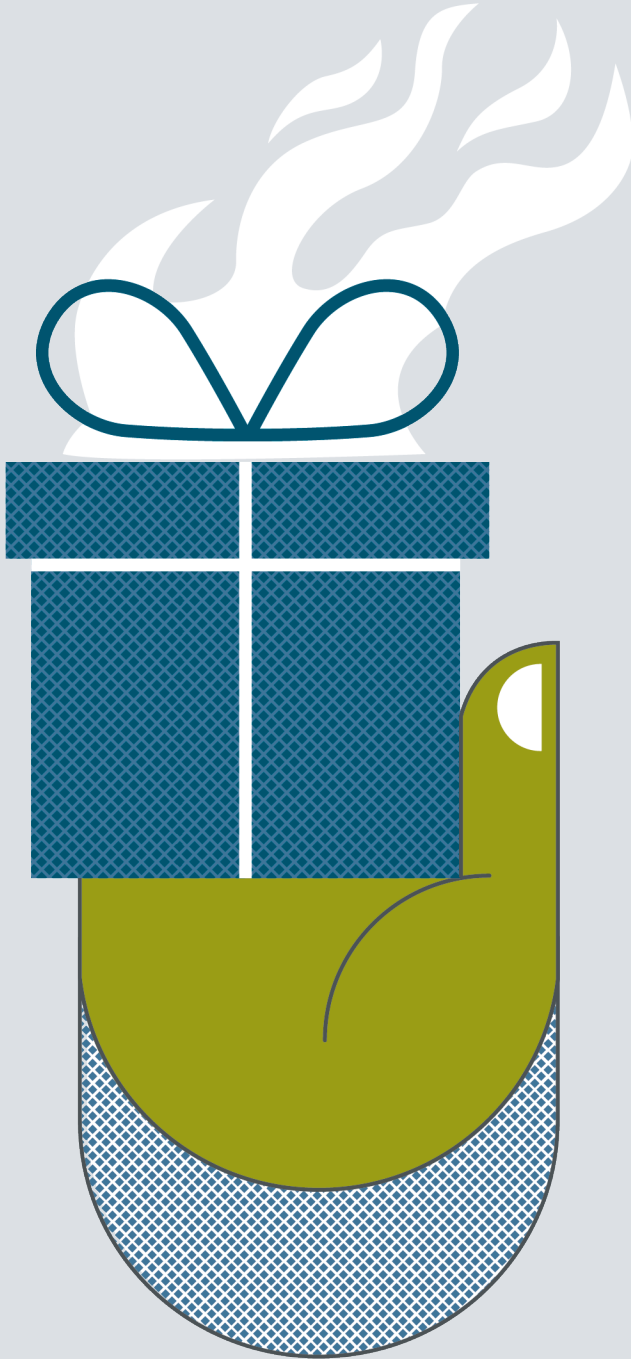
MY CONTRIBUTION

I do my best to be familiar with the guidelines on handling gifts, hospitality and invitations. I monitor my conduct in this regard to detect actual or potential conflicts of interest.

EXAMPLE

An employee from a BUGATTI supplier gives you a valuable birthday gift.

The value of the gift should not exceed the value set out in the relevant internal guidelines on gifts. When in doubt, do not accept the gift. If you are concerned that rejecting the gift could be misinterpreted, contact your supervisor and agree on a solution with him/her, e.g., that the gift should be handed over to the appropriate department and documented.



Prohibition of corruption

BACKGROUND

Corruption is a serious problem in commercial trade. It generates decisions based on improper grounds and prevents progress and innovation, and it distorts competition and is damaging to society. Corruption may result in substantial penalties for BUGATTI and for the employees involved.

CORPORATE PRINCIPLE

The quality of products and services from our Company is the key to our success. Consequently, we do not tolerate corruption. We grant benefits to business partners, customers or other external third parties only within the permissible legal framework and in line with existing rules.

MY CONTRIBUTION

I never bribe others and I never accept a bribe, either directly or indirectly. I act responsibly and keep myself updated by consulting the internal rules before I give or accept gifts, issue or accept invitations, or offer or receive hospitality.

If I receive any corruption-related tip-offs, I immediately inform the compliance function or one of the other contacts listed in chapter 6.

EXAMPLE

You are responsible for sales and you would like to outstrip this year's revenue target. You prepare a bid for a major contract where a potential customer has issued a call for tender. The relevant decision-maker on the customer side tells you that if you pay him he can make sure that your company will get the contract in question.

This is corrupt behavior. It is crucial to report it to your supervisor and to the compliance function.

Dealings with officials and holders of political office

BACKGROUND

Dealings with officials or holders of political office, governments, authorities and other public institutions often involve special statutory rules, any individual breach of which may have serious consequences and could permanently bar BUGATTI from public contract awards.

CORPORATE PRINCIPLE

Our contacts with officials and holders of political office are strictly in line with all laws and legislation as well as the relevant internal rules concerning the avoidance of conflicts of interest and corruption.

Even where payments to certain officials could actually accelerate routine administrative manners, for instance at customs, they would be against our policy-in clear, we do not make any “facilitation payments”.

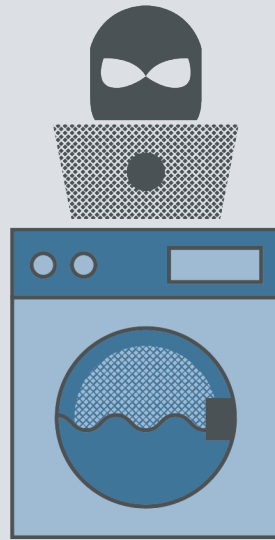
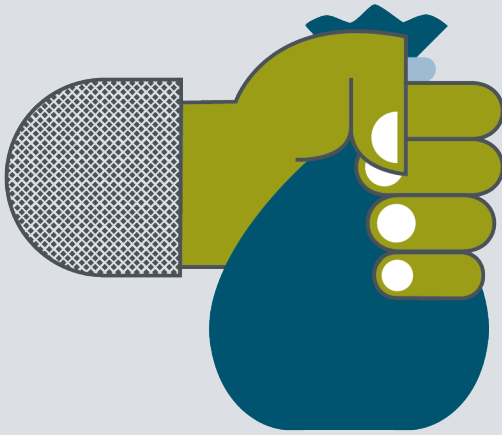
MY CONTRIBUTION

I am aware that stringent rules apply when dealing with public contract awards and I do my best to familiarize myself with these rules. I seek assistance from the Company's experts in charge of external relations.

EXAMPLE

You know an authority is planning a call for a tender for a major contract. Because you know the employee in charge of the tender from a previous project, you consider asking him to design the tender in such a way that BUGATTI wins the contract.

Even if you might consider this as a new business opportunity for Bugatti, exerting this kind of influence is illegal and would make you criminally liable.



Prohibition of money laundering and terrorism financing

BACKGROUND

Laws against money laundering and terrorism financing are in place in almost all countries worldwide.

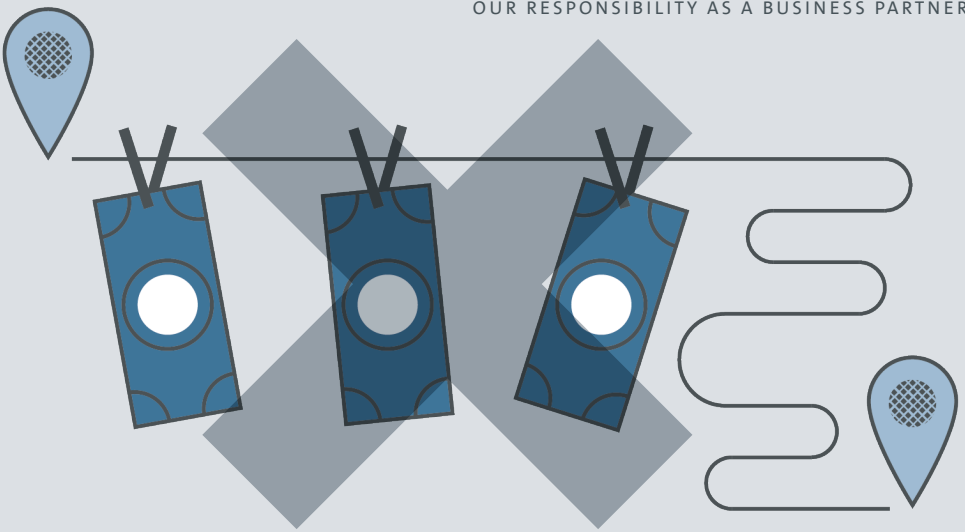
Money laundering occurs when funds or other assets originating directly or indirectly from criminal activities are put into circulation in the legal economy, making their source appear legal. Terrorism financing occurs when money or other resources is/are made available to commit criminal acts of terrorism or to support terrorist organizations.

Liability for money laundering does not require the person involved to be aware that money is being laundered through the legal transaction concerned or the transfer concerned. Inadvertent involvement in money laundering may already be sufficient grounds for high penalties.

CORPORATE PRINCIPLE

We carefully check the identity of customers, business partners and other third parties with whom we wish to do business. We carry out due diligence of our business partners, whether potential or actual. It is our declared aim to conduct business solely with reputable partners who operate in line with legal provisions and who use resources from legitimate sources.

We assign incoming payments to the corresponding services without delay and post them accordingly. We ensure transparent and open cash flows.



MY CONTRIBUTION

I carefully check the identity of any business partner including important customers, and I also check the identity of the ultimate business owners where my business partners are companies. I am vigilant and carry out a google search to check into potential misconduct or ongoing investigations.

Where there are sufficient grounds for suspicion, or simply where the transaction could be very risky-for instance because the name of a shareholder is on an international sanctions list- I discuss the matter forthwith with the compliance function.

I abide by all applicable provisions for recording and posting transactions and contracts within my area of responsibility in the accounting system.

EXAMPLE

One of BUGATTI's customers has overpaid and asks for the excess amount to be repaid by transferring it to an account held in Switzerland or by paying it in cash instead of wire transfer to the original business account.

Do not accept the suggestion readily. This kind of request requires an explanation. Ask the customer why the amount cannot be repaid in the same way it was originally paid. Seek advice from the compliance function.

Accounting and financial reporting

BACKGROUND

BUGATTI can build and retain the trust of the general public, its shareholders and contract partners only through proper accounting and correct financial reporting. Any irregularities may have serious consequences for the Company as well as for those responsible.

CORPORATE PRINCIPLE

We strictly comply with the statutory provisions for proper accounting and financial reporting. Transparency and correctness are our top priorities. To that end, we regularly inform all capital market players of our financial position and business developments. We publish our periodic financial statements punctually in accordance with national and international accounting regulations.

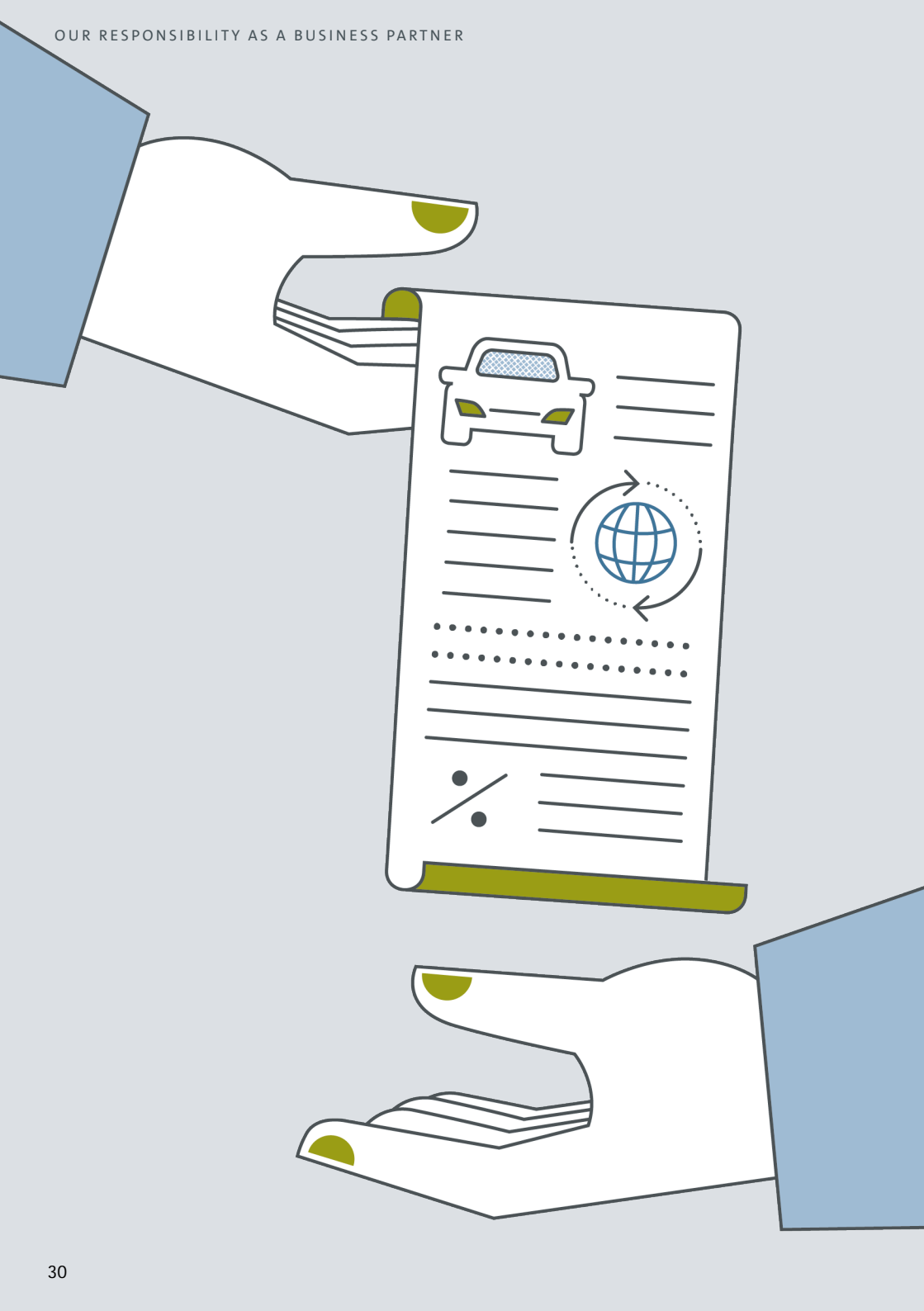
MY CONTRIBUTION

I organize processes so that all business financial data can be entered into the accounting system correctly and promptly. If I have any questions about the correct recording of data, I contact my supervisor or the appropriate finance department.

EXAMPLE

You urgently need new equipment. However, the budget in your department for the current fiscal year has already been used up. You consider acquiring the equipment nevertheless and posting the cost in the next fiscal year when your budget is replenished.

Refrain from taking such action. Entries must always be posted accurately. Posting entries inaccurately may have serious consequences for the company or individual employee.



Taxes and customs

BACKGROUND

Our global operations and the development of new markets can only be successful if we comply with a raft of various regulations relating to external trade, tax and customs. Compliance with tax and customs regulations builds trust with customers, financial authorities and the general public. Any irregularities would cause significant financial damage to BUGATTI and seriously impact the Company's reputation.

CORPORATE PRINCIPLE

We are fully aware that compliance with domestic and international tax and customs laws and regulations is part of the social responsibility of BUGATTI.

MY CONTRIBUTION

I design internal structures and processes so as to ensure that the taxes and customs to be paid by the Company are calculated correctly, disclosed appropriately in reporting, and paid to the relevant tax authorities. If I have information about the potential violation of tax and customs regulations in my area of responsibility, I undertake every action I can to prevent or stop such situation. If this is not possible, I get in touch with the appropriate contact person in the tax and customs department, or the compliance function.

EXAMPLE

You are responsible for entering certain business transactions, such as general overheads (maintenance expenses) and production costs, in the statutory financial statements.

As one project exceeds certain controlling parameters early in the financial year, you are told to make an entry under maintenance expenses even though the transaction unquestionably relates to an investment, and should therefore be treated as capitalized production costs.

Discuss the irregular instruction with the compliance function, even where it involves your supervisor.

Accounting errors result in incorrect tax returns and lead to serious consequences under tax and customs laws for the Company and the employees taken individually.

Fair and free competition

BACKGROUND

Fair and free competition is protected by antitrust legislation. Complying with this legislation ensures that market competition is not distorted-this benefits consumers by keeping prices low and the quality of goods and services high.

Specifically, agreements between companies intended to prevent free competition are prohibited. Abusing a dominant market position as a single company is also illegal.

Such abuse may result from a difference in the treatment of customers -refusal to supply, imposing unreasonable purchase/selling prices and conditions, unjustified tie-in arrangements for additional services can all be illegal.

Such practices can potentially significantly damage BUGATTI's reputation and can trigger very high penalties.

CORPORATE PRINCIPLE

We conduct business solely on the basis of merit and market economy principles. We like to measure ourselves against our competitors, because we know that our customers will eventually benefit from such unhindered competition.

We do not enter into any anti-competitive agreements with competitors, suppliers or customers. If our Company holds a dominant market position, we do not abuse this position.

We comply with the specific antitrust provisions for distribution systems in our dealings with our authorized distribution partners.

MY CONTRIBUTION

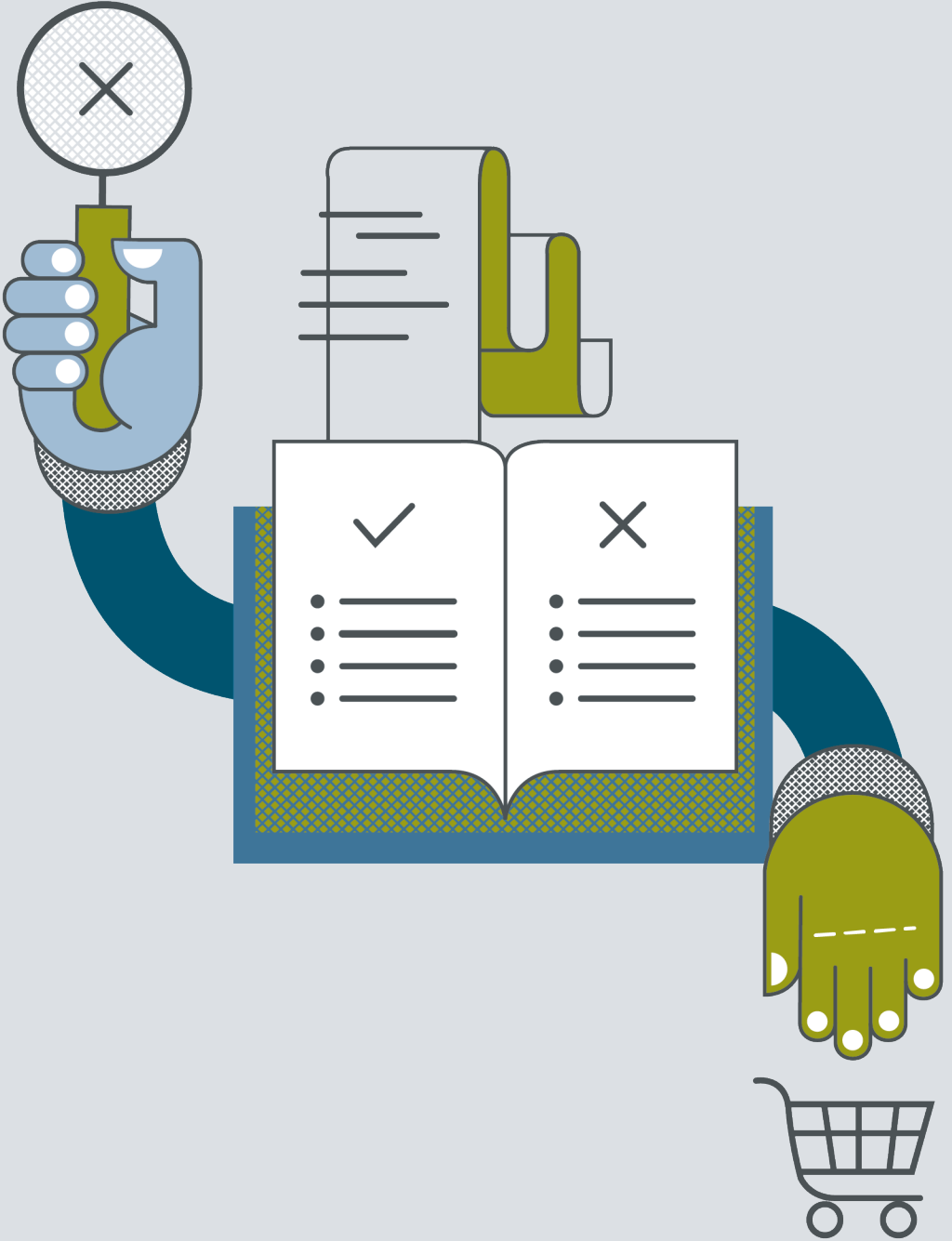
Whenever I come into contact with competitors, I make sure that no information about our current or future business conduct is provided to them, or received from them.

I avoid conversations or any other contact with competitors involving sensitive information such as prices, pricing, business planning, development statuses and delivery times.

EXAMPLE

You talk to a competitor's employee at a trade fair. After a while, you notice you are being sounded out for information about BUGATTI's future business planning. In return, the employee offers to divulge the same information about his company.

Immediately inform the competitor's employee that you will not discuss such issues. This type of conversation — apart from the unauthorized disclosure of business secrets — is in itself a breach of competition and antitrust legislation and could have drastic consequences for you personally, the Company and both the competitor's employee and his company. Document the conversation and discuss the matter with the compliance function.



Procurement

BACKGROUND

BUGATTI is contractually bound to a large number of suppliers and service providers in its business operations.

CORPORATE PRINCIPLE

We carefully select suppliers and service providers based on objective criteria.

When purchasing products and services, we involve the appropriate purchasing departments as laid down in the applicable procurement guidelines.

MY CONTRIBUTION

I show no preference in favor of a supplier or service provider without an objective reason, and I avoid any conflict of interests.

I do not purchase any products or services without first having looked at the market and alternative suppliers. I follow the relevant procurement principles and involve the appropriate purchasing department at an early stage in the purchasing process.

EXAMPLE

It comes to your attention that a BUGATTI employee would like to commission a supplier without involving the appropriate purchasing department.

Notify one of the contacts listed in chapter 6 or the appropriate purchasing department to ensure that the bid that is most cost-effective for the Company has a chance.

Export control

BACKGROUND

Export control can impose prohibitions, restrictions, approvals from authorities or other monitoring measures on the cross-border exchange of goods. These provisions under export control legislation apply to technologies and software as well as goods. Apart from exports per se, export controls may also apply to the temporary cross-border transfer of, for instance, objects and technical drawings taken on a business trip, or technical transmissions by e-mail or cloud.

Furthermore, any business with individuals or companies named in sanctions lists is strictly prohibited, regardless of the delivery process.

CORPORATE PRINCIPLE

We comply with all provisions for importing and exporting goods, services and information.

MY CONTRIBUTION

When making a decision concerning the import or export of products and services, I consciously examine whether the decision may fall under export control. When in doubt, I seek advice from the compliance function or any of the contacts mentioned under Chapter 6.

EXAMPLE

You receive an inquiry from a potential customer wishing to place an order with BUGATTI to supply products in a country that is listed as an embargoed country.

Clarify the matter by asking the relevant department about export restrictions that apply to the country to be supplied (e.g. a UN embargo) and do not conclude any contracts that bind the Company to export to this country until the issue has been fully clarified.



5 Our responsibility in the workplace

It is in the fundamental interests of BUGATTI to protect the health and safety of every employee, as well as personal data, know-how, company assets and IP rights



Occupational safety and healthcare

BACKGROUND

BUGATTI is committed to its responsibility in relation to the safety and health of its employees. We provide occupational safety and healthcare in line with the provisions of national regulations and with the occupational health and safety policy of the Company.

CORPORATE PRINCIPLE

We preserve and promote the health, performance and job satisfaction of our employees through continuous improvements in the working environment and a raft of preventive healthcare and health promotion measures.

MY CONTRIBUTION

I comply with the occupational health and safety rules. I never put the health and safety of my colleagues or business partners at risk. I take all appropriate and statutory precautions to ensure that my workplace always enables safe working. I make an active contribution to maintaining and promoting my health by voluntarily participating in preventive healthcare and health promotion measures.

EXAMPLE

You notice that a machine in your department has an electronic defect.

Take the machine out of operation and make sure the “out of order” sign is clearly displayed. Ask the appropriate department to repair the machine because repairing electrical equipment on your own is not permitted as it could be hazardous.

Data protection

BACKGROUND

There are special statutory rules to protect privacy when dealing with personal data. As a general rule, collecting, storing, processing and other use of personal data (namely the personal data that makes an individual identifiable) require the consent of the individual in question by way of a contractual arrangement or some other legal basis.

CORPORATE PRINCIPLE

We protect the personal data of employees, former employees, customers, suppliers and other relevant individuals.

We collect, gather, process, use and store personal data strictly in accordance with legal provisions.

MY CONTRIBUTION

I ensure that personal data is collected, stored, processed or used in any other way only with the consent of the concerned individual, under a contractual arrangement or on some other legal basis.

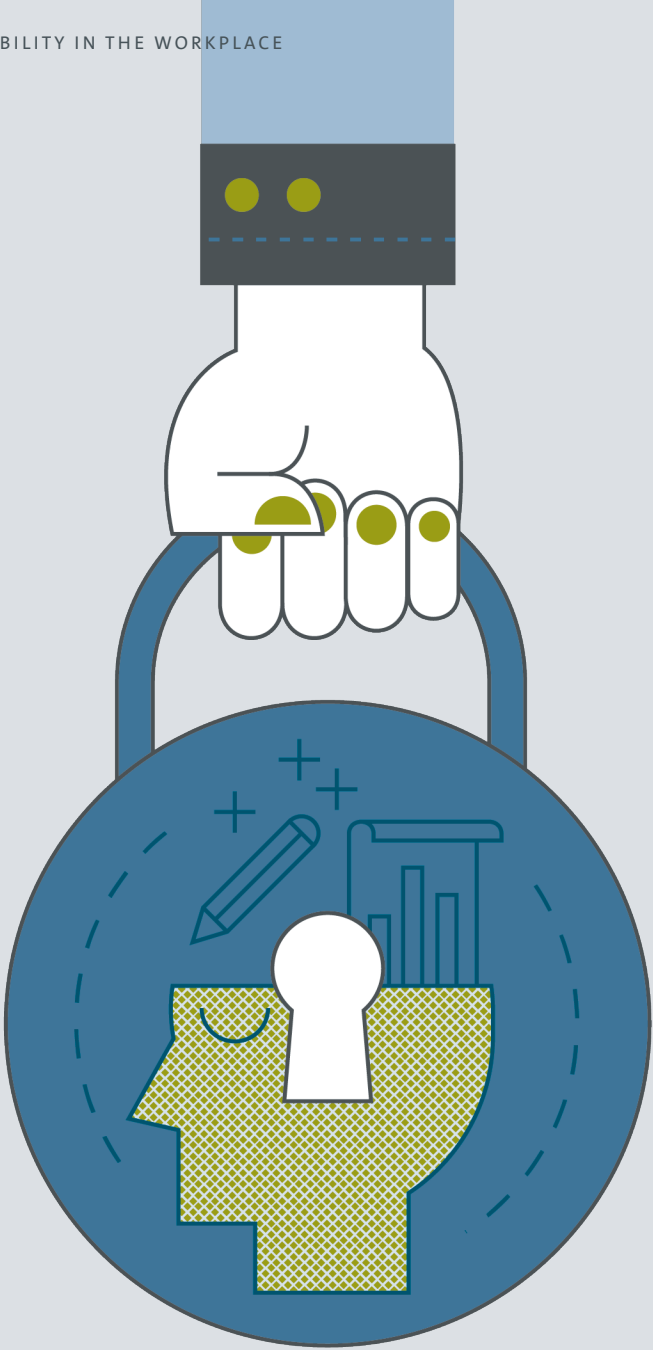
All data processing components must be secured in such a manner that the confidentiality, integrity, availability, verifiability and reliability of such sensitive data is guaranteed, and that unauthorized internal or external access is prevented.

When in doubt, I contact my supervisor, the colleague(s) in charge of data protection or the compliance function.

EXAMPLE

You have organized a seminar for BUGATTI with external participants and receive personal data from the participants. A colleague asks you to pass the addresses on.

Do not pass this data on without consulting one of the contacts mentioned above. As a general rule, data may be used only for the purpose for which it was initially communicated.



Security and protection of information, know-how and intellectual property

BACKGROUND

BUGATTI holds internationally protected patents and also has extensive trade and business secrets in addition to technical know-how. This knowledge is one of the fundamentals of our business success. Unauthorized transmission of such knowledge may lead to extremely high losses for the Company and to penalties and/or imprisonment for the involved employee, under labor, civil and criminal law.

CORPORATE PRINCIPLE

We are aware of the value of Company know-how and take great care to protect it. We do not infringe on the intellectual property rights of competitors, business partners and other third parties.

MY CONTRIBUTION

I handle all BUGATTI information carefully and do not disclose it to unauthorized persons. I take particular care with regard to information relating to technical know-how, patents, and trade and business secrets.

EXAMPLE

You are involved in the development of an innovative technology. You are to present your development at various Company sites and want to take your laptop, on which the relevant documents are saved, with you for presentation purposes. You intend to go over these documents again on the plane or the train on the way to the individual sites.

Make sure that no-one obtains knowledge of sensitive information belonging to BUGATTI, as this could lead to serious competitive disadvantages. Do not retrieve this type of information in places where third parties can access it or take note of it.

IT security

BACKGROUND

Information technology (IT) and electronic data processing (EDP) have become an integral part of everyday life at BUGATTI. At the same time, they involve numerous risks, foremost of which are impairment of data processing as a result of malware (viruses), loss of data due to program errors, and data misuse (e.g. due to hackers).

CORPORATE PRINCIPLE

We respect IT and EDP security and abide by the applicable regulations.

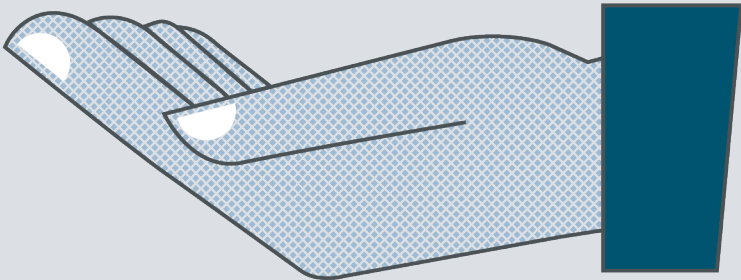
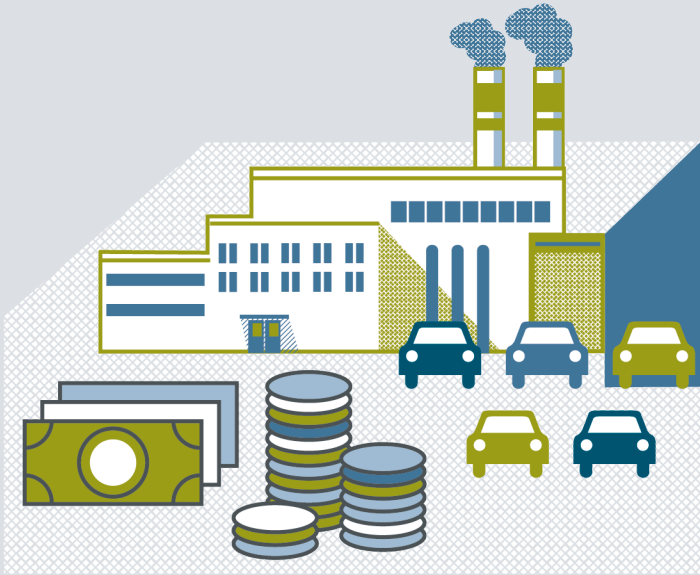
MY CONTRIBUTION

I familiarize myself with the applicable IT security regulations and abide by the rules contained therein. I am aware that unencrypted data exchange (e.g. by e-mail or USB stick) is not a secure means of communication.

EXAMPLE

You are out of the office and are given a USB stick in order to exchange a document at a meeting.

Use only BUGATTI data carriers or data exchange systems and proceed according to the guidelines for information classification. Arrange for the document to be e-mailed to you, for example. Never open e-mails or attachments that appear to be suspicious or that come from unknown e-mail addresses. That is how you prevent malware from entering the Company network.



Handling Company assets

BACKGROUND

BUGATTI's tangible and intangible assets serve to help our employees achieve the Company's business objectives and may be used only for business purposes.

CORPORATE PRINCIPLE

We respect the Company's tangible and intangible assets and do not use them for non-business purposes.

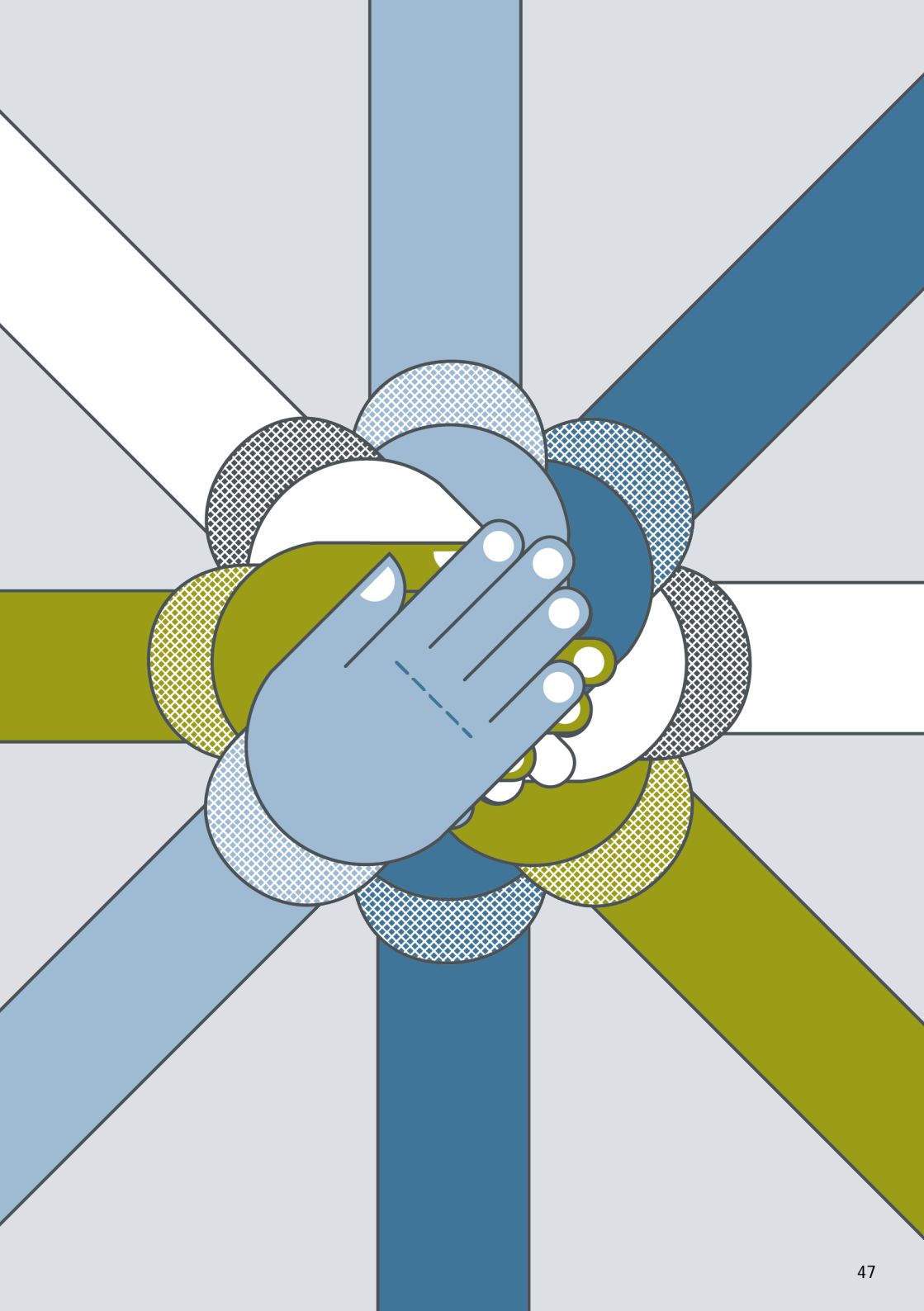
MY CONTRIBUTION

I adhere to the Company's rules and exercise care when handling Company assets.

EXAMPLE

Your soccer club is planning a weekend trip. The trainer asks whether you, as a BUGATTI employee, can "organize" a vehicle from the Company fleet.

Company vehicles can generally be rented by employees at market conditions. You cannot be given a vehicle free of charge for private use, nor can such a vehicle be made available to third parties.



Employee representation

We recognize the basic right of all employees to establish trade unions and employee representations.

We are committed to working with employee representatives in candor and trust, to conducting a constructive and cooperative dialogue, and to striving for a fair balance of interests.

Professional dealings with employee representatives that do not allow for either privilege or discrimination are part of our corporate culture. Safeguarding the future of BUGATTI and its employees is achieved in a spirit of cooperative conflict management and social commitment, on the basis and with the goal of ensuring economic and technological competitiveness. Economic viability and jobs are equal and shared goals.

Help / Contacts / Whistleblower System

Our first point of contact for any questions or uncertainties regarding the Code of Conduct is our supervisor. We can also contact the employee representatives or the HR department. In addition, every employee can get in touch with the Compliance Officer (s) at the following address :

francoise.steyer@bugatti.com

If we suspect a violation of the Code of Conduct or a serious rule violation, misconduct or fraud at our workplace, **but would like to remain anonymous**, we can use the BUGATTI Whistleblower system to report this, at the following Bugatti **Speak Up** link :

<https://clicktime.symantec.com/32Kx1x9KdAYis6PnLwis9JA6H2?u=https%3A%2F%2Ffeu.deloitte-halo.com%2Fwhistleblower%2Fwebsite%2Fbugatti%3FPg%3D1%26Lang%3Dde-DE>

Please note that serious rule violations significantly harm the reputation or the financial interests of BUGATTI -we therefore rely on everybody's co-operation. Managers must act as role models and have an obligation to report any such suspicion immediately. Failure to do so would be deemed a serious rule violation in itself.



Self-test for decision guidance

If at any time I am unsure whether my behavior complies with the principles set out in this Code of Conduct, I should ask myself the following questions:

- 1. Did I take all relevant factors into consideration and assess them properly? (content test)**
- 2. Am I confident that my decision is within the constraints of legal and company requirements? (legality test)**
- 3. Do I stand by my decision when it is revealed? (supervisor test)**
- 4. Am I in favor of all such cases being decided the same way company-wide? (universality test)**
- 5. Do I still think my decision is right when my company has to justify it in public? (public test)**
- 6. Would I accept my own decision if I were affected? (involvement test)**
- 7. What would my family say about my decision? (second opinion)**

If my answer to questions 1–6 is “yes” and the answer to question 7 is positive, my behavior is very likely compliant with the principles of this Code of Conduct. If questions remain unanswered or if I have any doubts, I should get in touch with any of the points of contact listed in this chapter.

© BUGATTI AUTOMOBILES S. A. S.

Compliance (BG-S)

1 Château Saint-Jean

Dorlisheim

67120 Molsheim

France

01/2022