

Code of Conduct

valid since February 2017

I. Introduction

For more than 125 years now, the Trützschler Group SE has been successfully active as a family business with dedicated employees in the field of development, manufacturing, sales and servicing of machines, systems and components for fiber processing in the spinning, nonwovens, and carpet and technical yarns industries. That is a long tradition which provides roots and represents the foundation for the future.

Our business relationships are based on the principles of honesty and trust. When it comes to cooperation with our partners, we have committed to ethical principles and rules of conduct.

This Code of Conduct is derived from Trützschler values, i.e. the basic principles which we affirm as a company. This always includes the valid laws and the United Nations Global Compact program. Wherever the regional conditions demand it, the local laws supplement this policy. The code applies for the Trützschler Group SE ("Trützschler") and all subsidiaries in which Trützschler holds a majority share.

The good reputation of the company is essentially defined by the everyday behavior and actions of every single one of us. We are all responsible for keeping our company successful and respectable and doing our societal responsible justice sustainably.

Trützschler aims to prevent situations which can call into question the integrity of Trützschler. The code describes the principles which apply for all the employees of our group and at all times. It identifies potential areas of risk and serves as a guide for questions in daily business operation. It is substantiated by internal company guidelines and specific instructions for action.

II. Principles and assistance in case of violations

We are all obligated to observe and adhere to the legal rules and the stipulations of this Code of Conduct. It is equally important, in the interest of all employees, to take violations of this code seriously and pursue them. The consequences can be serious; they encompass both disciplinary measures when contractual work obligations are breached and the sanctions and claims for compensation for damages provided for by the law.

If you can answer the following questions with "yes", in general terms you are acting in the spirit of this Code of Conduct:

- Is my behavior in harmony with the valid laws?
- Is my behavior free from conflicts of interest?
- Does my behavior align with the company values of Trützschler and my own ethical standards?
- Can I assume responsibility for my behavior myself?
- What impression do other people have of my behavior, would it generally meet with approval in public?

If you are uncertain in the case of any of the questions, please contact our Compliance Officer in order to discuss the situation. The term 'compliance' is understood as adherence to the legal regulations and the voluntary rules of conduct in companies. The Compliance Officer is primarily responsible for "preventive consulting" and the maintaining of compliance measures. The Compliance Officer can provide you with sound advice and support during the decision-making process but will not make decisions in individual cases.

Please contact the Compliance Officer if you have the feeling that there may be a violation of the Code of Conduct or a suspicious case. This also applies, of course, if there are already specific indications of a violation. Offenses committed by employees must be reported immediately. Reports of any violations or suspicious cases can be submitted confidentially or, if desired, anonymously using our whistleblower system "Hintbox" on the Trützschler website. An employee who informs his/her Compliance Officer or submits a report using the whistleblower system, does not have to fear any penalties as a result. If your question or notification is in relation to the Compliance Officers themselves, please contact the board of directors.

III. Prevention of conflicts of interest

All business decisions which you have to make as an employee of Trützschler, must be free from conflicts of interest. Mixing business interests with private interests must therefore be avoided. A conflict of interest is to be assumed if personal interests carry more weight than the interests of the company when making a business decision. Conflicts of interest can be constituted in particular if an employee is simultaneously a competitor or holds secondary employment with another or even his/her own company. Even financial investment in a competitor, customer, supplier, service provider or a company with a special business relationship with Trützschler can constitute a conflict of interest.

For this reason, our employees are prohibited from having business relationships with competitors, suppliers, customers or service providers of Trützschler and companies which bid for an order at Trützschler, or those which have any other business relationship with Trützschler if they could lead to a conflict of interest. Such business relationships should in any case be disclosed, even those in the family environment of the employee.

IV. Prohibition of corruption, handling of gratuities

Trützschler – like other companies – is reliant on good and trustful relations with the company's business partners. It is customary and important to maintain these relationships with business partners and express their importance with gestures. In this regard, gifts, hospitality and entertainment – with a reasonable scope – are accepted.

The limits of such gestures are wherever they are clearly no longer in the interest of Trützschler. Also, any gratuities which bring about conflicts of interest and thus could damage the reputation of Trützschler, are inadmissible.

Trützschler does not tolerate corruption!

Corruption damages the economy. It distorts competition, encourages decisions from adverse considerations and is thus considerably detrimental to society as a whole. For these reasons, corruption can lead to sensitive administrative penalties for Trützschler and penal sanctions for the individual employee.

Corruption in relation to public officials and in the private economy is a criminal offense both domestically and abroad. Any party offering, promising or granting his/her counterpart advantages, runs the risk of becoming criminally liable. This also applies inversely to "accepting promises", demanding or assuming such advantages from employees of Trützschler.

Such an advantage is any material and/or immaterial gratuity which objectively improves the situation of the recipient in a financial, legal or even personal sense – and for which the recipient has no claim. Alongside monetary benefits, these also include paid-for invitations to events, paid-for invitations to meal and other gifts.

V. Donations, sponsoring, social engagement

The financing of marketing measures, customer events, donations and sponsoring actions is implemented from a defined annual budget and is posted transparently. It is thus subject to the checks of the Compliance Officers, for instance.

VI. Commercial agent contracts

For decades, and with good success, Trützschler has relied on the concept of supportive "indirect sales and marketing". For this purpose, commercial agents, and in some individual cases, project consultants, are integrated into the sales and marketing processes on the individual markets.

We select these commercial agents and project consultants carefully and diligently. They are, of course, employed in accordance with the legal framework conditions. In this regard, we also follow the defined guideline which we established ourselves. The commercial agents and project consultants of Trützschler are bound to this Code of Conduct and all the rules issued based on it in exactly the same way as the employees of Trützschler.

VII. "Four-eyes principle"

Within the scope of delegation of functions, Trützschler uses the "four-eyes principle" at all levels whenever Trützschler is represented, authorized or obligated externally. This way, the employees have mutual responsibility for guaranteeing the quality and lawfulness of internal decisions in a proper procedure. Documentation is indispensable in order to make all decisions taken transparent. This documentation must be complete, clear and understandable and comprehensible for everyone.

VIII. Environment, safety and health

Safety in the workstation and a preventive approach to all questions of health are elementary for Trützschler. The wellbeing and health of us all are a factor for success. We therefore expect our employees and managers to strictly adhere to all the health regulations, are aware of dangers and use "common sense" when carrying out all safety-related tasks.

IX. Export control

As a globally active company, when it comes to international business activities, Trützschler – and thus every one of us – must adhere to regulations which restrict the free movement of goods. Different national and international laws or embargoes restrict or prohibit importing, exporting or domestic trade of goods, technologies or services – the same applies to the movement of capital and payment transactions. In the process, the restrictions and prohibitions can be related to properties of the goods, the country of use or even the business partner personally. It is particularly important to adhere to all national and international export control regulations.

Some Trützschler companies have a privileged position: As a certified authorized economic operator (AEO), our companies are regarded as particularly reliable and trustworthy. As a result, they can take advantage of privileges when it comes to customs clearance.

To ensure that Trützschler maintains this status and remains globally successful, all employees have a special responsibility in this area. The control regulations and customs regulations must be observed resolutely and without exception for all import and export business transactions.

X. Competition and cartel law

Fair and free competition is also of fundamental significance for our sector. Trützschler therefore commits to resolute adherence to national and European cartel law and works exclusively in accordance with these regulations. The principle of integrity of Trützschler and its employees also applies in the fight for market shares.

Failure to adhere to the legal regulations can lead to severe sanctions and put the continued existence of our company at risk. Alongside the financial damage, violations of laws and rules can also lead to a considerable loss of reputation.

Trützschler expects all employees who have contact with competitors, customers or other trade partners, to make sure that our business behavior complies with the stipulations of cartel law.

The respective directives and the respective work/organization instructions regulate the subjects addressed above in more detail.

Mönchengladbach, June 2024

For the Trützschler Group SE



Stefan Schröder
Management (CFO)



Heinrich Krull
Management (COO)



Alexander Stampfer
Management (CSO)

Appendix:
"List of Trützschler companies with majority share"

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Domestic

Trützschler Group SE, Mönchengladbach

Trützschler Card Clothing GmbH, Neubulach

Trützschler Nonwovens GmbH, Dülmen

Trützschler Handels- & Beteiligungsgesellschaft mbH, Mönchengladbach

Trützschler Immobilien GmbH & Co. KG

International

American Truetzschler Inc., Charlotte/USA

Trützschler Textile Machinery (Shanghai) Co. Ltd., Shanghai Qingpu/China

Trützschler Textile Machinery (Jiaxing) Co. Ltd., Zhejiang/China

Truetzschler India Private Limited, Ahmedabad/India

Trützschler Industria e Comercio de Maquinas Ltda., Curitiba/Brazil

Trützschler Switzerland AG, Winterthur/Switzerland

Trützschler Card Clothing España S.L., Manlleu/Spain

Trützschler Card Clothing France S.a.r.l., Mulhouse/France

Trützschler Card Clothing Italia S.r.L., Casale/Italy

Trützschler Textile Machinery Trade Limited Company, Gaziantep/Turkey

Trützschler Central Asia, Tashkent/Uzbekistan

Truetzschler de Mexico, S.A. DE C.V., Tlalnepantla/Mexico

Truetzschler Vietnam Ltd., Ho Chi Minh/Vietnam

True Digital Solutions India Private Limited, Hyderabad/India