

# Code of Conduct for Business Partners

## Introduction

Compliance with the law and legislation is for the companies of the Trützschler Group SE (referred to hereinafter also as "Trützschler") a matter of course. Responsible and ethical behavior towards our employees and our business partners is a firm part of our values system. This Code of Conduct is based on the principles of the internationally recognized standards for responsible corporate management. These include:

- the *Universal Declaration of Human Rights of the United Nations* (UN)
- the *UN Global Compact* (UN)
- the *guidelines of the Organization for Economic Cooperation and Development* (OECD)
- the *5 fundamental core labor standards and the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization* (ILO)

We expect our business partners to adhere to these principles. This Code of Conduct therefore sets out binding minimum requirements for business relations with Trützschler.

The business partner hereby commits:

- 1. Adherence to laws**
  - to observe the laws of the respective applicable legal system(s). In the event that in individual countries there are stricter regulations than those referred to in this Code of Conduct, the stricter regulations apply.
- 2. Adherence to foreign trade law**
  - to take appropriate measures to guarantee that transactions with third parties do not lead to violations of valid economic embargoes or rules of trade, import and export control or on the fight against terrorism financing.
- 3. Prohibition of corruption and bribery**
  - Any form of corruption, bribery or corruptibility is prohibited, including any unlawful payment offers or similar gratuities offered to public officials or business partners.
  - Contributions, for instance within the scope of invitations or in conjunction with promotional activities, donations and sponsoring are only made within the legally permitted framework.
- 4. Protection of assets and property**
  - Any form of fraud or offenses which are damaging to assets (for example embezzlement, theft, misappropriation of funds, tax evasion or money laundering) is prohibited.
- 5. Adherence to cartel and competition law**
  - to refrain from agreements with competitors or business partners which restrain competition, e.g. price rigging with competitors, allocation of customers or sales areas.

## 6. Data protection

- to adhere to the valid laws and regulations in relation to the capture, processing, storage and transmission of the personal data of employees and business partners.

## 7. Respect of the human rights of employees

- to promote equality of opportunities and the equal treatment of all employees, including temporary employees, interns or persons employed in any other form, regardless of skin color, race, nationality, social background, any disability, sexual orientation, political or religious convictions, gender or age.
- to respect the personal dignity, privacy and personal rights of each individual.
- to not employ anyone against his/her will or to compel anyone to work.
- to not tolerate any unacceptable treatment of employees, such as mental hardship, sexual or personal harassment or discrimination.
- to not tolerate any behavior which is sexually coercive, threatening, abusive or exploitative.
- to adhere to the legal regulations on guaranteeing fair working conditions, including those regarding remuneration, working hours and on the protection of privacy.
- to respect the freedom of association of employees in accordance with valid laws and regulations, and to neither favor nor penalize members of workers organizations or unions.
- Employees have the opportunity to report potential violations of compliance confidentially. Notification of potential compliance violations will have no negative consequences for the employee submitting the report.

## 8. Prohibition of child labor

- to not employ any employees which have not reached a minimum age of 15 years, i.e. to adhere to the age limits defined by ILO convention 138.

## 9. Health and safety in the workstation

- to assume responsibility for health and safety in the workstation in relation to employees by adhering to the laws and regulations on health and safety in the workstation.
- to reduce risks and take preventive measures against accidents and occupational diseases.
- to implement measures for emergency situations.
- to provide training course and ensure that all employees are knowledgeable on the subject of occupational safety.

## 10. Environmental protection

- to adhere respect environmental protection in relation to the legal and international standards.
- to minimize environmental pollution and improve environmental protection continuously.

## 11. Implementation on the premises of the business partner and in the supply chain

- to guarantee adherence to the Code of Conduct. For this purpose, the business partner will pass on the principles of the Code of Conduct to employees who are to work for Trützschler.
- The business partner guarantees that his/her/its own business partners (for example subsuppliers) who work in relation to the business relationship with Trützschler, are familiar with and adhere to the minimum requirements of this Code of Conduct.

We fundamentally trust that our business partners will adhere to the provisions of this Code of Conduct and implement them in full. Trützschler reserves the right to terminate any contract and all business relations with the business partner immediately in the event of a violation of the Code of Conduct by a business partner. In case of problems with implementation, we kindly request that you contact us at an early opportunity at [compliance.MG@truetschler.de](mailto:compliance.MG@truetschler.de). In case of questions or suggestions, you can, of course, contact us at the indicated e-mail address.

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For the Trützschler Group SE



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