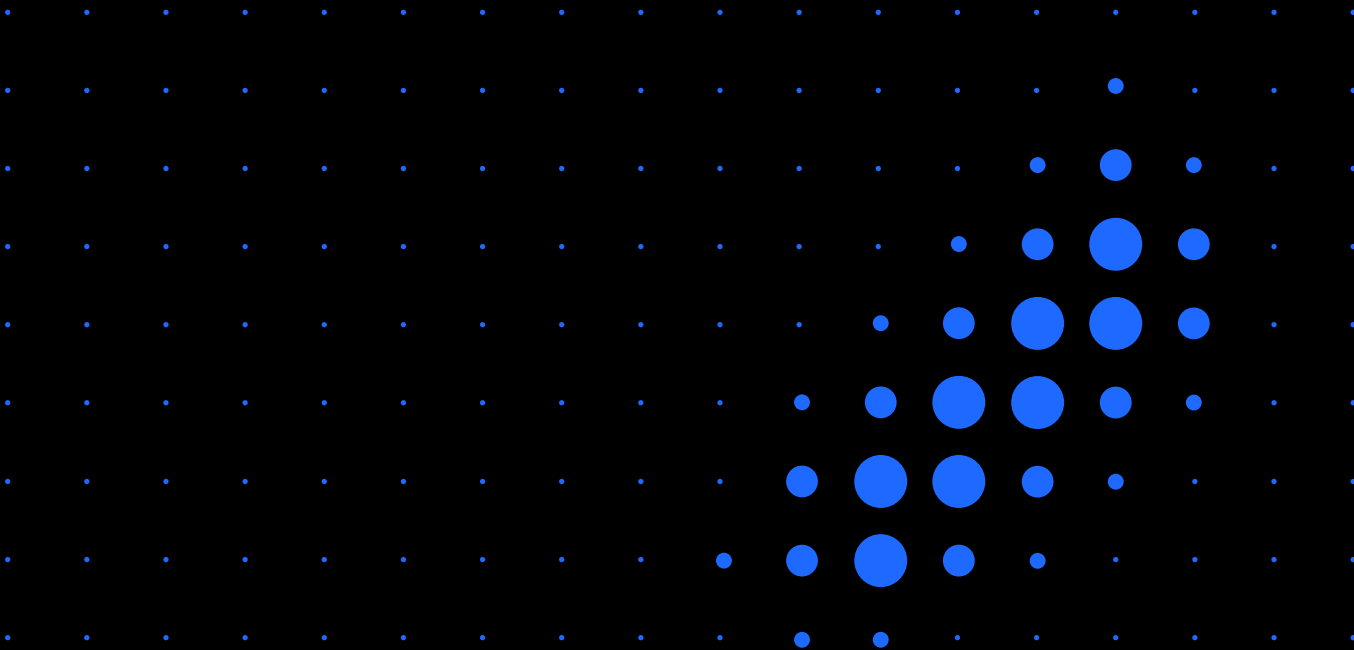


Compliance – The Code of Conduct

for all employees
of the technotrans Group





Introduction

Dear Colleagues,

technotrans is an international company. Our standards of conduct are therefore the same worldwide and are set out in this Code of Conduct.

Nothing is more important than our integrity, both as a company and as individuals. technotrans is obliged to strictly uphold statutory regulations and ethical principles, and expects all of its employees to observe these regulations and principles. This kind of commitment must be firmly embedded throughout the entire organisation, as each employee

is also a messenger for our company. Compliance is always a priority. There can be no compromises in this area. None of this is new, but compliance will always

be a challenge and we must constantly promote and develop further our compliance culture based on our values.

We therefore expect you to take personal responsibility for upholding all

- applicable laws
- basic international standards, and
- internal company guidelines and regulations.

The technotrans Code of Conduct brings together important laws and internal company regulations, which govern the conduct of all technotrans employees in the way they deal with business partners, officials, other employees and the company.

The Code helps us to make the right decision but cannot describe every situation you could face. Special laws and regulations can apply to certain functions or activities, or on individual sites.

Ensuring compliance is an essential component of our daily work. technotrans will give you all of the necessary information and support that you need to enable you to fulfill your obligations.

If in doubt, ask.

Thank you most sincerely for your commitment.

The Board of Director

Michael Finger

Code of Conduct

About this Code of Conduct

This Code of Conduct is binding for all employees of the technotrans Group.

It defines basic, internationally applicable standards of conduct and describes the conduct that is expected of you.

It is the task of management to support their staff in these matters.

An infringement by a single employee can seriously harm the reputation of our

company and inflict considerable damage, including financial damage.

technotrans does not tolerate any legal infringements and will not protect anyone responsible for them from sanctions.

Breaches of laws, international standards and internal regulations can result in disciplinary measures (including the end of the employment relationship) and the pursuit of civil or criminal procedures.

Legal infringements can almost always be avoided by seeking early advice. If you are not sure what requirements exist or whether your conduct is perfectly legal and ethical, it is expected that you ask your manager, Legal & Compliance or the Compliance Officer.

In addition, all suspected or actual breaches of the law or company guidelines are to be reported.

If in doubt – ask!



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Rights



»We act in accordance with internationally recognised human rights, employment and social accountability standards, and strictly observe the applicable laws.«

Human Rights, Employment and Social Accountability Standards

technotrans has the goal of all employees acting in compliance with internationally recognised human rights standards, as well as basic employment and social accountability standards, and is therefore obliged to follow the regulations of the UN Global Compact.

technotrans champions, in particular, the abolition of any kind of child and forced labour, the principle of non- discrimination, the recognition of freedom of association, collective bargaining and industrial relations, fair pay and benefits, in accordance with local market conditions, reasonable working hours and paid holiday, as well as access to adequate medical care and health insurance.

technotrans is committed to equal opportunities in the labour market and observes all of the relevant laws, which prohibit disadvantage with regard to age, race, skin colour, gender, sexual orientation, background, religion or disability. This principle applies to all human resources decisions, such as recruitment, hiring, training, job changes, promotion, remuneration, benefits, disciplinary measures and terminations.

Sexual harassment and other harassment in the workplace is strictly prohibited.

Health and Safety



Health and Safety

technotrans is particularly concerned about protecting the health of its employees. All employees are obliged to respect the regulations with regard to health protection at all times. You help to avoid dangers to health by following the health and safety at work regulations.

The statutory, or standard, work regulations for the protection of employees must be observed. A transparent and trustworthy system for recording working hours exists in all of the manufacturing operations of the technotrans Group.

The statutory driving and rest periods for driving company vehicles must be observed at all times. Holidays help employees to stay healthy and must be given every year.

Each employee is co-responsible for the protection of people and the environment in his or her work environment.

Cartel Law

Cartel Law

The business policy of technotrans is to promote fair competition. All employees are therefore expected to strictly observe the applicable cartel legislation.

Agreements between competitors and coordinated conduct between competitors (“horizontal agreements”) are prohibited, if they are intended for or lead to the prevention or restriction of competition. This includes, for example, price agreements, tenders, customer allocations, sales or purchase conditions, production or sales quotations or the division of geographical markets.

Not only expressly contractual agreements but also concerted actions as a consequence of unilateral statements (e. g. announcements of price increases, which have the goal of causing the same kind of reactions from competitors) are prohibited.

Every direct or indirect exchange of information between competitors (non-exclusive traders can also count in this connection) is prohibited, e. g. the exchange of information on customers, pricing, costs, salaries, sales conditions, sales methods, market share, production volumes, tender submissions or strategies (e. g. business and research strategies).

In your contacts with competitors you must take care at all times that no information is accepted or passed on, which allows any kind of conclusions to be drawn with regard to the market conduct of technotrans or its subsidiaries at that time or in the future.

Particular care should be taken at meetings of associations and other industry meetings, such as trade fairs. The opportunities that are offered there for meetings and discussion may not be used to exchange confidential market and corporate information in order to influence market activity. Even the slightest sign of an infringement is to be avoided.

In the case of horizontal agreements, the strict regulations of European cartel law must be followed globally – and, indeed, independent of deficient or less strict local legislation.

Vertical agreements too, i. e. agreements between suppliers and customers or patent holders and licensees are prohibited in the EU, the US and other countries. Such agreements can result in fines or the ineffectiveness of the relevant agreement.

These include restrictions on the freedom of the customer to set prices or delivery conditions for its business partner (geographical restrictions, restrictions in relation to customers or product applications), certain most-favoured nation clauses, exclusivity ties like total fulfillment of demand or exclusive supply and restraints on competition.

If in doubt with regard to the admissibility under cartel law of particular conduct, you must refer to your manager or to Legal and Compliance at an early stage.

[Cartel law prohibits agreements between competitors.](#)

Corruption

»You may never accept or grant material benefits, which can result in the impression of (attempted) improper influence.«

Corruption

Relationships with all business partners must be based on quality, reliability, competitive prices and the respect of ecological and social accountability standards, and the principles of good corporate conduct.

Anti-corruption laws in most countries of the world prohibit bribes being given to domestic and international officials, as well as the employees of domestic and international companies in the private sector.

technotrans therefore prohibits its employees and everyone commissioned by technotrans from being involved in any kind of bribery. When dealing with business partners or officials, you may never demand or accept material benefits (e. g. cash, gifts, entertainment offers or other personal benefits) that can result in the impression of (attempting) to influence business decisions.



In the same way, employees of other companies or officials may never promise or grant personal benefits with the intention of receiving an order, to secure a business transaction or to create an advantage for technotrans without legal cause.

All employees are obliged to notify their managers if a business partner or official offers or demands a personal benefit.

Moreover, so-called “facilitation payments” (i. e. relatively small amounts of money or payments in kind to officials

to simplify or accelerate administrative processes or official acts such as customs clearances) are not allowed.

Gifts and Invitations



»Accept gifts or invitations only if they can be seen as a courtesy gesture.«

Gifts and Invitations

Gifts and invitations may be granted or accepted only if they correspond to a courtesy gesture as part of general business practice and the question of improper influence on a business decision or an official act can be excluded from the outset.

This also applies to gifts and invitations on the occasion of or as part of official corporate events or business conferences.

If it is not possible to reject unacceptable gifts tactfully, they can be accepted. In such cases, you must subsequently notify the manager, who must decide how to proceed (e. g. make a donation to a charitable organisation).

The offering, granting, demanding, or acceptance of cash or contributions that have the nature of cash is never admissible.

In most countries, gifts and invitations over a certain value are regarded as taxable benefits. You must ensure that the applicable tax regulations are strictly observed. If in doubt, you should refer to your manager or to Legal & Compliance.

Conflicts of Interest



Conflicts of Interest

Personal relationships or interests may not influence your business activity. This means that your personal interests may not conflict with the interests of technotrans, nor influence your decision-making, nor create such an impression.

Therefore, business decisions (e. g. selection of business partners, initial business contacts, personnel decisions, submission of tenders) must be made exclusively on the basis of comprehensible economic aspects or objective criteria and transparent processes.

Financial or other investments in business partners of the technotrans group which could have a positive impact on the employee concerned in the event of any business transaction, are to be disclosed in a timely manner.

You must notify your manager of every existing or possible conflict of interest and together with him or her seek a solution to avoid the conflict of interest or at least to minimise it.

Private business interests must be kept strictly separate.

IT Security, Data Protection

IT Security

All employees are obliged to observe the protection and security regulations issued by the IT Department.

The applicable IT security guidelines stipulate the conditions regarding the use of the IT-systems of technotrans. If in doubt, please contact the IT department directly.

Data Protection

technotrans is obliged to respect the privacy and integrity of employees and business partners. Strict standards are observed when the personal data of employees, applicants, business partners and other interested parties are processed.

All personal data that technotrans collects and stores are processed comprehensibly, carefully and exclusively for specific purposes in accordance with the relevant applicable data protection legislation.

Access to personal documents is limited to technotrans employees of HR Department and persons who have valid authorisation to do so and have a legitimate business interest in such an inspection. Confidential employee data may not be shared with anyone outside of the company without relevant authorisation or unless there is a statutory reason.

In case of doubt, the Data Protection Officer or the Legal & Compliance must be consulted for advice.

Data protection has high priority at technotrans. Personal data are processed for specific purposes only and in accordance with the relevant applicable data protection legislation.



Export Controls



Export Controls

On the basis of the resolutions of the Advisory Board on Human Security of the United Nations to combat international terrorism, many countries and international communities have issued laws that prohibit any trade with persons, organisations or companies, which are under suspicion of supporting terrorism. With the help of sanctions lists, international terrorism is to be deprived of an economic basis through the prevention of any financial transactions and the use of economic resources. Along with the sanction lists, the anti-torture regulation, the EU embargo regulations and the EU dual-use regulation must be followed.

technotrans has automated systems in place to ensure as far as possible the observance of the trade prohibitions mentioned.

All employees are forbidden to make any delivery or payments to addresses that are not in the system and checked. If in doubt or if you have any questions, please contact the Export Control Officer or the Compliance Officer.

All employees must observe the trade control laws for production or marketing of goods and technologies when buying and selling.

Money Laundering

»Be alert to dubious financial transactions and if in doubt insist on clearance.«



Money Laundering

Money laundering is the infiltration of assets (not just cash), which results from criminal acts, into the regular financial and economic cycle. Money laundering is a criminal act in the member states of the EU, the US, China and various other countries.

No employee may alone or in collaboration with third parties take actions that infringe the applicable anti-money laundering laws.

If dubious financial transactions are demanded, which have as their object the handing over of cash or other assets, they must be checked and receive clearance from the Board.

Protection of Property



»PROTECTION OF COMPANY PROPERTY AND THE PROPERTY OF BUSINESS PARTNERS«

Protection of Company Property and the Property of Business Partners

Every employee must handle company property responsibly and protect the assets of technotrans against loss, damage, theft, misuse, and unauthorised use. Intangible assets such as proprietary information, intellectual property rights and copyright-protected works also count as company property.

Confidential information on business partners and their expertise must also be observed and protected. This applies in particular if such information has been entrusted to us as part of a joint venture.

Company computers and other equipment are for business purposes and are not intended for personal use. No company property may be used for private purposes or removed from the company premises without the express consent of the relevant department.

Protection of the Environment



Protection of the Environment

The protection of resources and climate protection are amongst the central challenges of our time. With the recognition of the principles of the Global Compact, technotrans is obliged to give high priority to environmental protection.

The goals of the waste management concept at technotrans are „avoid“, „reduce“ and “utilise”. For this purpose, an integrated disposal concept for the raw material economy was developed. If possible, reusable materials are deployed. Recyclables and waste are collected separately and disposed of in accordance with the technotrans disposal concept.

With our own products, too, we pay attention to the acceleration of the development and dissemination of environmentally-friendly technologies.

Each employee is co-responsible for the protection of people and the environment in his or her work environment.

Whistleblower System

Whistleblower System

Compliance with applicable law and internal guidelines is a top priority for the technotrans group. We can only prevent damage to our company, our employees and our business partners if rules and standards observed. Non-compliant behaviour must therefore be identified at an early stage and processed and remedied without delay.

The prerequisite for this is that all employees understand the rules of compliance and are willing to point out possible serious violations of applicable law or internal regulations if they have knowledge of possible violations. We also attach great importance to relevant information from business partners, customers and other third parties.

Therefore, a whistleblower system is an elementary component of an effective compliance management system. Employees, but also external stakeholders, should be given the opportunity to confidentially communicate unethical and illegal behaviour within the company to a reporting office.

The fundamental objective of a whistleblower system is to accelerate the detection and elimination of violations whilst protecting the whistleblower and, if applicable, third parties who assist in the reporting process so that they do not have to fear any negative civil, criminal or internal consequences / reprisals as a result of the report.

Accordingly, any lead given will be treated with the highest level of confidentiality. The information will be processed in a fair, quick, and confidential manner.

How do I report a tip?

You can report your information both orally and in writing. You can use the following guideline:

- which company or division
- what
- when
- where
- who is involved

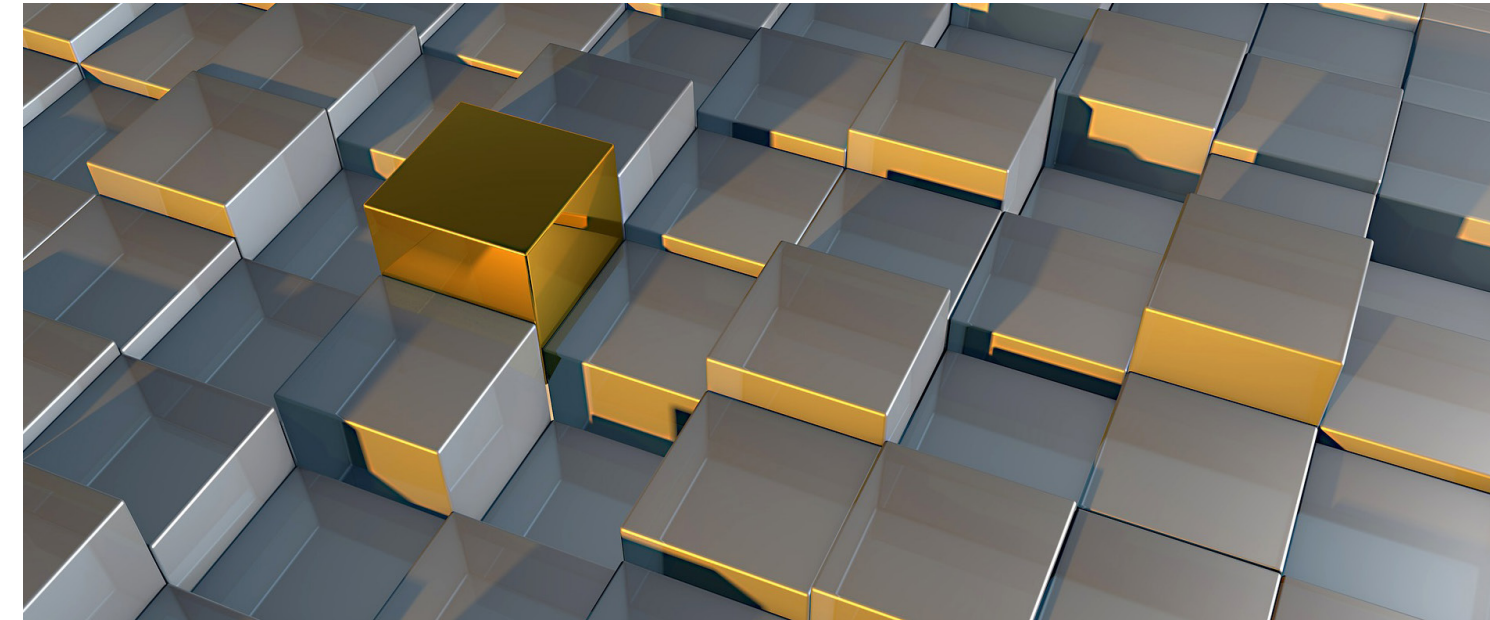
Before submitting a notice, please check carefully whether the information you provide is correct in terms of content.

Who can I contact?

In principle, you can contact your direct superior, but also the board of directors or your managing director. Furthermore, the responsible works council or compliance officer of the respective company can be contacted.

It is recommended that you primarily use the internal contact persons. However, there is no obligation to do so.

Whistleblower System



Chief Compliance Officer (group):

email: whistleblower@technotrans.de

In addition to the group's internal contacts, an external lawyer has been appointed as ombudsman for business partners, customers and other third parties.

Lawyer:

Dr. Johannes Dilling

phone: +49 221 933 107 40
mobile: +49 163 3476 111
email: info@ra-dilling.de
RADilling@protonmail.com
whistleblower portal: www.whistleblower24.eu

power to transform

Transformation means for us:
Creating something new,
Becoming better together.
Shaping the future!

technotrans

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