

# Code of Conduct



# Foreword by the Board of Management and the Owners

Dear colleagues,

As a family business with more than 100 years of history, acting “properly”, according to high ethical standards, has always been a cornerstone of our success. By respecting these standards, we have grown from a small workshop in Vienna to a global player with 2.000 employees in more than 40 countries.

Our company values describe our DNA: We are the Original, setting new standards day by day. We shape our future and we are committed to remaining the best we can be as a company and individuals. We achieve this through our respect and esteem for each other and for our partners, our intellect, our knowledge and inspiration, and our commitment to technology and design.

Derived from our values we defined “leadership and cooperation principles”. Those principles are our guidelines for leadership and collaboration within the company. These are both a promise and our

aspiration. Every employee in the company can expect a work environment that is based on these guidelines. But we also actively request compliance with these guidelines from every employee.

This new Code of Conduct goes one step further: it defines how we want to interact with all individual stake holders including society and environment. Where the leadership principles look inwards, the Code of Conduct defines our role in a global and complex world.

To ensure sustainable success for our companies we must adhere to the rules laid out in this Code of Conduct. It is the responsibility of each and every employee of TroGroup independent of rank or nationality to act according to this Code of Conduct. This Code of Conduct is available to all employees, customers, and business partners. It will help us to guarantee the integrity of our conduct and ensure greater success in the long term.



N. Schrüfer

Norbert Schrüfer

CEO



P. Köstler

Peter Köstler

CFO



Christopher Müller

Christopher Müller

Owner



Georg Eder

Georg Eder

Owner

”

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# Introduction

As an internationally active company<sup>1</sup>, the TroGroup is required and attaches great value itself to acting responsibly and lawfully. We face up to this responsibility as a company and as part of society and thus ensure our long-term economic success. Employees and representatives of the TroGroup (in short: employees) must at all times comply with the legal provisions as well as the internal guidelines and processes and are required to protect the company as best they can against corresponding misconduct such as extortion, fraud or bribery.

The reputation and trust that we enjoy with our customers, employees, business partners and in society could also be seriously damaged by inappropriate behaviour on the part of individuals. Therefore, we all share responsibility for the reputation of our company.

This Code of Conduct summarises the essential principles and rules for our actions. It defines the requirement for us, but also for all third parties connected with our company in any way, to comply with all the basic legal and ethical rules relevant to us. This requirement must be put into practice by every single employee of the TroGroup in their daily work.

This Code of Conduct is a guideline for all employees (including managing directors and other managers) of the TroGroup worldwide. It describes principles that we must always adhere to in our daily dealings with each other, but also with customers and business partners. The obligation to comply with all applicable laws and regulations as well as moral and ethical principles applies to all countries in which we do business. Furthermore, it is in our interest that the Code of Conduct is also brought to the attention of our key business partners (customers, suppliers, consultants, etc.) and that employees take compliance with the requirements into account as an element of decision-making when selecting business partners.

We expect all employees of the TroGroup not only to formally comply with the Code of Conduct, but also to internalise and live its meaning and purpose in spirit.

Managers have the additional responsibility of setting an example of our corporate culture. In addition to our values, this includes observing the Code of Conduct and applicable law at all times as the core of our business activities.



<sup>1</sup>This Code of Conduct applies to TroGroup GmbH and all associated companies. For the sake of clarity, the term “company” or “TroGroup” is used in the following. This always refers to the entire Group.

We have (partially) omitted gender-specific formulations for general better readability and ask for your understanding.



# Principles



...we would rather refrain from  
achieving a goal than breach the  
**law**

# 1

.1

## Compliance with laws

We comply with the national and international laws and regulations applicable in the countries in which we operate. This has always been a matter of course for our company, regardless of any economic disadvantages resulting from it. We expect the same from our business partners.

In case of doubt, we would rather refrain from achieving a goal than breach the law. Should national laws or other relevant regulations differ from the rules of this Code of Conduct and the relevant international guidelines or supplementary specifications, the stricter regulation in each case shall prevail. If the Code of Conduct is stricter than the respective applicable national law, exceptions to these regulations are only permitted with the prior written consent of the TroGroup Management.

Fraudulent acts, breach of trust, falsification of accounts and embezzlement are disapproved of and not tolerated. All deliberate acts to the detriment of the company are unacceptable. Employees and managers are always aware of this.

.2

## Compliance with rules is the responsibility of each individual

Each employee and each representative of our company is personally responsible for compliance with this Code of Conduct, in particular with the applicable legal provisions and internal guidelines, within their area of activity and influence, and is therefore personally responsible for their actions. With their appearance, actions, and conduct, they make a significant contribution to the reputation of the TroGroup.

It is the responsibility of all managers to ensure effective communication and to demand and monitor compliance with these rules of conduct, but also to set an example.

In all business situations where the legal requirements or this Code of Conduct appear incomplete or unclear, employees are encouraged to use sound judgment and common sense. In cases of doubt, they must seek advice from their superiors in consultation with the Compliance Officer and/or the Group Legal Department.





### Accountability

Violations of this Code of Conduct can have serious consequences not only for the individual personally but also for the company as a whole.

The TroGroup pursues a zero tolerance policy with regard to compliance with this Code of Conduct. Violations of this Code of Conduct are sanctioned by appropriate measures. Therefore, violations must be expected to have corresponding consequences. In addition to consequences under labour law due to breaches of duty, claims for damages and criminal complaints may be filed.

In cases in which employees have doubts despite the best possible judgement, their supervisors, the Compliance Officer and/or the Group Legal Department is/are available at all times as a point of contact. This Code of Conduct protects not only our company from serious consequences, but also us as its employees!

### Reporting of infringements

Every employee is requested to immediately remedy any violations of this Code of Conduct or of applicable laws of which he becomes aware, or to report such misconduct to the local Managing Director and to the above-mentioned bodies (Compliance Officer and/or Group Legal Department), provided that such report is made in good faith. This means that the employee must have objective reason to believe that the information disclosed, and any allegations made in connection therewith could be materially true. Employees who report known or suspected violations in good faith are protected from repercussions. Any form of repercussion against employees who report violations in accordance with these principles is a clear and serious violation of this Code of Conduct and will be subject to appropriate sanctions. On the other hand, communications made with the intention of falsely accusing colleagues or managers will be sanctioned as clear and serious violations of this Code of Conduct and will be subject to appropriate sanctions.

As a matter of principle, you should always try to find your way to the respective supervisor. Should this not seem appropriate in individual cases due to special circumstances, every employee is free to report to the next higher level.



**Andreas Penz**

CEO - Trotec

As the Managing Director of Trotec I'm responsible for adherence to all applicable national and international laws and regulations in the countries in which Trotec operates. It is essential that all our stakeholders are aware of their respective responsibility. This Code of Conduct and the principles contained therein serve as respective guidelines for all relevant stakeholders and creates the basis for a trusting and secure cooperation.





# Customer Orientation



...we enter into long-term partnerships  
with our customers which are  
characterised by openness and  
**honesty**

## Customer Orientation

2.1

### Cooperation with customers

In order for us to meet the demands we make on ourselves, just being a service provider or supplier is not enough. Rather, we enter into long-term partnerships with our customers which are characterised by openness and honesty. At the TroGroup, all strategic decisions are examined for their long-term probability of success.

Whatever the requirements of our customers – we see it as our task to find solutions that are not only safe and effective, but also provide sustainable added value for our customers. However, we will only enter into a business partnership where such a partnership does not conflict with our fundamental values and the principles set out in this Code of Conduct. This ensures our long-term economic success.

.2

### Quality of our products

Our aim is to meet the highest demands on our products in terms of quality, function, safety, and design in an optimal way.

For this purpose, our central quality management is an integral part of our operating procedures. We do not compromise on the quality and safety of our products. Our products are therefore subject to strict quality controls.

Following the tradition of our company, we are constantly pushing our product development. Every employee is aware of the importance of their work.





2  
.3

## Positive handling of complaints

Any complaints or notices of quality defects will be processed by the TroGroup promptly, swiftly, and impartially and resolved in an open and fair manner in accordance with the relevant rules and laws. Amicable agreement with customers and suppliers is the primary objective.

.4

## Dealing with suppliers

Our suppliers play a vital role in our operations and our ability to provide high quality products and development services to our customers.

We understand and treat suppliers as partners. Accordingly, the TroGroup employees approach every supplier of the company politely, openly, respectfully and with the recognisable interest that business is always initiated and implemented in a sincere manner.

We strive to make our relationships with business partners as beneficial as possible for both sides. We make decisions based on factually and economically reasonable aspects. In return, we expect our business partners to be highly competent in terms of quality, costs, innovation, and reliability.

We also expect our business partners to act in accordance with guidelines that are also in line with the TroGroup's Code of Conduct.

It is of central importance to us that the suppliers' ability to deliver is secured at all times, even in the event of unforeseeable incidents. In this respect, a corresponding "contingency plan" must be drawn up with each key supplier.



**Anita Abate**

**Head of Customer Service - Trodat**

Customer Orientation is one of our Corporate Values. Together with my team I'm always seeking to support our customers in the best possible way with questions related to our products. Any complaint or notice of a quality defect shall be promptly resolved in all parties' best interest. We strive for a sincere, honest and mutually beneficial and sustainable business relationship with our customers and suppliers.

”



# Assets and Financial Integrity



... measures must therefore  
be appropriately reviewed and  
**approved**

The TroGroup maintains a financial and accounting system that provides a complete and appropriate presentation of all its business transactions and complies with the applicable national and interna-

tional accounting regulations. We do not compromise our financial integrity under any circumstances. Financial risks and operational measures must therefore be appropriately reviewed and approved.

## 3.1

## Data, documents, reporting and accounting

### Disclosure and reporting:

Business transactions are accounted for in accordance with general accounting principles and other applicable requirements. Our financial and non-financial documentation and reporting is truthful, accurate, complete, and objective to give a true and fair view of the relevant transactions and events. We believe it is our duty to provide our stakeholders with accurate information; in addition, accurate documentation and reporting is an important basis for our business decisions and activities.

### Accounting and valuation principles:

The consolidated financial statements of the TroGroup are prepared in accordance with the International Financial Reporting Standards ("IFRS") adopted by the International Accounting Standards Board ("IASB") and their interpretations ("IFRIC"), which have been adopted by the European Union (EU), and in accordance with the applicable legal requirements.

The application of company-wide accounting policies requires management to make assessments. Areas involving a higher degree of assessment or complexity, or areas where assumptions and estimates are significant to the consolidated financial statements, are decided by Corporate Finance in conjunction with the management and the auditors.

An important accounting principle for us is the "timely" realisation of sales and revenues. The main revenue streams of the TroGroup include

- Sale of stamp components and accessories
- Sale of laser machines
- Sale of accessories and raw material for laser processing
- Technical service
- Sale of service packages
- Sale of laser tubes

### Other data:

Non-financial data, such as quality specifications or documents for the fulfilment of print runs, are also documented correctly and completely, regardless of form and medium (e.g. printed, computer file).



Protection of assets

The principle that the property of our company must be handled with care applies to all employees. We treat operating materials and equipment economically, carefully and in accordance with their purpose. In addition, every employee is required to report the misuse of company property by other persons.

IT equipment provided by the TroGroup is to be used primarily for operational purposes. The private use or non-commercial use of this equipment is permitted within the framework of the relevant (IT) guidelines, as long as it is appropriate and does not conflict with the interests of the company.

Confidentiality

Every employee or representative of the TroGroup is bound by law or contract to secrecy. This duty of confidentiality applies to confidential company information, in particular TroGroup business secrets, know-how, patents, trademarks and copyrights, business and marketing plans, drafts, business papers, salary data and all other non-published financial and technical data and reports. Unauthorised disclosure of such company and business secrets of the TroGroup or third parties can have serious consequences for the company and the concerned employees.



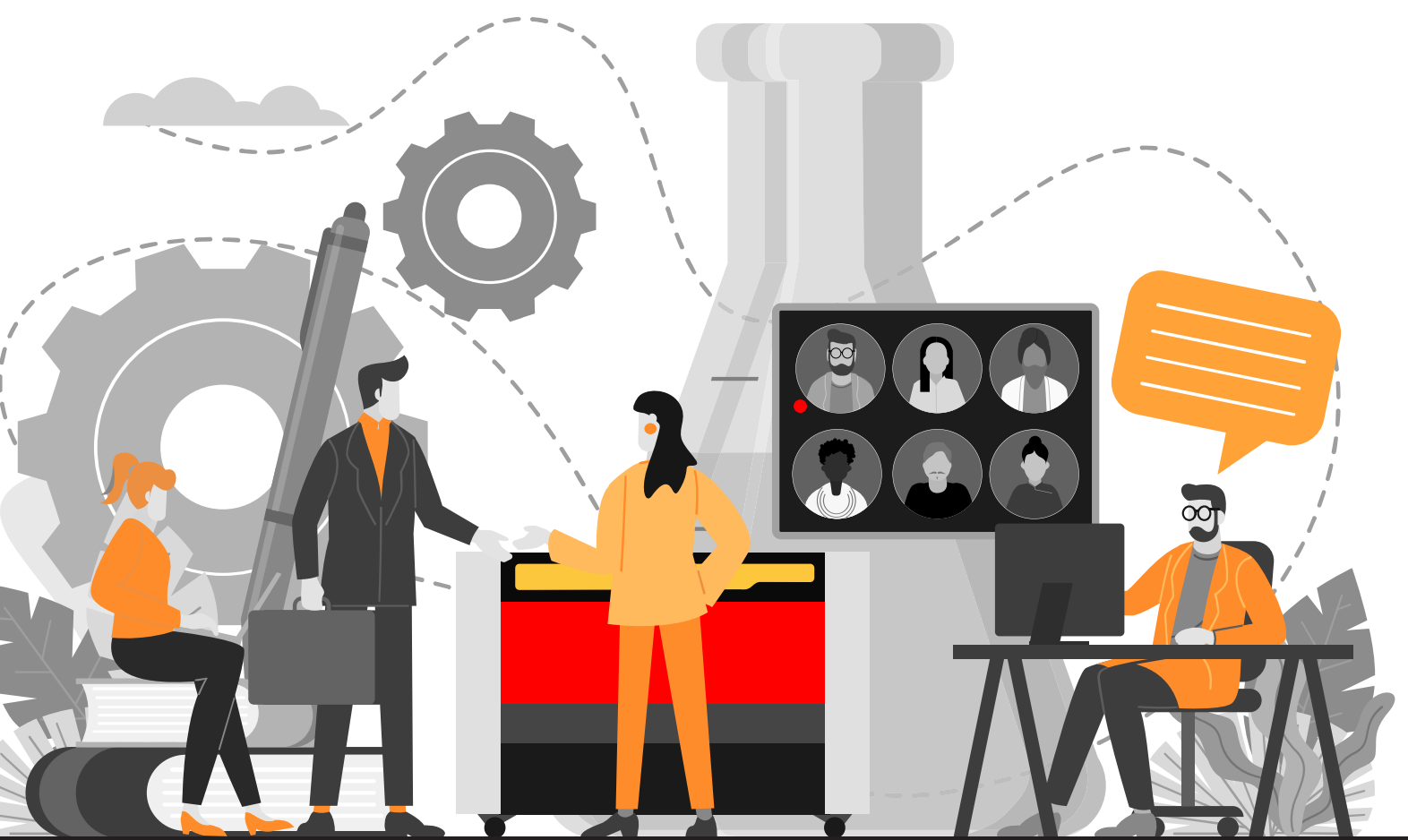
**Gabriele Mayr** Head of Accounting & Finance - TroGroup

Proper accounting is one of the key factors for a financial healthy and profitable company. All our business transactions are posted in accordance with general accounting principles and respective applicable laws. It is essential that the company property will be protected against misuse or loss. We all are required to adhere to the respective guidelines and obliged to treat e.g. information and industrial properties accordingly.





# Employees and Human Rights



... requires tolerant, respectful,  
and trustworthy  
**dealings**

### 4.1

#### Culture and human rights

The TroGroup is active in various countries and cultures. For this reason, as employees we are under an obligation to respect religious and cultural diversity within the framework of the applicable local laws. This requires tolerant, respectful, and trustworthy dealings, as well as openness and sensitivity, particularly with regard to cultural, ethnic, and national origin, among each other and towards third parties. Respect for our employees and business partners is at the centre of our actions. The cohesion and interaction between our colleagues are excellent and distinguishes us. We operate and grow profitably on this basis.

The TroGroup undertakes to comply with and promote internationally applicable regulations

for the protection of human rights.

The TroGroup treats its employees, its business partners and the general public with dignity and respect in accordance with the understanding of the international community. Any form of discrimination based on ethnic and cultural origin, nationality, gender, race, age, disability, religion, or sexual orientation by TroGroup employees will not be tolerated.

All employees of the TroGroup must be given the opportunity to use their skills, knowledge, and experience in the best possible way for the benefit of the company. Each of us is called upon to make a positive contribution to a pleasant, respectful, and constructive working atmosphere.



4

.2

Employee protection

The health and safety of our employees is one of our highest priorities. We therefore create safe working conditions and integrate occupational health and safety into our operational processes. Each employee is personally responsible for complying with our safety regulations without reservation and for immediately pointing out any irregularities or for remedying them in their own area of responsibility. Every manager is required to support their employees in the fulfilment of this responsibility and is responsible for compliance with the health and safety guidelines in their area of management.

.6

Right of assembly and association

We respect the right of employees to form company organisations, to join inter-company organisations and to engage in collective bargaining (where collective agreements exist) in accordance with applicable national law.

The TroGroup guarantees its employees a safe workplace and an appreciative working atmosphere. Teamwork, cultural diversity, and trust are lived and promoted in the workplace.

.3

Mutual respect

A working environment characterised by mutual respect without bullying. At the TroGroup, every employee is entitled to fair treatment, courtesy, and respect. The TroGroup does not tolerate any forms of insult or harassment at the workplace, whether against employees, suppliers, customers, or other persons.

.7

Open and free communication

Open, fair, and direct communication between employees and management is the most effective way to solve problems, especially regarding job and/or remuneration. Every employee is entitled to communicate their concerns regarding working conditions etc. openly to management without having to fear disadvantages, intimidation, or harassment.

.4

Equal treatment

Based on the Charter of the United Nations and the European Convention for the Protection of Human Rights and Fundamental Freedoms, human rights are considered fundamental values which must be strictly respected and observed.

Any form of discrimination by employees on the basis of ethnic and cultural origin, nationality, gender, race, age, disability, religion, or sexual orientation will not be tolerated.

.8

Working hours

Working hours within the TroGroup must always comply with the respective local laws.

.5

Child labour

Child labour is generally prohibited within the TroGroup. The TroGroup expects its business partners who work for the TroGroup in any way to employ only workers who are at least 15 years old. This minimum age for employment is based on several conventions of the International Labour Organisation (ILO). These conventions regulate internationally valid lower limits. Any higher minimum age for employment applying in the country in which the business partner concerned maintains its business premises must be observed.

.9

Remuneration

Wages and salaries must comply with the relevant local laws.





Workplace

The TroGroup guarantees its employees a safe and professional workplace where teamwork, cultural diversity and trust are experienced and promoted.

Personal development

The TroGroup endeavours to support each employee in the best possible way in their personal professional development based on their abilities.



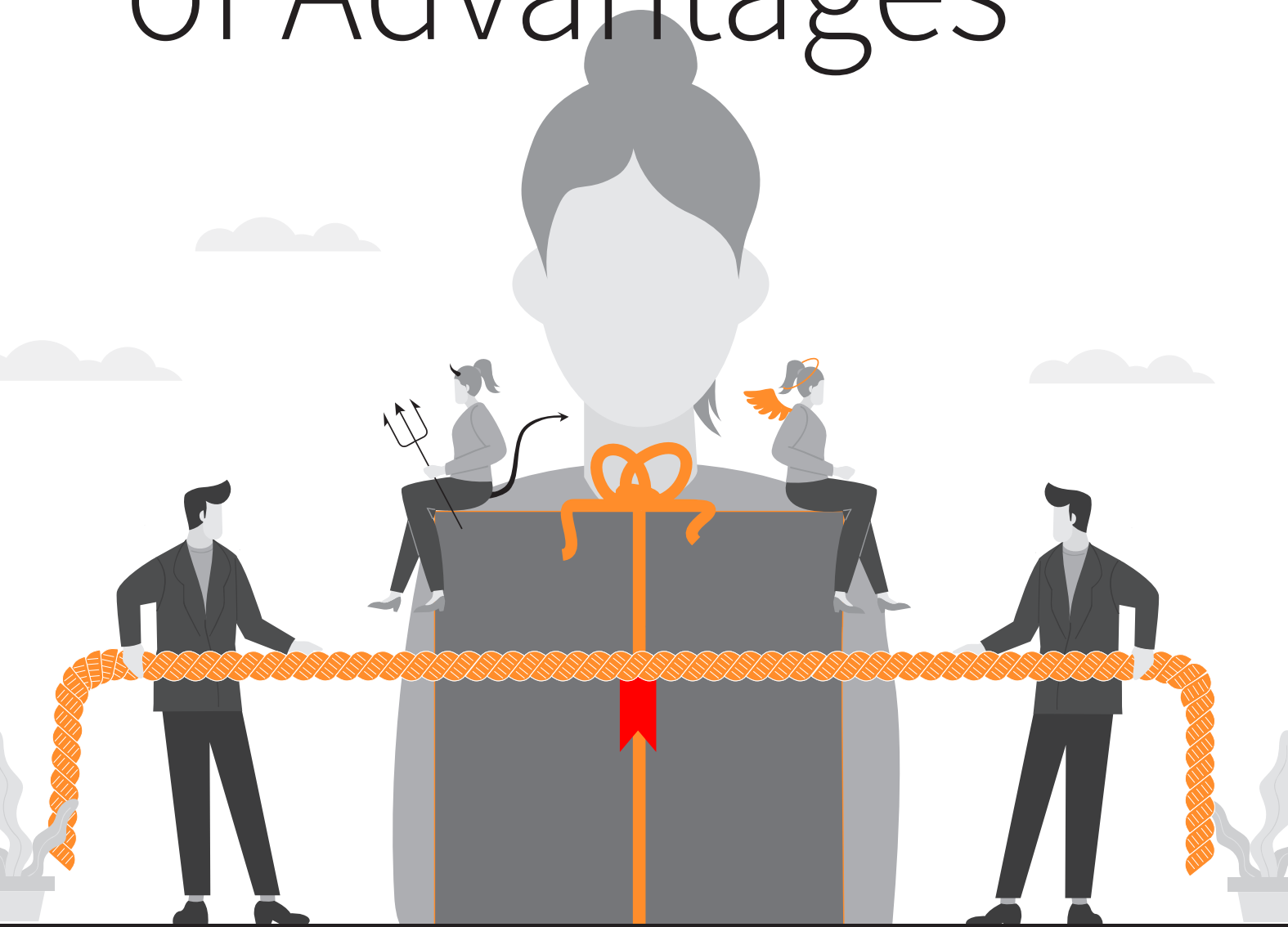
**Daniel Ennsbrunner** Head of Human Resources - TroGroup

Compliance begins with the job interview. I’m responsible for searching employees who meet beside the professional requirements also those required by our Corporate Values. We comply with and promote internationally applicable regulations for the protection of human rights. We treat our employees with the utmost respect and invite them to take responsibility for their activities. We always strive to achieve our goal as best employer.

”



# Conflicts of Interest and Acceptance of Advantages



separate private and business  
interests and make  
**decisions**

A conflict of interest always exists when business decisions are influenced by private interests. To avoid this from the outset, every employee shall separate private and business interests and make decisions without bias and in the interests of the company.

The mere existence of private interests in a business-related situation does not necessarily lead to a conflict of interest. Most cases can be solved

by clearly documenting the private interests and transparently explaining why there is no conflict. Such documentation is beneficial for all parties involved: it proves the integrity of the employees and the compliance of the TroGroup.

In any case, we are all required to make our decisions in this regard to the best of our knowledge and in the interests of the TroGroup.

**5**.1

## Business partners and competitors

No private business relationships may be entered into with business partners or competitors of the TroGroup if this leads to a conflict of interest in professional terms.

Employees may not enter into a business relationship with a business partner of the TroGroup over which they can directly or indirectly exercise significant influence.

.2

## Private advantages from business relations

Any misuse of professional activities for private gain is prohibited. In this sense, no advantages from a business relationship or the initiation of a business relationship may be assumed which are likely to influence business decisions.

Conflicts of interest can also arise in contracts and negotiations from which employees or persons close to them (e.g. relatives, friends) would benefit. Conflicts of interest may also arise from accepting secondary employment, consultancy assignments, functions in legal entities or political offices.





# Conflicts of Interest and Acceptance of Advantages

5

.3

## Dinner invitations and gifts

All employees are prohibited from offering, granting, requesting, or accepting gifts and benefits directly or indirectly in connection with business activities. This does not apply to occasional invitations and gifts that are of insignificant financial value and are in line with standard business practice (any other guidelines must be observed).

However, the acceptance of such invitations and gifts is always subject to the condition that no legal provisions are breached and that any influence on a business decision can be excluded from the outset. The acceptance of cash and cash equivalents (e.g. vouchers, securities) is inadmissible in any case.

.4

## Disclosure of conflicts of interest

All employees are expected to maintain an impartial relationship with business partners and to act exclusively in the interests of the TroGroup. Furthermore, they may not hold any significant legal or financial interests in business partners of the TroGroup.

Employees must disclose possible conflicts of interest to their supervisor and clarify them in consultation with their supervisor. In the employee's own interest, such agreements must be documented.



**Michael Rosenkranz**

Head of Internal Audit - TroGroup

A conflict of interest is a situation posing a risk that personal interest will interfere with legitimate business interests. Any conflict of interest creates an appearance of impropriety, which may undermine your confidence. For this reason, it is essential for an internal auditor to detecting any potential conflict of interest and handle it effectively.

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# Business and Trade Secrets



... we are particularly depending  
on the protection of our  
**know how**

The sustainable success of the company is particularly dependent on the continuous development of our products. In this respect we are particularly depending on the protection of our know-how.

## 6

.1

## Protection of intellectual property

Our know-how is our capital. That is why we protect our intellectual property and our products against unauthorised use, because they secure our competitiveness and thus our future.

We respect the intellectual property of third parties and comply with contracts and applicable laws such as copyright, patent law and trademark law.

All employees are therefore requested to handle the TroGroup's business know-how with particular care. It must be ensured that confidential information is not disclosed to unauthorised third parties. This also applies to information we receive from our business partners. Confidential information must be protected under all circumstances against access by unauthorised persons by taking appropriate measures (such as locking offices, locking lockers and desk drawers, entry or access restrictions, passwords for electronic devices). Compliance with the relevant internal guidelines is essential.

This confidentiality applies equally to information that we receive from business partners. Conversely, we also contractually bind our suppliers and other business partners to maintain confidentiality.





6

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External communication

External communication requires a prudent approach and a precise understanding of legal and media-related issues, which is why only expressly authorised staff are allowed to deal with such enquiries. Compliance with the relevant internal guidelines is essential.

Furthermore, employees may not disclose non-public information to persons outside the company without an approved business need and without obtaining a confidentiality agreement in advance, especially if third parties would under certain circumstances disseminate such information generally. Certain laws restrict the disclosure of information by the Company.

Dealing with social media

In principle, the right to freedom of expression applies to public statements by TroGroup employees. Employees always ensure that their public appearance does not damage the TroGroup's reputation. When expressing private opinions, employees do not refer to their own role or activities in the company. Under no circumstances may company or business secrets be disclosed.



Hagen Strasser

Head of Research & Development - Trotec

As Head of R&D at Trotec I have a key interest in ensuring that our investments in R&D projects are reflected in a variety of usable development results. In order not to lose any potential market advantage with our innovative products, confidential information and development results must be protected. We ensure this with appropriate technical and contractual measures but also by self-responsible actions of our employees.

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# Anti-Corruption



... zero tolerance of bribery and corruption. We win orders and customers in a **fair way**

Most countries have laws to combat bribery and corruption. Every employee is required to strictly comply with these laws and corresponding internal guidelines. The TroGroup pursues a strategy of zero tolerance of bribery and corruption. We win orders and customers in a fair way through the quality and prices of our innovative products and

7.1

## Zero tolerance for any kind of bribes

Bribery is not tolerated by the TroGroup under any circumstances. Every relationship of the TroGroup with public officials, companies and their employees and agents must be designed in such a way that even the appearance of corruption is avoided. We therefore refrain from any form of offering or granting advantages that could be understood as an attempt to influence.

This also applies to facilitation payments, speed, or grease money, even if these are permitted under local law or are considered “normal” in the concerned country. Facilitation payments are payments or small gifts to government officials with the intention of expediting a routine service or process to which the payer is generally entitled (as opposed to bribery). If you are requested or feel that you are required to pay such a bribe, you must refrain from doing so and immediately contact your line manager, the Compliance Officer and/or the Corporate Legal Department to resolve the matter.

However, services which correspond to politeness or courtesy and are considered socially customary and generally accepted may be approved as socially adequate. These include, for example, a cup of coffee, a New Year’s gift to employees and small promotional gifts such as pens or lighters. Gifts to management personnel may be considered socially acceptable if they are used solely for representation purposes, for example, invitations to public events. Prior to any such benefit, the relevant internal guidelines must be observed or, particularly in cases of doubt, the Compliance Officer and/or the Group Legal Department must be contacted.

not by offering others undue advantages.

Offering, promising, giving or soliciting, promising and receiving a benefit with the intention or effect of influencing the decision-making process of a business partner or public official is strictly prohibited and punishable by law.

.2

## Business partners

Against this background, no gratuitous or non-gratuitous benefits are offered, promised, or granted to business partners of the TroGroup. Subject to the relevant applicable law provisions, only approved donations, business meals or other low-value socially conventional gifts may be excluded from this principle.

Failure to comply with these regulations by third parties (e.g. consultants, brokers, or agents) is of course equally inadmissible.



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.3

Officials

In particular, extreme restraint must be exercised in relations with public officials. Gifts, entertainment, or similar benefits to or from governments and/or other public officials are prohibited.

The term “public official” is to be interpreted broadly and, irrespective of the definition in the respective national legal system, always includes civil servants and employees of public authorities, public corporations, state-owned enterprises and international organisations, right through to members of parliament and candidates for political office and representatives and employees of political parties.

.4

Advisers and intermediaries

In some countries, the TroGroup regularly involves external consultants and sales partners in the initiation and/or processing of sales-based business relationships, who support sales in various ways in the interest or on behalf of the TroGroup or its customers.

Due to the lack of affiliation to the TroGroup, compliance by such consultants and sales partners with the high ethical principles of the TroGroup cannot be guaranteed. To avoid any risk as far as possible, appropriate caution must be exercised when using consultants. Remuneration to consultants and sales partners may only be paid for consultancy and services actually provided and based on a corresponding contract, and the remuneration must be in reasonable proportion to the service provided. Furthermore, the respective account holder must be identical with the respective contractual partner.

Legal infringements by such consultants and service providers can also damage the reputation of the TroGroup and even lead to the company being liable to third parties and to remarkably high fines.



Roland Rier

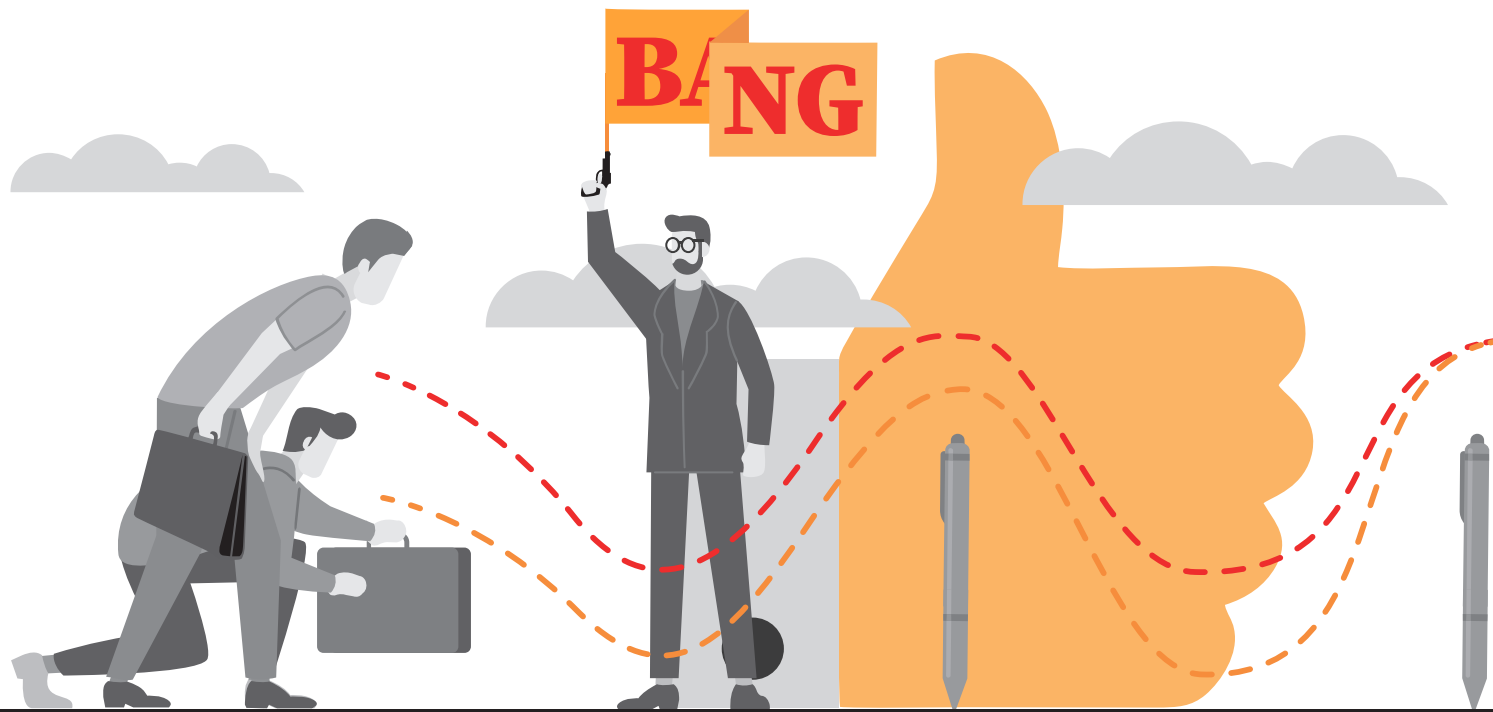
CEO Trodat

We always act honestly and respectfully and are committed to fair competition. The acceptance and granting of bribes – directly or indirectly – is strictly prohibited for all our business transactions. Any behavior which may be qualified as an illegal influence of decisionmakers or as a violation of antitrust and competition laws will be not tolerated by the General Management.

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# Competitive Behaviour



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We are committed to fair competition as a prerequisite for the social market economy and abide by the laws protecting competition. All employees are required to observe the rules of fair competition. Examples of unacceptable behaviour that we do not tolerate include, in particular, illegal exchanges of information, price fixing and market sharing with competitors or suppliers.

Insofar as the TroGroup has a leading/dominant market position, it will take the necessary measures to exclude any abuse of this market position. In particular, TroGroup will not discriminate against customers or unfairly hinder competitors.

The violation of applicable antitrust and competition law can cause remarkably high damages for the TroGroup. Employees are strictly prohibited from entering into agreements or concerted practices that have as their object or effect the prevention or restriction of competition. We expressly reject espionage, theft, and other illegal methods of obtaining information about competitors or their business activities.

TroGroup employees must comply with the internal guidelines for correct competitive behaviour in every business transaction and timely contact the Group Legal Department in all cases of doubt.



# Donations and Sponsoring



9.1

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## Donations

TroGroup donations are always made transparently as social commitment and on a voluntary basis, without expecting anything in return. All donations must be transparent, i.e. the identity of the recipient and the planned use of the donation are known, the reason and purpose of the donation are legally justifiable.

The TroGroup does not make direct donations to political organisations, parties, or individual politicians.



## Sponsorship

In contrast to donations, sponsoring involves a service in return, for example in the form of communication or marketing activities, for the TroGroup group of companies. Sponsoring measures must be transparent and may only be carried out on the basis of written contracts. In addition, there must be an appropriate relationship between the costs of the sponsoring and the advertising consideration.



# Privacy



# 10

The protection of the personal data of our employees, customers and business partners is of great importance to us. We therefore only collect, store or process personal data if this is necessary for defined, clear and legally permitted purposes.

We support the security of the data and processing procedures with appropriate technical and organisational measures. All employees have to make their own individual contribution to data protection. Our employees are expected to exercise a fundamental duty of care in this regard.



**Stefan Fankhauser**

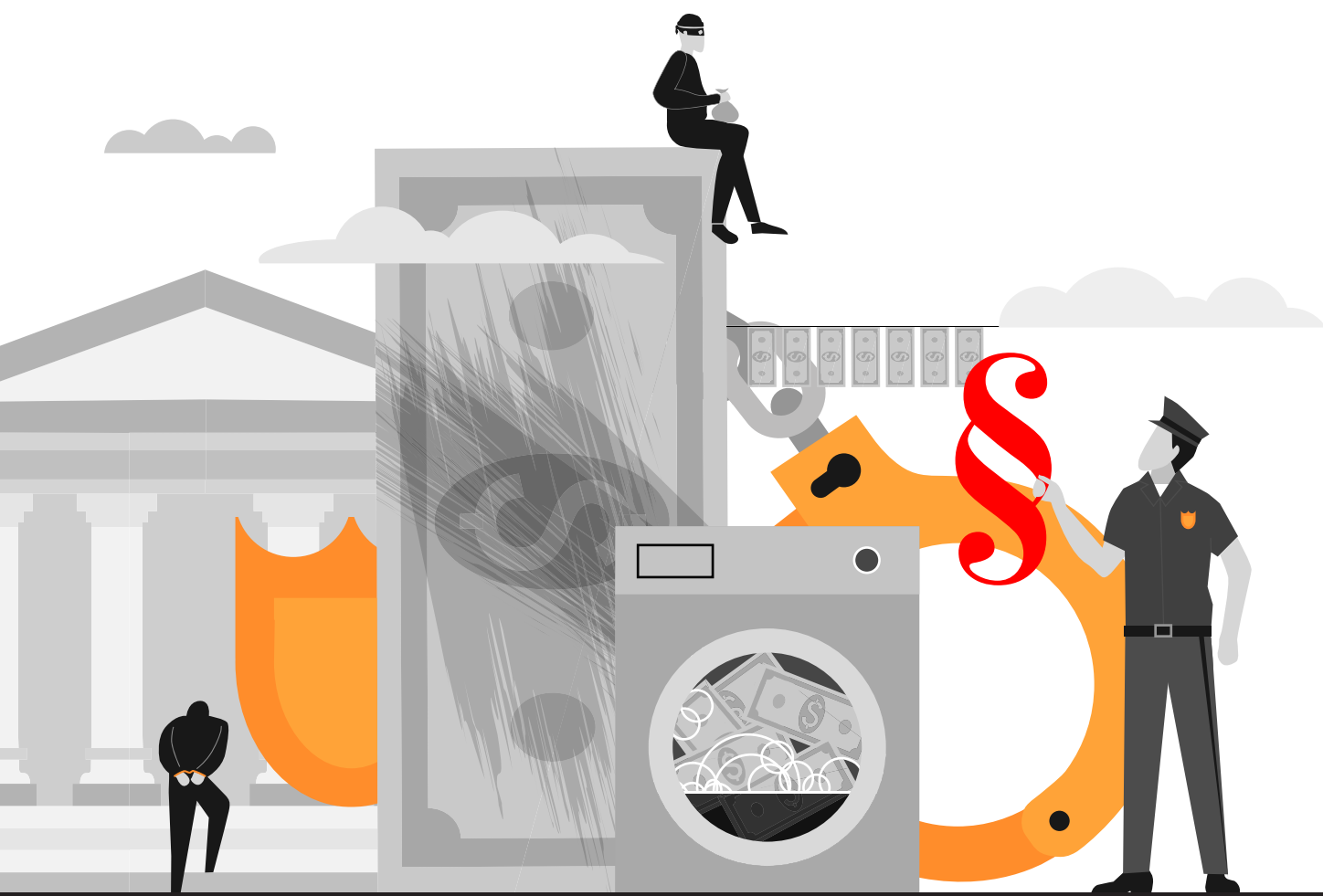
**Head of Legal Department - TroGroup**

With my team I ensure that all legal and regulatory requirements as well as the applicable internal guidelines are adhered to by all employees of the TroGroup during their business activities. The protection of the personal data of our employees, customers and business partners is of great importance and requires all employees' fundamental care in this regard. The relevant data protection laws must be strictly respected.

”



# Money Laundering



... attaches great importance to the principle „Know your customer“

## Money Laundering

# 11

Money laundering is the act by which individuals or organisations attempt to conceal the origin of funds derived from illegal activities and to create the appearance that the funds have been acquired in good faith. Terrorist financing is the provision of assets to carry out a massive crime against life, body, or freedom. The TroGroup will not accept, facilitate, or support money laundering or terrorist financing.

According to international principles, payments for goods or services delivered or rendered by our customers (as opposed to end customers/private individuals) under a contract may not be accepted in cash, as traveller's cheques, third party payments or money orders. We normally expect our

customers to transfer payments from their bank accounts in the name of the customer who is also the addressee of the invoice.

Payments which the TroGroup makes to a supplier or other third party must also be made to a bank account in the name of this third party. Any exceptions to this rule must be approved in writing in advance.

With regard to money laundering and terrorist financing, the clear identification of the customer is of particular importance. The TroGroup therefore attaches great importance to the principle „Know your customer“. Only in this way can the advantage of anonymity in the context of money laundering and terrorist financing be eliminated.





# Environment, Health and Safety



... always envisages the use of the  
most sustainable production processes

## Environment, Health and Safety

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The TroGroup has undertaken to comply with all applicable environmental laws, standards, and other legal requirements. We take a proactive approach to environmental issues, taking a long-term perspective to avoid or minimise environmental pollution as far as possible. The TroGroup's corporate philosophy always envisages the use of the most sustainable production processes possible and the responsible use of resources (especially raw materials and energy). All areas of production are therefore geared towards minimising the environmental impact of processes and products.

Health and safety are an integral part of all our business activities.

The abuse and consumption of alcohol, drugs or other intoxicating substances and narcotics is prohibited in general during the period of service.

It is forbidden to work in a state of unconsciousness or alcohol. We appeal to the personal responsibility of employees to avoid the excessive consumption of alcohol in the interest of their health and to refrain from the use of drugs in general.





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[www.trogroup.com](http://www.trogroup.com)

As a minimum standard, this Code of Conduct applies unrestrictedly to all TroGroup companies. Compliance with it is understood as the basis for all economic activities of the TroGroup.

This document can be translated into the local languages. The basis for this is the English version (Group language). In case of contradictions between the original version and a translated version, the original version shall prevail.

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