

Code of Conduct



Foreword

Dear colleagues,

our mission statement describes what values we share and how we want to work together – today and in the future. It gives us a clear goal, which must be achieved to secure our company's success in the long term. Based on the central idea "We are **more** than technology", we can only achieve this goal together. Our values such as reliability, partnership and transparency as well as legally compliant and ethically correct behavior at all times play an important role.

This Code of Conduct brings together our most important basic rules and principles in one document, which are binding on us today and in the future. It provides an orientation framework and applies equally to each of us – to the management, to the managers and to each individual employee. It places a demand on us, at the same time it is a promise to the outside world for responsible behavior towards business partners and the public, but also in dealing with each other within the company.

Together, we are responsible for the reputation of our company. The misconduct of individuals can cause enormous damage to all of us. Therefore, we ask you, dear colleagues, to read this Code of Conduct carefully and use it together with us as a guideline for our daily behavior. Sustainability, climate protection and the responsibility of companies are crucial for the development of our society. Our actions today and the sustainability of our current economy and way of life determine the living conditions of tomorrow's generations – and companies like ours are obliged to help shape the future with this awareness.

The management of ThermoTEC Weilburg GmbH & Co. KG



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Preamble

Employees¹ of ThermoTEC Weilburg GmbH & Co. KG, hereinafter referred to as "ThermoTEC", have jointly developed a corporate mission statement. This mission statement expresses what our company stands for today and in the future:

We are more than technology.

Partnership and reliability, global networking and tradition are the foundations of our performance. We create added value for our customers and our employees.

In a world of constant change, we accompany our customers as a reliable partner towards tailor-made solutions in testing technology.

We always work solution-oriented and communicate with our customers on an equal footing. Competence and quality from the advice of our customers, through delivery to after-sales service are standard for us.

We are characterized by high reliability and many years of expertise in our actions. Our goal is long-term partnerships because of authenticity and quality.

Cohesion through common values

Um to make working on our products as comfortable as possible, have we the claim, to act quickly and to be a reliable partner for our

customers. We work with full passion and motivate by our Attitude and

Conviction as well as through our products and services.

In doing so, we constantly pay attention to the development of our employees. Health and safety at work have the highest priority. We act in the overall interest of the company. Openness and mutual appreciation characterize our cooperation. We build on strong values: reliability and partnership, credibility, and integrity.

The responsibility for society expressed in the mission statement also includes active commitment to sustainable development. We are also committed to the United Nations Universal Declaration of Human Rights and the core labour standards of the International Labour Organisation (ILO).

This Code of Conduct is based on the most important international standards and regulations for human rights, such as B international labour standards (ILO), OECD Guidelines for Multinational Enterprises, ISO 45001, ISO 14001, United Nations Global Compact, United Nations Guiding Principles, United Nations Universal Declaration on Human Rights, United Nations against Corruption.

Based on this, this Code of Conduct summarizes the essential principles and rules for our actions and sets out our claim to ourselves and to our business partners and stakeholders.

¹ These and other collective terms include both the male, female, and various forms.

Behaviour in the business environment

Compliance with the law

For us, following laws and regulations is an essential basic principle of economically responsible action. We always observe the applicable legal prohibitions and obligations, even if this entails short-term economic disadvantages or difficulties for the company or individual persons. If national laws have more restrictive regulations than the regulations applicable at ThermoTEC, national law takes precedence.

Avoidance of conflicts of interest

At ThermoTEC, business decisions are made exclusively in the best interests of the company. Conflicts of interest with private matters or other economic or other activities, including those of relatives or other related parties or organisations, should be avoided at the outset. If they nevertheless occur, they must be resolved in compliance with the law and the applicable company guidelines. The prerequisite for this is the transparent disclosure of the conflict.

Fair competition

The commitment to the Code of Conduct made by the Management Board of ThermoTEC is the basis for our actions in the competition: ThermoTEC stands for technological competence, innovative strength, customer orientation and for motivated, responsible employees. This is the basis of our high reputation and the sustainable economic success of the company in the competition.

Corruption and antitrust violations threaten these guarantors of success and are not tolerated (zero tolerance). bribes or

For us, cartel agreements are not a means of obtaining an order.

We would rather forego a business and the achievement of internal goals than to violate the law. ThermoTEC takes far-reaching measures to ensure compliance with corruption and anti-trust regulations. Violations will not be tolerated

and will result in sanctions against the persons concerned.

All managing directors, all senior executives and all other employees must be aware of the extraordinary risks that a corruption or cartel case can mean for ThermoTEC, but also for them personally. Every employee is called upon to actively participate in the implementation of corruption, bribery, extortion, fraud, or embezzlement as well as insolvency offences and taking advantage in his or her area of responsibility.

It must be ensured that all employees, subcontractors, or representatives do not grant, offer or accept bribes, so-called "facilitation payments", inadmissible donations or other inadmissible payments or benefits to customers, public officials or other third parties.

We also expect that our suppliers do not offer, promise, or grant gifts, tickets, invitations or other benefits to our employees or related third parties with the aim of obtaining an advantage in the course of business.

Gifts, tickets, invitations, or other benefits are generally considered to be anything of value that is of a personal nature and is offered, accepted, received, or provided by or to someone outside of ThermoTEC. These include food, tickets or invitations to games or events, payment for travel expenses, holiday gifts and other personal gifts.

All ThermoTEC employees should use their common sense! When it comes to gifts, tickets or invitations, the following questions must be asked:

- Is the value of the gift, ticket, or invitation excessive or disproportionate in the circumstances?
- Are they offered and approved in a way that is not completely transparent?
- Are they offered for a purpose other than legitimate business?
- Are negotiations underway between ThermoTEC and the supplier or recipient?
- Is the provider or recipient a public official?
- Could anyone assume that the gift, ticket, or invitation is linked to the expectation that

something of value such as a business opportunity will be given in return?

If the answer to any of these questions is yes, the gift, ticket, or invitation may need to be subjected to further review. In this case, all employees should contact their supervisor for further guidance.

Prevention of money laundering

We comply with legal obligations to prevent money laundering and do not participate in money laundering activities. In case of doubt, every employee is requested to have unusual financial transactions, in particular including cash, which may give rise to a suspicion of money laundering, checked by the responsible finance or legal department.

Objectivity in examinations and assessments

When providing testing or appraisal services, we also expect them to be carried out objectively in a comprehensible, transparent manner and with the necessary expertise and professionalism.

Export and control law

We expect ourselves and all other parties involved in our supply chain to comply with the applicable export and customs laws and regulations in all countries in which we do business and to inform you immediately if a delivery/service is subject in whole or in part to export restrictions under national law, EC regulations or other international embargo and export regulations.

Behaviour towards colleagues and employees

Equal treatment and non-discrimination

A culture of equal opportunities, mutual trust and mutual respect is of great importance to us. We promote equal opportunities and prevent discrimination in the recruitment of employees as well as in the promotion or

provision of training and further education measures. We treat all employees equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religion or belief.

Human and labour rights

We respect internationally recognized human rights and support their observance. We strictly reject any form of forced and child labour. We recognize the right of all employees, in accordance with local laws, to freely unite, organize, appoint employee representatives and negotiate together.

The right to equitable remuneration is recognised for all employees. The remuneration and other services correspond at least to the respective national and local legal standards or dem level of the national economic sectors/sectors and regions.

Cooperation with employees' confidants

For ThermoTEC, a trusting and close cooperation with the trusted persons of the employees is an essential component and proven cornerstone of the company's policy. The basis of mutual trust and cooperative cooperation is an open and constructive dialogue characterized by mutual respect.

Fair working conditions

The applicable local laws and the regulations on working hours specified by the International Labour Organization (ILO) must be complied with at ThermoTEC. Sufficient break times must be ensured. Corporal punishment, the threat of physical violence, sexual or other forms of harassment and intimidation are prohibited in any form with us.

Health and safety at work

In addition to the quality of our products and economic success, the safety and health of our employees are an equally important corporate goal.

Occupational health and safety are an integral part of all operational processes and are included in the technical, economic and social

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considerations from the outset – already in the planning phase.

Each of our employees promotes safety and health in their working environment and adheres to occupational health and safety regulations. Every manager is obliged to instruct and support his employees in the exercise of this responsibility.

Employees of subcontractors on behalf of ThermoTEC are subject to the same safety standards as our employees.

This is considered in the selection and cooperation.

Product quality and product safety

We consistently observe all applicable product safety regulations and requirements and expect this to happen.

equally from our business partners. This also includes the legal requirements regarding the quality, safety, labelling and packaging of products, as well as for the use of hazardous substances and materials and the avoidance of counterfeit parts or plagiarism.

High customer orientation and a "zero-defect goal" are the basis of our actions, which are always geared to the safety of the use of our products. We develop future-oriented and innovative products according to the current state of technology and science and constantly educate ourselves to meet the high requirements of our customers.

We are guided by the internationally applicable quality management standards and comply with them. Our certified quality management meets the valid requirements. We deal with risks transparently, professionally, and responsibly.

Behaviour within society

Donate

We see ourselves as an active member of society and are therefore involved in different ways. We provide donations and other forms

of social commitment solely in the interests of the company.

We do not make any financial contributions, in particular donations and sponsoring measures to political parties at home and abroad, party-affiliated, or party-like organizations.

Political advocacy

We follow the legal requirements for lobbying and avoid unfair influence on politics and legislation under all circumstances.

Appearance and communication in public

We respect the right to freedom of expression as well as the protection of personal rights and privacy. Every employee should be aware that he can also become part and representative of ThermoTEC in the private sector and is therefore required to preserve the reputation and reputation of the company through his behavior and appearance in public. In the case of private expressions of opinion, we take care not to place the respective function or activity in the company in connection with the private statement.

Behaviour with sustainable environmental and climate protection

Sustainable environmental and climate protection as well as resource efficiency are important corporate goals for us. Both in the development of new products and services and in the operation of sites, we make sure that all resulting effects on the environment and climate are kept as low as possible and that our products make a positive contribution to environmental and climate protection for our customers.

Every employee has a responsibility to treat natural resources sparingly and to contribute to the protection of the environment and climate through his or her individual behavior.

Consumption of natural resources

Every employee has the responsibility to ensure that natural resources are used sparingly and that they are preserved as much as

possible. The use of natural resources is to be reduced through practices such as material reduction and substitution, shared use, maintenance, reuse, reprocessing, and recycling. Applicable laws and regulations regarding the prohibition and restriction of certain substances must be strictly adhered to and labeling for recycling and disposal must be carried out. Self-inflicted negative effects on the environment and the climate must be identified and prevented as quickly as possible.

Environmental

Each employee is responsible for ensuring compliance with applicable local environmental laws, regulations, and standards. Furthermore, everyone in our supply chain should strive to establish and apply an appropriate environmental management system (e.B. in accordance with ISO 14001). Environmental pollution and hazards should thus be minimized, and environmental protection established and improved in daily business operations.

Waste, wastewater, and emissions

Compliance with local regulations and laws in the generation, storage, disposal and recycling of waste, exhaust gases and wastewater must be ensured by every employee. Activities that may have a negative impact on human health or on the environment and climate must be managed, measured, and controlled in an appropriate manner. The generation of waste, wastewater and emissions should be minimized as far as possible.

Chemicals

The production of mercury-added products is prohibited by us. Similarly, we do not produce or use persistent organic pollutants or chemicals that are banned at national or international level.

Handling of information

Coverage

ThermoTEC is built on strong values: reliability and partnership, credibility, and integrity. Thus, we attach great importance to open and truthful reporting and communication on the company's business processes to employees, customers, Business partners, the public in general and state institutions.

Each employee ensures that both internal and external reports, records and other documents of the company are in accordance with the applicable legal rules and standards and are therefore always complete and correct and timely and system compliant.

Confidential company information

We take the necessary steps to protect confidential information and business records from access and insight by non-involved colleagues and other third parties in an appropriate manner. We will not use confidential information provided to us outside the purpose of the transfer, not imitate it (e.B. by way of so-called "reverse engineering").

Data protection and information security

The protection of personal data, especially of employees, customers, and suppliers, is of particular importance to ThermoTEC. No personal data may be collected or processed without legal admissibility or the consent of the data subject.

Protection of company property

We use the company's property and resources properly and sparingly, protecting it from loss, theft, or misuse. The intellectual property of our company represents a competitive advantage for ThermoTEC and thus a good worth protecting, which we defend against any unauthorized access by third parties.

We use tangible and intangible property of the company exclusively for corporate purposes and not for personal purposes, unless expressly permitted. Our employees, together with their superiors, are responsible for that the type and scope of business trips are always in a reasonable proportion to the respective purpose of the trip and are economically planned and carried out taking into account time and cost aspects.

Implementation and contact person

ThermoTEC actively promotes the communication of the guidelines on which the Code of Conduct is based and ensures that no employee is disadvantaged by compliance with the guidelines or agreements.

Our managers have a special role model function and can be measured in their actions to a particular extent by the Code of Conduct. They are the first point of contact for questions regarding the understanding of the regulations and ensure that all employees know and understand the Code of Conduct. They prevent unacceptable behaviour within the scope of their management tasks or take appropriate measures to prevent violations of rules in their area of responsibility. Trusting and good cooperation between employees and managers is reflected in honest and open information and mutual support.

The respective superiors, managing directors and reporting offices can be addressed directly at any time, on request also confidentially and anonymously.

If you become aware of compliance violations, you are obliged to inform the following reporting offices immediately. They have no retaliation to fear through their disclosure of information. To comply with these standards, we rely on our partners to alert us when they have concerns about whether an action or conduct does not meet the integrity and compliance requirements set forth above.

If you have any concerns or questions:

1. Talk to your supervisor or the responsible department, for example with the HR department for employment contract issues.
2. If the clarification with the supervisor or the responsible department is not possible or if concerns remain, the respective responsible contact person in the management is available.

ThermoTEC also offers internal and external persons the opportunity to report incidents of any kind, taking into account the requirements of the Whistleblower Protection Act. Incidents that violate or impair legal, contractual, normative or directly related aspects of cooperation can be reported.

If you would like to make a report in this regard, you have the option of doing so through the internal reporting system (Hinweisgeber@ttwe.de) or through the external reporting office of the Federal Office of Justice (https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html).

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We are **more than technology.**