



tts

Code of Conduct of the tts group

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Foreword

Dear business partners, suppliers and employees,

since tts was founded in 1998, respect, appreciation and trust have been paramount. Our success is built on these values. Our goal is to be a responsible, value-oriented and sustainable partner and employer for our business partners, suppliers and employees in the long term. Integrity and reliability are very important to us, as is treating each other with respect. Each individual employee represents our company through his or her behavior and appearance and supports the image and appreciation of our business partners. We support our customers and form the basis for a long-term and cooperative partnership through our competence. Our clientele appreciates our professionalism and expertise, as we have high standards for our work and for ourselves.

With 350 employees from more than 25 nations, in 9 countries and 13 locations, tts is internationally positioned. This diversity is nevertheless based on uniform values, which we exemplify in our daily work and which we have laid down in our Code of Conduct. Furthermore, acting responsibly in accordance with applicable regulations is essential for corporate success. Therefore, in addition to the legal requirements and our commitment to the United Nations Global Compact, tts is committed to establishing this Code of Conduct as a binding regulation and orientation framework for our daily decisions and actions.

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This Code of Conduct sets out the values and principles that govern our company, as we want to act ethically and morally correct in addition to our business and economic goals. Thus, we would like to bind all employees of the tts group, at all locations, as well as our business partners and suppliers, to these rules of conduct. By placing the Code of Conduct on the website, all employees, suppliers and other interested parties are made aware of the Code of Conduct. The application of and compliance with the policy is monitored by the management.

The Management



*Hermann Ude
Managing Director*



*Ulrich Ude
Managing Director*



*Harald Weingartner
Managing Director*



*Alexander Woelke
Managing Director*



*Dr. Rolf Zajonc
Managing Director*

Social responsibility

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Human rights & prohibition of child labor

Equal opportunities are promoted in every area at tts. We are strictly opposed to discrimination of any kind, especially on the basis of skin color, race, nationality, gender, age, social origin, any disability, sexual orientation, and political or religious views. Any form of harassment or bullying is also prohibited.

All tts employees act in accordance with internationally recognized human rights and the most important labor and social standards. These include the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

We strictly reject any form of forced and child labor and are in favor of compliance with the provisions of the UN Convention on the Rights of the Child. Each of our employees has the free decision to join or not to join a trade union/employee representation of his/her choice without threat or intimidation.



Ecological responsibility

Through various measures, tts is actively working to reduce emissions in all business areas in order to make the vision of a climate-neutral future a reality.

At tts, our goal is to minimize environmental impact and improve environmental protection. Therefore, we comply with the legal regulations on safety and the environment and take care not to endanger anyone.

tts expressly supports activities of employees to improve environmental protection and welcomes corresponding suggestions.

In order to bundle all initiatives to reduce its carbon footprint, tts has launched the #ttsgoesgreen project in 2019. #ttsgoesgreen creates a clearly defined framework for action with a variety of measures to improve tts' ecological climate footprint and strengthen existing impulses.

On our [homepage](#) you can see the individual initiatives that we have already implemented in our group of companies.



Occupational safety and health protection

Occupational safety and health protection play an important role in our company so that every employee can work safely and without restrictions. Occupational health and safety regulations are to be observed by the individual employees. We use risk minimization and precautionary measures to avoid any health hazards.

We are supported in this by expert third-party companies. Together with our external company physicians and in cooperation with service providers, site-specific topics relating to occupational safety are discussed at quarterly ASA meetings and in conjunction with site inspections. This also includes an assessment of the physical and mental hazards and the implementation of appropriate measures. Topics such as fire and evacuation protection, accident prevention measures and the provision of company first aiders are addressed.

In addition, during the Corona pandemic, specific protective measures will be taken based on the recommendations of the federal government.



Responsibility as a business partner

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Antitrust & Competition

tts is committed to open and fair competition, which may not be restricted or influenced by agreements with competitors on prices, offers, conditions or similar matters, and completely rejects such agreements. Sensitive information may neither be exchanged nor used to abuse a dominant market position.

We are committed to the principles of a free market economy and open competition. We conduct our business on the merit principle and on the basis of free, unrestricted competition. We are required by law to make business decisions in the best interests of tts without undue restraints such as illegal agreements or understandings with competitors. We expressly refrain from any conduct that violates applicable antitrust regulations.



Prohibition of corruption and bribery

tts does not tolerate corrupt behavior and complies with all applicable anti-corruption laws. We do not accept or grant any benefits in our business relationships. This applies in particular to relationships with public officials that are connected with the intention or could give the appearance of influencing business decisions or obtaining any other improper advantage.

Gifts, invitations and other benefits in everyday business are only permissible if they are within the legally and socially accepted, customary framework. In particular, they must not be suitable for influencing current or future business decisions or give the impression of doing so.

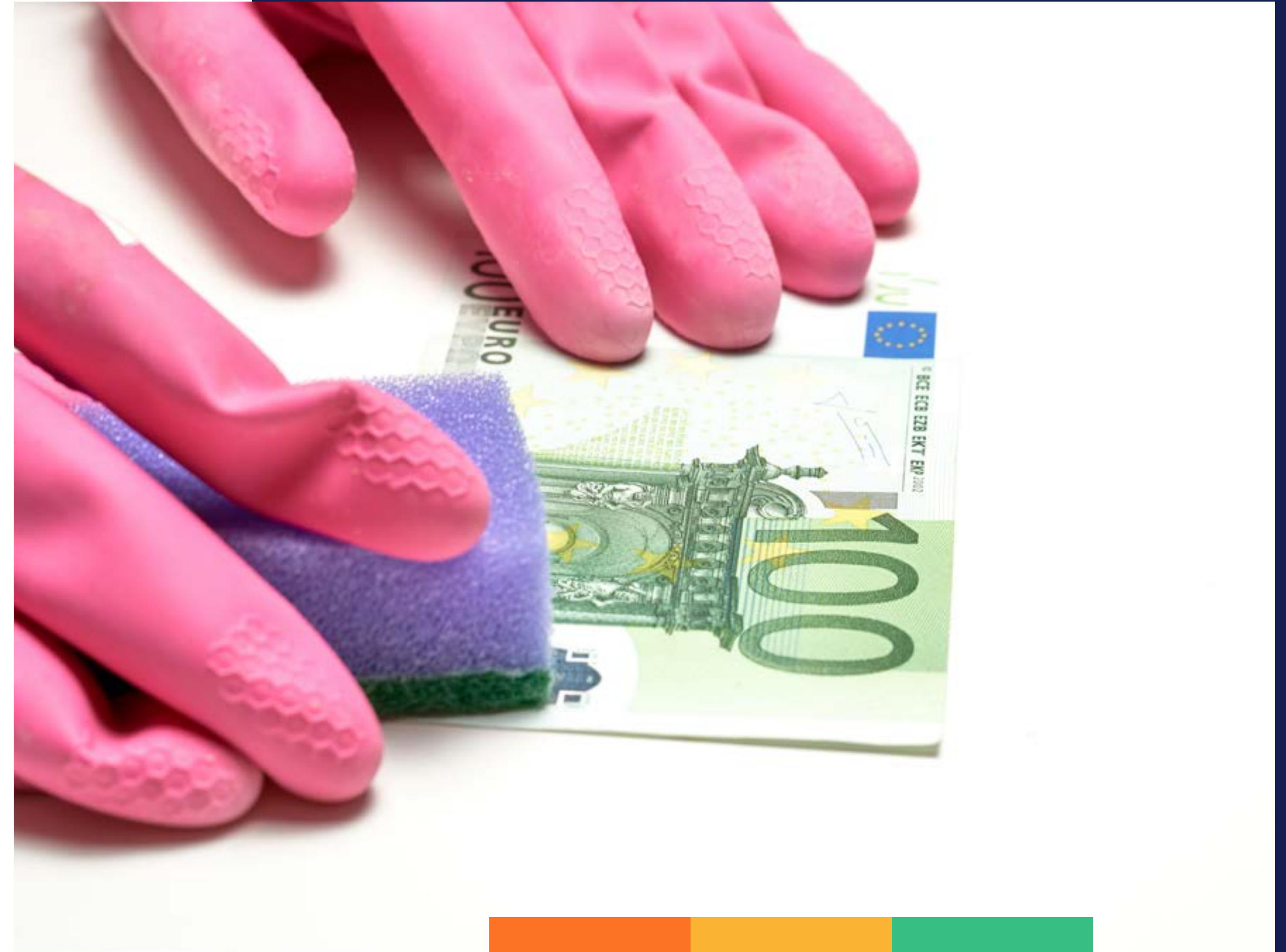


Prohibition of money laundering and terrorist financing

We consistently reject transactions with financial resources that have been criminally acquired and are to be introduced into the normal economic cycle. To this end, we verify the identity of business partners and other third parties with whom we intend to do business. We expect that all applicable laws and regulations to combat the financing of terrorism are observed.

We ensure transparent and open payment flows by immediately allocating and posting incoming payments to the corresponding services.

In the spirit of responsible and ethical business practice, we always act in accordance with legal regulations and international conventions.





Privacy

The protection of personal data is a central priority at tts. We understand data protection and the right to informal self-determination as a fundamental right and not just as required by law. That is why tts has established an appropriate data protection management system. As a result, data protection and data security are formally integrated as functions in the corporate structure and confirmed by management as the responsible party within the meaning of the GDPR.

tts has standardized measures across the Group in order to meet the protection objectives of the General Data Protection Regulation and other national data protection laws. Our data protection concept is the core of our data protection organization and the basis for all other documents and catalogs of measures. In this way, we ensure that information and data from business partners, suppliers and employees are handled with care. All information is only processed for a specific purpose, in a comprehensible manner and in accordance with applicable data protection laws, and is not passed on to third parties.



Accounting and financial reporting

The tts Group complies with the statutory regulations on accounting and proper bookkeeping and is aware of its social responsibility by fulfilling tax and duty obligations. All business transactions must be recorded correctly, appropriately and in a timely manner. We ensure the reliability, accuracy and completeness of our books, records and reports in accordance with established procedures, generally accepted accounting principles, relevant counting systems, controls and audits.

We comply with applicable tax and customs regulations, in particular laws to prevent tax evasion, and fulfill local obligations to pay taxes and duties correctly and on time. The requirement for accurate information also applies to travel and other expense reports. We prepare financial statements in a timely manner and in accordance with applicable accounting standards and publish them in compliance with applicable disclosure requirements.



Responsibility in the workplace

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Dealing with resources

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Data protection and information security in the workplace



Dealing with resources

The trustful and careful handling of company resources as well as natural resources is important to us and we want to avoid misuse and waste. Each employee must protect company property against loss, damage, theft and other damage.

The facilities, work equipment, business documents and data provided for the performance of our tasks are the property of the tts group or of the suppliers and business partners. We handle these responsibly and carefully and use them only for the intended purpose. Neither negligent nor intentional acts against the company's own or third party property will be tolerated.





Data protection and information security in the workplace

tts has standardized measures across the Group in order to meet the protection objectives of the General Data Protection Regulation and other national data protection laws. tts employees are sensitized to the handling of personal data, which is guaranteed by mandatory training courses. This also ensures data protection-compliant behavior in the workplace. The options for accessing, controlling and monitoring information in the tts working environment are designed in accordance with the GDPR. The information is only processed for a specific purpose, in a traceable manner and in accordance with applicable data protection laws, and is not passed on to third parties.

In all necessary steps in the processing of information and data, we take into account the three main objectives of information security (availability, confidentiality and integrity) and have introduced far-reaching measures to ensure security at all times and to support our employees, business partners and customers.

Validity

Compliance with these rules of conduct is a central concern of ours, which is why any employee can contact any manager or the legal department in case of doubt or questions. Violations of our Code of Conduct must be consistently pursued and resolved as soon as possible.

tts complies with the requirements of the EU Whistleblower Directive and implements corresponding measures within the Group. In this way, tts ensures effective self-monitoring of compliance with the rules of conduct, free from any partiality or bias.

Information about violations of this Code of Conduct can be reported via the tts group's whistleblower system. Whistleblowing can be reported under absolute confidentiality of the whistleblower or completely anonymously via a secure mailbox:

<https://tts.integrityline.com/>

This reporting channel/whistleblower system can be used by both internal and external stakeholders.



tts

The Code of Conduct applies to tts GmbH
and all affiliated companies.

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