

CODE OF CONDUCT

TTTECH Group

Version: V2.2.0

Document number: D-001-E-06-002

AGENDA

AGENDA

AGENDA

01

PURPOSE AND SCOPE

02

RESPONSIBILITY FOR
IMPLEMENTATION

03

QUESTIONS AND ASSISTANCE

04

NOTIFICATION OF VIOLATION

05

COMPLIANCE WITH LAWS AND
REGULATIONS

06

FAIRNESS

07

ANTI-CORRUPTION / BRIBERY &
GIFTS

08

CONFLICTS OF INTEREST

09

CONFIDENTIALITY, EXTERNAL
COMMUNICATION, IT-USE, DATA
PROTECTION

10

HARASSMENT

11

ENVIRONMENTAL PROTECTION,
SAFETY, HEALTH PROTECTION AND
QUALITY

11

PROMOTION OF PEACE AND
SECURITY

01

PURPOSE AND SCOPE OF APPLICATION OF THIS CODE OF CONDUCT

This Code of Conduct applies to all members of the Management and Supervisory Boards, to managers and employees, as well as to all persons acting for the TTTECH Group*, regardless of their position, function and level of employment (collectively the “Employees”).

*The TTTECH Group comprises TTTECH Computertechnik AG as well as all organizational units in which TTTECH Computertechnik AG directly or indirectly holds at least 50% (hereinafter referred to as “TTTECH”).

TTTECH STANDS FOR RELIABILITY, ROBUSTNESS AND SAFETY.

Real-time networking, software platforms and certifiable electronic modules enable customers of TTTECH to deploy their solutions more efficiently and profitably in a variety of industries.

CODE OF CONDUCT

TTTECH expressly commits to **responsible corporate management**, thus it can continue to grow sustainably.



Corporate risks should be minimized

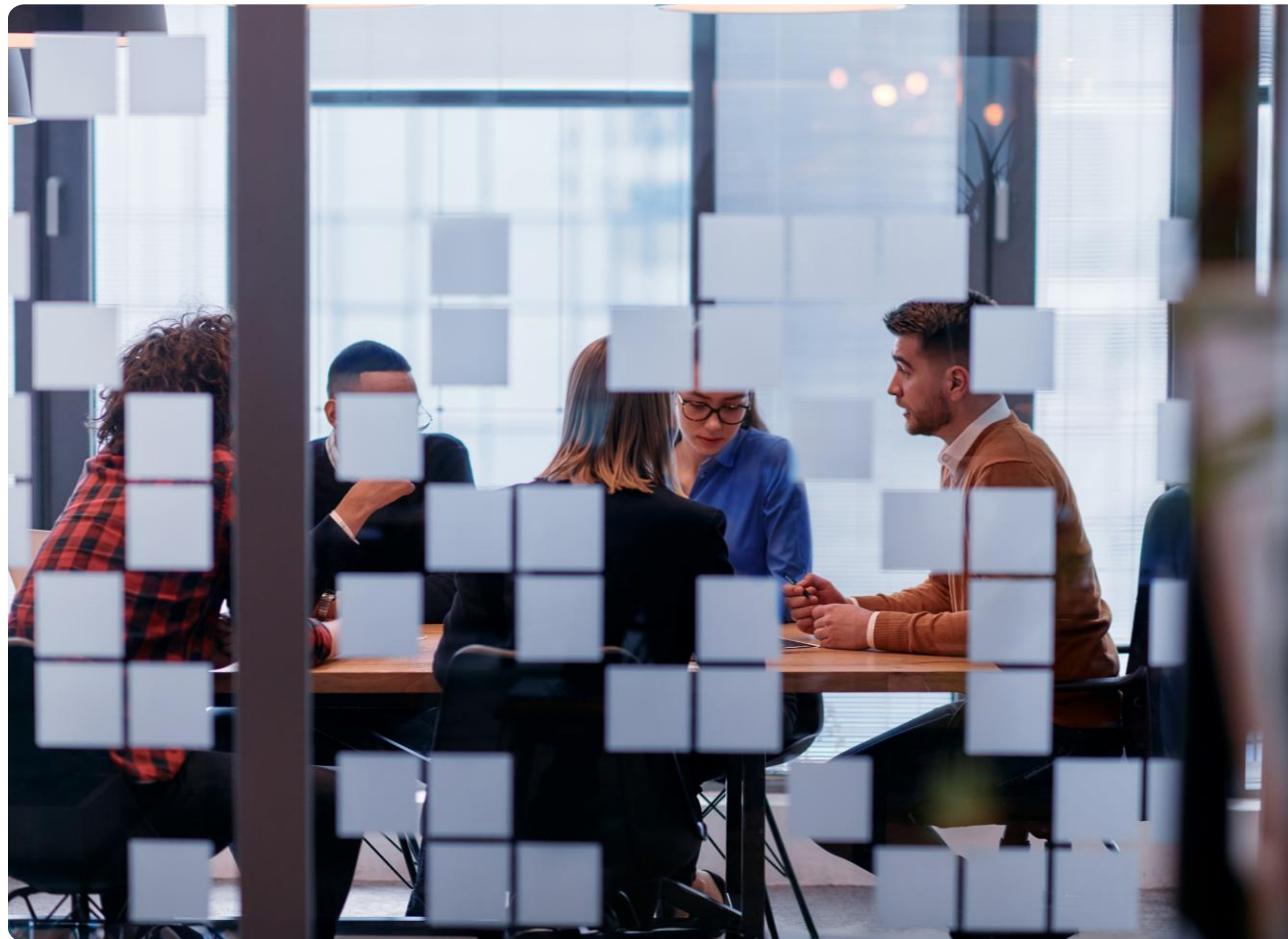
- by ensuring compliance with the relevant local and international laws as well as by,
- implementing ethical and transparent processes.

These measures are designed to prevent financial losses and protect TTTECH's reputation.

CODE OF CONDUCT

This Code of Conduct:

- seeks to clearly and understandably express the essential values of TTTECH and the resulting principles for all business processes.
- The following general principles of conduct and guidelines are intended to form the basis for the morally, ethically and legally correct conduct of all employees in all activities and decisions within TTTECH.
- should be regarded as a practical guide, supporting employees in making responsible choices and sound decisions that align with the organization's values in their daily work. It is further complemented by binding process descriptions and guidelines in TTTECH's Integrated Management System.



02

RESPONSIBILITY FOR IMPLEMENTATION

TTTECH's management is dedicated to upholding the values and principles outlined in this Code of Conduct, actively endorses them, and leads by example in putting them into practice.

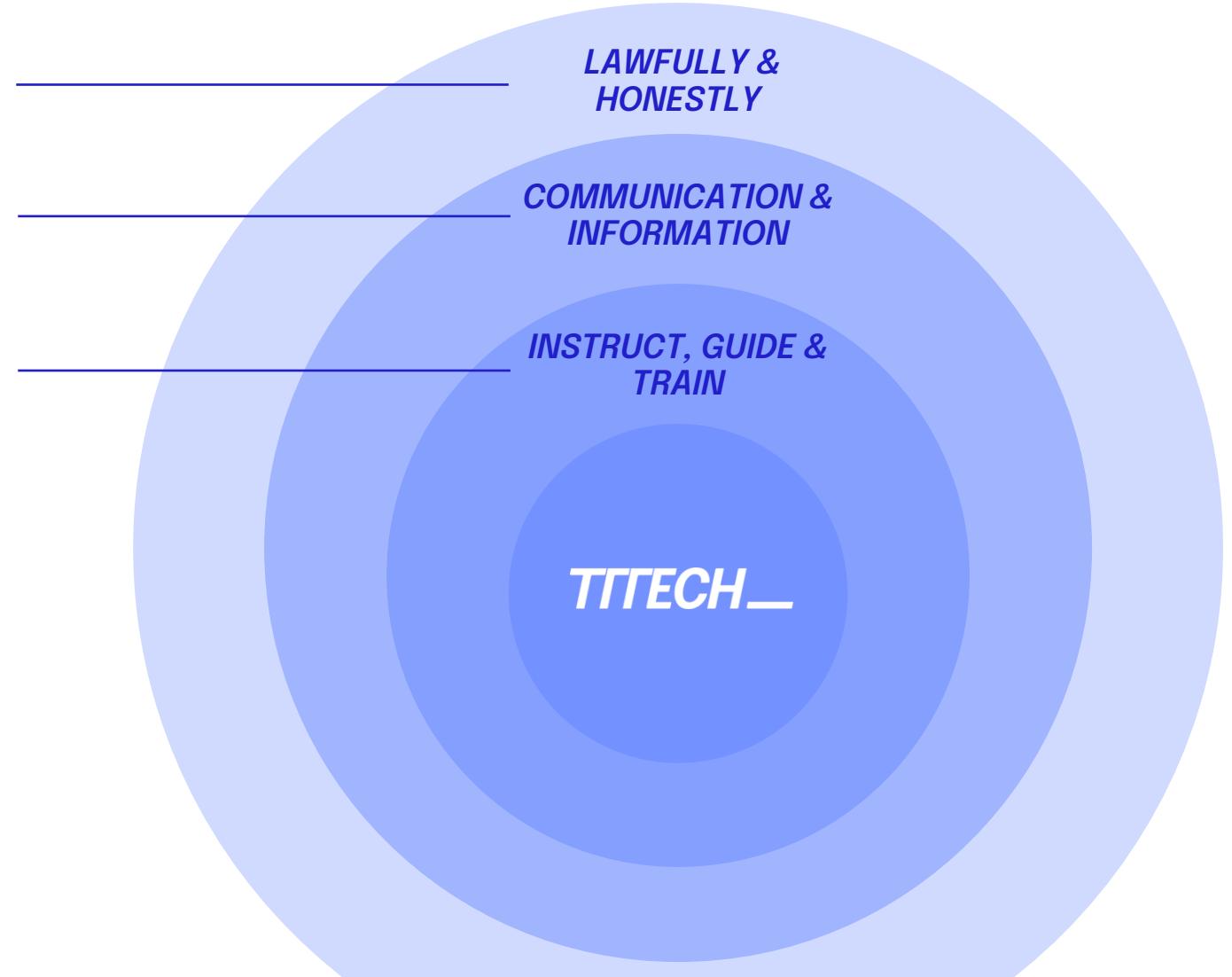
RESPONSIBILITY FOR IMPLEMENTATION

The economic success and reputation of TTTECH depends to a large extent on every employee behaving lawfully and honestly.

Management and other executives are liable for ensuring that those employees for whom they are responsible, are fully informed of this Code of Conduct and all other applicable policies.

They shall instruct, direct and monitor compliance with the provisions of this Code of Conduct and, where necessary and appropriate, shall organize training courses with the support of the relevant TTTECH departments.

**OUR VALUES ARE OUR SUCCESS.
WE ALL LEAD BY EXAMPLE.**



03

QUESTIONS AND ASSISTANCE

If a situation, in which it is not entirely clear whether a certain behavior is legally and ethically correct, arises, the following questions offer guidance:

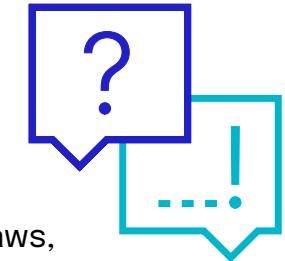
QUESTIONS AND ASSISTANCE

When applying the principles of the Code of Conduct, employees should use sound judgment and consider whether a specific action aligns with generally accepted ethical and moral standards.

If additional information is needed to answer these questions, or if uncertainty persists after the questions have been answered as to whether the planned action is in line with the legal framework and the Code of Conduct, the employee must contact his or her supervisor or the Legal Department before taking the planned action.

GUIDANCE

- Does my intended action comply with all relevant laws, internal policies, and contractual obligations?
- Does the action comply with the values and rules of conduct stated in this Code of Conduct and is it transparent and comprehensible?
- Is this action consistent with general ethical standards?
- Would I feel comfortable telling my colleagues, family or friends about the action, or would it be embarrassing or unpleasant?
- Do I act free from conflicts of interest?
- Could my action pose financial or reputational risks for TTTECH, or have other negative consequences for the company?
- If my actions were reported in the media, could this reflect poorly on TTTECH?



04

NOTIFICATION OF VIOLATIONS

Violations of this Code of Conduct may result in disciplinary or even legal consequences. TTTECH does not tolerate any behaviour that violates any laws or this Code of Conduct and will sanction any such violation accordingly.

NOTIFICATION OF VIOLATIONS



Any employee who becomes aware of or suspects a serious violation of laws and regulations, this Code of Conduct or other applicable policies must notify his or her supervisor or, if the supervisor is affected, the Executive Board or the Legal Department.



If a member of the Executive Board is affected or if an employee feels uncomfortable reporting violations to his or her supervisor or the Executive Board, the employee must notify the violations to the Chairman of the Supervisory Board.



In addition, TTTECH has established a whistleblowing channel, which allows employees, suppliers, and third parties to report easily and confidentially any unlawful, unethical, or inappropriate conduct or process.



Reports may be submitted in

- writing (via the whistleblowing channel or via e-mail)
- or orally (in person or via phone)
- and whistleblowers may choose to submit their report anonymously if they feel uncomfortable presenting their identity.

WHISTLEBLOWING CHANNEL

[CONFLUENCE / WHISTLEBLOWING CHANNEL](#)

05

COMPLIANCE WITH LAWS AND REGULATIONS

All business activities and processes at TTTECH must adhere to this Code of Conduct, comply with applicable laws, and fulfill any voluntarily assumed or otherwise binding obligations.

COMPLIANCE WITH LAWS AND REGULATIONS



EMPLOYEE

Every employee is required to observe the applicable laws as well as other relevant provisions, agreements and cultural norms specific for the respective region (such as dress codes, social standards etc.). In addition, employees are expected to thoroughly familiarize themselves with all laws, regulations, internal policies and obligations that apply to their role.

PRACTICES IN INDIVIDUAL COUNTRIES

Even if certain behaviors or business practices that conflict with this Code of Conduct are accepted in some countries, employees are still required to adhere to this Code of Conduct, follow corporate policies and guidelines, and avoid any actions that may be inconsistent with these standards if necessary.

UNCERTAINTY

If there is any uncertainty, individuals should seek guidance from their respective supervisor or consult TTTECH's Compliance Manager or Legal Department for advice.

FIELDS OF LAW / LEGAL AREAS

In the following chapters, you will find a short summary of certain legislative fields which TTTECH is committed to comply with and expects all employees to comply with as well. Please note that this list only provides examples of relevant fields of law and is non-exhaustive.

EMPLOYMENT LAW AND PROHIBITION OF DISCRIMINATION

TTTECH is strongly committed to human rights and employees' rights as expressed in the International Bill of Human Rights and the International Labour Organization (ILO) Conventions.

WE DO NOT TOLERATE

Therefore, TTTECH ensures that it **does not use child labor, compulsory or forced labor** and respects all applicable laws and regulations on employment.

TTTECH **does not tolerate any form of discrimination** and promotes equal opportunities and fair treatment of employees in all employment-related decisions.

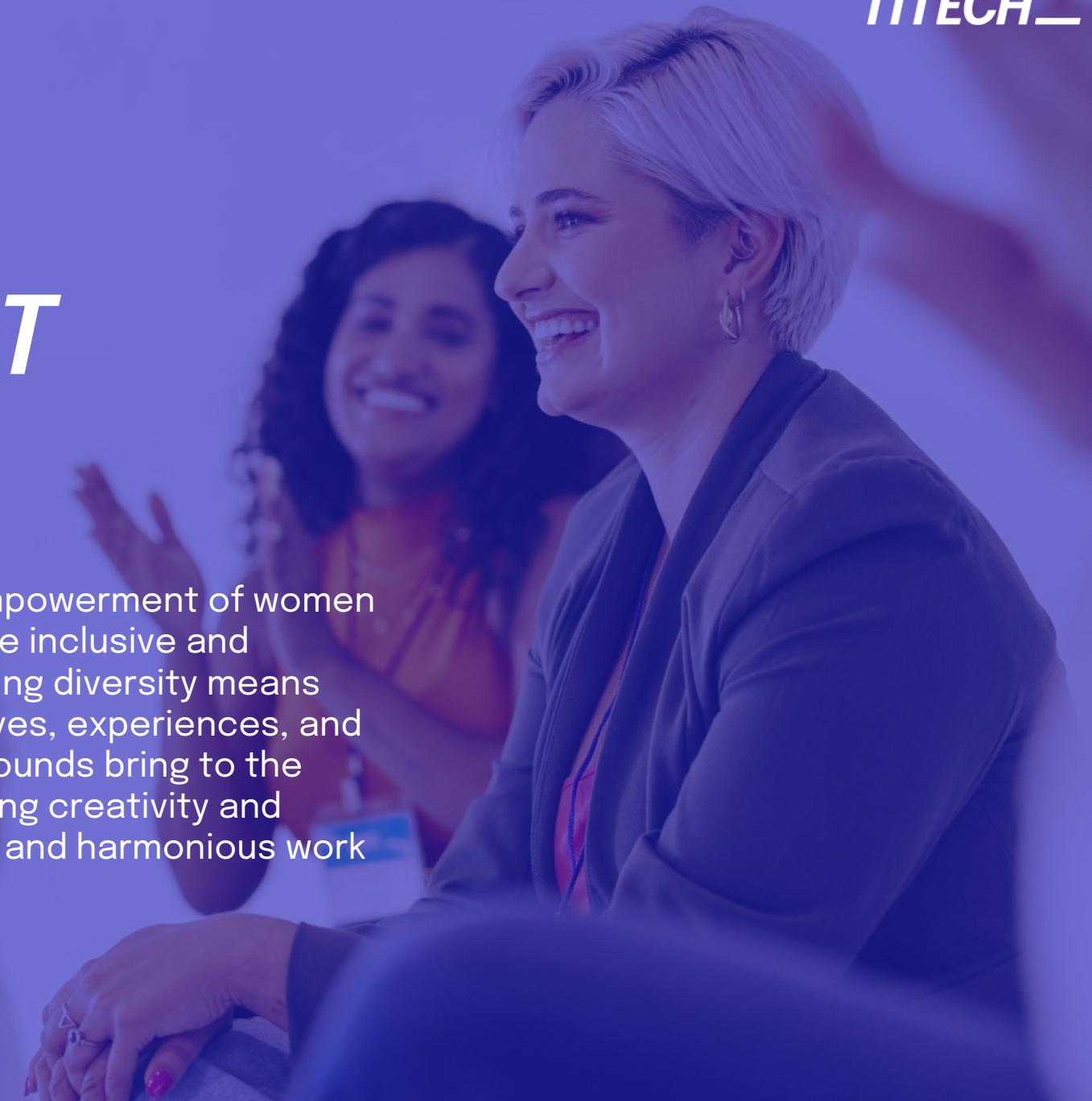
WE ADVOCATE FOR

TTTECH advocates and recognizes **that each person is unique, valuable and respected** for his or her individual abilities.

Every employee is treated with **dignity and respect**, irrespective of ethnic or national background, skin color, religion, political views, gender, age, sexual orientation, marital status, disability, or any other personal characteristic.

DIVERSITY & EMPOWERMENT OF WOMEN

TTTECH is convinced that diversity and the empowerment of women in the work context are key in fostering a more inclusive and equitable workplace. We believe that embracing diversity means recognizing and valuing the unique perspectives, experiences, and talents that individuals from different backgrounds bring to the table. All these factors contribute to enhancing creativity and innovation and promote a more collaborative and harmonious work environment.



COMPETITION AND ANTITRUST LAW

TTTECH is committed to fair, open and undistorted competition.

It is essential that all employees act in accordance with applicable antitrust and competition laws.

Therefore, any agreements or coordinated actions between competitors that could unlawfully influence, limit, or distort competition are strictly forbidden.

IN PARTICULAR, THE PROHIBITION CONCERNS

- Entering into agreements or sharing information with competitors about sensitive topics—such as pricing, terms of sale or purchase, cost structures, customer lists, or future business strategies—is strictly prohibited.
- Activities like dividing markets or customers or engaging in boycotts or discriminatory practices against certain suppliers or customers, are not allowed.
- Even informal conversations with competitors can lead to antitrust violations. As a result, all forms of anticompetitive conduct must be strictly avoided.

Violating antitrust or competition laws can have **significant repercussions for TTTECH and its employees**. Beyond substantial fines and damages, such violations may also result in criminal penalties in certain countries.

FOREIGN TRADE AND EXPORT CONTROL

Due to its international activities, TTTECH is committed to complying with all applicable national, multinational and supranational trade regulations. These include in particular customs and export control regulations.

Employees are therefore obliged to observe such regulations and to comply with the respective TTTECH internal processes and policies (e.g. *Export Control Work Instruction*, *guidelines for carrying out blacklist checks* and *Know Your Customer* checks) and to attend trainings on export control on a yearly basis.

OBLIGATION: ANNUAL EXPORT CONTROL TRAINING

GUIDANCE

Certain customer behaviors may signal that a TTTECH product could be destined for an unauthorized end use. If any of the following **“red flags”** are observed, employees must promptly inform the Export Control Department or the Legal Department:

- The customer provides vague or hesitant information about the intended end use or end customer.
- The customer is unfamiliar with the product's features, or the goods are inappropriate for their business;
- The goods fail to meet the technical standards required in the destination country.
- The customer declines standard installation, training, or service.
- There are unusual instructions regarding packaging or transportation.
- The customer proposes unusual payment methods, such as cash payments.
- There is limited information available about the company's business activities.

TAX LAW

As an internationally operating Group, TTTECH must comply with all applicable tax regulations, both domestic and foreign.



Employees shall support the efforts of TTTECH in this field by taking all actions necessary within their respective responsibility and by complying with the applicable regulations themselves.

This can comprise, e.g.:



- Setting billing prices according to established standards, such as the arm's length principle.
- Ensuring that employees assigned to work abroad fulfill all relevant personal tax obligations.



REPORTING INTEGRITY

Proper accounting is an integral part of the business integrity of TTTECH. It forms the basis for entrepreneurial decisions and the orientation of business and is indispensable for compliance with disclosure obligations.

All

- financial reports
- accounting documents
- research reports
- sales reports
- receipts
- environmental and safety reports
- other relevant records

must accurately, clearly, and promptly represent the relevant facts and details of each business transaction.

VIOLATIONS

Violations of accounting rules, fraudulent accounting or incorrect documentation or financial reporting are not tolerated within TTTECH.

OBLIGATIONS

- All employees must collaborate confidentially with TTTECH's auditors, involving the relevant departments responsible for financial statements and audits, and must provide all information requested by these parties.
- TTTECH's corporate policy requires that information and documents shared with administrative authorities, interest groups, and the public accurately reflect the present-day status or knowledge.

06

FAIRNESS

Fairness is a core value at TTTECH and is considered fundamental to the company's culture and operations. Every employee is expected to act with fairness in all professional interactions and decisions.

EQUAL TREATMENT OF CUSTOMERS AND SUPPLIERS

It is a core belief of TTTECH to engage with customers, suppliers, service providers, and other stakeholders in a fair and transparent manner. This approach is fundamental to achieving the highest standards of quality, ensuring the best possible balance between price and performance, and delivering consistently satisfactory service.

***THIS SPIRIT OF COOPERATION
MAKES STAKEHOLDERS INTO PARTNERS
FOR LONG-TERM GROWTH.***



OBLIGATIONS

- All employees are individually responsible for treating all business partners honestly, equally and fairly.
- Suppliers and service providers are selected by the responsible procurement and quality department in a regulated procedure and in accordance with objective and traceable criteria, taking into consideration compliance by the business partner with requirements comparable to those contained in this Code of Conduct.
- Competitive offers are evaluated based on quality, price, and delivery timelines.
- Wherever possible, orders are placed based on competitive offers rather than personal preferences.

USE OF ASSETS AND RESOURCES OF TTTECH

The assets and resources of TTTECH may only be used by employees for business purposes. Employees are responsible for safeguarding the assets of TTTECH they are provided with and ensure careful and appropriate use.

The use of the resources for private, self-serving purposes is only allowed upon prior written approval of the management.

07

ANTI-CORRUPTION | BRIBERY & GIFTS

TTTECH is dedicated to conducting its business operations with the utmost integrity, transparency, and fairness. The organization enforces a rigorous zero-tolerance policy regarding bribery and corruption; consequently, any act of bribery or attempted bribery is strictly prohibited.

BRIBERY AND GIFTS

Bribery generally means the offering or receiving of an undue reward to influence the behavior of a business partner or an authority with the intention of obtaining an improper advantage.

OBLIGATIONS

TTTECH employees are obliged not to promise or give any payments or valuable gifts in order to induce employees of public authorities or companies to provide TTTECH with an unjustified business advantage. Neither are third parties commissioned to do this. This applies regardless of location or culture.

PROHIBITED

The acceptance and donation of cash, regardless of the actual amount, transfers to fake accounts or letterbox companies, as well as the payment of fictitious or excessive bills are always and without exception prohibited.

GIFTS, FAVORS, HOSPITALITY AND OTHER BENEFITS MAY ONLY BE GRANTED OR RECEIVED IF

- they are of little value and do not go beyond the limits of business practice in the region concerned (local or customary local attentions of low value are in principle permitted, even if they do not constitute undue influence for other reasons);
- they are not offered or granted in anticipation of consideration;
- it can be ruled out that this gives the impression of an impermissible influence;
- it does not for other reasons violate applicable law or the ethical principles of TTTECH;
- the public perception of TTTECH cannot be adversely affected thereby or would not embarrass employees if made public.

BRIBERY AND GIFTS

In addition, the following rules must be observed when dealing with domestic and foreign authorities and with persons entrusted with public administration tasks:

PROHIBITED

- Any payment of gratuities or other pecuniary benefits to civil servants or public employees is prohibited, unless required by law or by an existing permissible written agreement;
- Offering, paying for, or accepting any form of kickback payment to obtain a business or personal advantage is also prohibited.
- So-called facilitation payments are also prohibited. This refers to the payment of small sums to speed up the processing of routine administrative enquiries or applications or to positively influence the outcome (e.g. the granting of a permit).
- If gifts, favors, hospitality or other benefits are offered to employees that may not be accepted because they are incompatible with the rules contained in this Code of Conduct, they should be rejected politely.

THESE RULES MUST BE STRICTLY ADHERED TO, EVEN IF TTTECH OPERATES IN A COUNTRY WHERE SUCH SERVICES ARE EXPECTED OR “CUSTOMARY” FOR OFFICIAL ACTS.



08

CONFLICTS OF INTEREST

Employees must ensure that any business decision and the resulting actions are in the interest of TTTECH and are not motivated by personal or financial interests or relationships.

CONFLICTS OF INTERESTS

The emergence of conflicts of interest or even the appearance of such a conflict must therefore always be avoided if this gives the impression that the objectivity or independence of a person may be impaired.

POSSIBLE CONFLICTS OF INTEREST MAY ARISE WHEN

- accepting a secondary job or taking on a role in another organization or corporate body;
- engaging in business activities with friends, acquaintances, or family members.
- holding stakes or participating in companies that compete with or are business partners of TTTECH.

Employees are required to proactively inform the HR Department or their supervisor of any potential conflict of interest. If these actions result in a conflict of interest or create a competitive situation, TTTECH reserves the right to restrict or prohibit such activities.

BUSINESS TRANSACTIONS WITH FAMILY MEMBERS AND/OR FORMER EMPLOYEES

Business transactions with family member of an employee should always be avoided.

In individual cases, however, such transactions may be authorized by the HR Department, the competent manager or the Supervisory Board.

In this case, it must be ensured that the affected employee is not involved in the decision-making process and that the external comparison principle is used.

The term **family member** includes

- Spouses and partners
- parents
- children
- other relatives

INSIDER TRADING

- 1 The laws of some countries (including those of Austria) **prohibit** the use of information not destined for the public domain or information which has not yet been made public in connection with the purchase and sale of shares and securities. In certain cases, such behavior may also be punishable by law.
- 2 TTTECH employees may **not use insider information** resulting from the employment relationship (including information about business partners), either for the personal benefit of the employee or for the benefit of third parties.
- 3 Insider information includes all information which is not yet publicly known and which directly or indirectly relates to an issuer of securities and which is sufficiently precise and capable of materially affecting the price of a financial instrument because, for a prudent investor, this information is an essential element in the assessment of a (future) investment decision.

09

CONFIDENTIALITY, EXTERNAL COMMUNICATION, IT USE, DATA PROTECTION

All information to which the public has not been granted access to, is subject to a certain level of confidentiality as further specified in TTTECH's Information Classification and Protection Guideline and must not be disclosed to unauthorized third parties.

CONFIDENTIALITY, EXTERNAL COMMUNICATION, IT USE, DATA PROTECTION



- 1** The obligation of each employee to keep information about TTTECH confidential remains valid even after termination of employment or engagement with TTTECH.
- 2** Confidential information comprises information that is not publicly known about TTTECH or provided by TTTECH as well as information about or provided by the customers or suppliers of TTTECH that may only be provided to persons who have a legitimate interest in the information for the same specific purpose for which the information was provided.
- 3** All employees must comply with the provisions of the Information Security Policy and the Information Classification and Protection Guideline of TTTECH.

DATA PROTECTION

All information to which the public has not been granted access to, is subject to a certain level of confidentiality as further specified in TTTECH's Information Classification and Protection Guideline and must not be disclosed to unauthorized third parties.



DATA PROTECTION

Due to respect for the privacy of others, TTTECH has always taken great care when handling personal data. The employees' and business partners' right to self-determination with regards to information must always be guaranteed.

PROHIBITED

The unauthorized collection, processing and sharing of personal data relating to employees and business partners is prohibited.

IT SECURITY

Due to the intensive use of IT systems, the activities of TTTECH depend to a great extent on the correct functioning and availability of such systems. Furthermore, there is a high risk of loss, theft or unnoticed alteration of information.

OBLIGATIONS

For information on limiting this general risk and risks due to technical failure and human error, the Information Security Policy and the IT Guideline of TTTECH must be observed.

EXTERNAL COMMUNICATIONS

**OFFICIAL STATEMENTS FROM TTTECH,
PARTICULARLY TO THE MEDIA, MAY ONLY
BE ISSUED BY PERSONS EXPRESSLY
AUTHORIZED TO DO SO.**



PROHIBITED

- If an employee or a person acting on behalf of TTTECH is contacted by a third party, he or she shall not release any information to them regarding the financial, social or environmental performance of TTTECH or any other information. Rather, the employee must inform the Head of his or her department and the External Communications team about the request.
- Furthermore, the employees or people acting on behalf of TTTECH are not allowed to mention the TTTECH name when asked to give interviews for any media, e.g. in newspapers or magazines, without **contacting the External Communications team** and getting prior written approval.
- This also applies to speaking on behalf of the company on digital platforms such as social media:
- Official presences on any channels may only be run by employees authorized to do so and need to be aligned with the External Communications Team.

10

HARASSMENT

Every employee's behavior is characterized by respect, appreciation, reliability and trust.

Any form of harassment is prohibited at TTTECH and will be sanctioned accordingly. This includes but is not limited to sexual harassment, in any form, for instance by way of obvious advances, demeaning comments, jokes, vulgar expressions, obscene gestures or the display of graphic material.

SEXUAL HARASSMENT GUIDELINE

A comprehensive guideline addressing sexual harassment and appropriate responses is available on Confluence. Alongside key principles and general definitions, employees can access additional support resources and will find contact details for designated individuals to reach out to for assistance.

[Sexual Harassment Guideline - Confluence](#)

11

ENVIRONMENTAL PROTECTION, SAFETY, HEALTH PROTECTION AND QUALITY

Environmental protection, health and safety, and quality are fundamental values at TTTECH. The company is dedicated to sustainable, long-term development and upholds the principles of responsible care.

ENVIRONMENTAL PROTECTION, SAFETY, HEALTH PROTECTION AND QUALITY

TTTech managers lead by example, taking responsibility for protecting the environment, preventing work-related injuries and illnesses, and ensuring the provision of safe and healthy workplaces and activities.



DUTIES

- TTTech managers consistently emphasize the significance of environmental protection, health, safety, and quality, as well as the importance of adhering to relevant regulations.
- They foster a culture that values awareness in these areas and encourage ongoing improvement throughout the organization.



ENVIRONMENTAL PROTECTION, SAFETY, HEALTH PROTECTION AND QUALITY

OBLIGATIONS

- Employees shall act responsibly and bear in mind the effects of their conduct on environment, safety, health and the quality of TTTECH products and services.
- They support and form part of a corporate culture marked by taking appropriate responsibility for themselves, other people and the environment.
- Whenever an employee recognizes a situation or an event that may pose an environmental, health, safety or quality hazard, he or she **is obliged to report this to his or her supervisor and/or the responsible management person**, so that appropriate actions can be taken to eliminate the hazard or reduce the related risk, complying with laws and principles of responsible corporate management.
- Especially in the fields of occupational health and safety and environmental protection, it is important to report “near misses”—situations where no harm or damage has occurred, but there was a potential for injury, illness, or environmental impact.

**TTTECH EXPRESSLY
SUPPORTS EMPLOYEE ACTIVITIES
IN IMPROVING ENVIRONMENTAL
AND HEALTH PROTECTION,
SAFETY AND QUALITY AND WELCOMES
RELATED PROPOSALS.**

12

PROMOTION OF PEACE AND SECURITY

TTTECH is committed to contributing to a peaceful and secure world. Therefore, developments for military applications may only be conducted upon prior approval of the Executive Board.

In its decision making the Executive Board considers the applicable laws and the political and humanitarian situation in the countries affected.

GET IN TOUCH WITH US.

CONTACT

Elisabeth Krenn
Compliance Manager

elisabeth.krenn@tttech.com

HEADQUARTER

TTTECH Computertechnik AG
Schoenbrunner Strasse 7
1040 Vienna/Austria

+43 1 585 34 34-0
office@tttech.com
Follow us on 

Find out more → tttech.com

