

Code of Conduct

Dear colleagues,

Our company's reputation for being a fair, competent and trustworthy company is one of our most valuable assets, which we are determined to preserve. Maintaining high ethical standards within our company and in our relationships with customers, suppliers, government agencies and the public in general is critical to our continued success wherever we operate.

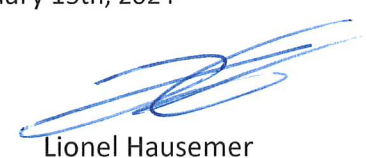
For this reason, we have developed the TMT Code of Conduct, which sets out the principles that apply to all TMT employees and other stakeholders everywhere and in all circumstances. It is mandatory that its contents are known and understood by each of us, as it underscores our responsibility as a company and as individuals to implement and protect our core values and ethical standards in the way we do business.

Let us embrace this Code of Conduct and Core Values to guide our behaviour every day, everywhere, and keep TMT a great company to work for and with.

Luxembourg & Siegen, January 15th, 2024



Andreas Dango
Managing Director



Lionel Hausemer
Managing Director



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1. Lawful Conduct

TMT considers the integrity of its employees to be an essential prerequisite for sustainable entrepreneurial success. Compliance with the law is our top priority.

We therefore expect every TMT employee to comply with the applicable rules and regulations. Breaches may result in criminal and civil law consequences, as well as sanctions against our company.

2. Safety, Health, and Respect for human rights

We are responsible for all our employees. The protection of life and health of all employees is our top priority. It is the duty of all employees to avoid hazards at the workplace and to eliminate or reduce hazards as far as possible.

We expect our employees to conduct themselves appropriately in business. Employees must not engage in any form of discrimination or harassment or behave in a manner that could be construed as such, such as using inappropriate language, keeping or posting inappropriate material in their work area or storing inappropriate material on their computer.

We are committed to respecting internationally recognized human rights. We respect individuality and rights of the employees, treat them equally and do not tolerate any kind of discrimination and harassment and reject any form of child or forced labor.

3. Transparent Competition and Trading with Integrity

In competing for market share, we are committed to fairness and integrity. In our sales and marketing activities, we comply with nationally and internationally applicable laws and do not engage in unfair practices such as corruption, participation in cartels or monopolies and other competition infringements.

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4. Appropriate Business Conduct

We comply with the applicable statutory provisions and other legal requirements, e.g. on environmental protection, labour law and data protection.

TMT expects its employees to perform their duties conscientiously, honestly and in the best interests of the company. Employees must not use their position or the knowledge resulting from their position for private or personal gain.

We make our business decisions exclusively in the interest of our company. Private interests and the interests of the company must be separated.

Business entertainment and gifts (received and given) have to be, from whatever source, always socially appropriate and in accordance with applicable internal and external regulations.

5. Product Responsibility

The company's success is more closely linked than ever to the quality of our products and services. Customer satisfaction, fit-for-purpose machine concepts, combined with high flexibility and adherence to delivery dates are our greatest endeavours. We expect our employees to act and live according to our quality policy and quality objectives.

6. Protection of Corporate Assets

We treat the company's assets with care and use company property for business purposes only. All employees are obliged to be careful with company property entrusted to them and to protect it against loss, damage, and theft.

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7. Protection of Intellectual Property

We protect our technologies through patents, copyrights, trade secrets and other industrial property rights. Our Intellectual property must be protected, and its use is permitted only within the scope of your work. We expect our employees to comply with our internal technical, organizational, and legal safeguards. Disclosure to third parties without appropriate confidentiality agreements is not permitted.

Just as we protect our own intellectual property, we respect the intellectual property of others. Intellectual property belonging to others must be kept confidential. It may only be shared with colleagues who have a legitimate need to know such confidential information for a specific purpose.

8. Export Control and Customs Regulations

We are committed to the objectives and values of international export control. We commit to observe and adhere to export control and customs regulations and thus internal and external specifications related thereto. We will not engage in illegal exports.

9. Data Protection

We protect the personal data of our employees, customers, and suppliers. The personal data of individuals may only be collected, processed, and used in accordance with the relevant statutory regulations and internal regulations on handling confidential information.

10. Know Your Customer (KYC) and business Partner/Supplier (KYS)

Sometimes appearances are deceptive, or the camouflage is so good that it is difficult to see the reality. It may be that not all of our business partners behave the way we think they do. A look behind the façade can reveal unexpected risks - for our company and for us personally. We will therefore run a KYS/KYC check on our suppliers, and customer on an ongoing basis to reveal any concealed financial crimes and non-compliance.

We do not enter relationships with organizations, individuals or third parties associated with organized crime or money laundering.

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11. Organization Records, Sound Accounting Practice and Tax Declaration

Accurate and reliable records of many kinds are necessary to meet the company's legal and financial obligations and to manage the company's affairs. The company's books and records must reflect all business transactions accurately and in a timely manner.

We conduct our financial reporting and tax returns and record keeping in a sound and transparent manner and in compliance with all applicable laws and regulations. We do not tolerate illegal activities such as fraud, misappropriation, and manipulation of financial statements.

12. Prohibition of Acts that conflict with Corporate Interests

We shall always work fairly and in the interest of our company, avoid conflicts of interest with the company and keep professional and private issues separate. All managers and employees, including part-time and temporary staff, must abide by this Code of Conduct.

Violations of this Code of Conduct will not be accepted.

13. Investigation Policy

In a sound corporate and management culture, commitment and shared values go hand in hand. Violations of the law or internal rules are not in line with our understanding of compliance. Therefore, we systematically investigate all reports/incidents of legal violations, establish the facts and take appropriate actions.

For further questions related to the Code of Conduct, all employees and third parties (customers, suppliers, etc.) can contact us by mail at compliance@tmt.com.

Any infringements of the law or company policies can be reported through the company's whistleblower system. The contact details can be found on the company's website.