



Compliance Policy - Code of Conduct

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Content

Content 1

1. Principles..... 1

2. Whistleblower and reporting system 2

3. Conflicts of interest and information security 2

4. Business partners and legal compliance 2

5. Other legally relevant topics 3

6. Cooperation with authorities..... 3

7. Protection of the environment, health and property 3

1. Principles

As a globally active company, Trenz Electronic GmbH is aware of its legal and social responsibilities. All employees undertake to act in accordance with applicable laws, internal guidelines and ethical principles.

We comply with all relevant legal regulations, including tax, customs, competition and antitrust laws, as well as export control regulations. Corruption, bribery and money laundering are strictly prohibited. Our products are state-of-the-art and the necessary approvals are always obtained.

Compliance with these principles is binding for all employees, regardless of position or location. Violations may result in consequences under labour law or other laws, up to and including termination of employment or claims for damages.

Managers bear special responsibility for implementing these principles. They act as role models and are obliged to prevent, identify and report violations within their area of responsibility.

As an employer and along our value chain, we take responsibility for sustainable business practices and for fair and respectful treatment within the company and with our business partners. This is an essential foundation for our long-term success.

We are committed to meeting customer requirements, enhancing customer satisfaction, and continuously improving the effectiveness of our processes and products. As well as identifying and managing risks and opportunities that could affect the achievement of our objectives or compliance with this Code.

If you have any uncertainties, the Compliance Department is available at any time and will treat your enquiry confidentially.

2. Whistleblower and reporting system

Employees are obliged to report possible or actual violations of laws, internal guidelines or the Code of Conduct in good faith. This can be done via the direct line manager, the compliance department, the human resources department or via the whistleblower system. The whistleblower system also allows anonymous reports. These can be made via specially protected channels or the anonymous reporting mailbox. A report made under name facilitates clarification, but is voluntary.

Every report is treated as strictly confidential. Retaliation or discrimination against whistleblowers acting in good faith is prohibited and will itself be sanctioned.

Abusive reports – such as those aimed at discrediting others – may result in legal consequences.

3. Conflicts of interest and information security

Secondary activities and significant holdings in competitors, customers or suppliers require prior written approval. This also applies to business relationships with close relatives in management positions.

Internal and external documents must be created and stored in a correct, complete and comprehensible manner. Compliance with statutory retention and deletion periods, in particular in accordance with GDPR Art. 5, is mandatory.

Company property may only be used for business purposes and must be treated with care.

Personal data and trade secrets must be protected by appropriate organisational and technical measures. Data protection requirements must be complied with at all times. The data protection officers and the compliance department are available to answer any questions.

4. Business partners and legal compliance

Trenz Electronic GmbH undertakes to comply with all applicable competition and antitrust laws. Unlawful price fixing, market sharing or coordinated strategies are prohibited.

Suppliers are selected according to objective and transparent criteria (e.g. price, quality, performance). Contracts and amendments are fully documented. Any form of bribery or unfair influence is prohibited, regardless of whether it is active or passive. Representatives and intermediaries are also contractually bound to comply with this.

Gifts or benefits may only be given within socially acceptable limits. In Germany, for example, the tax exemption limit is 35 euros per person in accordance with Section 37b of the Income Tax Act (EStG). Any benefits must be approved and documented.

5. Other legally relevant topics

The company fulfils its tax obligations, including the correct payment of taxes and customs duties.

Suspected cases of money laundering are reported to the competent authority in accordance with Section 43 of the Money Laundering Act (GwG). Business relationships are monitored accordingly. Donations and sponsorship are only made with the approval of the management and are subject to clear criteria and documentation requirements. Export and import regulations, embargoes and sanctions laws are fully complied with. The compliance department is available to answer any questions you may have.

6. Cooperation with authorities

Trenz Electronic GmbH maintains an open and cooperative relationship with authorities. In the event of lawful inquiries or investigations, we cooperate fully within the scope of applicable laws. Employees of Trenz Electronic GmbH are obliged to provide objective and truthful support in the event of an official investigation, provided that this does not conflict with any legal rights such as the right to refuse to give evidence or make a statement.

Individual procedural rights are preserved at all times.

7. Protection of the environment, health and property

Trenz Electronic GmbH is committed to sustainable business practices along the entire value chain. Fair, non-discriminatory, legally compliant working and remuneration conditions are a matter of course for us; the internationally recognised standards of the International Labour Organisation (ILO) are binding. We also expressly commit ourselves to the principles of the UN Global Compact and base our actions on them.

We condemn and reject any form of human rights violations, forced or child labour and modern slavery – including among our business partners. Respecting and upholding human rights is a fundamental principle for us.

Occupational safety, health protection and resource conservation are an integral part of our corporate responsibility.

Intellectual property is a valuable asset. This includes industrial property rights (e.g. patents, trademarks) and copyright-protected works (e.g. software, image rights). We respect the rights of third parties and only use their intellectual property or know-how if there is a legal or contractual basis for doing so. Any use or disclosure is exclusively for legitimate business purposes.

Freigabe und Ansprechpartner

Hüllhorst, den 27.02.2026

Für die Geschäftsführung

Thorsten Trenz T. Trenz

Geschäftsführer (CEO)

Für das Compliance-Management

Marcel Stranghöner M. Stranghöner

Compliance Officer