

Code of Conduct

Final

Code of Conduct

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1. Preamble

For over 25 years, we have been the world's leading data specialist for networked collaboration in the digital automotive aftermarket. In addition to up-to-date vehicle and spare parts data based on the TecDoc standard, our portfolio also includes comprehensive repair and maintenance information. We also deliver integrated solutions and consulting services for digital order processing, fleet management and market and data analysis in the automotive aftermarket. The TecDoc catalogue is one of the most comprehensive and leading automotive spare parts catalogues worldwide.

We are the international driving force for standardised data, digital processes, and integrated solutions in the automotive aftermarket.

Today, we employ around 850 people from 26 nations worldwide with deep industry and automotive aftermarket expertise, working purposefully to make data and processes even more efficient. Our shareholders are among the largest global players in the automotive industry; they provide us not only with experienced, competent, and solid leadership, but also with a strong customer base.

To meet these different demands and to strengthen our own company, we are committed to compulsory compliance with legal provisions and regulations as well as internally developed guidelines. This Code of Conduct sets out our fundamental approach to the standards and expectations that apply in our day-to-day business activities. We are committed to integrating and living the Code of Conduct in our daily operations.

While individual rules, responsibilities or processes may vary at each of Tec Alliance's locations due to size and applicable national regulations, these corporate and behavioural policies are binding for all locations where we can implement them due to our majority shareholding. We work towards ensuring that these rules are also applied in any participations. Irrespective of this, national law must always be observed.



2. What we stand for: our company policies

Dear colleague,

What makes a company successful? An excellent product alone does not determine success or failure. To be successful, we must all deal with each other responsibly and respectfully, complying with all applicable laws and regulations. This creates trust, credibility, reliability, and a good reputation inside and outside the company. This is what we stand for.

We owe our growing success to our core competencies:

- **Entrepreneurial thinking:** we focus on customer needs and are forward-looking.
- **Collaboration:** we share knowledge, network and exchange ideas and prioritise the success of the team.
- **(Self-)reflection:** we ask for feedback, are lifelong learners, reflect on our own behaviour and are open to change.
- **Communication:** we communicate clearly, openly, and transparently, talk to each other instead of about each other, benefit from our ability to initiate relevant discussions and deal with conflicts.
- **Individual responsibility:** we give and build trust, can prioritise our own work, take responsibility and make decisions.

These qualities make us the driving force in the digitisation of the entire market.

All our actions are based on trust to do the right thing. This means that we always act in a way that actively maintains, nurtures and increases the trust of our customers, colleagues and business partners.

With our Code of Conduct, we have created guidelines that correspond to our corporate values. We would like to offer you an orientation that supports you in your daily actions. Familiarise yourself with this code. It is a special concern of ours that we develop an awareness of these issues and integrate them more into our daily life.

Our internal operational processes are measured against compliance with the regulations of the Code of Conduct and, if necessary, adjusted to ensure compliance.



We ask our readers to understand that we use the generic masculine grammatical form for reasons of language simplification and better readability. In accordance with our understanding of diversity, inclusion and integration, the corresponding terms always apply to all people in the sense of equal treatment.

Your thoughts and actions are a decisive driver for the success of TecAlliance to remain the international driving force for standardised data, digital processes, and integrated solutions in the automotive aftermarket.

If you have any questions or suggestions, please contact our compliance contacts at any time.

You can find the contact details on Page 26.

Jürgen Buchert



3. Our principles of conduct

Commitment to and compliance with law and order is our highest priority. This is reflected in our conduct in **society, in the workplace, as business partners and as a sustainable company**.

Each employee is required to comply with the legal provisions of the jurisdiction in which he or she acts - regardless of whether they apply locally or nationally. This applies even if it results in economic disadvantages or difficulties for the company or individual persons.

As a company, we have committed ourselves to complying with the **ten principles of the United Nations Global Compact** in the areas of human rights, labour standards, environmental protection, and the fight against corruption. Click on this [link](#) to read them.

To this end, we prepare an annual report outlining our actions to continuously improve our integration of the Global Compact and its principles into our business strategy, corporate culture, and daily operations.

The issue of compliance is particularly important to our customers and to us. That is why the management of TecAlliance has defined these overarching principles of conduct:

- Each employee is obliged to comply with all applicable laws and regulations within the framework of which he or she acts. Violations may result in profound consequences for the company, the management, and the employees, such as criminal prosecution, consequences under labour law, damages, or reputation damage.
- Our employees will not be held responsible for losses based on compliance with applicable laws.
- An individual's decision-making situations in which the interests of the company conflict with personal interests must be reported immediately to superiors or the management to work out solutions together.
- We attach immense importance to open cooperation in which everyone can approach their superiors or the management with critical issues without hesitation and in a spirit of trust. An important part of this is our "Du" culture, which facilitates open communication.

Our principles of conduct are dynamic. Every employee is invited to participate in their further development.



3.1 Our conduct in society

We **respect** all relevant laws and regulations that protect **human and labour rights** worldwide.

Based on this fundamental attitude, we are committed to the following principles:

Compliance with the Principles of the United Nations Global Compact

As a company, we are committed to upholding [the ten principles](#) of the United Nations Global Compact in the areas of human rights, labour standards, environmental protection, and anti-corruption.

To this end, we prepare an annual report outlining our actions to continuously improve the integration of the Global Compact and its principles into our business strategy, corporate culture, and daily operations.

We are committed to sharing this information with our business partners using our primary communication channels.

Child labour

A child's development must not be disrupted by work that prevents him from receiving an education. The dignity of the child must be respected, and his health and safety protected. In accordance with ILO conventions ([Link](#)), we observe the minimum employment age and strictly reject any kind of child labour. Laws for the protection of minors are observed. Trainees, apprentices, and underage workers are only employed within the framework of the legal requirements.

Forced labour

In accordance with ILO labour standards ([Link](#)), we strictly reject the use of forced labour of any kind in our worldwide business activities. We adhere to the applicable human rights. Our employees are voluntarily employed by the company and can leave of their own free will.



Discrimination, harassment, diversity, and inclusion

We consider the fair and equal treatment of all our employees to be a fundamental principle of our corporate culture and social responsibility. Our employees shall not be favoured, disadvantaged, or harassed based on gender identity and expression, race, religion, nationality, political opinion, ethnic origin, disability, age, sexual orientation, pregnancy, or any other characteristic protected by national laws. We strongly believe in the value of diversity and inclusion for building and developing our culture.

We are committed to diversity within the company. In our understanding, this includes nationality, physical ability, appearance, sexual orientation, religion, age, family status, class, education, and mental health. It is important to us to promote an inclusive culture based on this. We strive to include all people with visible and hidden differences, as well as those with diverse backgrounds and ways of thinking, in our culture.

Product safety/customer satisfaction

We are committed to ensuring that all products and services meet legal quality and safety criteria and must comply with legal requirements. Our products must not have defects or hazardous characteristics that could affect health or damage property. We aim to meet the high-quality demands that our customers always place on our products. We understand quality as a dynamic process of continuous improvement with a view to maintaining and increasing customer satisfaction.

Company property

To achieve our common goals, we make company resources available to all employees. Our understanding of the use of these resources is based on the premise of not using them wastefully or improperly. For this reason, we always treat company assets responsibly.



3.2 Our conduct in the workplace

We strive for working conditions for our employees that are well above the minimum standards. We value cooperation as one of our core competencies. Our dealings with each other are characterised by mutual respect, appreciation, openness, and trust. A key role is played by our managers, who set a good example and put these values into practice.

For us, our **duty of care** manifests itself in our relationship with our employees, in the rules for handling company property and in the form of our relationship with our customers. We see **occupational health and safety** as key factors in our relationships with our employees. We have an obligation to all employees to provide safe and healthy working conditions and to continuously develop them.

Based on this fundamental attitude, we are committed to the following principles:

Mutual commitment

We commit ourselves to our employees to all legal and further resulting requirements and guidelines within the framework of regulations defined in employment contracts. Likewise, our employees agree to comply with these regulations in the same way.

Fair pay

We recognise the right to fair remuneration for all employees. We compensate our employees with performance-related pay, which may be supplemented by additional benefits. We strive to reward our employees fairly and competitively and use reward systems to allow our employees to share in our success.

We always compensate our employees in accordance with the law and above the country-specific legal minimum wages. In addition, we strive to offer our employees remuneration packages including fringe benefits. We strive to ensure that these compensation packages are above comparable standards in local labour markets.

In all our units worldwide, where we have access to them due to majority ownership, the operational performance of the company is the decisive criterion on which employee salaries are based.



Fair working hours

Work-life balance and reasonable working hours are important to us. We comply with national legal working time regulations as a minimum requirement. In addition, we promote sufficient rest periods, free time, holidays, and a healthy work-life balance worldwide. Working hours and rest periods consider not only business but also personal needs to limit physical and mental stress.

Personal development

We support personal development and training. We promote lifelong learning and the long-term employability of our employees. We hire new employees based on their personal skills and help them to develop accordingly, for example through on-the-job training. The respective skills and talents of our employees are promoted through future-oriented training courses that are intended to improve their performance and employability. Access to training is based on the principle of equal treatment of all employees.

Safety in the workplace

We are committed to complying with all applicable local laws and regulations regarding workplace safety.

For our sites in Germany, this means

- 5% of the employees at each site are appointed as **first aiders**.
- 5 % of the employees at each site are appointed as **fire safety officers**.
- Every site with more than twenty employees has a **safety officer**.
- A quarterly **safety meeting (ASA meeting / accident prevention)** is held at each site.
- **Electrical** testing of all electrical systems in accordance with legal requirements
- An occupational safety specialist is appointed centrally.
- All employees receive **occupational safety instruction**, regular instruction of the plant electricians

Health protection

We strive to create a healthy working environment for our employees and to comply with all applicable occupational health laws and regulations at the respective sites.



In Germany, we advocate the following:

- A **company doctor / works doctor** is appointed for each site
- Compliance with **hygiene regulations** according to ASR
- Regular **workplace inspections** by an occupational safety specialist.
- The occupational safety specialist prepares **risk assessments** for all relevant work and work environments. In addition to the applicable laws, we offer ergonomic, height-adjustable workplaces
- **Work-life balance** including the possibility to work from home
- **Flu vaccination - eye wash station** (Weikersheim)
- **Compliance with SARS-CoV-2 infection control guidelines**
- Covid masks, tests, disinfectants & Covid-adapted workstations and ventilation systems
- Subsidies for healthy meals
- Fitness facilities, bicycle storage, changing rooms & showers for a healthy commute.

Freedom of association and the right to collective bargaining

We recognise the right of employees to form representative bodies. We promote a culture of mutual trust as one of the key principles of our company policy. Constructive cooperation, either directly with our employees or through their employee representatives, is the basis for our sustainable development. Employees are neither favoured nor disadvantaged by belonging or not belonging to a trade union or employee representation.



Protection of company information

We protect company-relevant information from misuse, loss, destruction, and manipulation. We implement current security standards and comply with local legislation.

All employees are obliged to maintain confidentiality and to manage information properly. This obligation continues even after the termination of employment.

Data protection and information security

As a data-driven company, information security is especially important to TecAlliance.

We therefore protect company data, employee data and business partner data with technical, organizational and legal measures.

The associated regulations are documented, for example, in the "Information Security Handbook" and in the "Device Usage Policy".



Finances & taxes

We keep our accounts accurate and complete

We ensure that all business transactions are appropriately recorded in our books in accordance with existing rules and processes and in compliance with all applicable accepted accounting principles. Our accounting, financial reporting and regulatory reporting are completed in a timely, accurate, correct, complete and truthful manner. They comply with the applicable legal and regulatory requirements.

We comply with national and international tax regulations and reject any form of abusive tax planning

We expressly commit to comply with all tax obligations. We conduct responsible tax planning that considers both our legal obligations and the interests of our investors. We reject abusive tax planning but take advantage of opportunities to legitimately optimise our tax positions. When introducing new products, we ensure compliance with tax requirements.

Everyone informs himself about the obligations to avoid tax risks as far as they apply to his respective area of responsibility and consults the finance departments for advice on relevant matters and open questions.



3.3 Our conduct as a business partner

Adherence to **sound business ethics** as a principle of action can be seen as a key factor in making a difference for our company and for society.

We integrate voluntary norms and standards into our daily business and are responsible for acting in a compliant manner and actively addressing misconduct.

By acting in accordance with the principles of our Code, we bring about positive change and help ensure that TecAlliance provides an inclusive and respectful working environment where everyone feels safe and that he is heard.

We safeguard our business interests by protecting our assets and those of third parties, acting responsibly and maintaining values-based, long-term business relationships.

As a matter of principle, we are committed to fair and honest dealings with each other, our customers, suppliers, and other business partners.

Business ethics – cooperation with business partners

We expect our business partners to follow the guidelines of ethical business practices, to respect human rights, and to comply with the [ILO labour conventions](#), the principles of the UN Global Compact and the UN Guiding [Principles on Business and Human Rights](#) ([Link](#)).

We actively work to ensure that these principles are adhered to and implemented by our business partners in the value chain (i.e., suppliers, business partners). We expect them to comply with the above standards such as child labour, forced labour, discrimination, and freedom of association, etc.



Conflicts of interest

Conflicts of interest can arise, for example, if personal or one's own monetary interests collide with the objectives of TecAlliance or of business partners. If a conflict of interest cannot be eliminated, this may be the reason an office or activity cannot be conducted.

Individual decision-making situations in which the interests of the company conflict with personal interests must be reported immediately to superiors or management for clarification.

Typical examples of conflicts of interest are:

- Gainful secondary employment of employees. The responsible manager must be informed of such an activity before it begins. If such a conflict of interest exists, the secondary activity can be disallowed if it conflicts with the legitimate interests of the company.
- The acceptance of a mandate on the board of directors, supervisory board, advisory board or any other body at a corporate client or supplier - also applies to close relatives. Therefore, employees may only take on such tasks if they have been approved in advance.
- Participation in competitor companies
- The hiring of a relative or partner, the promotion of such a hire or the assumption of a management position vis-à-vis a relative or partner.
- The hiring of a person by use of a political connection
- A personal interest in a supplier, customer, or competitor, not based on official business, which influences decisions.
- Close relationship with senior management of a competitor or supplier
- A substantial personal financial interest in a supplier or corporate client - also applies to close relatives.

If there is uncertainty as to whether a conflict of interest is material, the direct supervisor, senior management, Human Resources, or the Compliance Officer must be contacted.



Business ethics – fair competition and anti-trust laws

We always comply with all competition and antitrust laws. We are committed to fair, open and unrestricted competition and do not accept any form of illegal, anti-competitive or derogatory behaviour or unethical practices to win a contract or continue a business relationship.

We pay particular attention to prohibited cartel agreements such as:

- Price rigging
- Agreements on market shares
- Capacity agreements
- Division of regional markets
- Division of customers
- Price fixing

Even concerted actions, informal discussions or informal gentlemen's agreements which have as their object or effect the restriction of competition are prohibited. Even the appearance of such conspiratorial actions must be avoided. Collusion with other bidders - especially in private tendering and public procurement procedures - is not only prohibited under antitrust law, but also under criminal law. In the case of all (even if only planned) agreements with competitors - even if they relate to areas outside the competitive situation - the legal team must be consulted.

Violations of the antitrust laws applicable in the individual countries, and of the US and European anti-trust laws, can have profound consequences for us as a company. In the case of antitrust violations, there is the threat of severe fines, claims for damages, exclusion from public contracts and loss of image. The employees involved can also be personally exposed to profound consequences, including sentences of imprisonment.

Even if a business has fallen into a crisis through no fault of its own, self-help through cartel agreements cannot be justified.



Corruption prevention

We apply the same zero-tolerance policy to any direct or indirect bribery, kickback or corruption. This is independent of whether it is practised by employees, clients, or other business partners.

We do not do business at any price. We do not bribe and do not allow ourselves to be bribed.

We convince our business partners and customers with our products and services and not through undue influence. Nor do we allow ourselves to be unduly influenced but make decisions for objective and comprehensible reasons.

We do not tolerate corrupt behaviour by our employees, business partners or customers. Decisions based on corruption distort competition and harm our company and the common good. To avert damage to us, we avoid even the mere appearance of undue influence.

We also act in accordance with our corporate principles when in contact with employees of the government and government authorities as well as public officials and politicians. We avoid even the mere appearance of improper influence, for example through payments, contributions, or other advantages.

We also adhere to these principles when such benefits are expected or allegedly customary for official acts. With regular training and controls, we ensure that corrupt behaviour is prevented, uncovered, and punished.

Our guiding principle is always: we would rather forego business and the achievement of internal goals than violate the law.

Money laundering prevention

We fulfil our legal obligations to prevent money laundering and do not engage in money laundering activities. Each employee is requested to have unusual financial transactions, especially involving cash, which could give rise to suspicion of money laundering, checked by the responsible finance department in case of doubt.



Gifts and entertainment

When dealing with business partners and customers, gifts and invitations are customary and permissible within reasonable limits, as they serve to maintain relationships. However, they must be proportionate.

For example, travel, services, tickets to sporting, musical or other cultural events, bonuses and discounts are considered gifts.

Receiving gifts and entertainment

As employees, we must not solicit, request, or demand gifts, entertainment, personal services, or favours from business partners, either for ourselves or for others.

We refuse to do so if there is even the mere appearance of improper influence. We also pay attention to the appropriateness of discounts and benefits.

We may accept voluntarily granted promotional and occasional gifts of reasonable value. We only accept invitations from business partners to meals or events if they are unsolicited, serve a business purpose, and not repeated unreasonably often and if the invitation is in proportion to the occasion.

As an order of magnitude of what can be considered appropriate, we are guided by a value of 60 euros for gifts from third parties and a value of one hundred euros for invitations from third parties.

In case of doubt about the appropriateness of gifts or invitations, we consult with the direct manager or company management. If we receive benefits that exceed our guidelines, we disclose this and document the receipt.

As a matter of principle, we do not accept monetary gifts.

We must comply with the legal regulations of the country in which we work.



Gifts from us to our partners & customers

Also, in the case of gifts and invitations to our business partners and customers, we adhere to the principle that even the mere appearance of undue influence must be avoided. Their acceptance must not place the recipient in a position of compelling dependence. Benefits are only permissible in reasonable amounts and within the scope of ordinary business activities. In this context, a maximum amount of EUR 60 is also assumed for gifts in kind and EUR 100 for invitations.

In the case of gifts and invitations to employees of public authorities and publicly owned companies as well as to public officials and politicians, we are cautious and examine the appropriateness particularly critically.

Monetary gifts are inadmissible.

In cases of doubt, the decision of a superior or the company management must be obtained.

These principles also apply to mailings to private addresses.

Country-specific legal regulations must also be considered here.

Donations & Sponsoring

Donations are defined as charitable, non-commercial contributions in the form of money, goods, or services. We are committed to social causes, donate to charitable causes, and encourage our employees to participate in ethically worthwhile activities. The same applies to sponsoring measures implemented by the company.

Donations & sponsorships are only made after approval by the management.



Export and import laws

We are required to comply with all applicable export and import laws, including, among others, sanctions, embargoes and other laws, regulations, government orders or directives.

Political advocacy

Politics and legislation influence the framework conditions for economic activity. TecAlliance influences society through its participation in economic transactions and can specifically introduce the company's positions into decision-making processes (e.g., in legislative projects) within the framework of political lobbying.

In principle, in the case of political representation of interests - regardless of whether it is undertaken by an individual/an employee or on behalf of the company (e.g., via an association) - it applies:

- that this be done or would be done openly and transparently, and
- that it is always clear whether the interests involved are those of the individual person or those of the TecAlliance.

We conduct lobbying in accordance with the principles of openness, comprehensibility, and accountability. Neutrality in dealing with political parties and interest groups is a matter of course for us. Unfair influence on politics and legislation is not permitted.

No individual employee attempts to influence political decisions on behalf of the company unless he has been authorised to do so.

If he has been authorised to do so, he shall comply with the relevant internal guidelines in the performance of his duties.



3.4 Our conduct as a sustainable company

The protection of the **environment**, **natural resources** and **climate** are important goals of our company. We believe that we all have a duty to use energy, water, and raw materials sparingly and efficiently, and to behave in an environmentally friendly manner when disposing of wastes.

This commitment includes compliance with the specified limits of permissible emissions to not harm the climate and the avoidance/reduction of waste. In addition, we strive to use resources responsibly and sparingly and to keep the impact on people and the environment as low as possible. We continuously improve by integrating sustainable and ecologically oriented procedures in all business processes.

We also expect our suppliers and service providers to provide their services in a way that conserves resources and protects the environment. As a globally active company, we recognise that climate change is highly relevant to the company and that we have a responsibility to actively deal with the risks of climate change.

Based on this fundamental attitude, we are committed to the following principles:

Sustainability in products and services

We are committed to complying with all applicable national and European environmental and climate laws and regulations. We develop new, adaptable, market-based solutions to address the opportunities and risks of environmental issues and climate change.

We continuously raise environmental awareness among our employees and customers and educate them about the risks that can arise from climate change. We raise awareness among our business partners about our behaviour as a sustainable company and encourage them to adopt our guidelines in this area.



Environmental management

Our management of environmental and climate performance encompasses our internal processes as well as our property and equipment.

- Reduce energy consumption
- Increase production and self-consumption of renewable energy; energy neutral by 2030
- Reduce overall waste and promote the reuse and use of recycled products (e.g., KANBAN cabinet and products)
- Reduce business travel through more efficient travel schedules and increased use of telephone, video, and web conferencing as an alternative to business travel. Should travel be necessary, economic, and environmentally friendly options will be considered.
- Use of resource-efficient vehicles within the limits of their intended use and purpose.

Ecological procurement

We consider social and environmental factors when procuring goods and services. It is also important to us to make our suppliers aware of this Code and to encourage them to adopt appropriate standards.

Reporting and liability

We promote transparency and accountability by providing adequate information on the risks and opportunities of environmental change and climate change, and on environmental performance. We set measurable targets for continuous improvement of our environmental and climate performance.

A first report is expected as part of the 2022 annual financial statements. In subsequent years, reporting will be developed in accordance with the EU Corporate Sustainability Reporting Directive (CSRD) / ([Link](#)) and officially published annually.

Commitment and engagement

We promote projects to reduce the risks of environmental and climate change to protect the interests of society, customers, and partners. We work in partnership with stakeholders to learn more about the impact of climate change and share this knowledge.



3.5 Compliance with the Code of Conduct

The implementation of our Code of Conduct concerns every single employee. Any indication of a violation of human rights will be followed up immediately and with the utmost care.

All employees must familiarise themselves with the content of this Code of Conduct, know it and act accordingly. We use e-learning to ensure that all employees and managers are trained accordingly.

If (country-) specific guidelines or other regulations exist, these are of course binding and must be considered.

This Code of Conduct is one of the company regulations for which compliance is a secondary obligation under an existing employment contract and the associated company agreement. A deliberate violation may have consequences under labour law. In such cases, the works council must be involved if it exists.

Our managers have a special role model function and are particularly measured against the Code of Conduct in their actions. They are the first point of contact for questions regarding the understanding of the rules and ensure that all employees know and understand the Code of Conduct. As part of their management duties, they prevent unacceptable behaviour and respond appropriately to prevent violations of the rules in their area of responsibility.

Our managers have the duty to advise and support their employees in implementing it in everyday business. Local laws and regulations always take precedence.

The following principles arise from this basic attitude:

Dealing with mistakes

As individuals and as an organisation, we learn from mistakes. We cultivate a transparent and open approach to mistakes and share our experiences to enable further development and innovation. A prerequisite for this is to shape our corporate culture in such a way that mistakes are recognised, discussed, and corrected.

It is up to each of us to take responsibility and create - or demand - a work environment where employees are not inhibited from addressing potential mistakes. We treat employees who disclose mistakes fairly and responsibly.



Dealing with breaches of regulations

Violations of laws, guidelines and other regulations can lead to economic damage, risks under criminal laws and fines, damage to the company's image and reputation, non-issuance of permits and exclusion from national markets.

Therefore, (potential) violations must be identified at an early stage to prevent damage to the company and its employees and to ensure fair cooperation. That is why we do not hesitate to address them.

In case of any question, uncertainty, or suspicion of a violation of internal or external regulations, we talk to our superiors and seek advice from supporting persons.

In addition to the managers, including the CEO and COO, the compliance manager and the works council are available to us.

Potential violations can be reported by email to compliance@tecalliance.net or anonymously via our whistle-blower system <https://tecalliance.integrityline.com/frontpage>.

All reports - irrespective of the reporting channel - are treated confidentially and followed up so that the identity of the whistle-blower and that of the person(s) concerned are preserved.

Reports received are documented in an audit-proof manner in compliance with data protection and confidentiality and are carefully checked in compliance with the dual control principle (by Compliance, P&O, or the management).

If applicable rules have been violated (e.g. management and instruction rights, employment contracts, regulatory agreements, company agreements, collective agreements, laws and regulations, Basic Law, European law), appropriate consequences will be taken. The principle of proportionality is always observed and in each individual case it is examined which consequences are suitable, necessary, appropriate and legally possible.

Proven breaches of the rules can lead to process changes and new work instructions, as well as to the initiation of further steps under labour law, civil law, or criminal law, if necessary. In the case of steps under labour law, the works council must be involved if it exists.

The legal deadlines for processing incoming reports are ensured by Compliance.

It is always ensured that the whistle-blower is subject to the protection of the Whistle-blower Protection Act and does not suffer any disadvantage because of reporting.



4. Contact information

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