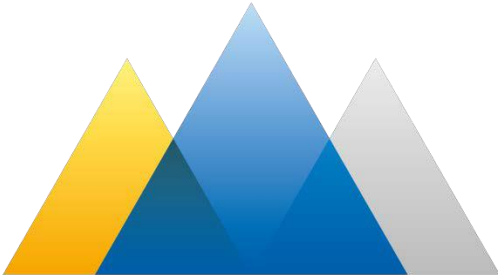


# Code of Conduct

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**TRISTONE**

Tristone operates internationally and needs to respect a wide range of different legal requirements based on different cultures and in different areas of business and legal backgrounds. Key driver in our daily business is our philosophy of Excellence and high Quality standards.

Excellence and Quality must also include “excellent” behavior in everyday business. The management is committed to act in a responsible and lawful manner in all daily business and in all countries. This leads us to a reliable partner and an attractive employer. And, all our employees are requested to conduct lawful and ethical. Compliance – responsible and lawful behavior- must be an integral part of our company culture.

The Board implemented this Code of Conduct to set the standard for responsible and lawful behavior. The Code of Conduct emphasizes our commitment to Compliance with the laws and international conventions and reflects common values. The Code of Conduct is binding for all of us. Infringements will be treated accordingly, but fairly.

August 2022

Approved by Ignacio Salazar  
CEO & President

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## **Preamble**

Specific rules and regulations for individual situations and circumstances in the work environment are clearly formulated in TRISTONE's policies. These rules are unconditionally valid and binding.

### **1. Human rights**

The Declaration of Human Rights is a common standard of achievement for all people and all nations whose universal and effective recognition and observance must be secured by everybody.

TRISTONE believes in ethically correct behavior. Therefore we respect all regulations in force to protect human rights. This fundamental requirement applies internally as well as towards external business partners.

### **2. Equal treatment and non-discrimination**

A culture of equal treatment and respect is of great importance to TRISTONE. We promote equal opportunities and prevent discrimination. We support diversity in order to achieve the highest degree of productivity, creativity and efficiency.

TRISTONE offers equal opportunities to men and women. TRISTONE treats everybody equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, world view or religion.

### **3. Donations and sponsoring**

TRISTONE regards itself as an active corporate citizen. Therefore we demonstrate our commitment in different ways. All of these actions are carried out solely in the interest of TRISTONE.

TRISTONE does not support political parties and does not grant any donations for religious causes. No donation is being made to receive a special performance or decision in return for the donation. Donations are made in a transparent and open manner.

### **4. Lobbying**

Lobbying is part to bring TRISTONE's interests into different decision-making processes, like those for legislation plans.

TRISTONEs' lobbying activities are open and transparent. TRISTONE respects the local laws in all countries concerning lobbying.

### **5. Environmental protection**

For TRISTONE protecting the environmental and climate protection as well as resource efficiency are key objectives. We all bear responsibility to conserve natural resources and to protect the environment.

During our daily work, we ensure that all impacts on the environment and on the climate are kept to a minimum and that legal requirements are fulfilled.

### **6. Occupational health and safety**

The health and safety of TRISTONE's employees is Tristone's fundamental and utmost responsibility.

TRISTONE is firmly committed to provide a safe and healthy working environment to employees. Regarding occupational health and safety, TRISTONE complies with all legal and technical requirements and standards for safety in the workplace in the different countries and clearly defines the related roles and responsibilities in its Health & Safety Policy.

## **7. Conflict of interest**

A conflict of interest is the collision or possible collision of an employee's private interest with TRISTONE's interests. Undisclosed private interests may cause serious harm to TRISTONE and are a sign of unprofessional behavior.

All employees are primarily bound by TRISTONE's interests. Therefore, TRISTONE must rely upon that its employees' decisions are made solely in the best interest of TRISTONE.

## **8. Gifts and invitations**

Benefits like gifts and invitations are a part of ordinary business conduct.

Nevertheless, such benefits must not exceed, what is deemed appropriate, or be misused to influence business partners, as this may be seen as corruption.

All gifts, hospitalities and invitations that exceed the amount of 75 € are not allowed to be granted or accepted. Exceptions can be made, after written approval of the superior.

## **9. Corruption**

Corruption is a criminal offense and sanctions under criminal law may incur for TRISTONE's employees who are involved in corruption. Furthermore, TRISTONE might be exposed to heavy fines.

TRISTONE does not tolerate corruption. No benefits must be granted or received that are not legally permitted.

## **10. Fair competition**

Fair and free competition is protected by several laws. This shall ensure that competition is not distorted. All agreements or similar actions between competitors intended to influence the market to achieve an advantage are prohibited. The same applies for the use of dominant position in the market. The violation of competition laws may incur severe fines and penalties and can possibly damage TRISTONE's image in the market.

TRISTONE does not enter into any anti-competitive agreements with competitors, suppliers or customers. TRISTONE will not use its position in the market to influence the market illegally.

## **11. Export control**

Foreign trade can be restricted under export control regulations for security reasons. This applies for the cross-border exchange of goods and services that might be used as weapons or arms.

TRISTONE complies with all provisions for importing and exporting goods, services and information in the different countries.

## **12. Prohibition of money laundering**

Money is laundered if funds or assets that origin from criminal activities are put into the circulation of the legal economy to make them appear legal. Money laundering is a crime and may incur serious penalties for the persons involved.

The identities of customers and all other third parties have to be checked carefully, if legal relationships are entered into. Business is only conducted with legitimate business partners that operate in line with legal provisions. Cash must flow transparently and openly.

## **13. Capital market**

The shareholders success on the capital market is based on being trustworthy. Irregularities can have serious consequences for the shareholder and the employee involved.

TRISTONE adheres strictly to all applicable rules for proper accounting and financial reporting. Transparency and openness are of highest importance.

## **14. Insider trading**

It is legally prohibited to use inside information in the purchase or sale of shares, financial instruments or other securities. As an employee of TRISTONE you get in touch with a lot of information that is classified as insider information e.g. confidential business information, forecasts, possible gains or losses.

TRISTONE does not tolerate insider trading. You are only permitted to use internal information for business purposes.

## **15. Data protection**

Privacy is protected by the law, if personal data is handled. Collecting, storing, processing and other use of personal data essentially require the consent of the person concerned or a specific legal basis.

TRISTONE protects the personal data of employees, customers, suppliers and other persons concerned. TRISTONE only collects, gathers, processes, uses and stores personal data for which this is prescribed by law or required for TRISTONE's regular business operations.

## **16. Protection of know-how, patents, trade and business secrets**

Know-how, confidential business information and patents are one of the key valuables of TRISTONE's business. Unauthorized transmission of such knowledge may lead to extremely high losses for TRISTONE and furthermore to penalties under civil and criminal law for the employee concerned.

TRISTONE employees are not permitted to transfer confidential information such as technical data, financial data, business data, customer information or other information relating to TRISTONE's business, to third parties unless this is required by their job assignments and transferred to appropriate parties within those assignments. Any confidential data should be handled with extreme care.

## **17. Anti-harassment policy**

TRISTONE is committed to maintaining a work environment that is not intimidating, hostile or offensive and that is free of unlawful harassment and discrimination. TRISTONE has a zero-tolerance policy towards prohibited or illegal harassment of TRISTONE employees by anyone, including supervisors, co-workers, vendors, clients, customers or any other person involved in the business activities of TRISTONE.

Prohibited harassment consists of unwelcome conduct, whether verbal, physical or visual, that offends or humiliates a person and makes the workplace be considered as intimidating, hostile, or abusive.

TRISTONE forbids retaliation against anyone for reporting in good faith any kind of harassment and/or cooperating in a harassment investigation.

TRISTONE's policy is to investigate all such complaints thoroughly and promptly, to take appropriate corrective action up to and including termination when it is warranted, to correct any effects of harassment, to ensure that harassment does not recur, and to ensure that there is no retaliation.

## 18. Ethics escalation policy

In case of identified deviance as regards to any topic described hereinbefore, or even any doubt concerning a behavior, any person in TRISTONE organization is encouraged to disclose the observed situation by using the appropriate channel of communication. Unless otherwise specified in this code of conduct, you can escalate the identified matter by using one of the channels below:

- Report this case to the person responsible for the human resource department or to your superior
- Contact the Vice-President Human Resources of TRISTONE Group
- Visit TRISTONE website, on Company\Compliance webpage – <https://www.tristone.com/company/compliance> – and click on [External link to whistleblower portal](#) or scan the QR-code:



You can report anonymously your matter.

Our policy in this field is clear: we take any message seriously and act accordingly, assuring privacy and professional secrecy. We are engaged to follow up incoming matters.

END