



Business Ethics Program

Documentation and structure

Techem's Business Ethics Program includes various measures to firmly anchor ethical conduct in the corporate culture and make it an integral part of business processes.

Techem's Business Ethics Program consists of the following core components:

1. Code of Conduct

The Techem Group has a uniform Code of Conduct that applies throughout the Group. It describes both our corporate values and our ethical principles and thus serves as a guideline for ethical behavior within the company. Our Techem Code of Conduct is available to the public on our website in the Compliance section.

The Techem Group also has a Supplier Code of Conduct from the BME (German Association for Supply Chain Management, Procurement, and Logistics) that applies to our suppliers.

2. Embedded in corporate management

The management of the Techem Group is clearly committed to corporate ethics and social responsibility.

This commitment (also at management level) is expressed, among other things, in a foreword by the management in our Code of Conduct, a direct reporting line from the Chief Compliance Officer to the CEO, and regular references to compliance-related topics in the management call. The clear commitment to ethical leadership serves as a role model for employees.

3. Risk assessment and compliance

Ethical risks in business processes and corporate culture are continuously monitored and regularly evaluated.

Compliance processes for adherence to legal and ethical standards are continuously implemented.

4. Communication and training

The corporate values and code of conduct are communicated to employees on an ongoing basis. All new employees receive the Techem Code of Conduct as an appendix to their employment contract and are informed of the most important points regarding compliance within the Techem Group during an onboarding event.

Topic-specific workshops and information events are held with relevant employees.

Employees are regularly made aware of ethical issues through compliance training, which all employees must complete on an annual basis.

5. Contact options and reporting

Employees and external third parties have various reporting channels and contact options at their disposal to report unethical behavior (and other relevant issues).

Our anonymous whistleblower channel also has a set of rules and procedures that describe the elements and process of case handling.

The Chief Compliance Officer reports directly to the Chairman of the Management Board. He also reports to the Risk & Audit Committee twice a year as a rule, and there is regular communication with the Chairman of the Risk & Audit Committee.

6. Sanctions

Violations of the Code of Conduct and other company guidelines may be punished with organizational and disciplinary measures depending on the individual case.

7. Improvement

The functionality of the Business Ethics Program is reviewed regularly and the various components are continuously developed.