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CODE OF ETHICS

The Code of Ethics of Tratter Engineering Srl applies to all employees, regardless of their type of employment, position, or affiliation, as well as to all natural and legal persons who come into contact with our company or maintain business relationships. This code addresses various topics and establishes clear guidelines for actions and behavior, including the following points:

THE COMPANY

Actions within the society are based on values shared by all stakeholders, department heads, and employees of the company.

ENTREPRENEURIAL SPIRIT

We encourage our employees to be innovative. All decisions within the company are based on pragmatism and common sense, aiming to ensure balanced and profitable growth.

AUTHENTICITY

Transparency and exemplary behavior are the cornerstones of our relationships both internally and externally. We value the disclosure of information and clear communication to comprehensively inform stakeholders. This transparency extends across all areas, from corporate management to production and distribution.

We implement our company values such as authenticity through open disclosure of information. This actively contributes to positive societal change and strengthens the trust of customers, partners, and investors. This promotes an open and responsible business culture.

SHARING

We share our knowledge and continuously question ourselves, as this is the only way to recognize the true value of our ideas and strengthen our actions and projects. We share the achievements we make and the challenges that await us with our employees so that they not only stand on the sidelines but participate as responsible parties in our successes – and in our failures. We firmly believe that ethics and deontology are moral imperatives in leading our society, contributing to entrepreneurial success by projecting an image of a reputable, reliable, correct, and absolutely transparent company to the outside

world.

RESPECT

The foundation of every employment relationship is respect for individuals and individuality, for diverse cultural backgrounds and characteristics of employees, customers, suppliers, partners, and stakeholders. We are fully aware that each of our decisions and actions has impacts beyond the company, which is why we treat our environment and surroundings with the necessary respect.

SATISFACTION

We continuously support our employees in their development because we believe that constant growth is only possible when there is a strong sense of community that serves as inspiration for each individual. Only when our employees feel fulfilled are we able to satisfy our customers and improve our company's performance. In this way, and only in this way, can we achieve the goals we set for ourselves every day.

THE PRINCIPLES

Intellectual honesty is the ethical guiding principle that directs all activities of our company toward fulfilling its own vision and mission, regardless of the specific level within the company.

Anyone working for us must adhere to applicable state and European regulations, as well as internal or external behavioral codes of the society and, where applicable, professional ethics standards within the scope of their activities. A violation of these rules is never justified and will not be tolerated, even if such violation is based on an individual interpretation of values or in the interest of Tratter Engineering Srl.



DEFINITION OF PRINCIPLES

The company is committed to proper, impartial conduct that adheres to all regulations applicable in the countries where we operate. Our business relationships are guided by concepts such as integrity and loyalty, avoiding any personal or business conflicts of interest. Every individual employee must be guided by our principles. Whoever collaborates with our company, in any form, must align themselves with the principles we believe in.

CORRUPTION

Tratter Engineering Srl commits to financial responsibility and fair competition in all business areas. Any action that could compromise the impartiality and free judgment of the company is prohibited. To enforce this prohibition, the company takes all necessary measures to prevent and eliminate any form of corruption and behavior that may meet the criteria set forth in Legislative Decree No. 231/01. This includes accepting or offering money, gifts, or favors from third parties to provide direct or indirect benefits to the company. Our employees are strictly instructed not to accept, demand, or exert pressure for money, gifts, or benefits of any kind to influence the hiring, transfer, or promotion of an employee.

Furthermore, the company is committed to fair competition and prohibits actions, agreements, or arrangements that would restrict competition or enable anticompetitive agreements with competitors. We actively work to ensure that plagiarized parts do not enter the supply chain. If plagiarized items are discovered, we take appropriate steps to prevent damage and inform Tratter Engineering Srl accordingly.

CONFIDENTIALITY

The know-how acquired by Tratter Engineering Srl is a valuable and sensitive resource. Therefore, it must be appropriately protected by all employees, suppliers, and partners. Our company regards this know-how as strictly confidential, and we require all parties involved not to disclose this knowledge to third parties.

Employees, suppliers, and partners are required not to disclose or make technical, business, and strategic knowledge as well as development plans of Tratter Engineering Srl accessible. This obligation of confidentiality continues even after the termination of employment or the expiration of supply or consulting contracts.

The protection of our intellectual property and know-how is of utmost importance to us. Any violation of this duty of confidentiality is considered a serious offense and may have legal consequences. We expect our employees, suppliers, and partners to actively contribute to the security and protection of our confidential information and promptly report any security risks.

DATA PROTECTION AND SECURITY

Data protection and data security are our top priorities, as we intend to treat personal information securely and confidentially. Our strict data protection policies and modern security measures ensure that data is protected against unauthorized access, loss, or misuse.

We guarantee that all data is collected, processed, and stored in accordance with applicable data protection laws. Through continuous review and optimization of internal processes and technologies, we achieve the highest standards in this area.

Our dedicated team of internal and external experts work to consider all aspects of data security. This encompasses not only the physical security of the infrastructure but also extends to the secure transmission of data through digital channels.

CONFLICTS OF INTEREST

Every decision and entrepreneurial step of Tratter Engineering Srl is grounded in ethical considerations. It's not solely about optimizing the company's balance sheet. Conflicts of interest arise for us whenever an employee pursues interests other than those articulated in the company's vision and mission, gains personal advantages within the company's business activities, or abuses the trust placed in them and their position within the company. We do not tolerate any situation that directly or indirectly constitutes a conflict of interest.

PRINCIPLES OF CONDUCT

Our employees in management, controlling, and administration are required to actively contribute to ensuring that the company and all its employees can derive ethical and transparent benefits from their specific competencies. They are encouraged to actively promote improved collaboration by, for instance, timely informing their respective superiors about controversies and potential conflicts of interest. They are to treat information they become privy to in the course of their work confidentially, prioritize the fulfillment of Tratter Engineering Srl's vision and mission above any individual interest, regardless of whether it's the interest of an employee, a customer, or a stakeholder.

EXPORT CONTROLS AND ECONOMIC SANCTIONS

Compliance with export controls and economic sanctions is of central importance to us, as we wish to conduct our business activities responsibly and in line with international regulations. We are committed to ensuring that our products and services do not reach countries subject to embargoes or sanctions.

Our suppliers and business partners are also expected to adhere to these guidelines, ensuring that our entire value chain meets the highest ethical standards. We continuously review the legal framework and adjust our processes accordingly to minimize potential risks.

RESOURCE USAGE

Our employees are directed to act responsibly while always respecting the procedures prescribed for dealing with corporate resources. Where required, the use of such resources is to be documented. It is not allowed to utilize company assets for personal

gain, except in cases where they have been provided as benefits or with explicit authorization from management.

SUSTAINABILITY

Tratter Engineering Srl, along with its stakeholders, is committed to contributing to environmental preservation within the scope of its activities by consistently maintaining the necessary balance between economic interests and those of the community and environment. We assess and select all our stakeholders based on their ability to provide alternatives to environmentally damaging production methods. We prefer and promote the use of products manufactured using environmentally friendly methods and, wherever possible, oriented towards energy conservation and sustainability.

HUMAN RIGHTS

Our company is committed to providing all employees with equal rights and opportunities, including opportunities for advancement within the company. Advancement is not limited to specific academic qualifications; rather, anyone can apply for positions within the company based on their respective abilities, even in management and administration.

Tratter Engineering Srl does not tolerate any discrimination based on age, gender, sexual orientation, health status, race, nationality, or political or religious beliefs. Modern slavery in any form is firmly rejected and combated. We advocate for diversity and inclusion in the workplace and promote a positive corporate culture that ensures the respect and dignity of all employees.

Furthermore, we respect the rights of minorities and indigenous peoples and ensure that their interests are acknowledged and protected. Tratter Engineering Srl is committed to respecting and promoting human rights in all aspects of its business activities.

PROMOTION OF TRANSPARENT CORPORATE CULTURE

Whistleblowing, which involves reporting violations or ethical concerns, is a crucial component of our efforts towards integrity and transparency. We encourage all our employees, business partners, and suppliers to report potential violations of our policies without fearing any retaliation.

Our policy for reporting violations provides clear and confidential channels through which concerns can be raised. We ensure that these reports are taken seriously and treated appropriately. We guarantee protection from retaliation for those making reports and ensure their anonymity if they wish.

By promoting a transparent corporate culture where concerns can be reported, we contribute to the early detection and resolution of legal and ethical risks.

SUPPLIERS

Tratter Engineering Srl requires its suppliers, contractors, subcontractors, and external workers to adhere to the ethical principles derived from the company's mission and vision, as outlined in this document. While selecting suppliers, Tratter Engineering Srl considers maximizing competitive advantage, but also evaluates technical and economic capabilities beyond mere economic suitability, including the reliability of the contractual partners. All relationships with suppliers and external workers are governed by appropriate contracts that ensure maximum transparency in the relationship between the company and its partners. Relationships with suppliers are built on the foundation of good faith. This principle primarily implies that personal gifts or favors must not be offered or accepted if they could influence decisions or behavior, no matter how minimal. Suppliers themselves are obligated to apply this principle to their partners. Beyond the principle of good faith, Tratter Engineering Srl reminds its suppliers of the specific requirements listed below, which the suppliers accept.

Furthermore, suppliers must adhere to the following principles of Tratter Engineering Srl:

- Child labor is unacceptable to us. Workers must not be younger than what the corresponding law permits, and in no case younger than 14 years.
- The workplaces of individuals directly or indirectly employed by our company must be dignified, healthy, and safe.
- The freedom to unionize and the right to collective bargaining must be granted to every worker and ensured accordingly.
- Working hours must comply with legally and industry-prescribed standards; overtime must not exceed legal limits and should be compensated.
- Every worker must be compensated at least to the extent prescribed by relevant legal regulations and must have equal access to all social benefits provided by law.

IMPRINT

Tratter Engineering Srl
Waltraud Gebert-Deegstr. 10
39100 Bolzano

Tel. +39 0471 06 40 00
Email: info@trattereng.com
Website: www.trattereng.com

Tratter Engineering Srl: Registered in the Bozen Chamber of Commerce Register No.: BZ-156223
VAT ID: IT 01674780216

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