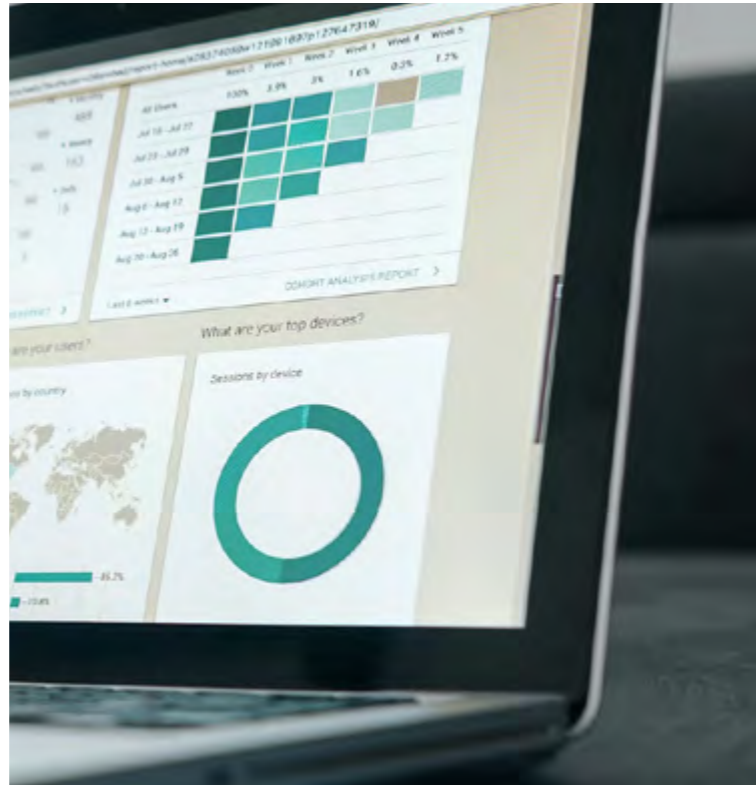




Code of Conduct

Compliance at TOX® PRESSOTECHNIK

www.tox.com



CODE OF CONDUCT

Table of contents

Foreword	4
Our responsibility for compliance	6
Human rights	7
Cultural diversity, inclusion, anti-discrimination, equal opportunities and equal treatment	8
Rights of minorities and indigenous peoples	8
Land, forest and water rights and eviction	8
Use of private or public security forces	9
Standards of cooperation	10
Gifts, hospitality and invitations	10
Conflicts of interest	11
Donations, sponsoring and charity	12
Political representation of interests	13
Dealing with public officials and elected representatives	14
Prohibition of money laundering and terrorist financing	15
Environment and sustainability	16
Product conformity and safety	17
Taxes and customs duties	18
Export control	19
Procurement	20
Accounting and financial reporting	21
Occupational health and safety	22
Freedom of association and collective bargaining	22
Fair wages, salaries and social benefits	22
Reasonable working hours	23
Healthy and safe working conditions	23
IT security	24
Privacy policy	25
Security and protection of information, knowledge and intellectual property	26
Corruption	27
Fair and free competition	28
Dealing with company assets	29

Foreword

We are all committed to complying with applicable laws and regulations and making our daily decisions based on our corporate values and the principles of the Code of Conduct. The Code of Conduct provides us with practical guidance and advice. It also helps us to recognize misconduct and irregularities and to react appropriately.

Entrepreneurial activity means responsibility. Responsibility towards our business partners, employees and colleagues.

Thinking and acting ethically is our declared goal.

We do not limit ourselves to compliance with applicable local laws, but also demand respect for international conventions, such as those for the protection of human rights, anti-corruption and sustainability, as well as respect for our internal corporate values and guiding principles.

This Code of Conduct is intended to serve as a guide for company management and all employees in their daily dealings with our business partners, employees, colleagues and the public. The aim is to ensure legally compliant behavior and to protect our employees from misconduct.

We define the Code of Conduct for us as TOX® PRESSOTECHNIK INTERNATIONAL GmbH & Co. KG and for all our subsidiaries and affiliated companies and therefore refer to TOX® PRESSOTECHNIK in the document without the respective local company name. The Code of Conduct applies to us as well as to companies and representatives representing us.

For reasons of better readability, the masculine form is used when referring to persons and personal nouns. Corresponding terms apply to all genders in the interests of equal treatment.

Dear colleagues,

Let's work together to firmly anchor these principles in our everyday lives. Together, we will secure the path to the future for ourselves and future generations - as a responsible employer, reliable partner, international technology company and passionate mechanical engineering company.



Susanne Eberhardt



Eugen Rapp



Stefanie Reich



Dietmar Weik



Our responsibility for compliance

The success of our company depends crucially on all of us, i.e. shareholders, management, executives and each individual employee, behaving honestly, with integrity and ethically correctly. This also means that we report and communicate truthfully, comprehensively and in good time, both internally and externally.

Our common goal is to take responsibility for our company. In line with the principle of sustainability, we are aware of our responsibility for the economic, social and ecological impact of our actions. This also includes ensuring that the rules that apply within the company are observed and adhered to by all of us at all times and everywhere.

Our managing directors and managers have a special and responsible role to play here: they act as role models and must prevent irregular behavior within the company, protect their employees and represent the company with integrity both internally and externally. This Code of Conduct helps us by highlighting potential areas of risk and conflict as well as their significance for our company and explaining them using case studies.

The Code of Conduct serves as a binding guideline for our day-to-day work. It is supplemented by internal guidelines and regulations, company agreements and employment contracts. In addition, we naturally comply with national and international legal regulations. This also means that we do not participate in activities that are based on fraud, embezzlement, blackmail, theft, embezzlement or other deliberate damage to the assets of our customers or third parties.

Non-compliance with the Code of Conduct can lead to considerable damage, not only for our company, but also for us as employees and for our business partners and shareholders. The Code of Conduct is therefore binding for all of us, regardless of whether we are employees, managers or directors in the company.

We do not tolerate violations of the Code of Conduct. Anyone who violates the Code of Conduct must expect appropriate consequences, which – depending on the severity of the violation – can range from labor law measures to civil claims for damages and criminal sanctions.

To prevent this from happening, it is the responsibility of each and every one of us to familiarize ourselves with the contents of the Code of Conduct, to incorporate it into our own conduct and to take it into account when making decisions. In cases of doubt, we ask for competent advice.

Human rights

The United Nations Universal Declaration of Human Rights and the European Convention for the Protection of Human Rights and Fundamental Freedoms set out the requirements and expectations of the international community with regard to respect for and observance of human rights. TOX® PRESSOTECHNIK is committed to complying with local and global human rights standards. We prohibit all forms of forced, child and compulsory labor as well as all forms of modern slavery and human trafficking at all TOX® PRESSOTECHNIK sites. We also stand for fair pay and respect employee rights and applicable working time standards. This applies not only to cooperation within our company, but of course also to the conduct of and towards business partners.

Every individual's contribution

As an employee, I can also make a contribution to respecting human rights. I observe human rights as a fundamental guideline and am vigilant against human rights violations that occur in my environment. If I have indications of human rights violations in my professional environment, I ensure that these violations are prevented or remedied. If necessary, I inform my line manager or the committee against bullying, discrimination and sexual harassment appointed by the Works Council. The neutral whistleblowing platform at <https://tox.com/en-en/company/headquarter-de> is also available.

Example

You are responsible for purchasing certain goods. You receive information that children are employed in the supplier's production facilities or that employees are working under inhumane conditions (e.g. are exposed to health risks). Take the necessary steps and inform your line manager and the responsible departments for sustainability in supplier relations. Our company must examine the business relationship with this business partner more closely and terminate it if necessary.



Cultural diversity, inclusion, anti-discrimination, equal opportunities and equal treatment

Characterized by our decentralized structures, we practice intercultural exchange regardless of origin, race, ethnic background or religion.

This applies equally to physical disabilities, gender or any other characteristics that set us apart. The diversity of our employees and mutual respect play a central role in the success of our company. We do not discriminate against anyone and do not tolerate discrimination on the basis of ethnic or national origin, gender, religion, ideology, age, disability, sexual orientation, skin color, political views, social background or other legally protected characteristics. We embrace diversity, are actively committed to inclusion and create an environment that promotes the individuality of each person in the interests of the company. The selection, recruitment and promotion of our employees is always based on their qualifications and skills.

Rights of minorities and indigenous peoples

We uphold and respect the rights of minorities and indigenous peoples. Our actions should be guided by international standards that define the principles of equal treatment and respect for the cultural identity of indigenous communities.

Land, forest and water rights and eviction

TOX® PRESSOTECHNIK and its suppliers are committed to fully respecting and upholding land, forest and water rights and protecting against forced evictions. We are actively committed to ensuring that our business activities are in line with internationally recognized standards. Our actions aim to respect and protect the rights of local communities in relation to their territorial resources, in particular by avoiding forced evictions and the deprivation of land, forests and water when acquiring, developing or otherwise using these resources. The goal is sustainable and fair use that takes both environmental and social concerns into account.

Use of private or public security forces

TOX® PRESSOTECHNIK and its suppliers will not tolerate the assistance of private or public security forces that commit violations or act illegally as described in risk management. These security forces should focus their role solely on ensuring the safety of employees, facilities, equipment and property in accordance with the principles of the rule of law, including laws that guarantee human rights.

Contribution of each individual

I respect the principles of equal opportunity and equal treatment and encourage those around me to do the same. If I observe violations of the principles of cultural diversity, anti-discrimination, equal opportunities and equal treatment (e.g. through discrimination, harassment and bullying), I draw the attention of the people concerned to their misconduct. If I am unable to exert any direct influence on what is happening, I report the incident to the HR department or contact the committee appointed by the works council to combat bullying, discrimination and sexual harassment. The neutral whistleblowing platform at <https://tox.com/en-en/company/headquarter-de> is also available.

Example

You learn from a colleague in another department that an applicant was rejected because of his religion and skin color, even though he was the most suitable candidate for the advertised position.

Please help to clarify the matter and report the case to the HR department immediately so that they can take appropriate action.



Standards of cooperation

We expect the highest level of integrity from all employees in our companies. If employees violate existing guidelines, rules or regulations in the course of their work or through their behavior, the employees concerned must expect disciplinary measures. We want to work together in a trusting and constructive manner and adhere to the following principles:

Gifts, hospitality and invitations

Benefits in the form of gifts, hospitality and invitations are widespread in business relationships. Provided that these benefits remain within reasonable limits and do not violate internal or legal regulations, they are not objectionable. However, if such benefits exceed these limits and are used to influence third parties, this may be punishable by law. Our internal guidelines on dealing with gifts, hospitality and invitations to events regulate which benefits are appropriate and which review steps must be observed when accepting and granting benefits.

Contribution of each individual

I familiarize myself with the guidelines on handling gifts, hospitality and invitations and strictly adhere to them. I review my behavior in this context to determine whether conflicts of interest exist or could arise.

Example

A representative of a TOX® PRESSOTECHNIK supplier gives you, as a purchaser, a valuable Christmas present.

Even if you believe that the business relationship will not be affected by accepting the gift, the value of the gift should not exceed the amount specified in the applicable internal guidelines. If you have any doubts, do not accept the gift. If you are concerned that rejecting the gift could be taken the wrong way, contact your line manager and agree a solution with them. If necessary, the gift should be handed in to the responsible office in the company. The hand-over will be documented for your personal protection.

Conflicts of interest

All employees of our companies are obliged to avoid activities that could lead to a conflict of personal interests with the interests of TOX® PRESSOTECHNIK. Business matters should never be influenced by personal interests. No one may abuse their position in order to gain a personal advantage. A potential conflict of interest exists when the private interests of one of our employees collide or may collide with the interests of TOX® PRESSOTECHNIK. Such a conflict of interest may arise in particular from secondary employment. If an employee places his or her personal interests above those of the company, this can be detrimental to the company.

Contribution of each individual

I avoid even the appearance of a conflict of interest and disclose any apparent or actual conflict of interest to my line manager and the responsible HR department. Together we look for solutions that do not compromise the interests of the company.

Example

Your boss asks you to check the offers of several suppliers for production parts. You discover that one of the most favorable offers comes from a good friend's company. Inform your line manager about the situation and withdraw from the decision-making process to avoid any appearance of a conflict of interest.



Donations, sponsoring and charity

TOX® PRESSOTECHNIK makes donations (i.e. donations on a voluntary basis without consideration) and sponsorships (i.e. donations on the basis of a contractually agreed consideration) with the aim of positively shaping our reputation and perception in the public eye. In order to avoid conflicts of interest and to ensure uniform behavior within the company, donations and sponsoring measures are only permitted within the framework of the respective legal system and in accordance with the current internal regulations of TOX® PRESSOTECHNIK. We make donations in cash and in kind for the following areas: Science and research, education, charitable purposes, sport, culture. In addition, donations are only made to institutions that are recognized as charitable or are authorized to accept donations by special regulations. Donations and sponsorship measures are only granted within the framework of a transparent approval process.

Contribution of each individual

If I consider a sponsorship worthy of support, I contact the relevant departments within the company (e.g. Communications, External Relations and Marketing) in advance. Donations are made transparently, i.e. the purpose, the recipient of the donation and the donation receipt from the recipient are documented and verifiable. I adhere to internal processes and do not make donations that could damage our company's reputation.

Example

A local politician asks you, as Managing Director of TOX® PRESSOTECHNIK, for a financial donation from the company for the election campaign. Turn down the request. Donations may only be made after the required approval procedure has been carried out. Approval of the donation cannot be granted in this specific case, as an internal guideline excludes donations to parties, party-affiliated institutions or politicians.

Political representation of interests

Politics and legislation influence the economic framework conditions for economic activity. TOX® PRESSOTECHNIK also influences society through its participation in business dealings and could introduce the company's positions into decision-making processes (e.g. legislative projects) as part of political lobbying. Neutrality in our dealings with political parties and interest groups is a matter of course for us. Unfair influence on politics and legislation is not permitted.

Contribution of each individual

I do not attempt to influence political decisions on behalf of the company unless I have been authorized to do so. If I have been authorized to do so, I adhere to the relevant internal guidelines when performing my duties.

Example

An acquaintance of yours is a member of the state parliament. You know that a bill of importance to TOX® PRESSOTECHNIK is currently being discussed in the state parliament. You consider contacting your friend to explain the interests of TOX® PRESSOTECHNIK in connection with this proposed legislation. Do not approach your friend about this topic. Lobbying in the company only takes place in a centrally coordinated, open and transparent manner. The correct contact for such lobbying measures is the management.



Dealing with public officials and elected representatives

Special legal conditions often apply when dealing with public officials or elected representatives as well as governments, authorities and other public institutions, whereby even individual violations can have serious consequences and permanently exclude TOX® PRESSOTECHNIK from being awarded public contracts. Our contacts with public officials and elected representatives are strictly based on the law and the relevant internal regulations to avoid conflicts of interest and corruption. We also do not make any facilitation payments, i.e. payments to public officials to speed up routine official acts.

Contribution of each individual

I am aware that particularly strict rules apply when dealing with public clients and I inform myself about these. The contact person is the External Relations Department.

Example

You know that a public authority is planning to put a major contract out to tender. You consider asking the public authority employee responsible for the tender, whom you know from a previous project, to design the tender in such a way that TOX® PRESSOTECHNIK wins it. It is imperative that you refrain from doing this. Influencing in this way would be illegal.

Prohibition of money laundering and terrorist financing

Almost all countries in the world have laws against money laundering and terrorist financing. Money laundering occurs when money or other assets originating directly or indirectly from criminal acts are brought into the legal economic cycle and their origin is thus concealed. Terrorist financing occurs when funds or other resources are made available for terrorist offenses or to support terrorist organizations. Liability for money laundering does not require the person involved to be aware that money is being laundered through the legal transaction or transfer in question. Even unintentional involvement in money laundering can result in severe penalties for all those involved. We carefully check the identity of customers, business partners and other third parties with whom we wish to do business. It is our declared aim to maintain business relationships only with reputable partners whose business activities comply with legal regulations and whose operating resources are of legitimate origin. We immediately allocate incoming payments to the corresponding services and post them. We ensure transparent and open payment flows.

Contribution of each individual

I do not take any measures that could violate domestic or foreign money laundering regulations. I am vigilant and investigate suspicious behavior by customers, business partners and other third parties. If there are indications that could give rise to such suspicions, I immediately contact my line manager or Human Resources.

I comply with all applicable regulations on recording and accounting for transactions and contracts in my area of responsibility.

Example

A customer of TOX® PRESSOTECHNIK who has overpaid asks for a refund not by bank transfer to his original business account, but by transfer to a personal account or by cash payment. Such a request requires explanation. Do not accept the suggestion without further ado, but ask the customer why the repayment cannot be made in the same way as the original payment. Seek advice from your line manager or HR.



Environment and sustainability

We are committed to our environment and want to make an active contribution to environmental protection. Sustainable management is therefore a priority for us. We strive to design our processes in such a way that the impact on our environment is minimized.

We strive to keep waste and emissions as low as possible and to use energy and other resources responsibly. We store and dispose of hazardous substances safely and in accordance with regulations. We rely on environmentally friendly, advanced and efficient technologies and implement these throughout the entire life cycle of our products. As early as the development and production stages, we pay attention to the careful use of natural resources, a continuous reduction in environmental impact and compliance with environmental protection laws and regulations.

Contribution of each individual

Within the scope of my work, I take into account the concerns of environmental protection and use resources and energy appropriately and sparingly. I ensure that my activities have the least possible negative impact on the environment and that they comply with environmental protection laws and regulations.

Example

You notice that large quantities of oil are leaking from our assembly hall and seeping into the ground. Inform a responsible employee immediately and draw their attention to the problem. Do not rely on someone else to report it.

Product conformity and safety

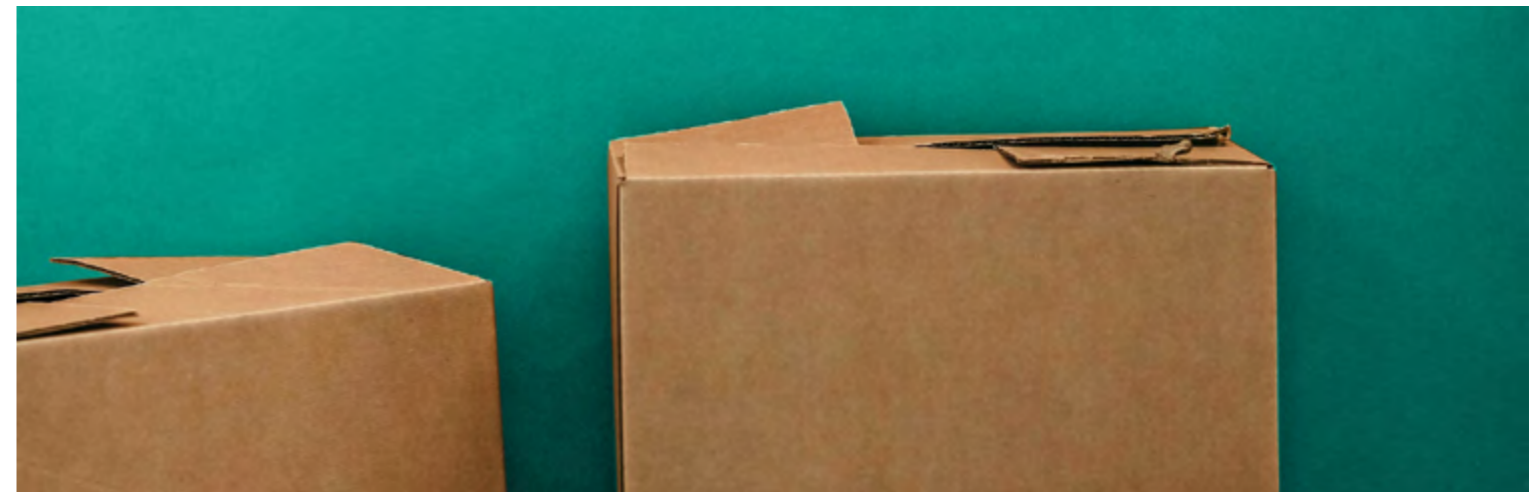
Countless customers come into contact with our products and services every day. TOX® PRESSOTECHNIK has a responsibility to eliminate as far as possible the risks, disadvantages and dangers to the health, safety, environment and assets of our customers or third parties resulting from the handling of these products and services. It is not only a legal obligation, but also our aspiration to comply with the legal and official regulations and internal standards that apply to our products. Our products correspond to the current state of the art and are developed in accordance with legal requirements. This is ensured continuously and systematically through processes and structures as well as product monitoring of the presses/components in the field. We make no compromises here. We ensure that suitable measures can be initiated in good time in the event of any deviations.

Contribution of each individual

If I notice or have concerns that our products may pose a risk or that regulations are not being complied with, I take action to prevent this. I report the case to my line manager and the relevant departments in the company, for example the product safety officer in my area.

Example

A customer reports problems with a small press. You are not sure whether the cause is an operating error on the part of the customer or a production or design fault. Raise the issue. It must be ensured that a problem for which our company is responsible is rectified. A customer's operating error may also require a response from the company (e.g. adaptation of operating instructions or application training).



Taxes and customs duties

Due to our global activities and the development of new markets, a wide range of foreign trade, tax and customs regulations must be complied with. Compliance with tax and customs regulations creates trust among customers, tax authorities and the public. If irregularities occur, TOX® PRESSOTECHNIK may suffer considerable financial losses and serious reputational damage, and the employee responsible must also expect negative consequences. We are aware of our social responsibility in fulfilling our tax and customs obligations and are expressly committed to complying with national and international legislation.

Contribution of each individual

I design the internal structures and processes in such a way that the taxes and customs duties to be paid by the respective subsidiaries are determined completely, correctly and on time, recorded in the reporting and paid to the responsible tax authorities.

If I recognize indications of violations of tax and customs regulations in my professional environment, I take every opportunity to prevent or remedy these violations. If this is not possible, I get in touch with the relevant contacts in the tax and customs department.

Example

You are responsible for recording certain business transactions in the financial statements under commercial law, such as material overheads (maintenance expenses) and production costs. A project exceeds certain key controlling figures at an early stage. For this reason, you receive an instruction to post maintenance expenses, although there is no doubt that this is an investment and therefore production costs must be capitalized. Always post in accordance with the legal requirements. All business transactions must be recorded in the accounting system in accordance with commercial and tax regulations, as the accounting system forms the basis for the tax return. Errors in accounting can therefore lead to incorrect tax returns and serious tax and customs consequences for the company and the employees responsible.

Export control

Cross-border trade is subject to prohibitions, restrictions, authorization requirements or other monitoring measures within the scope of export controls. In addition to goods, technologies and software are also affected by export control regulations. In addition to the actual export, temporary exports, such as taking items and technical drawings on business trips, as well as technical transfers, for example by email or cloud, are also covered. Irrespective of the delivery process, transactions with persons or companies on sanctions lists are still prohibited. We ensure compliance with all regulations for the import and export of goods, services and information.

Contribution of each individual

When making decisions on the import or export of products and services, I check whether this decision may be subject to export controls. In cases of doubt, I seek advice from the department responsible for customs and foreign trade law.

Example

You receive an inquiry from a potential customer who would like to place an order with TOX® PRESSOTECHNIK to supply products to a country that has been defined as an embargoed country. In consultation with the responsible department, clarify which export restrictions apply to the country to be supplied (e.g. a United Nations embargo) and do not conclude any contracts that oblige the company to export to this country before a complete review has been carried out.



Procurement

TOX® PRESSOTECHNIK is contractually bound to a large number of suppliers and service providers in its business activities. We carefully select suppliers and service providers according to objective criteria. When purchasing products and services, we involve the responsible purchasing departments in accordance with the relevant procurement principles. We have summarized our sustainability requirements in the sustainability guidelines for our suppliers.

Contribution of each individual

I do not unilaterally favor a supplier or service provider without objective reason and avoid any conflict of interest. I do not purchase any products or services without having informed myself in advance about the market and alternative providers. I observe the applicable procurement principles and involve the responsible purchasing department at an early stage in the purchasing process.

Example

You become aware that a TOX® PRESSOTECHNIK employee wants to commission a supplier without involving the responsible purchasing department. Contact the responsible purchasing department or the management to ensure that the most economical offer for the Group is used.

Accounting and financial reporting

TOX® PRESSOTECHNIK can only create and maintain the trust of the public and its shareholders and contractual partners through proper accounting and correct financial reporting. If irregularities occur, this may have serious consequences for the company and also for the persons responsible. We strictly adhere to the legal framework for proper accounting and financial reporting. Transparency and correctness are our top priority. With this in mind, we regularly inform all shareholders about the current financial situation and the course of business.

Contribution of each individual

I organize the processes so that all business financial data can be recorded correctly and on time in the accounting system. I contact my line manager or the relevant finance department if I have any questions about the correct recording of data. If the budget needs to be adjusted, this can be done by the management.

Example

You urgently need a new piece of equipment. However, the budget in your department has already been exhausted for the current financial year. You are considering purchasing the equipment anyway and posting the costs in the next financial year when your budget has been replenished. Please refrain from doing this. Entries must always be made in accordance with the principle of causation. Incorrect postings can have serious consequences for the company and the individual employee.



Occupational health and safety

The health and safety of our employees is our top priority.

We, as a company, are responsible for a safe working environment at all workplaces within TOX® PRESSOTECHNIK. The basis for this is, among other things, our distinctive occupational safety management.

In addition, we encourage each individual employee to ensure a safe and healthy working environment. Not only for themselves, but also for their colleagues and employees. Our declared goal is accident-free working. To achieve this and to sensitize our employees to recognize hazards and prevent injuries, regular occupational safety training is the first choice. We make our occupational safety measures transparent and learn from each other through constructive discussions. We are open to new ideas and want to continue to develop.

Freedom of association and collective bargaining

We recognize the rights of workers to associate freely with others with respect to collective bargaining. Not to discriminate, harass, intimidate or retaliate against individuals who exercise their legal right to freedom of association and collective bargaining.

Fair wages, salaries and social benefits

We pay all employees fairly by providing compensation packages consisting of wages or salaries and social benefits that at least meet the statutory minimum standards. We compensate employees for overtime work at a rate that meets or exceeds the legal minimum wage. In the event that no such statutory minimum applies, we pay overtime premiums based on industry benchmark standards or collective agreements, as applicable. This regulation forms the basis of all local company agreements and must be observed.

Reasonable working hours

We assign tasks according to local regulations. The statutory limits for regular working hours and overtime are not regularly or regularly exceeded.

Healthy and safe working conditions

We ensure a clean, safe and healthy working environment that is appropriately designed to prevent accidents and damage to health that could occur due to known hazards in the workplace. We operate the sites or production facilities in accordance with the applicable, legally prescribed standards for occupational health and safety in the countries and communities in which they are located.

Contribution of each individual

I comply with occupational health and safety regulations. I never endanger the health and safety of my colleagues or business partners. I take all reasonable and legally required measures within the scope of my authority to ensure that my workplace is always safe to work in. By voluntarily taking advantage of prevention and health promotion measures, I make an active contribution to maintaining and promoting my health.

Example

You notice that a machine in your department has an obvious defect in the electronics. Take the machine recognizably out of operation and inform the responsible supervisor. It is not permitted and can be dangerous to repair electrical equipment yourself.



IT security

Information technology (IT) or electronic data processing (EDP) is an integral part of TOX® PRESSOTECHNIK's day-to-day work, but it harbors a number of risks. These include, in particular, the impairment of data processing by malware (viruses), the loss of data due to program errors or the misuse of data (e.g. by hackers). We pay attention to IT and EDP security and adhere to the applicable regulations.

Contribution of each individual

I familiarize myself with the applicable IT security guidelines and adhere to the requirements set out therein. I am aware that unencrypted data exchange (e.g. by e-mail or USB stick) is not a secure means of communication.

Example

You are traveling and receive a USB stick to exchange a document during a meeting. Only use data carriers or systems provided by TOX® PRESSOTECHNIK for data exchange and act in accordance with the specifications for information classification. For example, have the document sent to you by e-mail. However, never open e-mails and their attachments that appear suspicious or that you receive from unknown persons; this will prevent malware from entering the company network.

Privacy policy

We take the data protection of our business partners and our employees equally seriously. Every employee of our organization is obliged to comply with local data protection laws. This means that personal data of our business partners may not be collected, processed or used by employees and third parties without their consent or legal permission. For further information on this, please refer to our data protection notice on our website.

Contribution of each individual

I take into account that the collection, storage, processing and other use of personal data may only take place with the consent of the data subject, with a contractual provision or on another legal basis. All components of information processing must be secured in such a way that the confidentiality, integrity, availability, verifiability and resilience of the information worthy of protection is guaranteed and unauthorized internal and external use is prevented. In cases of doubt, I contact my line manager or the office responsible for data protection.

Example

You have organized a training course for TOX® PRESSOTECHNIK with external participants and received personal data of the participants. A colleague from the sales department asks you to pass on the addresses. Do not pass on this data without consulting your line manager or the person responsible for data protection. Data may only be used for the purpose for which it was provided.



Security and protection of information, knowledge and intellectual property

TOX® PRESSOTECHNIK holds internationally protected patents and also possesses extensive trade and business secrets as well as technical know-how. This knowledge is the basis of our business success. The unauthorized disclosure of such knowledge can cause very high damages to the company and have consequences under employment, civil and criminal law for the employee concerned. We are aware of the value of proprietary know-how and protect it very carefully. We recognize the intellectual property of competitors, business partners and other third parties. We work exclusively with legally acquired software licenses and exclude the use of illegal software.

Contribution of each individual

I handle all TOX® PRESSOTECHNIK information with care and do not pass it on without authorization. I pay particular attention to information relating to technical know-how, patents, trade and business secrets.

Example

You are involved in the development of an innovative technology. You are to present your development at various company locations and want to take your laptop with you for presentation purposes, on which the relevant documents are stored. You intend to go through these documents again on the way to the individual locations on the plane or train. You must ensure that no one gains knowledge of sensitive information belonging to TOX® PRESSOTECHNIK. Failure to do so may result in serious competitive disadvantages. Do not retrieve such information in places where third parties can access it or take note of it.

Corruption

Corruption is a serious problem in business transactions. It leads to decisions being made for improper reasons, prevents progress and innovation, distorts competition and damages society. Corruption is prohibited. It can result in fines for TOX® PRESSOTECHNIK and criminal sanctions for the employees involved.

The quality of our company's products and services is the key to our success. We do not tolerate corruption. We only grant benefits to business partners, customers or other external third parties within the legally permissible framework and defined guidelines.

Contribution of each individual

I never bribe others and never allow myself to be bribed, whether directly or indirectly. I inform myself on my own responsibility about the internal regulations before giving or accepting gifts, invitations and hospitality. If I receive any indications of corruption, I report them immediately to my line manager or Human Resources.

Example

You are responsible for sales and would like to exceed your sales target for this year. You are preparing a bid for a major contract put out to tender by a potential customer. The responsible decision-maker at the customer offers to influence the award of the contract in favor of your company in return for an appropriate expense allowance. This constitutes corrupt behavior. Inform your line manager or Human Resources immediately.



Fair and free competition

Fair and free competition is protected by the applicable competition and antitrust laws. Compliance with these laws ensures that there is no distortion of competition on the market for the benefit of all market participants. In particular, agreements and concerted practices between competitors that have as their object or effect the prevention or restriction of free competition are prohibited. It is also illegal to abuse a dominant market position. Such abuse can occur, for example, in the case of different treatment of customers without objective justification (discrimination), refusal to supply, the enforcement of unreasonable purchase or sales prices and conditions or in the case of tying transactions without objective justification for the additional service demanded.

Anti-competitive behavior can not only cause considerable damage to the good reputation of TOX® PRESSOTECHNIK, but can also result in severe fines and penalties. We conduct business exclusively on the basis of the principle of performance and on the basis of the market economy and free, unhindered competition.

We like to measure ourselves against our competitors and always adhere to the law and ethical principles. We do not enter into anti-competitive agreements with competitors, suppliers or customers. If our company has a dominant market position, we do not abuse it. In our dealings with our authorized sales partners, we comply with the specific antitrust regulations for distribution systems.

Contribution of each individual

In any contact with competitors, I ensure that no information is received or given that would allow conclusions to be drawn about the current or future business behavior of the person providing the information. In discussions or other contact with competitors, I avoid topics that are relevant to competition. This includes prices, pricing, business planning, development status or delivery times.

Example

At a trade fair, you talk to a competitor's employee. After a short time, you realize that the person you are talking to is trying to elicit information about TOX® PRESSOTECHNIK's future business plans. In return, the person you are talking to offers to disclose corresponding information from his company.

Make it immediately and unmistakably clear to the other party that you will not discuss these topics with them. In addition to the unauthorized disclosure of business secrets, such a conversation would constitute a violation of the applicable competition and antitrust laws and can have drastic consequences for you personally and our company as well as for the other party and their company. Document this conversation and inform your line manager immediately.



Dealing with company assets

The tangible and intangible assets of TOX® PRESSOTECHNIK serve to support our employees in achieving the company's business objectives and may only be used within the framework of company regulations. We respect the tangible and intangible assets of the company and do not use them for non-business purposes.

Contribution of each individual

I adhere to the company regulations and handle company assets carefully and with care.

Example

Your soccer club is planning a team trip for the weekend. The coach asks you if you, as an employee of TOX® PRESSOTECHNIK, can organize a company vehicle from the fleet. As a rule, company vehicles can also be hired by employees at normal market conditions. You may neither use company vehicles for private purposes nor make them available to third parties free of charge.

Management Board of TOX® PRESSOTECHNIK INTERNATIONAL GmbH & Co.KG

Eugen Rapp

Susanne Eberhardt

Stefanie Reich

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