



TRUMPF

Code of Conduct





Compliance is for TRUMPF a responsibility that we all bear every day. Nicola Leibinger-Kammüller

Dear colleagues,

The word „Compliance“ represents our responsibility to comply with the law.

Compliance is a matter for all of us; employees, managers and business partners. The manner in which we each conduct ourselves in our everyday professional lives is of great importance. As the Board, we have therefore decided to summarize the basic rules that we all have to observe with regard to ethical conduct in business operations in this Code of Conduct. This Code of Conduct is designed to provide orientation in our everyday professional lives, especially in critical situations.

As the Board and as a business family, we want to create a company culture in which everyone abides by the rules as a matter of course, but are also free to express their questions and concerns openly. Everyone should act in compliance to this code and the values of TRUMPF.

Compliance is not a buzzword for TRUMPF, but a responsibility that we all bear every day. As the Board, we act according to these values and do everything we can to ensure that everyone at TRUMPF does the same.

I thank you all for your commitment.

Yours sincerely, Nicola Leibinger-Kammüller
Chairwoman of the Group Management Board



Dear Colleagues,

Compliance comes down to having the right attitude.

Our TRUMPF Code of Conduct and values form the foundation for our shared commitment to compliance. They shape the culture of our daily work and are a reflection of our attitude.

If you are unsure about the integrity of your behavior, use these principles as a guide and listen to your gut. Acting intuitively based on a gut feeling is often the best choice. Trust your instincts!

In this context, it is also important that our managers lead by example. They must strictly adhere to compliance regulations and promote the Code of Conduct and TRUMPF values to ensure that they are consistently enforced.

A sustainable compliance culture is our common goal. It is the best prevention against rule violations and a guarantee for our long-term success.

Together, we can firmly enshrine compliance in our corporate culture as a fundamental principle of our daily work. Let's adopt the right attitude.

Because TRUMPF lives compliance and everyone joins in!

Christian Greger
Chief Compliance Officer & General Counsel

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01

About our Code of Conduct

Why do we have a Code of Conduct?

Our Code of Conduct is intended to provide each individual at TRUMPF with guidance on how best to act. It therefore includes the most important rules of conduct for everyday professional life. By providing this information, the Code of Conduct looks to ensure that everyone at TRUMPF conducts themselves in an ethical and responsible manner.

Who does the Code of Conduct apply to?

Everyone at TRUMPF – no matter what role they have in the company, no matter where in the world they are based – they must adhere to the principles of conduct. In addition, all managers must provide their employees with guidance and support so that they can all make the right decisions and conduct themselves lawfully.





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Our highest principle of conduct: We adhere to the law.

What exactly does that mean?

Unlawful conduct is contrary to the interests of TRUMPF because it is unethical, damages the company's reputation and can result in severe penalties.

Our principle of conduct

It is in accordance with our fundamental values that we comply with the law - in all countries in which we operate. Employees who act unlawfully must be aware that they themselves may be at risk of criminal prosecution. Lawful conduct therefore also protects the employee.

What does this mean for me?

- I inform myself about and comply with the applicable regulations in my area of responsibility.
- If I have any questions or concerns, I am to contact my manager, the local Compliance Officer of my subsidiary, the Compliance Team or the TRUMPF experts responsible for the respective topic.

Example

A business partner gives you an expensive Christmas present.

Why could this be problematic?

The gift may be a bribe. Even if you believe the gift will not inappropriately influence your business decision, the value of the gift should not exceed the guideline values set forth in the applicable directives. If in doubt, do not accept the gift. If this is not possible, because for example it would be considered impolite or too complicated to decline the gift in a specific situation, inform your manager and agree on a further course of action. Transparency is our top priority.



Our conduct as a member of society: We assume social responsibility.

Human rights

What exactly does that mean?

The United Nations' Universal Declaration of Human Rights sets out the requirements and expectations of the international community with regard to respect for and observance of human rights.

Our principle of conduct

We respect, protect and promote the globally applicable regulations for the protection of human rights.

Notwithstanding the equal value of all human rights, the following rights are of particular importance to TRUMPF:

- The right to equality of opportunity as well as the right to non-discrimination
- The prohibition of all forms of child and forced labor
- The right to freedom of expression and information, and to form and join professional associations
- The right to health and safety and to labor and social standards

This applies not only within TRUMPF, but of course also extends to the conduct of and towards our business partners.

What does this mean for me?

- I observe the principles of equal opportunity and non-discrimination. I do not discriminate against anyone, and do not tolerate discrimination on the basis of gender, skin color, nationality, political opinion, ethnic or social origin, religion, age, sexual orientation or any other grounds.
- If I have reason to believe there are human rights violations taking place in my professional environment, I ensure that these violations are prevented or stopped. If necessary, I contact the Compliance Team.

Example

You work in the TRUMPF Purchasing Department and you have reason to believe that one of the subcontractors uses gold that comes from mines in the Congo where child labor is tolerated.

Why could this be problematic?

Such practice is contrary to the values of TRUMPF. The business relations with this business partner must be reviewed and, if necessary, counter measures must be taken.

Our conduct as a member of society: We assume social responsibility.

Environmental protection

What exactly does that mean?

In its duty of care for future generations, TRUMPF considers the prudent use of energy, materials and resources as well as the largest possible reduction of the negative environmental effects associated with such use a primary objective.

Our principle of conduct

TRUMPF is a leading global technology company. Our high product and process standards also extend to the area of energy and resource use. It is for this reason that we set ourselves ambitious global climate protection goals and support the objectives of international climate agreements with our own climate strategy. To achieve these objectives, the long-term reduction of resource consumption and the use and development of efficient technologies are therefore of particular importance. The environmental impact of our operations should be reduced to a minimum.

What does this mean for me?

- In my daily work, I use resources and energy sparingly and sustainably.
- I take environmental protection concerns into account whenever possible in my work.

Do you have an idea of how to further reduce resource consumption in your area of work?

Inform your manager and the TRUMPF experts responsible for sustainability of your idea.



Our conduct as a member of society: We assume social responsibility.

Donating and sponsoring

What exactly does that mean?

TRUMPF is a family business that thinks long-term and acts responsibly. It is out of this conviction that TRUMPF makes donations, contributions made on a voluntary basis without the expectation of compensation, that serve the explicit aim of improving the lives of individuals and society as a whole, and also awards sponsorship money, contributions made on the basis of a contractual agreement in return for compensation, with which TRUMPF pursues its own company-related goals of advertising and public relations.

Our principle of conduct

At TRUMPF, donation and sponsorship agreements are only made in accordance with legal regulations. This applies both to the subject areas that come into consideration for donations and sponsoring agreements, the selection of recipients or sponsoring partners and the procedure that must be followed by each individual involved in donation and sponsoring activities. The aim of this principle of conduct is to ensure a uniform strategy and to protect TRUMPF's reputation in the public eye.

What does this mean for me?

- In the case of a planned donation or sponsoring measure, I comply with the regulations applicable to donations and sponsoring measures.
- If I have any questions or concerns, I contact my manager, the local Compliance Officer of my subsidiary or the TRUMPF experts responsible for donations and sponsoring.

Example

A museum fundraiser asks for sponsorship for an exhibition planned for the spring or a customer asks for a donation for their sports club.

Why could this be problematic?

Tax, legal and internal TRUMPF regulations may not be met if it is not first clarified with the TRUMPF experts responsible for donations and sponsoring whether or not and in what form a sponsorship or donation is possible.

Our conduct in everyday business: We always act with integrity.

Anti-corruption

What exactly does that mean?

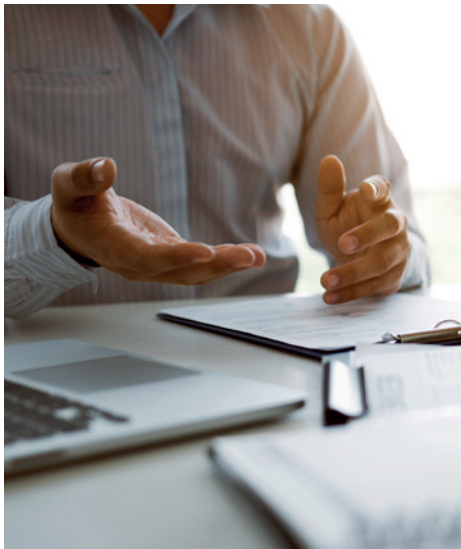
Corruption is defined as any abuse of a position of trust in order to gain personal advantage. It leads to the taking of decisions for subjective reasons, distorts competition and therefore harms society. That is why corruption is unacceptable.

Our principle of conduct

We reject corruption. We do not grant any unfair advantages to or accept any unfair advantages from our business partners. To avoid even arousing suspicion of potential corruption, our actions are always transparent.

What does this mean for me?

- I never bribe others and never allow myself to be bribed.
- If I have any questions or concerns, I contact my manager, the local Compliance Officer of my subsidiary or the Compliance Team.
- If I have reason to believe there is corruption, I report this immediately.



Example

You work in Sales for TRUMPF and want to involve an intermediary. The intermediary offers you their support if they do not have to sign a written commission agreement - they claim this allows you both more flexibility.

This constitutes incorrect procedure.

Commissions and payments made to traders, intermediaries or advisors require prior written agreement, may only be paid for permissible and actually rendered services and must be proportionate to these services.

Our conduct in everyday business: We always act with integrity.

Gifts, invitations and other benefits

What exactly does that mean?

The acceptance and granting of gifts, invitations and other benefits from or to business partners and public officials in return for disproportionate favors are prohibited. However: customary signs of courtesy, hospitality or general appreciation of a business partner are permitted. Nevertheless, the acceptance or granting of expensive or secret gifts is generally suspicious and may lead the public prosecutor to initiate a criminal investigation into the matter.

Our principle of conduct

Gifts, invitations and other benefits are permissible within generally accepted ethical standards, but must never be granted or accepted in a way that could be interpreted as undue influence. Particular caution should be exercised when dealing with public officials. Relevant guidelines must be observed.

What does this mean for me?

- I familiarize myself with and strictly adhere to the relevant guidelines.
- I check whether the provider or recipient is a public official.
- If I have any questions or concerns, I contact my manager, the local Compliance Officer of my subsidiary or the Compliance Team.

Example

You work in the TRUMPF Purchasing Department. A supplier invites you to a weekend business conference at a hotel. The program provides for an extensive leisure program on Saturday, while only the last hour before departure on Sunday has been set aside to discuss business.

Why could this be problematic?

It is common for purchasers and suppliers to get together to exchange experiences at business conferences. However, in the proposed conference program, the extensive leisure program and the hotel stay take up most of the time, while the business-related matters do not receive the attention they deserve. This could give the impression of bribery and corruption. Therefore, decline the invitation.

Our conduct in everyday business: We always act with integrity.

Avoiding conflicts of interest

What exactly does that mean?

A potential conflict of interest exists if the personal interests of a TRUMPF employee conflict or could conflict with the interests of TRUMPF. In particular, conflicts of interest may arise from the secondary employment of a TRUMPF employee or from personal relationships between TRUMPF employees and business partners.

Our principle of conduct

We draw a clear line between business interests and personal interests and do not use our employment at TRUMPF to gain personal advantages.

What does this mean for me?

- I avoid even arousing suspicion of a potential conflict of interest and disclose any potential or actual conflicts of interest to my manager.

- I do not engage TRUMPF business partners for private purposes.
- I do not favor TRUMPF business partners out of personal interest.
- I obtain the approval of my manager and HR before taking on a secondary job or acquiring a financial interest in a competitor, a customer or a supplier.
- If I have any questions or concerns, I contact my manager, the local Compliance Officer of my subsidiary or the Compliance Team.

Example

As part of your job, you review offers from different suppliers. You decide that the best offer comes from the company of a good friend.



Why could this be problematic?

There is a risk that you may have put private interests before the interests of TRUMPF. However, a clear line must be drawn between business and private interests. Therefore, inform your superior about the situation and take a step back from the decision-making process in order to avoid even arousing the suspicion of a potential conflict of interest.

Our conduct in everyday business: We always act with integrity.

Fair competition

What exactly does that mean?

Fair and free competition is protected by the applicable competition and antitrust laws. These laws ensure that no undue restrictions of competition lead to unfair market competition. This applies in particular to the prohibition of price and condition agreements, the allocation of markets, customers or territories, and the coordination of business strategies. In this respect, not only explicit agreements can constitute undue restrictions of competition, but also coordinated practices. Violations of these laws are consistently pursued by the competition authorities and can result in severe fines and penalties.

Our principle of conduct

We do not coordinate our competitive conduct with competitors and instead exclusively conduct business on the basis of free competition. We comply with the laws on the protection of competition.

What does this mean for me?

I never talk to competitors about:

- Prices and other conditions
- Market, customer or territorial allocation
- Participation or non-participation in tenders

If I have any questions or concerns, I contact my manager, the local Compliance Officer of my subsidiary or the Compliance Team.

Example

You are talking to an employee of a competitor company at a trade show. They try to elicit information from you about prices.

Why could this be problematic?

Such a conversation would constitute a violation of applicable competition and antitrust laws and could have drastic consequences for you and TRUMPF. Make immediately and unmistakably clear to the employee of the competitor company that you will not exchange information with them on this topic. Finish the conversation, document what happened and inform the Compliance Team about it.

Our conduct in everyday business: We always act with integrity.

Correct record keeping

What exactly does that mean?

Almost every time we compile information at work we produce a record. Correct record keeping serves internal purposes such as strategy development and forecasting, as well as planning, management and control. In addition, correct record keeping creates and maintains trust with government agencies, the general public and our business partners. For these reasons, it is indispensable from a commercial and tax law perspective.

Our principle of conduct

We ensure our books and records are kept complete, correct and in a timely manner, are collated by topic matter and comply with the applicable legal framework. We give an accurate account of facts and use factual language.



What does this mean for me?

- I document all business incidents correctly, completely and in a timely manner.
- I do not record false information.
- I do not manipulate records or omit information so as to misrepresent an event.
- I record my working hours correctly and keep my personal data up to date.
- If I have any questions or concerns, I contact my manager, the local Compliance Officer of my subsidiary, the Compliance Team or the responsible TRUMPF experts.

Example

The invoice for an ordered machine has already been sent to the customer and was paid on December 20. However, in order to receive subsidies for the purchase, the customer wants the original invoice to be canceled and a new invoice to be issued for 24 January.

Please refrain from taking such action. Falsifying records can have serious consequences and, in the example given, even result in criminal consequences.

Our conduct in everyday business: We always act with integrity.

Tax and customs regulations

What exactly does that mean?

Taxes are an important part of a functioning state. Tax regulations can include regulations on corporate income tax, payroll tax and turnover tax, while customs regulations can encompass customs duties payable on the importation of goods. Compliance with tax and customs regulations creates trust among business partners, tax authorities and the general public. Compliance with these regulations is subject to regular audits by the authorities. Violations are subject to considerable sanctions.

Our principle of conduct

We comply with the applicable tax and customs regulations. This requires that we submit tax declarations and customs declarations correctly and on time, and that we pay the set taxes and customs duties properly.

What does this mean for me?

- If I have any questions or concerns, I consult the TRUMPF experts responsible for tax and customs regulations.
- If I have reason to believe there has been a violation of tax or customs regulations, I contact my manager, the local Compliance Officer of my subsidiary, the Compliance Team or the TRUMPF experts responsible for tax and customs regulations.

Example

A customer who imports the machine itself asks us to issue an invoice for a lower value than we have invoiced for the import of the machine. It claims to have imported the machine at a lower value than is stated on the invoice.

Make it clear to the customer that TRUMPF cannot issue an invoice that is lower in value than the contractually agreed sum. Otherwise, TRUMPF would be aiding and abetting tax evasion.

Our conduct in everyday business: We always act with integrity.

Foreign trade law and export control

What exactly does that mean?

Compliance with foreign trade regulations is of great importance for a globally active company like TRUMPF. Foreign trade regulations must be observed when exporting goods, technology and software. Whether a permit is required or a ban is in place largely depends on what is being delivered, where it is being delivered to, to whom it is being delivered and for what purpose the goods are intended. Accordingly, existing embargoes, sanctions lists and the end use of dual-use goods are constantly reviewed by TRUMPF.

Our principle of conduct

We comply with all regulations applicable to cross-border trade. This applies above all to the observance of existing import and export restrictions and the obtaining of necessary permits.



What does this mean for me?

- If I have any questions or concerns, I consult the TRUMPF experts responsible for foreign trade law and export control.
- If I have reason to believe foreign trade regulation may have been violated, I contact my manager, the local Compliance Officer of my subsidiary or the TRUMPF experts responsible for foreign trade law and export control.

Example

You receive a request from a potential customer to deliver a laser to a country which, to your knowledge, is subject to an embargo.

Clarify this with the TRUMPF experts responsible for foreign trade law and export control which export restrictions apply to the country to be supplied. Do not conclude any contracts that obligate TRUMPF to export to this country before first clarifying this with the TRUMPF experts responsible.

Our conduct in everyday business: We always act with integrity.

Prohibition of money laundering and terrorist financing

What exactly does that mean?

Almost all countries in the world have laws against money laundering and terrorist financing. Money laundering is any transaction intended to conceal the origin of illegally obtained funds in order to allow this money to flow into the legal financial and economic system. Illegal money can be generated, for example, in connection with bribery payments. Terrorist financing is the supplying of funds or other legal assets to terrorists or terrorist organizations with the intended purpose of carrying out terrorist activities. Both money laundering and terrorist financing can result in severe penalties.

Our principle of conduct

We comply with legal regulations. Our aim is to only engage in business relations with reputable partners who also comply with anti-money laundering and anti-terrorism regulations.

What does this mean for me?

- I familiarize myself with and strictly comply with the relevant guidelines.
- If I have reason to believe a transaction conceals money laundering or terrorist financing, I immediately stop the transaction and contact my manager, the local Compliance Officer of my subsidiary or the Compliance Team.

Example

A supplier based in Hungary asks for their invoice to be paid to an account in Belgium.

Why could this be problematic?

By agreeing to this request, TRUMPF could potentially be aiding and abetting tax evasion as well as helping to conceal the origin of illegally obtained money. Such a request therefore needs to be clarified further. Do not agree to the request without first clarifying with the supplier why they do not want the money to be transferred to an account in Hungary. Consult the Compliance Team on how to proceed in such a case.

Our conduct in everyday business: We always act with integrity.

Occupational safety

What exactly does that mean?

The physical integrity of our employees is our top priority. In addition to this, their occupational safety has an important influence on both productivity and quality as well as the external image of TRUMPF and the trust of customers in our brand. Human error is the cause of most occupational accidents. Therefore, every employee can ensure occupational safety and prevent accidents from happening by not putting themselves or others at risk through their actions.

Our principle of conduct

Err on the side of caution. Safety always comes first.

What does this mean for me?

- I identify potential safety hazards and closely assess my working environment for potential safety hazards on a regular basis.
- I report unsafe situations, near-accidents and accidents of all kinds.
- If I have any questions or concerns, I contact my manager, the local Compliance Officer of my subsidiary, the Compliance Team or the responsible TRUMPF experts.



Example

You are a service engineer and are installing a machine tool at a customer's site. Due to unforeseen circumstances, the installation takes longer than expected. The customer is concerned about running behind on their schedule and puts pressure on you to finish the job quickly and pay less attention to the applicable safety regulations.

Inform your manager about what has happened. Continue to work at a comfortable pace. Continue to strictly comply with safety regulations and always put safety before meeting deadlines.

Our conduct in everyday business: We always act with integrity.

Product Compliance

What exactly does that mean?

Everyone who puts products on the market has to comply with high safety standards. This is the only way to ensure that a product is safe when used for its intended purpose and does not pose a risk to people's health, safety or the environment.

Our principle of conduct

We set the highest of standards for the safety of our products. We develop our products and their safety concepts according to the respective state of the art. We monitor our products in markets worldwide. We take appropriate measures in the event of any abnormalities that may arise.



What does this mean for me?

- If I notice that our products could pose a risk or that regulations are not being complied with, I take appropriate countermeasures.
- If I have reason to believe this is the case, I contact my manager and the TRUMPF experts responsible for Product Compliance.

Example

You work in Sales for TRUMPF and want to sell a machine to an American company. The customer wants to use the machine in Brazil, but wants to waive compliance with the applicable Brazilian machinery directive and makes reference to the product requirements document and their internal company regulations.

This constitutes incorrect procedure.

Even with an agreement, I cannot override mandatory legal regulations. All machines that are placed on the market in Brazil are subject to the applicable Brazilian machinery directive.

Our conduct in everyday business: We always act with integrity.

Data protection

What exactly does that mean?

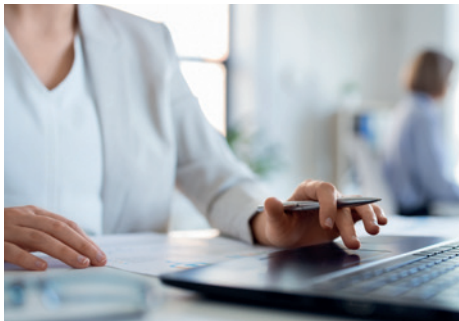
The aim of data protection is to protect people from the arbitrary handling of their personal data. Personal data is any data that makes a person directly or indirectly identifiable. The processing and other use of personal data is subject to special legal regulations. Accordingly, personal data may exclusively be used for its intended purpose. Furthermore, the use of personal data requires the consent of the person concerned or another legal basis.

Our principle of conduct

We handle the personal data of our colleagues, business partners and other data subjects responsibly and confidentially. We use personal data exclusively for the purposes for which it was made available to us.

What does this mean for me?

- I familiarize myself with the applicable guidelines and regulations of the data protection organization.
- I process personal data exclusively for its intended purpose and with the consent of the person concerned or on another legal basis.
- If I have any questions or concerns, I consult my manager, the local data protection coordinator in my subsidiary or the data protection team.



Example

You have noticed that you can see the working-time data timing data of the colleagues in your department.

Timing data is also personal data because it contains your colleagues' names and other characteristics that make a person identifiable. In such a case, you must ensure that only your manager or the working-time data administrator has access to this data.

Our conduct in everyday business: We always act with integrity.

Protection of confidential information

What exactly does that mean?

As a technology company with a high level of expenditure in research and development, TRUMPF is particularly reliant on the protection of its inventions, its trade and business secrets and its technical know-how. However, non-technical information (e.g. sales data or purchase prices) can also be valuable trade secrets.

Our principle of conduct

We handle sensitive information with particular care. We ensure that confidential information does not reach unauthorized third parties. This also applies to confidential information we receive from our business partners. If special confidentiality is required due to special circumstances (e.g. sensitive customer development projects of company purchases), we also maintain this confidentiality towards colleagues.

What does this mean for me?

- I handle sensitive information from TRUMPF and TRUMPF business partners with care and do not pass it on without prior approval.
- I observe existing non-disclosure agreements with our business partners.
- I only share sensitive information with those who absolutely need to know it.
- I am particularly careful when handling sensitive information in public (e.g. on business trips, on social media, in other public spaces, etc.).

Example

A customer has sent you documents containing confidential information on a joint project. You are on your way to the customer and plan to go through the documents again on the train.

You must ensure that no unauthorized person gains knowledge of this confidential information. This would constitute a breach of the signed non-disclosure agreement and would jeopardize TRUMPF's relationship with the customer.



Our conduct in everyday business: We always act with integrity.

Cyber security

What exactly does that mean?

The aim of cyber security (information security, IT security and product security) is to prevent damage to TRUMPF, its business partners, customers and employees. While information security and IT security safeguard our technical systems and information, product security protects our products from cyberattacks and their resulting malfunctions.

Our principle of conduct

We set the highest of standards for our cyber security and conduct ourselves in accordance with these standards. We handle information about TRUMPF, customers, business partners, products and colleagues responsibly. We assess the need to protect information in our business processes and products and take suitable technical and organizational security precautions.

What does this mean for me?

- I familiarize myself with the applicable cyber security guidelines and conduct myself in accordance with the applicable requirements.

- If I notice a potential risk or that security-relevant regulations are not being complied with, I take appropriate countermeasures and inform the responsible contact person.
- During the development of products, systems or applications, I follow the state of the art to ensure security and use standardized components to protect sensitive information.
- If I have any questions or concerns, I consult my manager. In addition, I contact the cyber-security contact persons if I have any questions.

Example

You are a project manager and decide to change business processes as part of your job by introducing a cloud-based tool.

To do so, you have to conduct an information security risk analysis with the respective process owner. You have to implement appropriate measures of both a technical and organizational nature. You discuss the organizational measures with your information security coordinator, the technical measures with your IT contact person and the data protection measures with your Data Protection Coordinator or manager.

Our conduct in everyday business: We always act with integrity.

Company property

What exactly does that mean?

Tangible and intangible assets such as equipment, products, services or know-how are essential to achieve our business goals.

Our principle of conduct

We handle TRUMPF's tangible and intangible assets responsibly. We do not use TRUMPF's assets for non-business purposes unless this is expressly permitted.

What does this mean for me?

- I avoid unnecessary costs.
- I treat TRUMPF property with care.
- I make business decisions on the basis of commercially comprehensible analyses of opportunities and risks.
- If I have any questions or concerns, I contact my manager, the local Compliance Officer of my subsidiary, the Compliance Team or the responsible TRUMPF experts.



Example

Your friend is planning to move house on the weekend. Because you are a TRUMPF employee, they ask if you could organize for a business vehicle from the TRUMPF fleet to come and help with the move.

As a general rule, we only use company property such as vehicles or office materials, mobile phones and laptops for business purposes. Exceptions to this rule apply if company regulations explicitly permit the private use of company resources. Therefore, before using company property privately, check whether the proposed use is permitted.



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Compliance with our principles of conduct

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How can I report a breach of conduct?

It should be in the interest of all employees to report wrongdoing, especially in the case of violations of applicable legal regulation and the TRUMPF Code of Conduct. By doing so, we help to resolve and combat misconduct and wrongdoing and protect ourselves and TRUMPF from risks and damages that may arise as a result.

Compliance email address

If you have any questions about compliance-related topics or wish to report a suspected breach of conduct, you can contact us at the following email address.

compliance@trumpf.com

The compliance email address can be used to send questions and information about suspected breaches of conduct to the Compliance Team. The identity of the person who has asked the question or provided information on a suspected breach of conduct will be treated confidentially, provided they do not deliberately report false facts or make false allegations.



Email address for reporting suspected cases of non-compliance
compliance@trumpf.com



Anonymous whistleblower system for reporting suspected cases of non-compliance
<https://trumpf.integrityplatform.org>



Of course, we are always available for personal contact.

Anonymous whistleblower system

An anonymous whistleblower system for reporting compliance-related issues is also available.

<https://trumpf.integrityplatform.org>

This web address provides access to a communication platform set up specifically for reporting suspected breaches of conduct or asking questions to the Compliance Team, 24/7, 365 days a year, in any language. Individuals with questions about or information on a suspected breach of conduct are also able to have a conversation with the Compliance Team using the platform without having to reveal their identity.

The anonymous whistleblower system is run on a secure server of an external service provider, not on a TRUMPF server. The system is anonymous; the message containing the information on or questions about a suspected breach of conduct which is sent to the Compliance Team is encrypted and cannot be traced. The individual with questions about or information on a suspected breach of conduct can disclose their identity if they wish, but do not have to.

Further communication channels

The Compliance Team is of course not your only available point of contact for compliance issues (suspected breaches of conduct and questions).

- Your manager,
- the local Compliance Officer of your subsidiary (typically the Chief Financial Officer (CFO)),
- the Compliance Team (part of the Legal Departments group) or
- the Chief Compliance Officer

can also be contacted in person, over the phone or via email (see also the Compliance page in bluenet).



What happens after reporting a suspected breach of conduct?

TRUMPF follows up on all reports of suspected breaches of conduct and takes appropriate measures, if necessary. Violations of applicable law and of this TRUMPF Code of Conduct will not be tolerated and will result in disciplinary action. As always, the accused is presumed innocent until proven guilty. TRUMPF will not tolerate any disadvantages against whistleblowers.

Third parties can also report violations of the TRUMPF Code of Conduct. The procedure for reporting a suspected breach of conduct is the same for third parties as it is for TRUMPF employees, insofar as this is legally possible.



Guidance

If you are unsure whether your conduct complies with our Code of Conduct, you can check your conduct using the following questions:

What is your gut feeling?

Listen to your gut feeling! Those who act according to their „gut feeling“ often do the right thing. Your own gut feeling can therefore be a good indicator.

What would happen if your conduct were to be reported tomorrow in the newspaper?

Would you be prepared to bear the consequences of your actions? If you would feel bad reading about your conduct in a newspaper report, you should refrain from conducting yourself in that way or first seek advice before proceeding any further. This almost always ensures that legal violations can be avoided.

When it comes to asking questions, better safe than sorry!

If you have any questions or concerns, contact your manager, the local Compliance Officer of your subsidiary or the Compliance Team.

By following these tips, you ensure that your conduct complies with our principles of conduct.

Because TRUMPF lives compliance and everyone joins in!

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