

# TOGETHER is better

our guide to a good climate -  
binding for everyone at Techem

The Techem logo consists of the word "techem" in a white, lowercase, sans-serif font. The letters "e" and "m" are connected at the bottom by a white horizontal line that curves upwards at both ends, resembling a stylized underline or a bridge.

[www.techem.com](http://www.techem.com)





# Foreword

Dear colleagues,  
This Code of Conduct is binding for how we work at Techem. It helps us to make the right decisions - guided by our fundamental value attributes and ethical principles such as honesty, openness, transparency, and courtesy.

Such integrity-based principles are fundamental to who we are and how we work. They underpin our vision and mission and guide the way we do business. They serve as a guide when decisions are made and ensure that we do the right thing every day.

By fostering and embracing ethical conduct and principles throughout the organization, we build trust among our employees and establish strong relationships with customers and partners. This creates a climate in which everyone can realize their full potential.





We are aware that this guide cannot cover every conceivable situation, but it aims to provide guidance and support for all our employees. This will ensure that everyone has the confidence to develop a sound sense of judgment and, above all, seek help if they are uncertain. This Code of Conduct focuses on the basic social values that are fundamental to our culture and society and embraced in our day-to-day work:



### **Cooperative**

This is the way we work and how we establish business relationships.



### **Passionate**

We strive for outstanding performance without compromising on our principles – for each other, our customers, our partners, our environment, and for society.



### **Honest**

Transparency and openness in our language and clarity in our approach with others are the basis for our actions.



### **Courteous**

We act with integrity, respect our counterparts, and build trust by keeping our promises.

We want to ensure that Techem continues to be successful in the future. We want to be proud of Techem and of the fact that we act with integrity. We want to be role models for our colleagues, our business partners, our customers and for society.

**Matthias Hartmann**  
CEO Techem Energy Services

**Nicolai Kuß**  
CSO Techem Energy Services

**Dr.-Ing. Carsten Sürig**  
CFO Techem Energy Services



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# Subject matter and area of application

## Our Code of Conduct - applying to everyone at Techem

The Techem Code of Conduct describes the framework within which we operate – within the company and in relation to business partners and the public. It applies to the Techem Group and all bodies and employees of its companies, both national and international.

When implementing the Code of Conduct, international subsidiaries or sub-subsidiaries of Techem have the freedom to take into account national particularities as long as they observe the basic principles.

The Code of Conduct is binding and sets out clear rules for all our actions. It forms the basis of our corporate culture - in conjunction with our corporate values: We are always cooperative, passionate, honest, and courteous. By adhering to the Code of Conduct and following the values it contains, each and every one of us contributes to securing Techem's long-term success.





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# Basic behavioral requirements

We act in accordance with the law, with respect, and in awareness of our responsibility

## Legal compliance and standards

We always comply with legal requirements – and never solicit third parties to violate the law.

We also always conduct our business activities in line with valid internal guidelines.

## Human rights & working conditions

We respect the personal dignity, personal rights and privacy of every single person - regardless of age, ethnic origin, gender, religion or ideology, disability and sexual identity.

Respect for human rights is an essential part of our corporate culture, both within our company and along our supply chain. Techem is therefore committed to respecting internationally recognized human rights and preventing human rights violations. In all our business activities, we are commit-

ted to complying with internationally recognized labour and social standards.

We ensure that all employees have reached the legal minimum age. Child labor is prohibited at our company and we are actively committed to preventing and eliminating it.

Forced labor and any form of modern slavery are unacceptable. We reject all forms of labor that are carried out under pressure, coercion or threat.

The Policy > [Statement on Respect for Human Rights and the Environment](#) is decisive for this

## Diversity & Discrimination

At Techem, we are committed to creating a working environment that is characterized by diversity, equality and inclusion. We do not tolerate discrimination, harassment, violence, threats or intimidation. All employees deserve respect and the same opportunities to develop professionally and personally. To ensure this, we are committed to unbiased recruitment procedures, fair pay and flexible working models. Discrimination cases can be reported confidentially at any time and are handled with the utmost care.

## Occupational health and safety

To ensure the health and safety of all employees in the workplace, we must observe the occupational safety regulations in our working environment. Through our personal conduct, we help to prevent accidents and work-related illnesses.



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# Environment and product safety

We are committed to environmental awareness and ensuring product quality

## **Environmental protection**

As a service provider and heat supplier, Techem has a responsibility to make a contribution to environmental and climate protection by precisely measuring energy and water consumption, intelligently controlling heating systems and providing heat with as few emissions as possible. In addition, a holistic energy and environmental management system ensures that we continuously improve in-house. All employees at Techem contribute to ensuring that the company's environmental standards are adhered to.

## **Product conformity and safety (of our devices)**

With existing solutions such as the smoke alarm service or legionella tests and new, future-oriented solutions, we contribute to a comfortable and healthy life for tenants. Our top priority is to ensure the quality and product safety of our solutions. We comply with the requirements of the Regulation (EU) 2023/988 on general product safety on general product safety and other European and country-specific relevant regulations that affect our products.

The [> Environmental Policy](#) and the [> Policy Statement on Respect for Human Rights and the Environment](#) are decisive for this



# Working with business partners and third parties

We are honest, fair and act with integrity

## General and antitrust standards

We deal honestly and fairly with all customers, suppliers, competitors and other third parties.

Decisions regarding customers, suppliers and other business partners are based exclusively on appropriate criteria and integrity.

The **Anti-Corruption Guideline** is decisive for this

In particular, this means that we do not act against our better judgment or contrary to our duty of care.

- make incorrect or misleading statements to customers, suppliers or third parties
- make incorrect or misleading statements regarding competitors

- otherwise take unfair advantage of a relationship with customers or suppliers of Techem or third parties - whether through manipulation, concealment, abuse of privileged knowledge or other unfair means.
- collude with competitors. This applies but is not limited to agreements resulting in or able to result in
  - prices, discounts, or other price elements being determined
  - sales being limited or controlled
  - customers or markets being split up
  - suppliers or customers being boycotted.

Interactions with competitors may only take place in compliance with the applicable legal systems and internal guidelines.

The **Antitrust and Competition Law Policy** is decisive for this

## Work in associations

We also ensure that our association work complies with the provisions of antitrust and competition law.

The **Policy on Association Work** is decisive for this

## Offering and granting incentives

In connection with our business activities, we do not directly or indirectly offer or grant third parties monetary amounts, commission, gifts or other remuneration in order to gain an unjustified advantage for Techem. Gratuities and gifts may not be granted for dishonest purposes or be inappropriate.

Accordingly, benefits or gifts may not be given if they could be construed as an attempt to unfairly influence a business partner or other third party. In case of doubt, we inform the responsible manager and obtain their decision. Similarly, no benefits may be offered or granted to public officials or elected representatives in order to bring about a particular decision.



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Benefits and gifts that can be obtained from marketing sources are appropriate. This also applies to customer and company events organized by marketing or coordinated with marketing or in accordance with marketing guidelines, as well as customary meal invitations and gifts.

The Compliance department decides on exceptions and deviations from this.

**Accepting and requesting incentives**

We neither directly nor indirectly accept nor demand benefits in connection with our business activities.

The acceptance of gifts of symbolic value or customary invitations to meals or events within an appropriate framework is permitted if local customs are respected.

We refuse all gifts, gratuities, invitations to meals or events that go beyond this. In case of doubt, we inform superiors and obtain their decision.

**Politics**

We do not use any Techem funds to support political parties or political organizations, candidates or public officials, either in Germany or abroad. Techem also does not reimburse any corresponding donations.

**Business relationships with suppliers**

We select suppliers or service providers exclusively on the basis of quality, costs, risk, strategy and sustainability. Techem as a company expects all suppliers to share Techem's value principles and to comply with all legal requirements.





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# Donations and sponsoring

We focus on transparency and ethical principles

## Guideline for donations and sponsoring

Donations and sponsoring activities may only take place in compliance with the respective legal systems and internal guidelines.

The **Sponsoring and Donations Policy** is decisive for this

## Donations

All donations must be transparent and legally, ethically and morally justifiable. The planned use of the donation and the identity of the recipient must be known and the reason for and purpose of the donation must be documented. In order to fulfill our social responsibility in the best possible way, we align our donation activities with our business purpose and our corporate vision.

## Sponsoring

All sponsorship activities must be transparent and for a legitimate business purpose.

Sponsorship agreements should be set out in the form of a written contract and must be commensurate with the value offered by the contractual partner. In order to best fulfill our social responsibility, we align our sponsoring activities with our business purpose and our corporate vision.



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# Avoiding conflicts of interest

## We act in the interests of Techem

### Avoid conflicts of interest

We do not participate, directly or indirectly, in transactions or arrangements that may ethically or legally conflict with the interests of the company and private interests.

The **Policy on the prevention of conflicts of interest** is decisive for this

### Non-competition

During our employment with Techem, we may not work for other companies that compete with Techem, provide them with information or support them in any other way.

### Investments in third-party companies

During our employment at Techem, it is not permitted to acquire shares in another company if this could jeopardize the legitimate interests of Techem. This applies in particular if the financial participation relates to a company with which Techem is in competition or in a business relationship.



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# Protection and using assets

We secure the value of Techem

## **Protection of property**

We treat Techem's property properly and with care. We protect it against loss, damage, theft, misappropriation or destruction.

We report any impairment of Techem's property to our manager immediately.

## **Ordinary accounting and financial reporting**

We have established processes to ensure that business transactions are recorded correctly and completely in compliance with the legal requirements for proper bookkeeping and accounting. Transparency and accuracy are our top priorities. Our periodic financial statements are prepared on time in accordance with the applicable national and international accounting standards. We provide the public and other relevant stakeholders with timely and accurate information.



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# Information and trade secrets

## We communicate truthfully and protect sensitive data

### External communication

Our external communication is transparent and dialog-based. In doing so, we are committed to truthfulness. Information about Techem or our business is only passed on to the public and in particular to the media by the management or authorized employees.

Complete, traceable file and document management is a matter of course for us, so that records and files can be traced by auditors and tax authorities at any time.

### Confidentiality

We do not pass on knowledge of confidential data, plans and processes to outsiders who are not employed by Techem. Nor to other employees who do not need this information for their work.

Excluded from this is information that has been designated and approved for publication by Techem or that we are obliged to publish due to legal requirements.

### Protection of trade secrets

The protection of trade secrets is essential for the success or failure of companies like Techem. Politicians have also recognized this and created appropriate regulations.

On the one hand, these legal regulations serve to protect trade secrets. On the other hand, they place increased demands on companies to ensure such protection.

In other words: If we do not adequately protect our trade secrets, we lose our legal rights in the event of infringements. In response to this, Techem has issued a guideline to protect trade secrets.

All employees and executive bodies of the Techem Group are obliged to comply with these rules.

Any case of inadvertent or inappropriate disclosure or use of trade secrets must be reported immediately to the Legal Department, Internal Audit, the Compliance Officer or the Management Board. This applies regardless of whether the trade secrets originate from Techem or third parties. This is the only way we can react promptly. And this is essential in order to retrieve data, assess the impact of the loss and, if necessary, take precautionary countermeasures.

The **Guideline on the protection of business secrets** is decisive for this



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### **Data protection and data security**

When processing personal data, the personal rights of the data subject must be respected. Personal data may therefore only be collected and processed in a lawful manner. The principles of good faith must be observed. This principle also applies to data processing between companies in the group.

The processing of data always requires a legal basis in accordance with the GDPR.

The processing of personal data may only pursue clear and legitimate purposes that were defined before the data was collected.

Before any processing of personal data, it must be checked whether and to what extent it is necessary to achieve the purpose intended by the processing (qualitatively and quantitatively). Data that is not necessary to achieve the purpose may therefore not be collected and processed.

Procedures and systems for processing personal data must be designed in such a way that their initial settings are limited to the data processing required to fulfill the purpose. This applies to the scope of processing, storage duration and accessibility.

The storage of personal data is subject to purpose limitation. Once the purpose has been fulfilled or no longer exists, the data must be deleted or anonymized. Storage beyond this is only permitted if this is required by statutory retention or verification obligations.





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# Complaints and reporting violations

## We act when the Code of Conduct is violated

### **Reporting violations**

Any of us can make a complaint to our manager, another designated person or body or a company employee representative. Indications of a breach of the Code of Conduct can be reported to the designated person or body at any time.

Anyone who becomes aware of a significant breach of the Code of Conduct should contact Human Resources or Compliance immediately. The report can also be made anonymously via the reporting channel linked on TING.

### **Confidentiality**

Techem ensures that reports of violations of the Code of Conduct are treated confidentially. We do not tolerate reprisals of any kind against whistleblowers.

### **Consequences of violations**

Any violation of the Code of Conduct will be corrected immediately. This may result in disciplinary action, in serious cases up to and including termination of employment. Where necessary, we will also involve and cooperate with the relevant authorities.



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# Compliance with the Code of Conduct

We all live the Code of Conduct in our day-to-day work

## **Implementation and responsibility**

We are committed to supporting and complying with this Code of Conduct. Any questions regarding the application or significance of individual provisions will be answered by managers and the relevant Human Resources or Compliance department.

All managers are aware of their special responsibility and role model function and emphasize this through appropriate management work.

Every managerial position is responsible for ensuring that the Code of Conduct is not violated in their area of responsibility. However, the responsibility of the manager does not release employees from their own responsibility. On the contrary: every individual is called upon to act at all times.



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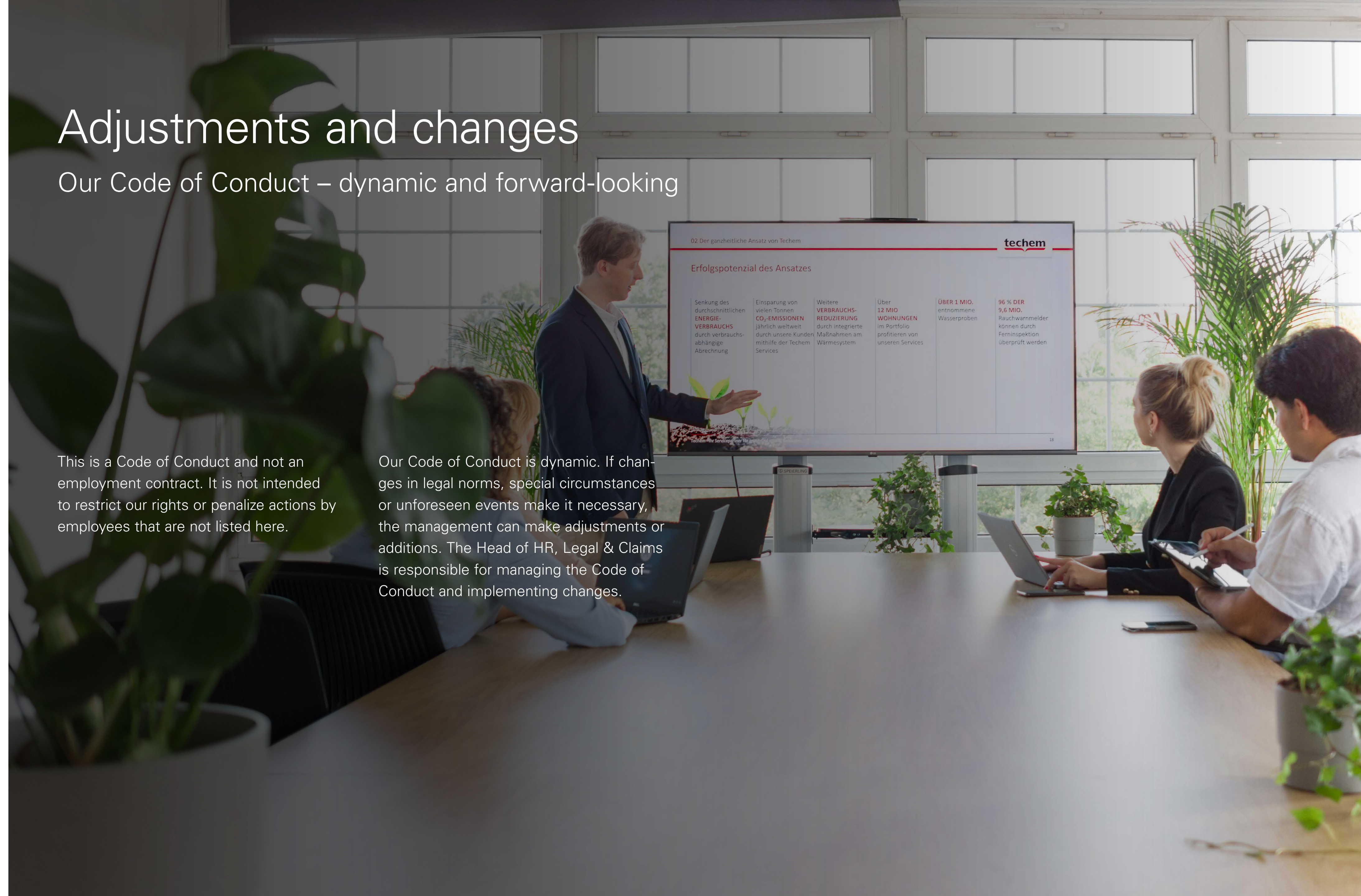
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# Adjustments and changes

## Our Code of Conduct – dynamic and forward-looking

This is a Code of Conduct and not an employment contract. It is not intended to restrict our rights or penalize actions by employees that are not listed here.

Our Code of Conduct is dynamic. If changes in legal norms, special circumstances or unforeseen events make it necessary, the management can make adjustments or additions. The Head of HR, Legal & Claims is responsible for managing the Code of Conduct and implementing changes.







**Techem Energy Services GmbH**

Hauptstraße 89

65760 Eschborn, Germany

[www.techem.com](http://www.techem.com)