

Our Code of Conduct –
applying to everyone at Techem

TOGETHER

is better: our guideline for a positive working.



FOREWORD

Dear Colleagues

This Code of Conduct applies to all of us here at Techem. It helps us to make the right decisions, led by our fundamental values and ethical principles, such as honesty, openness, transparency, and courtesy.

These principles are founded on integrity and are the cornerstones of who we are and everything we do. They underpin our vision and mission and determine our business procedures. They provide us with guidance when decisions need to be made and make sure that we do the right thing, day in, day out.

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 Code of Conduct cannot cover every conceivable situation; its purpose is to offer all of our employees guidance and assistance. 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 remains successful in the future. We want to be proud of Techem and that we conduct ourselves with decency. We want to be role models to our colleagues, our business partners, our customers, and the general public.

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CEO Techem Energy Services

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Our Code of Conduct – applying to everyone at Techem

The Techem Code of Conduct lays out a framework for our actions within the company and in relation to business partners and the general public. It applies to the Techem Group and all executive bodies and employees at Techem companies in this country and abroad.

The Code of Conduct is binding and sets clear rules for the actions of all of us. It forms the basis of our corporate culture in correlation with our company values: We are always cooperative, passionate, honest, and courteous. By adhering to the Code of Conduct and basing our actions on the values defined therein, each and every one of us can help secure the long-term success of the company.



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.

Working conditions

We respect the personal dignity, personal rights, and privacy of everyone, regardless of age, race, ethnic background, gender, religion, beliefs, disability, or sexual identity. Discrimination, harassment, violence, threatening behavior, or intimidation will not be tolerated. As a socially responsible employer, Techem is committed to offering the same opportunities to each and every employee.

Occupational health and safety

Adhering to occupational health and safety requirements in the workplace is essential to ensuring that everyone remains safe and well when at work. Our personal conduct helps to prevent accidents and work-related illness.

Protecting the environment

As a digital service partner to the real estate industry, we design our products and services to conserve and make responsible use of natural resources. Our vision is to design buildings to be green and smart so that people can live in them healthily and with comfort.

We actively contribute to developing and distributing eco-friendly technologies and measures to save millions of tons of CO₂ per year. In our working environment, we adhere to environmental requirements and minimize the environmental impact wherever possible.



We are honest and fair and act with integrity

General and antitrust standards

We deal honestly and fairly with all customers, suppliers, competitors, and other third parties. In a nutshell, this means that we do not, against our better judgment or in breach of our duty of care,

- make incorrect or misleading statements to customers, suppliers, or third parties
- make incorrect or misleading statements regarding competitors
- obtain unfair advantages in any other manner from relationships with Techem customers or suppliers or third parties – either through manipulation, non-disclosure, misuse of insider knowledge, or any 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

We may only interact with competitors in compliance with valid legal requirements and internal guidelines.

The relevant guideline here is

Antitrust Law – Dealing with competitors.

Decisions regarding customers, suppliers, and other business partners are only based on relevant criteria and integrity.



Offering and granting incentives

We never directly or indirectly offer third parties monetary amounts, commission, gifts, or other remuneration in the context of our business activities, nor do we grant such incentives to obtain an unfair advantage for Techem. Gratuities and gifts may not be granted for dishonorable or inappropriate purposes.

In other words, gratuities and gifts may not be granted if they could be construed as an attempt to unfairly influence a business partner or other third party. If in doubt, simply contact the relevant manager and ask for their approval. Public officials may not be offered or granted incentives to arrange particular decisions, either.

Gratuities and gifts that can be procured through marketing sources (TOM marketing platform) are considered appropriate. This also applies to customer and corporate events organized or approved by Marketing in accordance with marketing requirements, as well as normal meal invitations and small gifts.

The Compliance department is responsible for deciding on any exceptions and deviations from these requirements.

Accepting and requesting incentives

We never directly or indirectly accept or request incentives in the context of our business activities.

Accepting gifts with a symbolic value or normal meal or event invitations on an appropriate scale is permitted if local customs are adhered to.

All gifts, gratuities, and meal or event invitations above and beyond this must be refused. If in doubt, simply contact your superiors and ask for their approval.



We focus on transparency and ethical principles

Guideline for donations and sponsoring

Donations and sponsorships are only permitted in accordance with legal requirements and internal guidelines.

Donations

All donations must be transparent, legally compliant, and ethical. The planned use of the donation and the identity of the recipient must be known, as must the reason for and purpose of the donation.

Sponsoring

All sponsoring activities must be transparent and intended for a legitimate business-related purpose. Sponsoring agreements should be defined in a written contract and must be in proportion to the equivalent value offered by the contractual party.

Politics

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

Business relationships with suppliers

We select suppliers or service providers solely on the basis of quality, needs, performance, and prices. As a business, Techem expects all of its suppliers to share Techem's values and comply with all legal requirement.

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

Implementation and responsibility

We commit to upholding and complying with this Code of Conduct. Management and the relevant Human Resources and Compliance departments can answer any questions concerning the application or significance of certain requirements.

All managers are aware of their particular responsibility and function as role models, and they underline this by conducting themselves accordingly.

Every single person in a position of responsibility is accountable for ensuring that those under their stewardship do not violate the Code of Conduct. However, managers' responsibility does not absolve employees of their own responsibility, not by a long shot. The success of the Code of Conduct depends on each and every one of us.



We act in the interests of Techem

Avoiding conflicts of interest

We do not participate in transactions or agreements, either directly or indirectly, that could give rise to an ethical or legal conflict between the interests of the company and private interests.

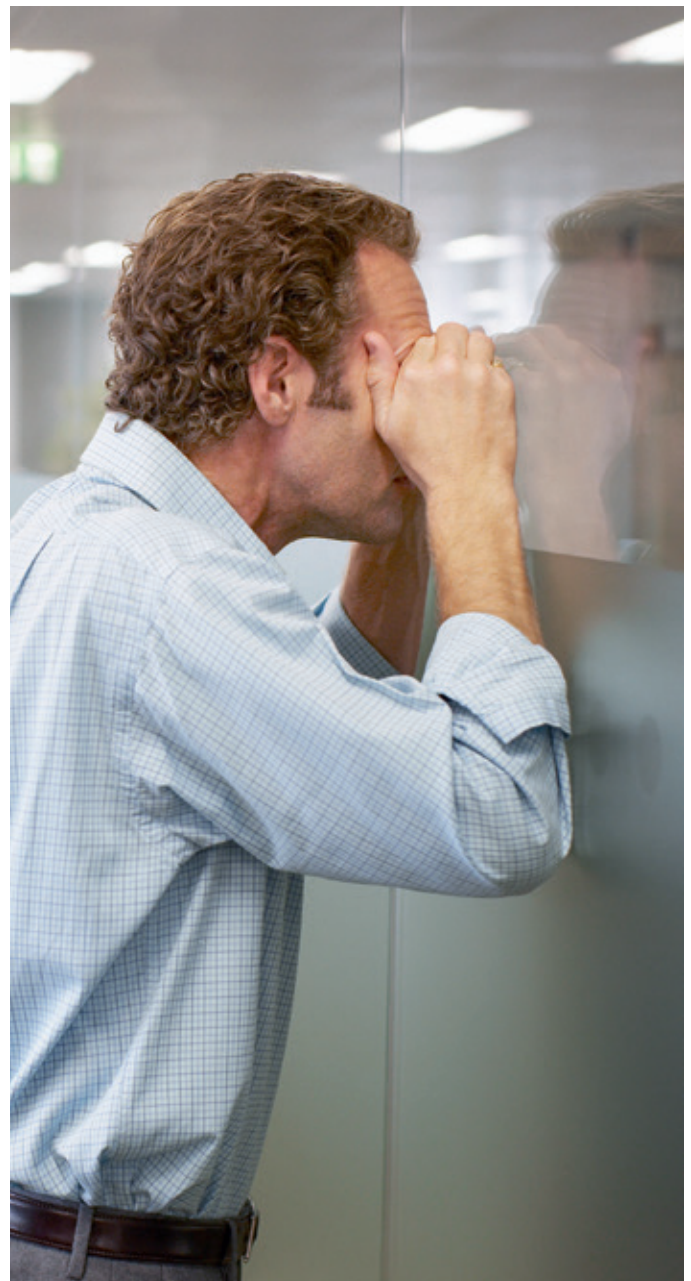
The relevant guideline for this is the **Guideline on Avoiding Conflicts of Interest.**

Non-competition

While we are employed at Techem we are not permitted to work for any other companies that compete with Techem, provide said companies with information or otherwise support them.

Investments in third-party companies

While we are employed at Techem we are not permitted to acquire shares in any other companies if this share acquisition could jeopardize the legitimate interests of Techem. This applies in particular if the financial investment is in a company in competition or in a business relationship with Techem.



We protect Techem's value

We use Techem property carefully and properly. We protect it against loss, damage, theft, misappropriation, or destruction.

We report any issues with Techem property immediately to management.



We communicate truthfully and protect sensitive data

External communications

Our external communications are transparent and dialogue-based. We are committed to truthfulness. Information about Techem or our business activities is only communicated to the general public and, in particular, the media by the management and authorized employees.

Full and complete record- and book-keeping is a matter of course for us. Auditors and financial authorities must be able to verify records and files at any time.

Confidentiality

We do not pass on any knowledge of confidential data, projects, or procedures to anyone not employed at Techem or to any employee who doesn't require the information for their particular job.

This does not apply to information earmarked or approved for publication by Techem or information we are required by law to publish.

Protecting trade secrets

Protecting trade secrets is essential to the success or failure of companies like Techem. Policymakers have recognized this fact and created corresponding legal frameworks to protect trade secrets.

They have also set high standards for companies to ensure this level of protection.

In other words, if we fail to adequately protect our trade secrets we will lose our legal rights to assert claims in the case of legal violations. 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 accidental or inappropriate disclosure or use of trade secrets must be reported immediately to the Legal department, Internal Audit, the Compliance Officer, or the management. This applies in all cases, regardless of whether the trade secrets originate from Techem or from a third party.

This is the only way for us to act quickly, which is essential to retrieve data, assess the extent of the damage, and if necessary take precautionary countermeasures.

All information needed on this can be found in the **Guideline on Protecting Trade Secrets.**

Data protection and data security

Personal data can only be collected, processed, or used for the clear and legal purposes agreed with the client. In addition, personal data must be stored securely and may only be transferred if the necessary precautions are taken.

We always make sure data subjects know what we are doing with their data and ensure that they have the opportunity to access their data, raise objections, suspend the processing of their data and erase their data.

We are bound to relevant laws and standards regarding the storage and usage of employee's personal data and third-party data – e.g. data belonging to customers and business partners – in order to protect the personality rights of others.



We act when the Code of Conduct is violated

Reporting violations

Everyone can lodge a complaint, either with their manager, an appointed person or body, or the company's employee representatives. Tip-offs of violations of the Code of Conduct can be submitted at any time to the relevant person or body.

Anyone who becomes aware of a severe violation of the Code of Conduct should contact Human Resources or Compliance immediately. Tip-offs can also be submitted anonymously using the reporting system linked on TING.

Confidentiality

Techem ensures that tip-offs of Code of Conduct violations are treated confidentially. Reprisals against anyone submitting tip-offs will not be tolerated.

Consequences of violations

We rectify any violations of the Code of Conduct immediately. This can result in disciplinary measures or, in serious cases, termination of the employment relationship. If necessary, we will also contact the relevant authorities and work together with them.



Our Code of Conduct – dynamic and forward-looking

This is our Code of Conduct, not an employment contract. It should not restrict any of our rights, nor should it punish employee conduct not covered by it.

Our Code of Conduct is dynamic. The management can make changes or adjustments at any time in the event

of changes to legal standards, special circumstances or unforeseen incidents. The Head of HR, Legal & Claims is responsible for managing the Code of Conduct and implementing changes.



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The Techem logo consists of the word 'techem' in a bold, lowercase, sans-serif font. Below the text is a red graphic element that resembles a stylized flame or a set of wings, with a white outline.