



TECHNIROPA
Holding GmbH

CODE OF CONDUCT

for suppliers and business partners of
Techniropa Holding GmbH
and its subsidiaries



ABOUT US

Techniropa Holding Group (hereinafter: TRH / we), headquartered in Daun (Eifel), Germany, is a medium-sized group of companies comprising the following entities:

- **Techniropa Holding GmbH**
- **TechniSat Digital GmbH**
- **TechniSat Teledigital GmbH**
- **TechniSat Digital Sp. z o. o. (Poland)**
- **TechniSat Digital Kft. (Hungary)**
- **Taishangda Electronics Co. LTD (Hong Kong)**
- **Taishangda Electronics (Shenzhen) Co. LTD**
- **TPS-Technitube Röhrenwerke GmbH**
- **TechniBike GmbH**
- **Pro Eifel Energies GmbH**
- **TechniRopa Markt GmbH**
- **Eifelion GmbH**
- **TechniForm GmbH**

Business activities focus in particular on the production and distribution of consumer and lifestyle electronics products, EMS contract manufacturing, the manufacture of high-quality steel and tube products, electromobility and artificial intelligence. The owner of the group is the non-profit LEPPER Stiftung e.S (hereinafter: LEPPER Foundation).

By establishing the LEPPER Foundation and deliberately selecting its charitable purposes, the founder sent a clear signal for social responsibility and unbureaucratic commitment. Under the guiding principle "SHAPING THE FUTURE TOGETHER", the LEPPER Foundation aims to create sustainable framework conditions for upcoming generations so that they can meet the challenges of the future with strength and responsibility.

The LEPPER Foundation is therefore dedicated to the following charitable purposes: the promotion of education, science and research as well as public health services and healthcare.

As an expression of this, we are committed to the highest standards of environmental and social responsibility and corporate policy. In our relationships with suppliers and business partners, trust, integrity and the pursuit of the shared goal of promoting sustainable and responsible business practices are common goal. We therefore expect our suppliers and business partners to comply with and promote the standards set out below. Where this Code includes examples of the implementation of the principles set out herein from the Techniropa group of companies, these examples are not exhaustive and serve only to illustrate possible forms of implementation.



We are committed to the highest quality in our products and expect the same from our suppliers and other business partners. Compliance with applicable laws and regulations (in particular occupational safety regulations, environmental provisions and human rights) as well as international agreements (such as the United Nations Universal Declaration of Human Rights, the 10 Principles of the United Nations Global Compact, the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD) and the International Labour Standards of the International Labour Organization (ILO)) plays a pivotal role. In addition, we comply with internationally recognised human rights, environmental, social and corporate governance standards (ESG standards), as set out in particular in international conventions. Our objectives in the area of environmental responsibility are guided by the United Nations Sustainable Development Goals (SDGs). Furthermore, we are guided by the principles of the German Supply Chain Due Diligence Act (LkSG) and other internationally recognised standards for responsible supply chain management.

We expect our suppliers and business partners to commit to the same high ethical, environmental and social standards. To this end, this Code of Conduct defines our fundamental principles and the standards we require of our suppliers and other business partners. Compliance with this Code is a prerequisite for every business relationship. We expect our suppliers and other business partners to observe and implement these standards also in their business dealings with their own suppliers and business partners.

This Code applies in its current version to all suppliers and business partners of the group. Executives of TRH as well as of the individual companies are, in particular, expected to exemplify the Code and integrate its individual provisions into everyday business conduct.

Together with its affiliated companies, TRH actively and sustainably promotes compliance with this Code and, when selecting suppliers and other business partners, takes into account the extent to which the principles laid down in this Code are observed.

ENVIRONMENTAL RESPONSIBILITY

We expect our suppliers and other business partners to reduce the environmental impact of business activities by identifying the ecological consequences of their operations and reducing them to the extent economically feasible. Alignment with internationally recognised sustainability goals, such as the 17 United Nations Sustainable Development Goals (SDGs), is expressly welcomed. The focus is on ecological sustainability and the protection of our natural foundations of life, such as biodiversity, clean water, clean air and healthy soils, as well as on minimising negative environmental impacts. Actively reducing the ecological footprint along the supply chain and continuously taking measures to improve the environmental performance of our suppliers and business partners are essential to achieving sustainable business development.



Climate protection

A reflective and innovation-minded approach to CO₂ emissions is an essential basis of environmental responsibility. Sustainable production and contributing to sustainable communities are central elements of our understanding of responsible business conduct. To protect the environment and people within our own sphere of influence and along our supply chain, we expect our suppliers and other business partners to comply with applicable environmental regulations and introduce appropriate measures to reduce emissions and waste. Where technically and economically reasonable, resource-saving materials, reuse, recycling and low-emission production processes should be used. We measure our business partners against these principles and are convinced that effective climate protection can only be achieved through joint responsible action.



Protection of biodiversity and ecosystems

Preserving biological diversity is an integral part of the environmental responsibility we all share. Responsible environmental management to protect flora, fauna and natural resources is essential. To compensate for potential negative impacts of their business activities on ecosystems, our suppliers and business partners should strive to promote and implement measures that avoid, reduce or at least offset such impacts. This may include, in particular, supporting projects to protect and restore habitats and cooperating with suitable local partners.

SOCIAL RESPONSIBILITY

Where people can work fairly and safely, trust is created - and trust is the foundation on which the future can be built. We stand for social responsibility as a lived foundation of entrepreneurial action and business success. We therefore expect our suppliers and business partners to advocate fair and humane working conditions and to be guided, among other things, by the 17 Sustainable Development Goals (SDGs).

This includes in particular the following aspects:



Prohibition of child labour

Child labour must be prohibited in any form in order to ensure a safe and healthy future for children. In accordance with international standards (such as ILO Conventions 79, 138, 142 and 182), we strongly support the right to a carefree childhood and education, especially along our supply chain. Suppliers and other business partners must not employ anyone who has not yet reached the applicable statutory minimum age. Employees under the age of 18 may not perform activities that could impair their safety, health or development.



Handling of conflict materials

We expect our suppliers and other business partners to recognise the importance of responsibly handling conflict minerals such as tin, tungsten, tantalum and gold (so-called "3TG" minerals) from risk areas. We therefore expect orientation towards the Dodd-Frank Act in cases of direct or indirect supply to US companies. We have also joined the Responsible Minerals Initiative (RMI) and expect relevant suppliers and business partners to comply with comparable standards. Their products should be free from such raw materials from conflict areas or, if this is technically impossible, they should disclose the origin of the materials transparently and take suitable due diligence measures. In addition, we require our suppliers and business partners to fully disclose all relevant data on the presence of conflict minerals in their products, always using the latest version of the Conflict Minerals Reporting Template (CMRT).



Exclusion of forced labour / prohibition of slavery

Any form of forced labour, slave labour, human trafficking or similar unethical practices that violate dignity and fundamental human rights will not be tolerated.

In line with international standards and legal requirements, it is imperative that all employment relationships are conducted on a voluntary basis and under fair conditions - this is the understanding we expect from our suppliers and other business partners. Business activities must be designed to create an environment throughout the entire supply chain that is free from (sexual or personal) coercion, intimidation and exploitation as well as physical harshness and humiliation.



Preservation of the natural foundations of life

The protection of natural foundations of life by business enterprises is essential to securing a just and sustainable future for all. We expect business activities to be aligned with environmentally conscious conduct, to minimise impacts on nature and to promote resource conservation, waste reduction and sustainable technologies. The goal must be to combine social justice and ecological sustainability so that present and future generations can benefit from an environment worth living in - we live by this and expect our suppliers and other business partners to follow these principles as well.



Freedom of association

Freedom of association is a fundamental right. All employees of our suppliers and other business partners must, in accordance with applicable legal provisions and international regulations, have the right to organise, conduct collective bargaining and represent their interests without fear of reprisals or other disadvantages. Employee representatives must be protected against discrimination, thereby strengthening social cohesion and social fairness.



Complaint mechanisms

Business partners and suppliers should establish and maintain an effective, transparent and confidential complaint mechanism that enables employees and other affected groups of persons to report actual or potential violations of applicable laws safely and without fear of reprisals. Incoming complaints must be reviewed promptly, impartially and transparently and handled appropriately. The protection of whistleblowers and the preservation of confidentiality must be ensured at all times. We provide an internal reporting office (<https://techniropa.hintbox.de/>) for employees of our business partners and suppliers as well as for all other persons who, in connection with their professional activities, may obtain information about actual or suspected violations of laws, policies and this Code. There, violations can be reported confidentially, anonymously or with contact details. Effective protection against reprisals is guaranteed.



Fair remuneration and working time

Fair remuneration with appropriate working time is mandatory. We expect our suppliers and other business partners to provide remuneration in line with customary industry standards, never fall below the applicable statutory minimum wage and respect collectively agreed minimum rates. Likewise, within the framework of relevant ILO standards, we expect working hours to be structured so that employees' individual needs and living circumstances are taken into account as comprehensively as possible. Our suppliers and other business partners work towards creating a balance between professional and private life and thereby sustainably strengthening the well-being, productivity and satisfaction of their employees.



Prohibition of discrimination

The prohibition of discrimination is a central component of this Code of Conduct. We expect our suppliers and other business partners to fully commit to equal treatment and gender equality and, through consistent implementation of the prohibition of discrimination, to make a decisive contribution to an inclusive and fair working environment. Every person is worthy of unrestricted respect and protection in his or her individual dignity, irrespective of ethnic or national origin, gender, religion, age, disability, social status, political conviction or sexual orientation. Any form of discrimination is unacceptable.



Health protection, safety at work

Every employee has the right to a safe and healthy workplace. We expect our suppliers and business partners to comply with all applicable laws, regulations and guidelines on health protection and safety at work and to implement suitable and appropriate protective measures to prevent accidents. It must be ensured that every employee immediately reports potential hazards and consistently follows all protective measures. Regular training and safety inspections must ensure that every employee has the knowledge and skills necessary to perform his or her duties safely. If security services are used in the course of business activities, their use must be organised with respect for human rights and relevant international standards.

Business partners and suppliers must strongly encourage their own business partners and suppliers, their temporary workers and other external personnel to act accordingly. Security personnel must be demonstrably trained and informed of the mandatory ethical and legal necessity of lawful and proportionate conduct.

CORPORATE POLICY

Entrepreneurial action carries responsibility - towards the market, society and, not least, ourselves. We therefore want to comply with the highest standards of integrity and ethics and expect the same from our suppliers and other business partners. We expect open and honest communication as well as transparency in all our business relationships.

These standards include:



Confidentiality / data protection

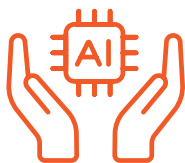
We expect suppliers and other business partners to ensure the privacy and protection of personal data of employees, customers, other suppliers and business partners. All data may be collected and processed exclusively in accordance with the GDPR (where applicable) as well as the respective relevant national data protection regulations and only for lawful and specified purposes, with the principles of data minimisation and purpose limitation being observed at all times. Suppliers and other business partners must ensure that employees store confidential information securely and prevent unauthorised access. Data protection breaches must not be tolerated and should lead to appropriate employment-law or disciplinary measures. To support employees in handling personal data and confidential information, corresponding training or other suitable measures for employees should be offered at regular intervals.



Trade and business secrets, intellectual property

We expect our suppliers and other business partners to protect know-how and confidential information with the utmost care and to safeguard the confidentiality, availability and integrity of all trade and business secrets in both electronic and physical form. The intellectual property rights of employees, customers and business partners must be respected without restriction. Technology and know-how transfers must take place responsibly and while preserving all intellectual property rights and the confidentiality of the information.

Suppliers and other business partners are obliged to strictly comply with all statutory and contractual obligations to protect confidential information. Any unauthorised use, transmission or disclosure is prohibited and may result in the restriction or termination of the business relationship as well as the initiation of legal action.



Responsible handling and use of artificial intelligence (AI)

Artificial intelligence is a driver of growth and development, but its use in everyday business is often associated with risks that should not be underestimated. We expect our suppliers and other business partners to use artificial intelligence (AI) and comparable digital technologies responsibly, lawfully and in accordance with the principles of this Code of Conduct. When using AI systems, the protection of personal data, the safeguarding of trade and business secrets and the observance of intellectual property rights must be ensured in particular. Suppliers and other business partners must implement suitable and appropriate measures to identify, assess and appropriately manage risks arising from the use of AI. In addition, relevant employees must be trained regularly in the handling of the AI systems and applications used.



Fair competition, fair business conduct and fair advertising

We expect our suppliers and other business partners to manage sustainable and fair business relationships responsibly. Such relationships require an unwavering commitment to open markets and fair competition. To this end, it is essential to comply at all times with national and international legal provisions, the rules of fair business conduct, fair advertising and fair competition, in particular the applicable antitrust regulations.

We take it for granted that our business partners and suppliers know and fully comply with their respective tax and customs obligations. This includes in particular the proper declaration of goods and services, the correct payment of taxes and duties, and compliance with all relevant documentation and cooperation obligations towards competent authorities.



Whistleblower protection

We provide a whistleblower protection system (<https://techniropa.hintbox.de/>) to our employees and to all persons who, in connection with their professional activities, may obtain information about actual or suspected violations of laws, rules and internal requirements (such as this Code). There, (suspected) violations of laws, rules and internal requirements can be reported confidentially, anonymously or with contact details. Effective protection against reprisals is guaranteed.

We also expect our suppliers and other business partners, where required by law, to establish and maintain appropriate whistleblower protection systems and to effectively protect whistleblowers against disadvantage.



Integrity / bribery, acceptance of advantages

Integrity is a central foundation of any business relationship. We expect our suppliers and other business partners to strictly refrain from any form of bribery, corruption, extortion and embezzlement as well as the impermissible granting or acceptance of advantages.

Employees of suppliers and other third parties otherwise connected with suppliers and business partners may not, directly or indirectly, offer, promise, grant or accept payments, gifts, invitations or other benefits in order to improperly influence

business decisions. Only advantages of minor and appropriate value within the scope of customary business practices and in accordance with applicable law are permissible, provided they are not directly connected with the conclusion of a business transaction.



Human rights

TRH and its affiliated companies are fully committed to the freedom, equality and dignity of all people. We expect the same commitment from our suppliers and other business partners. Discrimination on the basis of ethnic, national or social origin, skin colour, gender, language, religion, political or other conviction, birth or other status will not be tolerated.

The basis of our actions is, in particular, the United Nations Universal Declaration of Human Rights and the European Convention for the Protection of Human Rights, which serve as guidelines for our daily interactions within TRH and its affiliated companies and in dealings with our suppliers and other business partners.



Due diligence obligations in the supply chain

We expect our suppliers and other business partners to comply with appropriate corporate due diligence obligations in their supply chains. The aim is to identify human rights and environmental risks as early as possible and, where possible, to prevent them. Suppliers and other business partners should be guided by internationally recognised standards for corporate due diligence as well as the respective applicable legal requirements and implement suitable measures to avoid or minimise human rights or environmental risks wherever possible. The nature and scope of these measures are generally determined by the risk profile and position in the supply chain. Regular, risk-based analyses must be carried out to determine these parameters.



Implementation of requirements

Compliance with this Code of Conduct is a fundamental prerequisite for all material business relationships with TRH and its affiliated companies. To ensure that this Code of Conduct is accepted and respected by our suppliers and other business partners, we reserve the right to request evidence and to conduct audits or other suitable assessment measures. We pursue a zero-tolerance policy and reserve the right, in the event of serious or repeated violations of the principles of this Code by suppliers or business partners, to terminate the relevant business relationship.

Any actual or suspected violations must be reported to TRH or to the affected affiliated company of the group without delay. In such a case, suitable measures must be taken jointly to bring business practice back into line with the standards of this Code. Suppliers and other business partners are therefore required to regularly review their business practices for compliance with the principles set out herein.

Closing words

Your compliance with this Code of Conduct as our suppliers and business partners makes an important contribution to strengthening positive and responsible interactions between business relationships, society and the environment. We thank you for your commitment and for the trusting, partnership-based cooperation within the business relationships of our group of companies.

Together, we are shaping a sustainable, responsible and successful future.

Daun, on 1 June 2026



Dr. Michael Koch
Managing Director



Stefan Kön
Managing Director