

# CODE OF CONDUCT

# FOREWORD

CTI Systems is a recognized company in the design, supply and installation of integrated automated manufacturing solutions in the area of heavy or bulky loads. The correlations we have with our suppliers, contractors, customers and other business partners have been instrumental in our development and remain fundamental to our future success in the industry.

We are therefore committed to ensure that our business practices meet to relevant laws, regulations and ethical standards, while also fostering a culture of responsibility, integrity, and sustainability.

Following the company's executives' related instructions and explanations, the responsibility of each employee, supplier or business partner is to adhere to the standards outlined in this Code of Conduct.

In our duty of company owners and managers in charge, we apply a zero-tolerance policy towards any breaches of this Code of Conduct. Therefore, if you are uncertain or have any questions regarding this Code of Conduct, please reach out to our designated Compliance Officer, Ms. Jessica HOFFMANN, for clarification.

## Team of Owners / Executive Managers



**Bob GREIVELDINGER**  
Chief Executive Officer



**Alexander BORN**  
Chief Financial Officer



**Patrick POIRRIER**  
Executive Vice President  
Administration



**Laurent BISSEN**  
Executive Vice President  
Technology Development

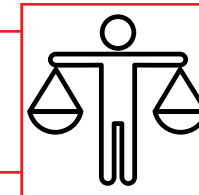


**Tom ROSTER**  
Executive Vice President  
Sales



**Jean-Luc BORN**  
Executive Vice President  
Engineering

# BUSINESS ETHICS & INTEGRITY



Business ethics and integrity serves as the basis of sustainable and responsible business practices, shaping the way we interact with stakeholders and the broader society.

In the essence, for us, business ethics entails the adherence to moral principles and values in all aspects of operations, from decision-making to daily interactions.

It encompasses honesty, transparency, fairness, and accountability, guiding our business to conduct themselves in a manner that upholds trust and fosters positive, long-term and well-being relationships with customers, employees, shareholders, and the community in a larger sense.

## **Bribery & Corruption**

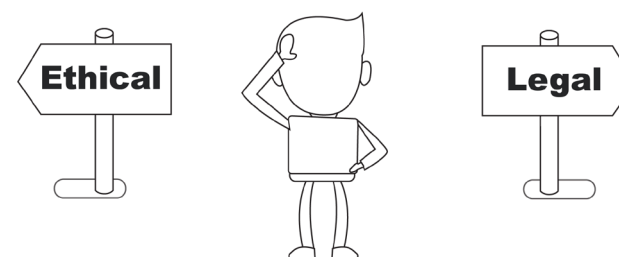
We do not tolerate offering, giving, soliciting, or accepting any form of bribe, kickback, or improper inducement. Our commitment to transparency, fairness, and honesty extends to all aspects of our business dealings, both domestically and internationally. We expect all employees to adhere strictly to these principles and report any suspected violations promptly.

## **Anti-Money Laundering**

In compliance with global regulations and our commitment to ethical business practices, our company maintains a strict stance against money laundering in all its forms. We are dedicated to preventing our services and resources from being misused for illicit financial activities.

## **Anti-Trust & Competition Laws**

In accordance with Anti-Trust and Competition Laws, our company is dedicated to fostering a marketplace characterized by fair competition, innovation, and consumer choice. We unequivocally prohibit any behaviour that may unlawfully restrict competition, including price-fixing, bid-rigging, market allocation, or other anti-competitive practices.



# HEALTH, SAFETY, ENVIRONMENT & ENERGY



At CTI Systems, we prioritize the well-being of our employees, the preservation of the environment, and the efficient use of energy resources. Our commitment to these principles is unwavering and guides our decisions and actions, as far as required means are reasonable.

## Health and Safety

We provide a safe and healthy work environment for all employees and visitors. Every individual is responsible for maintaining high safety standards, identifying hazards, and taking proactive measures to prevent risk and accidents. We encourage and support open communication, regular training, and continuous improvement to ensure the well-being of everyone.

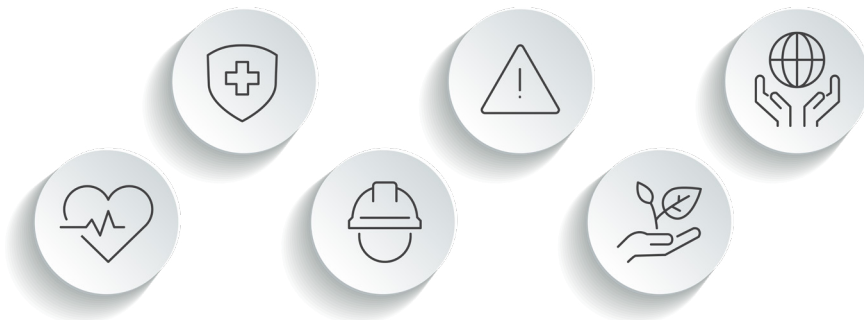
## Environment

We recognize the importance of environmental conservation and strive to minimize our ecological footprint, by means of sustainable practices such as waste reduction and pollution control measures. Our commitment to environmental stewardship includes and goes beyond compliance with relevant laws and regulations.

## Energy Management

We are dedicated to optimizing our company's energy efficiency to the extent technically possible, reducing greenhouse gas emissions, and promoting the use of renewable energy sources. By investing in energy-efficient technologies, implementing energy saving measures, and raising awareness amongst employees, we seek to reduce our impact onto the environment and contribute to a more sustainable future.

By adhering to these principles and integrating them into our daily operations, we demonstrate our commitment to fostering a safe, healthy, and environmentally responsible workplace for all.



# LABOUR STANDARD



CTI Systems upholds human rights by ensuring that both its employees and those working for its suppliers are treated with dignity and respect. This involves promoting fair employment practices, providing legal and competitive wages, as well as prohibiting any form of harassment, bullying, or discrimination in the workplace. Additionally, we strictly forbid the use of child labour, forced labour or bonded labour within our direct operations or in our supply chain. Furthermore, we refrain from any involvement in trafficking individuals for any purpose. These standards underscore a commitment to ethical conduct and the protection of the rights and dignity of all individuals throughout the supply chain.

## **Child labour**

Our code of conduct strictly prohibits the employment of underaged individuals, defined as those below the legal working age in their respective countries or those who are still of compulsory school age.

## **Forced labour, bonded labour & modern slavery**

CTI Systems undertakes to provide its employees with a written contract in a language that they comprehend, clearly outlining their entitlements and obligations concerning wages, working hours, benefits, and other employment conditions.

We are obligated to honour workers' rights to resign from their employment with reasonable notice and to receive all outstanding wages owed to them.

Each employee has the right to refuse an assigned task, if essential required preconditions are not given, e.g. in case of dangerous working conditions or the like.

## **Discrimination, harassment & bullying**

We do not tolerate discrimination of any kind, including but not limited to discriminatory practices in hiring, promotion, compensation, and employment termination. Every employee, independent of gender, has the right to equal opportunities and fair treatment. We actively promote diversity and inclusion in our workforce.

Harassment, whether verbal, physical, or visual, is strictly prohibited in our workplace. This includes unwelcome conduct that creates an intimidating, hostile, or offensive environment. We encourage employees to report any incidents promptly, so that we will take immediate and appropriate actions to address and prevent such behaviour.

Bullying, coercion, or intimidation of any kind is not tolerated at CTI Systems. We are committed to fostering a supportive and respectful work culture where all employees feel valued and empowered to perform their best. Any form of bullying, whether directed at colleagues or superiors, will be thoroughly investigated and addressed.

# WHISTLEBLOWING SYSTEM & DATA PROTECTION



As part of our commitment to upholding high standard of ethics and integrity, our company mandates compliance with reporting obligations for all potential cases of misconduct or non-compliance.

Everyone is invited to promptly report any suspected violations of laws, regulations, or company policies to the appropriate channels, such as management, human resources, designated Compliance Officer or via our Whistleblowing system. We ensure full confidentiality for those who come forward with concerns by promptly addressing and investigating reported cases.

## Whistleblowing system

<https://whistleblowersoftware.com/secure/c1e35249-d21a-4b2b-95b8-e67ff7d0ad30>

This system provides a confidential and secure platform for individuals - internals or externals - to report any suspected misconduct, ethical breaches, or violations of laws or company policies. We encourage to speak up without fear of retaliation, knowing that their concerns will be taken seriously and investigated thoroughly.

## Data protection

In alignment with the General Data Protection Regulation (GDPR), our company is committed to respect data protection and privacy. We recognize the importance of safeguarding the personal information of our customers, employees, and other parties. Our policies and procedures are designed to ensure compliance with GDPR requirements, including lawful and transparent processing of personal data, providing individuals with information about how their data is used, and respecting their rights to access, rectify and, eventually, erase their data.



**DEVOTED TO CREATE.  
COMMITTED TO PERFORM.**

COMPLIANCE

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