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1 Preamble

Introductory statement to the Code of Conduct

As a global industrial company, we are aware of our social responsibility and the impact our actions have on people, the environment, and markets worldwide. Our corporate identity is based on integrity, transparency, fairness, and respect for human dignity. This Code of Conduct defines binding principles for ethical behavior and sustainable business practices for all employees, managers, and business partners of our company.

We are fully committed to respecting human rights in all our business activities. Our actions are guided by internationally recognized standards, in particular:

- the Universal Declaration of Human Rights of the United Nations (UN, 1948),
- the core labor standards of the International Labor Organization (ILO),
- the UN Guiding Principles on Business and Human Rights (2011),
- the UN Global Compact, whose ten principles we support,
- the OECD Guidelines for Multinational Enterprises,
- as well as relevant regional and national laws and regulations, in particular the EU Supply Chain Due Diligence Act (CSDDD) and comparable international regulations.

We are committed to decent working conditions, equal treatment, occupational safety, environmental protection, and the fight against all forms of forced labor, child labor, discrimination, and corruption. We expect our employees and business partners worldwide to respect the same principles and implement them within their own sphere of influence.

Our goal is to promote sustainable and responsible value chains, build trust, and actively contribute to the implementation of international standards for responsible corporate behavior.

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This Code of Conduct describes the important framework within which the company's activities take place. This Code of Conduct applies worldwide to all employees of the Teufelberger Group. By complying with the framework set out here, we meet our own standards and the requirements of society and contribute to securing the long-term success of the company.

The basis of our business activities is compliance with all national and international regulations and voluntary commitments. All organs and employees of the company are obliged to inform themselves about the applicable regulations and to comply with them. The exemplary role of the organs of the companies is crucial, and compliance with the rules of conduct by this group of persons is of particular importance. Violations of essential guidelines of these framework conditions will not be tolerated. Failure to comply with regulations or guidelines may have consequences under labor law.

2 Our values and principles

This Code of Conduct is also intended to describe the values that guide our cooperation and work. We therefore commit ourselves to ...

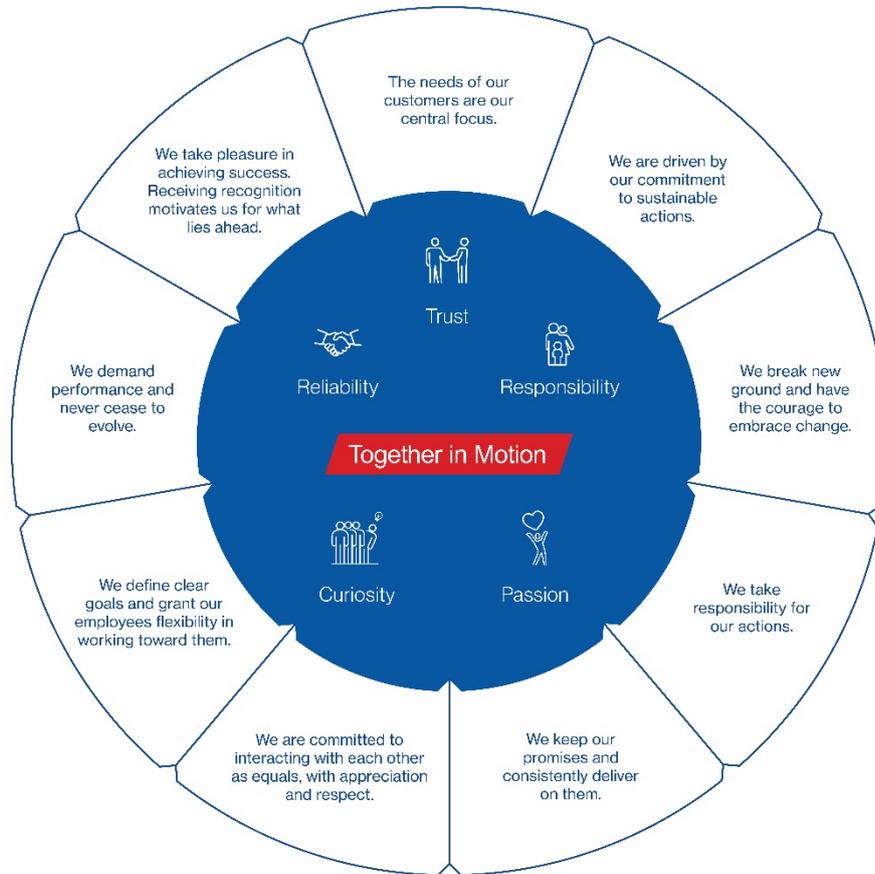
2.1 Our values

At Teufelberger, our corporate values are firmly anchored in our daily activities. Each employee contributes to our shared success with their individual strengths. Like a rope made up of many precisely coordinated elements, our strength comes from the interaction of all those involved.

Our five values form the core – symbolized by the inner rope. The outer rope represents our lived togetherness, which is based on trust, respect, and the principle of equality. This principle is a central component of our guiding principle "Together in Motion" and shapes our collaboration in a lasting way. The accompanying graphic shows a cross-section of a rope as a visual representation of our cooperation: every single element counts. Every contribution strengthens the whole.

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2.2 Leadership Principles

Our success is only possible through a strong team spirit and the strength-oriented commitment of all our employees. This requires managers at all levels with a common understanding of leadership.

With our Leadership Principles, we at TEUFELBERGER want to create a common understanding of what it takes to become and be a good leader at our company. We are convinced that good leaders among us are people who care about their personal development and the development of their teams. Our Leadership Principles put into words what makes a leader at TEUFELBERGER, i.e., the values, attitudes, and behaviors that define them.

For our employees, the principles create a common framework that provides CLARITY and GUIDANCE on the behaviors they can expect from their managers.

Whether we are discussing ideas for a new project, making decisions in the interests of our customers, or conducting job interviews, the Leadership Principles describe the culture that defines our leaders and makes TEUFELBERGER special.

We know why...

- We provide orientation and clarity about the path we are taking together
- We focus our actions on the benefit to our customers

We have trust...

- We take on and hand over responsibility
- We make decisions (even courageous ones)
- We stand by our results and use them to develop further

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We implement...

- We define clear goals, priorities, and deadlines
- We finish what we have decided to do
- We are dynamic and also take creative and unconventional paths

We want performance...

- We demand commitment, personal responsibility, and initiative
- We recognize and communicate outstanding achievements
- We deliver agreed results

We are role models...

- We communicate respectfully, appreciatively, and credibly
- We are aware of our strengths and our own potential for development

We promote potential...

- We develop each of our employees individually
- We identify and promote the strengths of our employees

3 Social principles

3.1 Human rights

Teufelberger expects all its stakeholders (employees, suppliers, customers, business partners) to observe and protect the globally applicable regulations for the protection of human rights as a fundamental and universal guideline. This includes, among other things:

- No child labor
- No human trafficking
- No forced or illegal labor
- Consideration of the legal minimum age
- Freedom of association and collective bargaining, including the right of employees to organize and bargain collectively.

3.2 Creation of competitive and fairly paid jobs

Teufelberger complies with the legal framework in the respective countries. Among other things, the focus is on working hours, which are in accordance with national laws. The same applies to overtime, which is paid on a voluntary basis or by agreement with the company and with appropriate remuneration.

The working environment is also a high priority. All sites ensure compliance with the relevant workplace regulations and focus on creating a workplace that takes into account not only the factors required by law but also well-being and ergonomics.

3.3 Occupational safety and health

In addition, we consider the occupational safety and health of our employees to be a special asset that must be maintained and promoted. We want to offer a high level of safety in the workplace. Employees and managers are required to promote safety in the workplace and not to tolerate negligence that endangers health. To this end, we rely on technical and organizational solutions as well as regular

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training for all employees. Maintenance of machinery and equipment and clear guidelines for the use of personal protective equipment are part of Teufelberger's measures to ensure occupational safety. These measures enable Teufelberger to minimize accidents and ensure the health and safety of all employees.

Furthermore, we take a holistic view of health, which encompasses both physical and mental well-being. That is why we place particular emphasis on prevention in all its forms. We promote a corporate culture in which work-life balance, mental health, and open communication about stress are actively supported. Measures to prevent burnout, health-promoting offers, and sensitive handling of psychosocial stress are just as important to us as ergonomic workplaces and safety precautions. This is the only way to ensure that our employees remain healthy, productive, and motivated in the long term.

3.4 – promoting diversity, inclusion, and equal treatment

Our dealings with employees and business partners are based on respect and guided by objective criteria. Teufelberger ensures a working environment in which discrimination of any kind is prohibited. This applies in particular to discrimination on the basis of ethnic origin, gender, age, religion, or sexual orientation.

No one may be disadvantaged on the basis of their age, gender, religion, nationality, or sexual orientation. This is stipulated by the Equal Treatment Act, and we are committed to this principle.

The law distinguishes between "direct and indirect discrimination." Direct discrimination occurs when a person is treated less favorably than another on the basis of one of the characteristics mentioned above. Indirect discrimination occurs when seemingly neutral regulations or criteria disadvantage certain groups in a particular way.

It is therefore important to ensure that all forms of discrimination are avoided in decisions, discussions, and correspondence. This applies in particular to hiring, remuneration, training and further education or retraining, promotions, other working conditions, and dismissals.

Discrimination also includes gender-based harassment that affects the dignity of those affected. All forms of gender- , degrading, or offensive behavior or communication must be avoided and will be sanctioned within the company.

The complexity of the issue of discrimination is particularly evident in the context of inclusion and related initiatives. Through targeted workplace analyses and measures based on these, we design working environments in such a way that people with disabilities can participate in working life in a self-determined manner and with equal opportunities. This active inclusion work not only prevents discrimination, but also contributes significantly to strengthening our corporate culture. It stands for openness, respect, and cohesion—values that we not only commit to on paper, but also live by every day. Because an inclusive culture is not an end in itself, but a central component of our values and our social responsibility. We are convinced that only in an environment where everyone feels safe, recognized, and included can potential be developed and sustainable corporate success be achieved. The employer and all managers share responsibility for actively ensuring compliance with these principles. We have a strict zero-tolerance policy when it comes to dealing with incidents of discrimination – any deviation from our rules and values will not be accepted.

All personal references apply to both genders.

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The legal regulations correspond to our values. We want to assess all employees of the company according to their qualifications and performance and develop them on this basis. We strive for a balanced employee structure in terms of gender, age, and origin in order to meet the demands of the future by drawing on the diversity of knowledge and experience.

4 Compliance with the principles of international trade

Teufelberger complies with all national and international regulations governing (foreign) trade. Every employee is obliged to comply with applicable export or import regulations, as well as all customs, and tax regulations. Any form of support for money laundering or tax evasion will not be tolerated.

Compliance with international trade principles is mandatory for us – especially with regard to fair competition, human rights, and environmental standards throughout our supply chain. Within the framework of the EU Directive on Corporate Sustainability (CSDDD), we take our due diligence obligations seriously and rely on transparent processes for early risk identification and prevention. We expect our business partners to adhere to the same ethical, social, and environmental standards—see also our supplier code of conduct. Through regular assessments, clear guidelines for conduct, and close cooperation, we promote sustainable trade practices. In this way, we make an active contribution to a responsible and sustainable global economy.

5 Maintaining fair competition

Teufelberger expects its employees to comply with the laws governing fair competition. Price and condition agreements with competitors are prohibited, as are agreements with competitors for the purpose of dividing up customers or markets. Participation in interest groups is an important basis for representing economic or industrial interests in the national and international arena. The rules of conduct set out above also apply to this activity.

When dealing with competitors, there are various factors to consider. This organizational guideline defines the framework for contacts with competitors and provides guidelines for conduct. The following factors can be identified:

- Competition law framework
- Protection of company know-how
- Information about the market and competitors

Contact with competitors and the exchange of information take place through mutual visits, in association committees or standardization committees, or on other occasions. In all these cases, the same framework conditions apply.

5.1 Conflicts of interest

As employees of Teufelberger, we are obliged to consistently separate our private interests from the business interests of the company. A conflict of interest may arise if personal relationships or advantages – for example, through family members or close associates – give the impression of influencing business decisions or impairing objective action. Such situations not only raise questions about integrity, but can also jeopardize the quality of our decisions and trust in our company. Even the appearance of a conflict of interest can damage Teufelberger's reputation. We therefore act responsibly, avoid potentially conflict-prone situations, and maintain clear boundaries between our private and professional lives. Anyone who finds themselves in an actual or even suspected conflict situation is

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obliged to discuss this openly with their line manager or the compliance office in order to find a joint, transparent solution.

5.2 Competition law

Maintaining and promoting competition is one of the pillars of the market economy and an essential task of the European Commission. Any violation of European competition law is strictly punished. In Austria, the Cartel Act prohibits and punishes any market-damaging agreements with competitors. Excerpt from the Federal Act Against Cartels and Other Restrictions of Competition (BGBl I No. 61/2005). Source: www.bwb.gv.at

Prohibition of cartels

§1. (1) All agreements between undertakings, decisions by associations of undertakings, and concerted practices that have as their object or effect the prevention, restriction, or distortion of competition (cartels) are prohibited.

(2) The following are prohibited in particular under paragraph 1:

- The direct fixing of purchase or selling prices or other trading conditions
- Restricting or controlling production, sales, technical development, or investment
- The division of markets or sources of supply
- The application of dissimilar conditions to equivalent transactions with trading partners, thereby placing them at a competitive disadvantage
- Etc.

§29. The Cartel Court shall impose fines of up to 10% of the total turnover achieved in the previous financial year! Against an entrepreneur... who intentionally or negligently violates the cartel prohibition (§1),....

The aim of contacts with competitors is to exchange general market information and information on market trends.

The following topics are not allowed and must not be discussed under any circumstances:

- Pricing policy (sales prices, recommended prices, discounts, profit margins, etc.)
- Cost position
- Division/allocation of markets
- Production or sales restrictions
- Preliminary talks regarding participation in tenders (both public and private, including " ")
- Exchange of information on production, sales, investments (unless they are public)
- Any other topic that could lead to an agreement restricting competition

The following topics are not restricted:

- General economic data and the economic climate, provided that the market behavior of individual companies is not affected
- Lobbying and committee work to promote the interests of the industry
- Legal issues
- Standardization issues
- Labor law, social issues, safety, and health issues

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5.3 Protection of company know-how

It should be noted that any information that reaches the outside world may adversely affect our competitiveness and our negotiating position in sales and purchasing. Therefore, internal information must be treated with great care, especially when dealing with competitors.

5.4 Information about the market and competitors

The goal is to maintain essential information (addresses, contacts, current business information, strengths/weaknesses profiles, etc.) for the A-competitors of all SGBs. Goals should be set for selected employees in their employee objectives.

Recording and distribution of information after contact with a competitor:

There must be a report for every competitor contact (e.g., visit or phone call). This report is recorded in the CRM system so that it is accessible to all authorized persons.

If the visit involves sensitive information that should not be made public, the visit report is distributed to the relevant employees as a Word document. Sensitive information is defined as any information whose dissemination within the organization could cause damage to the competitor. The following employees are always considered relevant:

- Executive Board/Business Development
- SGB manager

The selection of other employees to be informed is at the discretion of the person recording the report.

If a competitor is invited to a Teufelberger site, a tour of the premises is generally not permitted. Exceptions must be expressly approved by the Executive Board. Exceptions may include, for example, necessary tours of the premises in the context of cooperation negotiations.

The following departments must be informed in advance of the purpose of the visit and the agenda for each visit by a competitor:

- Executive Board/Business Development
- SGB manager

6 Anti-corruption

Decisions on the purchase and sale of products are made exclusively on the basis of quality and price criteria. Teufelberger firmly rejects the bribery of business partners with money or gifts. Offering or accepting money or monetary benefits is strictly prohibited.

Employees are prohibited from accepting or promising to accept money or gifts in kind in return for the purchase of goods or services. Minor occasional gifts, invitations, and hospitality are permitted within the scope of normal business practice.

In its Code of Conduct, Teufelberger undertakes to combat all forms of corruption in business and to take measures to prevent corruption. This organizational guideline serves to implement this commitment and at the same time fulfills the requirements of the Association Responsibility Act (VbVG), which regulates this matter in Austria.

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6.1 Legal framework

The VbVG provides for corporate liability in the event of a criminal offense committed by a decision-maker of the company, as well as liability in the event of a criminal offense committed by an employee of the company who is not a decision-maker, if the commission of the offense was enabled or at least facilitated by a lack of supervision or control on the part of the company.

The second prerequisite for liability under the VbVG, namely inadequate monitoring and control systems, poses particular risks for companies that fall within the scope of this law. Companies therefore run the risk of being held liable for negligent offences committed by their employees if their decision-makers have disregarded the care required under the circumstances and thereby enabled or significantly facilitated the employees' actions.

According to the provisions of the VbVG, this is already assumed to be the case if a fundamental technical, organizational, or personnel measure to prevent the act was omitted.

In general terms, corruption is defined as "the abuse of a position of power or trust for personal gain." The essential elements of corruption are "bribery, corruption, accepting benefits, and granting benefits." Corruption is not a necessary evil in business, but increases business risk. A clear line must be drawn between acceptable and prohibited behavior.

6.2 Facilitation payments

Bribes (kickbacks, speed money, facilitation payments) are payments for services to which one is already entitled. This applies in particular to services provided by persons in public service or by representatives of legislative bodies. Teufelberger rejects such payments on principle and aims to avoid them completely. These are to be distinguished from customary invitations or gifts (small gifts up to EUR 100), which are generally permissible. Country-specific legal regulations must be observed.

The following gifts are strictly prohibited:

- if they are linked to the expectation of unlawful conduct
- cash gifts
- gifts that could damage Teufelberger's reputation (e.g., visits to nightclubs)
- This is to be distinguished from commission payments or comparable services for which there is a corresponding consideration.

6.3 Bribery

Teufelberger rejects any form of bribery of decision-makers to obtain a personal advantage or an advantage for the company. This applies in particular to decision-makers at customers who decide on orders to Teufelberger. The types of gifts listed in point 2 are strictly prohibited. Small gifts and invitations up to an amount of EUR 100 are permissible, provided they are not prohibited by known customer regulations or by law.

6.4 Acceptance of gifts

Gifts from business partners are permissible within the usual scope of normal business life. The upper limit for such gifts is EUR 100.00 () per business partner per year. Gifts or invitations exceeding this limit require the approval of the respective managing director or, in the case of managing directors and executives in service areas, the Executive Board.

Gifts listed under point 2 are prohibited in all cases.

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6.5 Sponsorship

6.5.1 Purpose

Sponsorship can help to promote a positive image of the company among existing and potential customers and employees.

The number of requests for sponsorship support is overwhelming. In order to ensure a coordinated approach and make the best possible use of limited resources, it is advisable to regulate sponsorship activities.

6.5.2 Implementation

When it comes to sponsorship, a clear distinction must be made between material sponsorship, HR sponsorship, and corporate sponsorship.

Material sponsorship: The decision on the appropriateness and amount of material sponsorship lies with the respective SGF manager. The SGF manager must ensure that all marketing-related materials, such as photos and videos, are provided by the sponsored party and that TEUFELBERGER is recognizable to the public as the sponsor. The respective SGB manager must be informed.

HR sponsorship: This includes everything that serves to support employer branding activities. Regardless of the amount, these requests must be forwarded to the respective local HR manager for decision, processing, and response. If the request is relevant to the entire group, the Global Head of HR must be consulted. The basic strategy must be agreed with the Executive Board, and an overview must be sent to the Executive Board annually.

Corporate sponsorship: This includes all other requests, e.g., for cultural events, social institutions, or sporting events. Regardless of the amount, these must be forwarded to the Global Head of Marketing or the local Communications Manager/Marketing Communications Manager for decision and processing. The basic strategy must be agreed with the Executive Board, and an overview must be sent to the Executive Board annually.

In general, care must be taken to ensure that the corporate design guidelines are adhered to when using logos.

6.6 Donations

Teufelberger sees itself as a socially responsible company that supports regional projects, programs, and initiatives, especially in the areas of education and youth. The decision on whether and how much to donate is made exclusively by the CEO of the Teufelberger Group.

7 Environmental protection and conservation of resources

Teufelberger has both ethical and economic interests in using resources carefully and responsibly. We naturally comply with the legal provisions on environmental protection, as it is a central concern of ours to leave an intact environment for future generations. In addition, we contribute to the fight against climate change through active climate protection and targeted measures to reduce CO₂ emissions. The use of recycled materials, the economical use of all raw materials, the reduction of waste, and the continuous optimization of our energy and production processes are central components of this. They

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not only contribute to our environmental responsibility, but also strengthen the future viability and competitiveness of our company.

8 Protection of tangible and intangible assets /Data protection

Teufelberger expects its employees to handle the company's assets responsibly. This applies to both tangible and intangible assets. The protection of company knowledge is therefore of the utmost importance and it is prohibited to disclose or pass on trade or business secrets to third parties. All business-related or personal data must be treated with the necessary confidentiality. Confidentiality applies without restriction beyond the end of the employment relationship.

It is prohibited to use company resources for personal purposes unless such use is permitted by the employment contract or organizational guidelines.

9 Use of IT and the Internet

A significant portion of the company's knowledge is stored on IT systems. For this reason, access to these IT systems is protected by appropriate security systems. All security regulations must be observed by all users. This applies in particular to the confidentiality of passwords and company know-how.

There are additional risks associated with using the Internet. Therefore, all rules for using the Internet must be observed without restriction. The use of the Internet and email is restricted to business purposes; minor private use outside working hours is permitted.

In order to ensure the correct and efficient use of IT systems, applications, and data (in accordance with the GDPR, cyber security, etc.)—as well as the professional handling of future technological developments (e.g., AI)—the company offers regular training in the form of courses, seminars, and workshops.

10 Knowledge of violations of the code of conduct

10.1 General

If employees of the company become aware of misconduct or violations of these guidelines, they are free to report them. The following options are available: , , supervisors, the works council, Human Resources, or Quality Management. Anonymous reports of misconduct will not be investigated, but will ensure the absolute confidentiality of reports upon request. It is guaranteed that employees who make a report for the reasons stated will not suffer any disadvantages. Employees who make false allegations intentionally or through gross negligence will face disciplinary consequences.

The respective e supervisor, Human Resources, or the Teufelberger whistleblower system are available for this purpose.

10.2 Whistleblowing system

In accordance with the EU Directive, we have set up a whistleblower platform that can be accessed via the secret agent icon in T-Net .

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10.2.1 What is whistleblowing? Why does this system exist?

The European Union has adopted the Whistleblower Directive (EU 2019/1937), which stipulates, among other things, that public authorities and private employers with 250 or more employees must set up a whistleblowing system. At the same time, the directive provides strong protection for whistleblowers and even their supporters. The aim of the EU Whistleblowing Directive is to:

- To uncover and prevent violations;
- improve law enforcement by establishing effective, confidential, and secure reporting channels and providing whistleblowers with effective protection against retaliation;
- that whistleblowers cannot be held liable under civil, criminal, or administrative law, nor in relation to their employment.

10.2.2 Where can the platform be found and what topics can/should be reported?

The platform can be accessed on T-Net (intranet) by clicking on the secret agent icon. As a rule, incidents are reported that express suspicion of misconduct by a person that is believed to be in the public interest. Specific examples include accounting fraud, bribery and any form of corruption, corporate tax evasion, money laundering, financing of terrorist organizations, environmental damage, and violations of food and product safety regulations.

10.2.3 When is it better to go to the works council/supervisor?

The platform was not intended by the legislator as a tool for reporting personal issues. Reports of conflicts, harassment, bullying, etc. can and should continue to be reported to the works council or supervisor in accordance with company policy.

10.2.4 What is the process behind this? Who receives the report?

If an employee reports an incident, Florian Teufelberger, the Global Head of Human Resources, and the CFO receive this information. Within seven days, receipt of the report is confirmed, and a prompt and appropriate response is provided. After a final investigation, final feedback is provided within 90 days of submission. The documents must be retained.

10.2.5 Is the anonymity of the reporter protected?

Teufelberger has deliberately chosen to use the external whistleblower platform LOUPE in order to better protect anonymity. Reports can therefore be made anonymously in writing (digital reporting channel). Please make sure to note and keep the incident code so that the incident can be tracked at a later date.

11 Final statement

The document is an integral part of onboarding, training, and e-learning and is communicated to all employees in a complete and comprehensible manner.

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