



TRUMPF



TRUMPF

Policy Statement

On Respect for Human Rights and
Protection of the Environment

Introductory remarks

TRUMPF places a great deal of importance on this policy statement. Together with our corporate principles and our code of conduct, it sets out the most important provisions on which our corporate culture and day-to-day business activities are based.

It documents our commitment to respecting human rights and protecting the climate and environment that provide the natural foundations for all our lives. Furthermore, it outlines the specific steps we are taking to put this commitment into practice in our day-to-day work to the very best of our ability.

We are a family-owned business with a strong ethical stance that reflects the values of the family that owns TRUMPF. Respect for the inviolability of human dignity and a clear focus on the common good, including the well-being of future generations, have always played a central role in our business activities. We cannot imagine achieving success in any form of business practice without being guided by these two principles. We regard both these principles as inextricably linked to respect for human rights and protection of the climate and environment that constitute our natural life-support system.

Human rights form an integral part of our activities in many different ways. These are best summed up under the heading of corporate culture. Implementing a positive corporate culture based on mutual respect is something we have always pursued as an independent, high-priority aspect of our corporate strategy.

Protecting the natural resources on which humanity depends is another issue that we have always regarded as extremely important – and the visibly deteriorating state of the climate and environment has brought this issue into even sharper focus in recent years. We all know that we should be making every possible effort in this area to ensure our descendants inherit a world worth living in. We have therefore chosen to define sustainability as a further independent, high-priority action area within our corporate strategy to help us pursue ambitious environmental goals. This approach to forging the future also reflects our core purpose of “unlocking technological worlds for generations to come”.

We are aware of our responsibilities and are determined to do all we can to help ensure respect for human rights and protection of the environment. By doing so, we hope to make the world a little bit better.

This policy statement is an expression of our determination to achieve these goals. We expect elements of this statement to change and develop over time. This will allow us to continuously develop the risk management system we have established and to incorporate the new insights we gain each year into the wording of this statement.

This policy statement is directed at our employees, our suppliers and other business partners, and the general public. We hope it will lead to a debate on the issues it raises and discussion of the ways in which its content is put into practice.

TRUMPF Group Managing Board

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01

Our fundamental
position on human
rights and the
environment



01 Our fundamental position on human rights and the environment

We are a family-owned business with a strong ethical stance based on the values of the family that owns TRUMPF. We place great importance on two key points: respect for each person's individual dignity and a firm belief that the economy and our actions within it must ultimately work for the common good.

Conflicts that affect human dignity cannot be ruled out entirely. These might include behavior toward employees that is not well-founded or objectively justified, or situations that, while justified in themselves, have a harsh impact on an individual. We strive to prevent such conflicts from the outset. In the event that, despite our efforts, such an unjustified conflict occurs, we will make every effort to rectify it as soon as we become aware of it. In the event that a conflict is objectively justified, we shall endeavor to proceed fairly and achieve an appropriate balance between the parties concerned. We are also prepared to make compromises to achieve this. It is important to show mutual respect and appreciation for each other, especially in difficult situations.

We pursue the common good in various ways. We offer our employees meaningful occupations and provide our customers with high-quality products. In doing so, we make use of resources and expect a consideration in return. There should be a fair balance between the consideration we receive and the benefits of the activities we undertake. This is what guides our actions. We reject any form of excessive and unlimited pursuit of profit that flouts rules, infringes the rights of third parties or damages the environment through the excessive consumption of resources.

In our view, respect for human dignity and a focus on the common good are inextricably linked to respect for human rights and protection of the environment. Just as we expect to benefit from respect for human rights in our own personal and professional lives and wish to enjoy pristine natural environments, so, too, do we concede these same rights to others. We are therefore committed to upholding the following international standards:

- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- The Ten Principles of the UN Global Compact
- OECD Guidelines for Multinational Enterprises
- United Nations Guiding Principles on Business and Human Rights
- The Paris Climate Agreement

We uphold a rigorous commitment to respecting human rights and protecting the environment. We do not accept any violations of this commitment. At the same time, we do our utmost to encourage our business partners to also pursue this same goal. We want to make a tangible, positive contribution to upholding this commitment and do not wish to be associated in any way with human rights violations or damage to the environment.

01 Our fundamental position on human rights and the environment

This commitment is driven by our inner convictions. We comply with all laws and regulations in the countries in which we operate. To make this commitment more transparent and accessible, we have adopted the TRUMPF Code of Conduct. Should conflicts arise between the principles outlined in this policy statement and the national laws of certain countries, we endeavor to give the highest priority to human rights and to protection of the environment.

Respect for human rights and protection of the environment imposes limits on our actions, but it also provides an opportunity to take our future and the fate of our planet into our own hands and to guide them in a better direction. We strive to do this by embracing the excitement of innovation and progress and maintaining a firm belief in a positive future.

We wish to emphasize the following points concerning respect for human rights and protection of the environment:



01 Our fundamental position on human rights and the environment

Human rights

Child labor

Children require special protection. They should be able to grow up freely without exploitation and to develop into mature and responsible adults. We therefore strictly oppose child labor. We exclusively hire employees who have reached the legal minimum age and are not subject to compulsory education according to the law in effect at the place of employment in compliance with the ILO Declaration on Fundamental Principles and Rights at Work. At the same time, we offer special programs for schoolchildren as part of our efforts to encourage interest in and enthusiasm for business among young people both in the sectors we work in and in other areas. Every year, we accept young people with general school-leaving qualifications onto our apprenticeship scheme, and they generally take up permanent employment with us after completing their apprenticeship.

Forced labor

We do not tolerate any form of forced labor, human trafficking or slavery. All employment contracts must be based on work for which the employee has offered themselves voluntarily. All our employees have the right to terminate their contract of employment subject to a statutory or reasonable period of notice and shall be subject to no other disadvantages when doing so. We do not permit any means of enforcing performance that falls outside the employer's statutory right to give instructions to their employees. Employees who feel coerced or pressured in this or any other way can use our anonymous whistleblower system to notify our central compliance team about their situation. This system is described in more detail below. All submissions made through the whistleblower system will be followed up, documented centrally and brought to an appropriate resolution. We actively promote our whistleblower system within the company and verify employees' awareness of the system as part of our regular, worldwide, anonymous employee satisfaction surveys. Our employees can also provide anonymous feedback on their situation through these surveys. Our HR department follows up on any unusual or anomalous feedback and attempts to effect changes in the behavior of the managers concerned or to remedy the situation in some other way.

Security personnel

The security staff we employ are the gatekeepers to our various sites. We ensure they are professionally trained and able to take responsibility for protecting our employees and our facilities. We do not tolerate any behavior on the part of security personnel toward our employees or third parties that is not in line with human rights.

Health and safety at work

Employees have the right to protection of their health and safety during working hours. Providing them with a working environment that guarantees this right is one of our top priorities. We provide appropriate training to give our employees the skills they need to perform their tasks and we run worldwide initiatives to raise employees' awareness of occupational safety. We record the number and type of workplace accidents, regularly report these to the Managing Board and implement measures to prevent them from occurring. We adopt a preventive approach that regards all workplace accidents and occupational diseases as fundamentally avoidable. We take steps to ensure that employees are not subjected to unreasonable physical or mental stress. We comply with the working-time regulations applicable at each place of employment as well as ensuring the provision of appropriate rest periods and regular paid vacation. We also offer free mental-health support programs to assist employees suffering from emotional or psychological distress. We ensure that people treat each other with respect and take decisive action if an employee is threatened, insulted or harassed, particularly in the case of sexual harassment.

01 Our fundamental position on human rights and the environment

Human rights

Product safety

Ensuring that our products are safe for our customers and their employees to use is one of our top priorities. This is why our development and production processes are subject to such strict standards. Products are only approved for sale once they have passed a rigorous safety review. We provide intensive, tailor-made training to our customers and their employees. Through our service organization, we monitor how our products are used and take appropriate measures in response to accidents, near-accidents and identifiable safety risks. We carefully analyze such safety risks and incorporate the findings in our development departments' working practices.

Equal opportunities and protection against discrimination

We do not tolerate any form of discrimination based on gender, skin color, ethnic or national origin, medical conditions, disabilities, age, religion, political opinions, membership of a trade union or works council, sexual orientation or any other reason. Nobody may be disadvantaged or given preferential treatment without objective justification. This applies, in particular, to reviews of employees' performance and potential, to employee training and development – which we pursue in a targeted, systematic fashion – and to the filling of positions and granting of promotions. We also implement targeted measures aimed at promoting a better work-life balance. We believe in the creative power of diversity, tolerance and teams made up of diverse members.

Appropriate compensation

We offer reasonable remuneration and benefits that are at least equivalent to the terms that apply in the respective place of employment. We provide equal pay for equivalent work regardless of who performs it. Personalized career development, training and regular performance reviews are standard at our company.

Freedom of association

We respect the right to freedom of association. We regard it as natural that employees should have the right to defend their interests within the framework of applicable national laws and that their voices should be heard by management. Our employees shall not be disadvantaged by this or by their membership of trade unions. For the benefit of both sides, we strive for cooperation based on trust with our workforces and their representatives. Irrespective of whether such representative bodies exist or not, we regularly update our employees on our company's business developments and provide them with any other information that is important to them.

Third-party property rights

We fully respect third-party property rights. We purchase or lease the sites and locations required for our business activities in compliance with local laws. We would never carry out unlawful evictions or unlawfully lay claim to land, forests or bodies of water. When it comes to acquiring, developing and exploiting our business locations, we strive to coexist peacefully with our neighbors and respect their legitimate interests. We endeavor to take as much care as possible in situations where we may impact third-party property through our products and services.

How we handle data

We make responsible use of the data entrusted to us. We only use and process personal data to the extent permitted by legal provisions or by the parties concerned. Our data protection guidelines stipulate how we process the personal data of employees, customers and partners within the scope of the EU's General Data Protection Regulation. Non-personal data that are entrusted to us are used exclusively within the framework of the agreements made and for the purpose for which they were granted to us.

01 Our fundamental position on human rights and the environment

The environment

Our activities have an impact on the environment. We strive to minimize such negative impacts at our locations and in our value chain while also endeavoring to continuously improve our environmental protection standards and to harness our technologies to facilitate environmentally friendly products and production methods. Details of our approach are outlined in our TRUMPF environmental and energy policy.

Energy and climate protection

Our commitment to climate-change mitigation is particularly strong. We support the objectives of the Paris Agreement on climate change. We have set out our activities in the TRUMPF climate strategy, which is based on the criteria of the Science-Based Targets initiative (SBTi).

We are systematically reducing how much energy goes into our own activities and into the use of our products. We strive to minimize the CO₂ emissions generated through our activities and in our value chain. We have already achieved carbon neutrality at our locations and have set ourselves ambitious targets to reduce our CO₂ emissions even further. Our goal is to obtain the energy required for our company's activities exclusively from green sources. We also expect to see ambitious climate-change mitigation activities on the part of our suppliers.

Exploitation of natural resources

We moderate our use of raw materials and other natural resources and strive to systematically reduce our consumption of these resources. We avoid any consumption of water or other natural resources that could have an unacceptable impact on the environment that others depend on to survive.

Harmful effects on soil, water and air

To the best of our ability, we avoid inflicting harm on the soil, water and air. We do not tolerate any contamination or alteration of these elements or noise emissions that have an unreasonably harmful impact on the environment that others depend on.

Mercury and persistent organic pollutants

We comply with international regulations on the handling of mercury and persistent organic pollutants. As such, we adhere strictly to the provisions of the Minamata Convention on Mercury and the Stockholm Convention on Persistent Organic Pollutants.

Handling of waste and hazardous substances

We strive to avoid waste as much as possible and to steadily reduce how much waste we produce. When disposing of waste, we adhere strictly to the legal requirements applicable in each case. We comply with the provisions of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal. We minimize our use of hazardous substances to the greatest extent possible.

02

**What we expect
from our employees,
suppliers and other
business partners**



02 What we expect from our employees, suppliers and other business partners

In our role as members of the Managing Board, we are committed to this policy statement and determined that it should not only establish theoretical principles, but also achieve a real impact.

We can only make this happen by bringing our teams on board and getting everyone at our company working toward the same goals. That is why we expect all our employees around the world – regardless of their rank, role or place of employment – to familiarize themselves with this policy statement, to reflect on the values contained within it and to apply these values in their day-to-day work. We also want to empower our teams to identify, question and prioritize risks related to human rights and the environment and to either eliminate these risks themselves or escalate them. To this end, we will provide training on this topic in relevant areas of the company and submit internal reports on our findings and progress at regular intervals.

Our managers have a particularly important role to play in two senses. Firstly, they are role models for other employees, and should behave as such. If they apply this policy statement in their own work, their teams are likely to follow suit. Secondly, they will often need to make decisions that involve promoting respect for human rights or protecting the environment in specific situations. We therefore call on our managers to act as role models and decision-makers in the spirit of this policy statement.

The same obviously also applies to us as members of the Managing Board. As well as providing our own employees with inspiring working conditions based on respect for human rights, we also want our behavior toward others to make us a role model for respecting human rights and protecting the environment. As members of the Managing Board, we stand ready to help our managers and employees should they require assistance and/or support in making decisions when it comes to ensuring appropriate respect for human rights and protection of the environment in specific situations.

Our suppliers and other business partners

It is our interaction with our business partners that has the broadest impact when it comes to efforts to uphold human rights and protect the environment. In general, we seek to work only with business partners who respect human rights and protect the environment. For example, we do not want our products to be used as weapons, and we are therefore extremely cautious about working with customers from the military sector.

We expect business partners whose contributions are incorporated into our products or other services to respect human rights and protect the environment; we also expect their supply chain to meet high standards in this context. Under no circumstances do we want our business to be associated with human rights abuses or damage to the environment. That is why we ask our direct suppliers to comply with our Code of Conduct for Suppliers, which explains our expectations clearly and unambiguously. By signing this document, they enter into a contractual obligation to respect human rights and protect the environment and grant us the right to inspect and monitor their conduct as necessary. They are also required to ensure that these commitments are passed on throughout their supply chain. In return, we offer them support services such as a dedicated contact in the purchasing department and training programs on respect for human rights.

03

**How we minimize risks
related to human rights
and the environment
(our risk management
strategy)**



03 How we minimize risks related to human rights and the environment (our risk management strategy)

It is important to set out a fundamental position on human rights and the environment, but the key lies in taking appropriate measures to ensure this position is adhered to in practice. Consequently, we strive to do two things: firstly, to work to the best of our ability to identify and minimize risks to human rights and the environment in our area of responsibility at the earliest possible stage and to avoid damage wherever possible; and, secondly, to rectify or minimize the extent of any damage that has already occurred once we become aware of it.

This approach covers our own locations and subsidiaries as well as collaborative ventures in which we hold a majority stake or exercise some other kind of controlling influence (both referred to hereinafter as our "own area of business") and our suppliers with whom we have a direct business relationship. However, we even take action in regard to indirect suppliers if we become aware of risks that apply there or violations that have already occurred.



03 How we minimize risks related to human rights and the environment (our risk management strategy)

Responsibilities

To ensure our risk management strategy has the greatest possible impact, we have established a framework of tiered responsibilities.

Overall responsibility for monitoring the program lies with our Chief Compliance Officer, whom we have also appointed as our Human Rights Officer. They are responsible for overseeing the implementation of our risk management strategy and for the ongoing review of its adequacy and effectiveness. They report on this issue to the Managing Board at least once a year, though also on an ad hoc basis where required. Any significant developments in our risk management strategy are also included in their annual compliance report to the Supervisory Board. Decisions on the further development of the program are made by our Human Rights Officer in consultation with the Compliance Committee, which also includes members of our Managing Board.

Responsibility for operational implementation of the risk management strategy in relation to our suppliers – particularly the performance of risk analyses – lies primarily with our purchasing department. For synergy reasons, this also applies to the performance of risk analyses in relation to our own area of business.

If risks or violations relating to respect for human rights or protection of the environment are identified at suppliers, the further handling of the matter is entrusted to the supplier management team that forms part of our quality management department; in this process, any decisions that may affect the continuation or scope of the supply relationship are taken in collaboration with the purchasing department. If risks or violations are identified in our own area of business, responsibility for handling the matter and deciding whether the risk of violation should be eliminated or minimized lies with the central department that has functional responsibility for the situation in which these occurred.

Everyone involved in fulfilling these duties will be supported by our compliance team and, where appropriate, by our legal department.

This concept of tiered responsibilities is based on tried-and-tested processes from our compliance management system and our existing supplier management system. It ensures the consistent, targeted handling of relevant occurrences and the ongoing review and development of our risk management strategy.

03 How we minimize risks related to human rights and the environment (our risk management strategy)

Risk analysis

A core element of our risk management strategy is risk analysis, which allows us to systematically identify potential risks to human rights and the environment that may be associated with our activities. Risk analysis is performed on both an annual and ad hoc basis for both our own area of business and our direct suppliers; it is also carried out on an ad hoc basis in relation to our indirect suppliers and participative or collaborative ventures over which we have no controlling influence.

Due to the large number of direct suppliers we work with (over 15,000 as of January 1, 2023), we prioritize our activities in order to focus the available resources on the most important cases. To do this, we start by excluding suppliers whose sales to us are negligible. We then prioritize the remaining suppliers according to the volume of sales they have with TRUMPF or the strategic relevance they have for TRUMPF. At the same time, we make a risk-based assessment of publicly available indices that break down the probability of relevant violations of legal interests by country and industry. We combine the results of this assessment with a ranking of the legal interests concerned, focusing in particular on the significance of the legal interest, the anticipated severity of a violation, and the typical probability of a violation. This produces an overall scale of prioritization on which our suppliers are ranked.

The analysis also incorporates relevant information and reports from the press and social media, which we ask neutral third parties to systematically monitor on our behalf. It also includes specific information that we receive through the reporting channels specified below or by other means.

We subsequently attempt to have these abstractly identified risks verified by neutral service providers using self-assessments based on a specified format. If this assessment reveals that the situation is satisfactory, this result is documented. If the situation turns out to be unsatisfactory, further steps vis-à-vis the relevant supplier are once again decided on the basis of the prioritization described above.

This scale of prioritization is dynamic in two different senses. Firstly, the abstract risk indicators are continuously adjusted to take into account changes to any of the relevant parameters, such as the country and industry indices mentioned above. Secondly, we are continuing to develop the risk analysis by gradually loosening the prioritization criteria in order to steadily increase the number of suppliers subject to analysis.

The results of the risk analysis are reported to the relevant decision-makers on an ongoing basis. This is carried out in general terms as part of our Human Rights Officer's annual report to the Managing Board. Specific findings that could trigger further measures against individual suppliers are sent to the purchasing manager responsible in each case.

With regard to our own area of business, risk analysis is solely prioritized in terms of the time at which it will be carried out in each case. We perform risk analyses for all the sites, subsidiaries and cooperative ventures that form part of our company's own area of business.



03 How we minimize risks related to human rights and the environment (our risk management strategy)

Preventive measures

Using targeted measures, we strive to prevent from the outset any risks relating to respect for human rights and protection of the environment in connection with our business activities. First and foremost, these measures include the publication and dissemination of this policy statement and the establishment of our risk management strategy.

But preventive measures also start from within our own area of business. To protect the human rights of our own employees, our HR department has formulated and implemented a Fair Employment Policy, which also covers the provision of appropriate training to our managers. This approach is monitored by higher-ranking executives within the company as well as through our regular employee satisfaction survey, which allows our employees to submit complaints about inappropriate behavior or unacceptable working conditions. Employees are also able to submit such complaints through the reporting channels specified below. Any such complaints are taken very seriously and are subject to clarification and, where appropriate, sanctions, in particular by our compliance team and our HR department.

We also raise awareness among our employees of the need to respect human rights and the environment in their dealings with our suppliers and other business partners. Our purchasing department, in particular, is instructed not to select suppliers without first taking into account any risks they pose to human rights and the environment. We provide training in this regard. The purchasing department works closely with our compliance team and, where necessary, with our HR department and/or sustainability team.

Where necessary, we also have audits carried out by our internal audit department or suitable experts.

Preventive measures in relation to our direct suppliers begin with the dissemination of our Code of Conduct for suppliers. This is independent of the results of the risk analysis. We have modified this code to ensure that it clearly articulates our expectations concerning respect for human rights and protection of the environment. In addition, we hold regular meet-ups with our suppliers where we explain what we expect of them and clarify any questions they may have.

03 How we minimize risks related to human rights and the environment (our risk management strategy)

Preventive measures

Wherever possible, we enter into binding agreements with our direct suppliers concerning respect for human rights and protection of the environment. This also includes a commitment by the respective supplier to grant TRUMPF the right to audit them should it have any concerns and to take any necessary remedial action, as well as a commitment to ensure the agreement of corresponding arrangements in its own supply chain. In cases where it is not possible to conclude a binding agreement on such arrangements with our direct suppliers, we enter into discussions with the supplier an attempt to arrange appropriate compensatory measures. For example, these might include development plans whose level of implementation is regularly discussed with the supplier, or training by TRUMPF experts from the respective areas of specialization.

Long-term, carefully balanced relationships with our suppliers have proved to be a positive asset in the running of our business. As requirements become more stringent – such as the need to help boost respect for human rights and protection of the environment worldwide – our strategy is therefore to support our suppliers in fulfilling these requirements and to help them develop the desired level of performance.

The effectiveness of our preventive measures is reviewed on an ongoing basis; at least once a year, as well as when a specific need arises. To do this, we utilize the results of our periodic risk analyses as well as insights gained from the information we receive through the complaint channels specified below.



03 How we minimize risks related to human rights and the environment (our risk management strategy)

Remedial measures

If we become aware that violations of human rights or environmental protection are imminent or have already occurred, we take appropriate remedial action without delay. The procedure we follow depends on whether violations occur within our own area of business or whether they are committed by suppliers or other business partners.

In the case of violations committed by our own employees, we put a stop to the conduct in question and apply a sanction. In the event that employees abroad are affected, a sanction will be imposed if the conduct in question also violates applicable local law.

In the case of violations by suppliers, we seek to take swift and appropriate remedial action. As a rule, our direct suppliers are contractually obliged to cooperate in such cases and to work with us to remedy the situation. In cases where a violation cannot be brought to an end in the foreseeable future, we draw up a strategy and schedule for terminating or at least minimizing the violation. In doing so, we take a pragmatic approach and work together with the supplier to develop tailor-made solutions. Implementation of the agreed measures is reviewed on a regular basis. Given our determination to maintain stable relationships with our suppliers, a temporary suspension of a business relationship is certainly not our primary goal. Nonetheless, we are willing to take this option in cases where a supplier's efforts do not reflect the urgency called for by the nature of the violation. As a last resort, we reserve the right to terminate the relationship in more serious cases if the measures agreed with the supplier fail to provide a remedy.

In the case of a violation by an indirect supplier, we start by conducting a risk analysis of the specific incident in question. Whatever the situation, we endeavor to hold direct discussions with the perpetrator of the violation in order to make them aware of the risk and improve the risk situation as rapidly as possible. Within the scope of our abilities, and based on our agreements with the corresponding direct supplier, we work together with both the direct supplier and their suppliers to develop appropriate strategies for bringing to an end or minimizing the violation and, in principle, proceed in accordance with what has been discussed before.

The same applies to participative or collaborative ventures in which we have no controlling influence. In the case of violations committed by these parties, we once again talk directly to the perpetrator of the violation and, to the best of our abilities, make every effort to put an end to the violation or risk.

The implementation and effectiveness of agreed remedial action is reviewed at least once a year, with measures being updated as necessary.

03 How we minimize risks related to human rights and the environment (our risk management strategy)

Complaints procedure

An internal whistleblower system is available to those who wish to report risks or violations concerning human rights and the environment in connection with TRUMPF's business activities, its direct and indirect suppliers or other business partners. The goal of this system is to enable internal and external people to submit anonymous information on compliance issues. It was set up several years ago and has proved to be an effective tool. Available worldwide, it consists of several reporting channels, including the following:

“Integrity Line” anonymous whistleblower system – <https://trumpf.integrityplatform.org>

This web-based whistleblower system is operated by an external service provider. It can be used 24 hours a day, 365 days a year, to submit an online report in more than 25 languages. The system guarantees the anonymity of the whistleblower. They are not required to disclose their identity, though they may if they wish. Should the whistleblower wish to communicate further, it is possible to do this through a chat function that is designed to guarantee the whistleblower's anonymity.

Compliance team – compliance@trumpf.com

Reports can be sent to this email address 24 hours a day, 365 days a year; both German and English are supported as a minimum. Although no technical measures are in place to safeguard the whistleblower's anonymity, we nonetheless guarantee confidentiality in accordance with the principles described in more detail below.

The right to access this email address is held exclusively by the Human Rights Officer and our central compliance team. Internal provisions stipulate that the compliance team is independent and is not bound to any directives concerning the performance of its professional duties. In addition, the compliance team reports to an in-house attorney, who also acts independently without being bound to any directives concerning the exercise of their professional duties in accordance with German legal principles. These arrangements ensure that any incoming information is handled impartially.

In cases where no technical provisions are in place to ensure anonymity, confidential handling of any submissions is still guaranteed as long as the whistleblower has acted in good faith. Should it prove necessary to involve other departments within the company in order to process the information provided by the whistleblower, this information will always be passed on without disclosing the identity of the whistleblower and, as far as possible, in a form that does not allow the whistleblower to be identified based on the circumstances involved. This process has proved in practice to be a good way of ensuring impartial treatment. Should it prove absolutely necessary to disclose the identity of the whistleblower in order to clarify the situation, such disclosure shall be made to the recipients in exceptional cases on condition of strict confidentiality.

All the information provided by the whistleblower will be followed up, documented centrally and brought to an appropriate resolution. To achieve this, the compliance team strives to maintain direct and regular contact with the whistleblower and seeks to understand the reasons behind the reported facts and any additional details. It is not uncommon for whistleblowers to refuse to participate in such exchanges for fear of discovery and reprisals. Nonetheless, we expressly encourage transparency and openness in these exchanges, because candid, open communication makes it easier to assess and resolve the issue – and whistleblowers acting in good faith do not to worry about any kind of reprisals on the part of TRUMPF.

You can find more information on the TRUMPF whistleblower system in our TRUMPF Rules of Procedure.

We continuously monitor the effectiveness of our whistleblower system and make any necessary adjustments to reflect major new developments or changes in circumstances. By analyzing trends and patterns in the reports provided by whistleblowers, we are able to carry out regular reviews and make any required changes, both in the system as a whole and, more specifically, in the design of our risk analysis process.

03 How we minimize risks related to human rights and the environment (our risk management strategy)

Documentation and reporting

We maintain ongoing documentation of the insights gained and measures taken during the implementation of our risk management system and the monitoring of its effectiveness. We keep this documentation for a period of at least seven years from the date of its creation.

Our fiscal year ends on June 30 of each calendar year. Each year, we will publish a report on our website on the status of our risk management system with regard to respect for human rights and protection of the environment as of the end of the previous fiscal year. This report will be published no later than October 31 of the respective calendar year; the first report will be published by October 31, 2023. This report, too, will be kept for seven years, during which time it will remain available for browsing on our website free of charge. A copy of the report will be sent to the German Federal Office for Economic Affairs and Export Control (BAFA).



Final provisions

This policy statement comes into force with retroactive effect from January 1, 2023. No individual claims may be derived from it for injunctive relief, damages or any other purpose.

We shall review this policy statement on both an annual and ad hoc basis to ensure it is up to date and effective. Where necessary, we shall adapt it to changing circumstances. This will include incorporating insights gained from the risk analysis process, from information received through the aforementioned reporting channels, and from working groups or discussions with other companies in which we participate.

Please direct any questions or feedback on this policy statement – as well as any complaints or information on possible violations – to compliance@trumpf.com or submit them through any of the other reporting channels specified above. We are interested in pursuing an active discussion on our risk management activities. All well-founded feedback, complaints and information will be treated seriously.



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