

Rules of Procedure

for TRUMPF's whistleblower system

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01 About our whistleblower system

What is a whistleblower system?

For companies like TRUMPF who do business worldwide, their long-term success is inseparably linked to their culture and sense of values. In this regard, our whistleblower system is open to everyone, especially to avoid the following compliance-related issues:

- Bribery, corruption, and kickbacks
- Embezzlement, misappropriation, and theft
- Antitrust issues
- Conflicts of interests
- Suspicion of money laundering
- Sexual harassment, physical and psychological violence, discrimination
- Violations of human rights, labour standards, and social standards
- Violations of environmental obligations
- Violations of data protection and IT security issues

We wish to identify risks early on and proactively avoid them. A whistleblower system is a supportive tool to that end and can be used to report and investigate hints regarding risks and misconduct.

The **TRUMPF whistleblower system** gives us the opportunity to learn of potential risks and misconduct on the part of **TRUMPF, our business partners, or companies** with which we are otherwise connected. It is available for **reports** if information or justified suspicions of actual or potential violations are received **in a professional context**. To that end, the whistleblower must be able to assume to the best of their knowledge and belief that the information is truthful. If the report discloses a business secret, the whistleblower must also have actual grounds for assuming that the disclosure is necessary to uncover the violation. We investigate incoming reports systematically and take appropriate follow-up action if needed.

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What are Rules of Procedure?

These Rules of Procedure summarize all the **information about using TRUMPF's whistleblower system** to report a hint. Whistleblowers will learn how to make a report, which procedural steps trigger a report, how whistleblowers are informed about additional steps, and when whistleblowers receive a response.

The TRUMPF Group has been using a whistleblower system for several years now. These Rules of Procedure supplement this system by creating **transparency**.

The Rules of Procedure should encourage whistleblowers and people who support the whistleblower when a report is given to assist TRUMPF by **ensuring Compliance**.

From what date do our Rules of Procedure apply?

The Rules of Procedure **apply** to TRUMPF's whistleblower system beginning **immediately**. They will be checked at least annually to make sure they are up to date and adjusted if necessary.

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How can a hint be reported, and who will process it?

TRUMPF's whistleblower system contains **various in-house reporting channels**. All reporting channels are **free of charge**.

An overview of our reporting channels:

- **Compliance email address** - compliance@trumpf.com

Incoming hints and questions will be handled by our Central Compliance Team. The mailbox is subject to strict, minimal access rights. A report can be made in writing around the clock, 365 days a year, either in German or English. A telephone or personal appointment can be arranged.

- **Anonymous whistleblower system 'Integrity Line'** - <https://trumpf.integrityplatform.org>

The web-based whistleblower system 'Integrity Line' is provided by an external service provider under observance of strict, minimal access rights. The system technically ensures that the whistleblower remains anonymous. Incoming hints and questions will be handled by our Central Compliance Team. The login and chat functions can be used to continually communicate with the central Compliance Team, including anonymously. A report can be made in writing around the clock, 365 days a year, in over 25 languages.

- **TRUMPF's Chief Compliance Officer** - https://www.trumpf.com/de_DE/unternehmen/trumpf-gruppe/unternehmensgrundsaeetze/compliance/

Hints and questions can be addressed to TRUMPF's Chief Compliance Officer. A personal appointment can be agreed. When hints and questions are sent directly to the Chief Compliance Officer, the Central Compliance Team in Ditzingen will typically be called in.

- **Local Compliance Officer**

The Compliance Organisation is available worldwide. The TRUMPF subsidiaries have local Compliance Officers as points of contact for hints and questions. A report can usually be made in the national language, but at least in English. Hints and questions are normally processed locally. If a hint concerning significant misconduct is made, the Central Compliance Team is informed.

The Central Compliance Team is obligated to treat the identities of the whistleblowers and all the people named in the hints as confidential. Hints must always be handled **confidentially, impartially, and without instructions** so that **independent** completion of the tasks within the whistleblower system is guaranteed.

Additional departments can be entrusted to clarify the matter internally through a fact-finding procedure if needed. The principles named apply accordingly for all fact finders involved in that procedure.

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If one of the fact finders is participating in the actual or potential misconduct (a member of the Central Compliance Team or TRUMPF's Chief Compliance Officer, for example), the whistleblower should use a reporting channel that also guarantees confidentiality in these cases.

How will the whistleblower be protected?

Whistleblowers who report hints in accordance with the EU Whistleblower Directive or the national transposition laws are protected against disadvantages under statutory regulations if they had actual grounds for assuming the information they reported was truthful when the report was made. If possible, TRUMPF guarantees the same protection to whistleblowers who report additional compliance-related issues. The **whistleblower protection** also applies to people who support the whistleblower in giving such hints.

The **content of the hint will be treated confidentially** and is generally provided only to the fact finders, and only to the necessary extent.

The **confidentiality of the identity** of the whistleblower, of people who support them in giving a report, and of everyone named in a report must be protected by the fact finders working to clear up the matter. The statutory exceptions apply to that end, such as an incorrect report made intentionally or with gross negligence or a demand for information made by a law enforcement agency.

The whistleblower will be **protected against disadvantages**, including but not limited to discrimination, reassignment of tasks, withholding of a promotion, issuance of a negative performance evaluation, suspension, dismissal, or similar conduct toward the whistleblower due to the report. These and other disadvantages are prohibited. Even threatening or attempting one is forbidden.

Penalising a whistleblower, preventing reports from being made, and breaching the promised confidentiality of whistleblowers' identities will not be tolerated and will be punished. The penalties for those violations depend on the case at hand and are suited and proportionate to rule out repetition. If a whistleblower experiences a disadvantage after giving a report, the person accused of causing that disadvantage must prove the alleged disadvantage was not connected with the report in any way. To the extent possible, this **protection** under the EU Whistleblower Directive will sometimes be granted by TRUMPF outside that Directive as well, in connection with the compliance-related issues listed at the beginning.

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What happens after a hint is reported?

Within **7 days after the hint is received**, the whistleblower will be notified that the report has been received (unless this is impossible because it was sent anonymously).

As a first step, a **plausibility check** will be performed. To that end, the plausibility of the circumstances will be examined without bias.

If the circumstances are classified as plausible, the **facts will be clarified in greater depth**. During that process, the whistleblower might be asked for more information. As a rule, the clarification procedure **should be concluded within 3 months** after the receipt of a report is confirmed.

If the hint is found to be true after the facts have been clarified, reasonable **measures** will be introduced **to remedy** the misconduct, **prevent** related risks, or both.

As long as the internal investigations or the rights of the people who are the subject of or named in the report are not compromised, the whistleblower will receive a **response** that includes the follow-up action (both taken and planned) and the justification. This does not apply if a response is impossible because the report was given anonymously.

Plausibility check

During the plausibility check, the fact-finder examines without bias whether the circumstances described in the report are **comprehensible, possible, and convincing** after an initial review.

If the circumstances described are incomprehensible, legally or factually impossible, or unconvincing for other reasons, the circumstances are deemed **implausible**. In this case, **no additional steps** will be taken to clarify the facts. The whistleblower will be sent appropriate feedback (unless this is impossible because they are anonymous).

If the circumstances described are found **plausible** after an initial review, **further steps** will be initiated to clarify the facts.

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Clarification of facts and plausibility check

A fact-finding procedure to clarify the facts will always be carried out if the circumstance described in the hint is classified as plausible. That procedure is based on the principles of **openness of results, confidentiality, and traceability**.

Suspects are presumed innocent until proven guilty.

Whatever reporting channel is used, the overall fact-finding procedure is basically the same. The suspicion or the infringement is evaluated in an initial **in-depth fact-finding procedure** using established criteria (such as official investigations, the extent of damage, and breaches against the law or against internal or external regulations, etc.). The fact finder, in consultation with the head of the Compliance Team and possibly the Chief Compliance Officer or Compliance Committee, will determine what type of fact-finding procedure will be performed next as part of the evaluation, considering the overall circumstances.

If the hint is proven false or cannot be confirmed or classified as plausible during the fact-finding procedure despite reasonable efforts, the procedure will be terminated. The whistleblower will be sent appropriate feedback (unless this is impossible because they are anonymous).

Follow-up action

If the hint is confirmed after the facts are clarified, the fact finder, in consultation with the head of the Compliance Team and possibly the Chief Compliance Officer or Compliance Committee, will establish **follow-up action** and ensure its implementation is initiated.

If there is a risk that the one or more individuals suspected will continue their misconduct, suitable **preventive measures** will be determined to avoid it. Preventive measures can include trainings or process adjustments, for example.

If misconduct occurs or is imminent, **corrective action** to prevent, end, or minimise the extent of the breach will be determined and implemented immediately. Corrective action might include discontinuing certain in-house processes or personnel measures immediately, for example.

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What is the time sequence, and when will I receive a response?

The fact-finding procedure will be carried out as quickly as possible under consideration of the overall circumstances.

The fact-finding **procedure normally** occurs **within 3 months** from confirmation that the hint has been received.

As long as the internal investigations or the rights of the people who are the subject of or named in the report are not compromised, the fact finder will give the whistleblower **feedback** no later than 3 months after receipt of the report is confirmed. That feedback will include the result of the plausibility check and any follow-up action (either taken or planned) and its justification. This does not apply if a response is impossible because the report was given anonymously.

What will be documented?

All incoming hints and activity in this regard will be **fully documented**. This also applies to implausible reports.

The hint received will be documented in the form of a **content log**. The whistleblower will have the opportunity to view, inspect, adjust, and confirm the documented content log.

The documentation of the entire handling of a hint is subject to a strict **access and role concept**. Access is limited to the members and the head of the Compliance Team and possibly of the Compliance Committee. Applicable **data privacy regulations** will be constantly observed; personal data will be anonymised or pseudonymised if possible.

03 Guidance in the case of doubt

Are you not sure you should report a hint? Then use these principles as a guide without feeling obligated to make the report:

What does your gut tell you?

Go with your gut!
Acting from a "gut feeling" is often the best choice. Your own instinct can be a good guide.

What would happen if the content of your hint were reported in tomorrow's news?

If thinking about this gives you a bad feeling, you should definitely report your hint.

Better one report too many than one report too few!

You can use TRUMPF's whistleblower system even if you aren't sure. Helping to improve things takes courage.

If you consider these hints, nothing can go wrong.

Because TRUMPF lives Compliance and everyone joins in!

04 Data protection notice

Information pursuant to Art. 13 and 14 GDPR on the processing of personal data as part of the whistleblower system:

Controller	<p>TRUMPF SE + Co. KG Johann-Maus-Str. 2 71254 Ditzingen</p> <p>and the affiliated companies (TRUMPF Group) https://www.trumpf.com/de_DE/meta/datenschutz/</p>
Contact details of the data protection officer	<p>Mr Peter Bokelmann privacy@trumpf.com or by post, using the data above</p>
Data collection, data source Purpose and legal basis for the processing	<p>Data is collected from the whistleblower. They can disclose their own personal data or those of other people.</p> <p>The personal data disclosed by the whistleblower is processed as part of the inspection and fact-finding work associated with the report. After the retention period expires, the personal data will be anonymised and used for statistical purposes.</p> <p>TRUMPF is legally obligated to operate a whistleblower system. This means the legal basis for processing personal data is Art. 6(1)(c) GDPR (compliance with a legal obligation).</p>
Recipients or categories of recipients of personal data	<p>Access to personal data is given to IT service providers who process the data for TRUMPF based on an agreement on commissioned data processing. Other TRUMPF companies might also need to process personal data for a specific purpose. TRUMPF has used an in-house contract on processing personal data within the TRUMPF Group to ensure the processing is secure.</p>
Transmission into third countries outside the EU:	<p>It cannot be ruled out that the personal data might be transmitted to TRUMPF companies in third countries outside the EU. If this occurs, the security of the processing is guaranteed by the intragroup contract described above.</p>
Storage duration for the personal data	<p>The personal data are stored in case files in TRUMPF's legal department. The documentation will be stored for three years and then deleted. The period begins on expiry of the calendar year in which the case was concluded.</p>

Rights of the data subject

If the statutory requirements are met, you have the following rights in accordance with Art. 15 to 22 GDPR:

The right to information, rectification, erasure, restriction of processing, and data portability.

To assert your rights, please contact the data protection officer or the responsible body.

You have the right to contact the supervisory authority if you believe the processing of your personal data is unlawful.

The supervisory authority responsible for the controller is:

The State Commissioner for Data Protection and Freedom of Information for Baden-Wuerttemberg

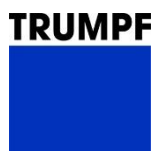
Lautenschlagerstr. 20

70173 Stuttgart

Tel.: 0711/615541-0

Email: poststelle@lfdi.bwl.de

If you'd like to know which authority is responsible for other companies in the TRUMPF Group, please contact the data protection officer.



TRUMPF SE & Co. KG
www.trumpf.com