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CODE OF ETHICS

The Code of Ethics of Tratter Engineering applies to all employees, regardless of their employment type, position, or affiliation, as well as to all natural and legal persons who come into contact with our company or maintain business relationships. This code addresses various topics and establishes clear guidelines and behavioral rules, including the following points:

THE COMPANY

Actions within society are based on values shared by all stakeholders, department heads, and employees of the company.

ENTREPRENEURIAL SPIRIT

We encourage our employees to be innovative. All decisions within the company are based on pragmatism and common sense, aiming to ensure balanced and profitable growth.

AUTHENTICITY

Transparency and exemplary behavior are the cornerstones of our relationships both internally and externally. We emphasize information disclosure and clear communication to comprehensively inform stakeholders. This transparency extends across all areas, from corporate leadership to production and distribution.

Our company values, such as authenticity, are implemented through open information disclosure. This actively contributes to positive societal change and enhances the trust of customers, partners, and investors. This fosters an open and responsible business culture.

SHARING

We share our knowledge and continually question ourselves, as this allows us to recognize the true value of our ideas and strengthen our actions and projects. We share the achievements we make and the challenges we face with our employees, enabling them not only to be on the sidelines but also as contributors to our successes—and our failures. We firmly believe that ethics and deontology are moral imperatives in leading our company, contributing to entrepreneurial success by projecting an image of a reputable, reliable, correct, and entirely transparent company to the outside world.

RESPECT

The foundation of every employment relationship is respect for individuals and their characteristics, different cultural backgrounds, and character traits of employees, customers, suppliers, partners, and stakeholders. We are deeply aware that each of our decisions and actions has implications beyond the company, which is why we treat our environment and surroundings with the necessary respect.

SATISFACTION

We consistently support our employees in their development, as we believe that continuous growth is only possible when there is a strong sense of community that serves as inspiration for each individual. Only when our employees feel fulfilled can we satisfy our customers and improve our company performance. In this way, and only in this way, can we achieve the goals we set ourselves every day.

THE PRINCIPLES

Intellectual integrity is the ethical guiding principle that directs all activities of our company towards fulfilling its own vision and mission, regardless of the specific corporate level.

Those who work for us must adhere to the applicable state and European regulations in the course of their activities, as well as company-internal or -external codes of conduct, and where applicable, the norms of professional ethics. A violation of these rules is in no case justified and will not be tolerated, even if such violation were to occur based on an individual interpretation of values or in the interest of Tratter Engineering Srl.



DEFINITION OF PRINCIPLES

The company is committed to correct and impartial behavior that complies with all regulations in force in the countries where we operate. Our business relationships are based on concepts such as integrity and loyalty, avoiding any personal or entrepreneurial conflict of interest. Each of our employees must be guided by our principles. Whoever collaborates with our company, in any form, must align with the principles we believe in.

CORRUPTION

Tratter Engineering Srl is committed to financial responsibility and fair competition in all business areas. Any action that could compromise the impartiality and free judgment of the company is prohibited. To enforce this prohibition, the company takes all necessary measures to prevent and suppress any form of corruption and behavior that could meet the criteria of criminal offenses under Legislative Decree No. 231/01. This includes accepting or offering money, gifts, or favors from third parties to provide direct or indirect benefits to the company. Our employees are strictly instructed not to accept, demand, or exert pressure to influence the hiring, transfer, or promotion of an employee, whether for money, gifts, or any type of benefits.

Additionally, the company is committed to fair competition and prohibits actions, agreements, or arrangements

that would restrict competition or enable anti-competitive agreements with competitors. We actively work to ensure that plagiarized parts do not enter the supply chain. Should plagiarism be detected, we take appropriate measures to prevent damage and inform Tratter Engineering Srl accordingly.

CONFIDENTIALITY

The know-how acquired by Tratter Engineering Srl is a valuable and sensitive resource. Therefore, it must be adequately protected by all employees, suppliers, and partners. Our company regards know-how as strictly confidential, and we require all parties not to disclose this knowledge to third parties.

Employees, suppliers, and partners are obliged not to disclose or otherwise make accessible technical, business, and strategic knowledge as well as development plans of Tratter Engineering Srl. This obligation of confidentiality continues to exist even after the termination of the employment relationship or after the completion of supply or consulting contracts.

The protection of our intellectual property and know-how is of the utmost importance to us. Any violation of this duty of confidentiality is considered a serious offense and may have legal consequences. We expect our employees, suppliers, and partners to actively contribute to the security and protection of our confidential information and promptly report any potential security risks.



CONFLICTS OF INTEREST

Every decision and every entrepreneurial step of Tratter Engineering Srl is also guided by ethical considerations. Therefore, it is not solely about optimizing the company's balance sheet. Conflicts of interest arise for us whenever an employee pursues interests other than those formulated in the company's vision and mission, gains personal advantages within the scope of the company's business activities, or abuses the trust placed in them and their position within the company. We tolerate no situation that directly or indirectly constitutes a conflict of interest.

PRINCIPLES OF CONDUCT

Our employees in management, controlling, and administration are encouraged to actively engage so that the company and all its employees can ethically and transparently derive benefits from their specific competencies. They are actively encouraged to improve collaboration, such as by timely informing their respective superiors about controversies and potential conflicts of interest. They are expected to treat confidentially the information they come to know in the course of their work. They are to prioritize the fulfillment of Tratter Engineering Srl's vision and mission over individual interests, regardless of whether it pertains to the interests of an employee, a customer, or a stakeholder.

RESOURCE USAGE

Our employees are directed to act responsibly while always respecting the procedures prescribed for dealing with corporate resources. Where required, the use of such resources is to be documented. It is not allowed to utilize company assets for personal gain, except in cases where they have been provided as benefits or with explicit authorization from management.

SUSTAINABILITY

Tratter Engineering Srl, along with its stakeholders, commits to contributing to environmental preservation within the scope of its activities by consistently maintaining the necessary balance between economic interests and those of the community and environment. We evaluate and select our stakeholders based on their potential to offer alternatives to environmentally harmful production methods. We favor and promote the use of products manufactured using environmentally friendly methods and, where possible, focused on energy conservation and sustainability.

HUMAN RIGHTS

Our company is committed to providing all employees with equal rights and opportunities, including in terms of advancement within the company. Advancement is not limited to specific academic qualifications; rather, all individuals can apply for positions within the company based on their respective skills, including those in management and administration.

Tratter Engineering Srl does not tolerate discrimination based on age, gender, sexual orientation, health status, race, nationality, or political or religious beliefs. Modern slavery in any form is strongly rejected and combated. We advocate for workplace diversity and inclusion and promote a positive corporate culture that ensures respect and dignity for all employees.

Furthermore, we respect the rights of minorities and indigenous peoples and ensure that their interests are acknowledged and protected. Tratter Engineering Srl is committed to respecting and promoting human rights in all aspects of its business activities.



SUPPLIERS

Tratter Engineering Srl requires its suppliers, contractors, subcontractors, and external employees to adhere to the ethical principles derived from the company's mission and vision as contained in this document. While Tratter Engineering Srl's selection of suppliers is based on achieving the greatest possible competitive advantage, it assesses not only the economic suitability but also the technical and economic capabilities and, in principle, the reliability of contracting parties beyond mere economic viability. All relationships with suppliers and external employees are governed by appropriate contracts that ensure maximum transparency in the relationship between the company and its partners. Relationships with suppliers are built on the foundation of good faith. This principle primarily entails that personal gifts or favors that could influence decisions or behavior in any way should not be offered or accepted. Suppliers themselves must commit to applying this principle to their partners. Beyond the principle of good faith, Tratter Engineering Srl reminds its suppliers of the specific requirements listed below, which the supplier agrees to abide by.

Furthermore, suppliers must adhere to the following principles of Tratter Engineering Srl:

- Child labor is unacceptable to us. Workers must not be younger than allowed by the relevant law and in no case younger than 14 years.
- The workplaces of individuals working directly or indirectly for our company must be dignified, healthy, and safe.
- The freedom to organize into unions and the right to collective bargaining are afforded to every worker and must be guaranteed accordingly.
- Working hours must comply with legal and industry-specific requirements; overtime must not exceed legal limits and should be compensated.
- Each worker must be remunerated at least in accordance with relevant legal regulations and have equal access to all social benefits provided by law, regardless of any distinctions.



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