

The Trepko logo is displayed in a stylized, bold, white font with a blue outline, set against a dark blue background. The logo is positioned at the top of the page, above a large, multi-story building with many windows. The building is illuminated from within, and a flagpole with a blue flag is visible on the left side of the frame. The overall scene is set at night, with a dark blue sky and some ambient lighting from the building and streetlights.

**Trepko**

# TREPKO

## Code of Conduct



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TREPKO Group is committed to responsible business practices and considers its impact on the environment, population, and its own enterprise. The Code of Conduct plays a crucial role in guiding company's actions and ensuring that all representatives and employees adhere to these principles. This commitment not only helps maintain a positive reputation but also fosters trust with stakeholders.

### **Responsible Business**

TREPKO places a strong emphasis on conducting business in a responsible manner. This implies taking into account the impact of operations on the environment and the well-being of the population.

### **Ethical Guidelines**

The Code of Conduct serves as a set of ethical guidelines that help employees and representatives of TREPKO make good decisions in their daily work.

### **Personal Responsibility**

Every representative and employee at TREPKO is personally responsible for strictly following the provisions outlined in the Code of Conduct.

### **Reputation and Trust**

By adhering to the principles, behaviors, and commitments outlined in the Code, TREPKO aims to maintain its reputation and earn the trust of stakeholders, including clients and the public.

### **Continuous Improvement**

TREPKO is dedicated to improving its clients' businesses and the processes they use, aligning with a vision of continuous improvement.

## People-Centric Approach

TREPKO's dedication to creating a work environment where employees are treated fairly, and their rights are respected, while also emphasizing legal compliance and adherence to ethical labor practices. Suppliers are expected to provide fair working conditions, encompassing various aspects such as wages, working hours, benefits, overtime processes, and hiring practices. This highlights a commitment to employee well-being and fair treatment.

## Safety and Health Priority

TREPKO prioritizes the safety and health of its employees, recognising that every individual has the right to work in a secure and healthy environment.

## Zero Accidents Policy

The company has a strict policy of zero accidents at work, meaning that the aim is to prevent any harm or injuries to employees while they carry out their job duties.

## Risk Mitigation

TREPKO is committed to identifying and mitigating any security threats or health risks that may arise in the workplace, with the goal of minimising such risks as much as possible.

## Responsibility of All

All employees share the responsibility for maintaining a safe and healthy workplace. This includes having a good understanding and adherence to all relevant safety rules and guidelines.

## Management Responsibility

Managers play a crucial role in ensuring that all employees and contractors are adequately trained and provided with the necessary protective equipment to perform their tasks safely.



## Fair Employment

TREPKO is committed to fair employment conditions and compliance with national and official standards. Ensuring fair rates and respecting copyright and legal guidelines, as well as following recommended collective bargaining laws, are essential for maintaining an ethical and equitable workplace.

## Employee Well-being

TREPKO places a high level of importance on the well-being of its employees. This includes not only their physical health but also their overall condition, which encompasses their mental, emotional, and social well-being. The company strives to create an attractive and happy workplace for all employees. This focus on employee satisfaction and well-being contributes to a positive work environment.

## Investing in the Future

TREPKO is committed to fair employment conditions and its investment in vocational training for students. Providing practical vocational training not only benefits students but also contributes to the development of a qualified workforce and the overall success of the company. By offering vocational training since 2004, TREPKO is investing in the development of a skilled workforce for the future. This demonstrates a long-term commitment to human capital development. Providing a wide range of employment and social benefits is not only attractive to students but also contributes to the overall well-being and job satisfaction of the workforce.



## Data Protection

TREPKO companies protect confidential information from loss, disclosure, or misuse. Highlighting the importance of information safety and defining what constitutes confidential information, reflects the company's dedication to upholding data security and preserving valuable assets. Confidential information is defined as data that has not been made public, which can include trade secrets, business and marketing plans, product development details, inventions, production methods, personnel and compensation information, and financial data.

TREPKO's approach to corporate social responsibility covers various aspects, including legal compliance, ethical conduct, employee well-being, human rights, anti-corruption measures, and environmental sustainability. Such an approach reflects a commitment to responsible business practices that benefit both the company and society at large.

### Compliance with Laws

Operating within the legal framework is crucial for maintaining ethical standards and building trust with stakeholders. Compliance with laws ensures that the company operates responsibly and avoids legal issues that could harm its reputation.

### Respect for Human Rights

Upholding by TREPKO fundamental human rights principles within its operations signifies a dedication to ethical conduct, social responsibility, and a recognition of the importance of human dignity. The United Nations' framework on human rights provides a comprehensive guideline for businesses to ensure they respect and support basic human rights.



### Environmental Responsibility

TREPKO's commitment to sustainability and environmental responsibility is through the reduction of net energy consumption and aligns with the global efforts to combat climate change. Our investments in energy-saving initiatives, such as photovoltaic investments involving the installation of solar panels to harness energy from the sun, are a significant step in the right direction. By utilising solar energy, TREPKO can reduce its carbon footprint and contribute to a more sustainable future.



### Minimising Negative Impact

TREPKO's commitment to minimizing negative impacts on stakeholders and broader society reflects a proactive approach to corporate responsibility. This mindset goes beyond mere legal compliance and indicates a genuine concern for the environmental and social consequences of its business activities.

TREPKO is committed to honest and fair business dealings and strives to conduct business in a fair, transparent and legal manner. This commitment to avoiding bribery, corruption, extortion and fraud is not only ethical but also important for the long-term success and reputation of the company.

## Honest and Transparent Business

Emphasizing financial integrity and setting expectations for suppliers to conduct their business honestly and transparently are crucial components of a commitment to ethical business practices. Financial integrity involves maintaining accuracy and honesty in financial reporting and transactions. Demonstrating financial integrity builds trust among stakeholders, including customers, investors, and regulatory bodies.

## Business Ethics and Principles

Operating based on commonly accepted principles and business ethics is not just a legal or regulatory requirement; it's a strategic decision that aligns the TREPKO company with broader societal expectations and values. This commitment lead to long-term success, positive relationships with stakeholders, and a positive impact on the communities in which the TREPKO company operates.

## Reputable and Honest Partners

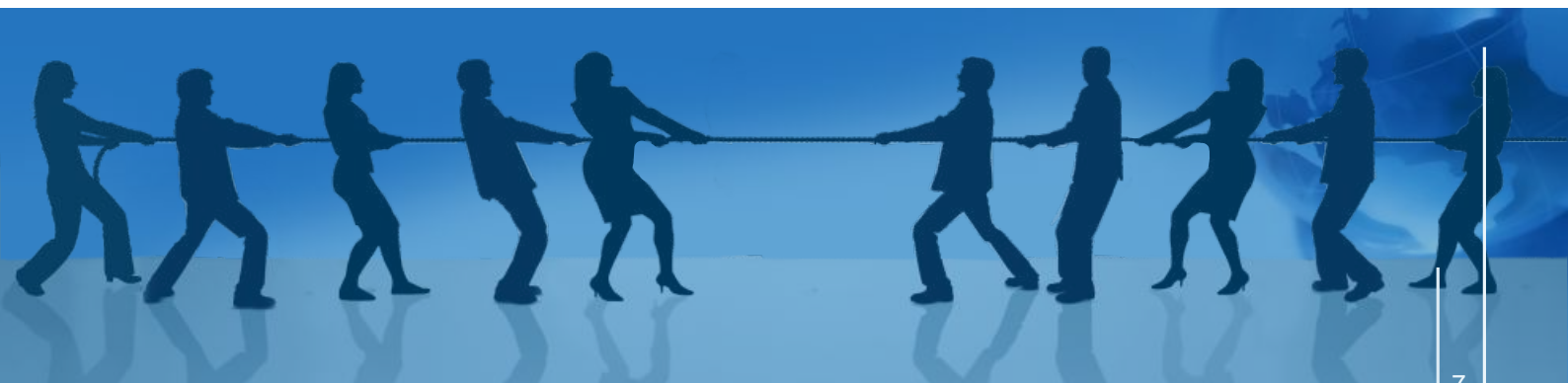
The company engages only with reputable, honest and competent business partners. This approach ensures that relationships are built on trust and that partners uphold similar standards of ethics and competence.

## Fair Competition

TREPKO underlines the commitment to ethical and lawful business practices, which is crucial for maintaining a competitive, fair, and healthy business environment. By prohibiting anti-competitive behavior, the company demonstrates a commitment to ensuring that consumers have access to a diverse range of choices and fair market conditions. This approach aligns with principles that promote transparency, competition, and consumer welfare, contributing to the overall integrity of TREPKO's supplier network.

## Risk Mitigation

Actively assessing the integrity and reputation of business partners helps identify potential risks early on. This includes the risk of being inadvertently involved in illegal activities or engaging with partners who do not align with TREPKO's ethos. Ensuring that business partners comply with relevant laws and regulations is essential for preventing legal issues and maintaining a high standard of ethical conduct. This can help protect TREPKO from potential legal liabilities.



## Anti-Corruption Efforts

It's commendable that TREPKO takes a strong stance against bribery, corruption, extortion, and fraud. Upholding high ethical standards in business is crucial not only for legal compliance but also for fostering trust with stakeholders and safeguarding the company's reputation. Ethical business practices contribute to a positive corporate culture, attract responsible partners, and enhance long-term sustainability.

By actively preventing and addressing unethical behavior, TREPKO demonstrates a commitment to integrity and social responsibility. This commitment can lead to increased employee morale, customer loyalty, and positive relationships with regulators and the community. In the long run, such ethical practices can contribute to sustainable business growth and resilience.

### Gifts and Hospitality

TREPKO's gift and hospitality policy reflects a commitment to ethical business practices and integrity in its relationships. The policy's prohibition on giving gifts with the intention of influencing decision-making processes aligns with best practices in maintaining transparency and preventing conflicts of interest. This approach ensures that business relationships are based on merit, competency and the quality of products or services, rather than on undue influence.

### Conflict of Interest

The company emphasizes conducting business in a professional and objective manner. Decisions should not be unduly influenced by personal, social, financial or political interests. TREPKO adheres to the transparency of business decisions and transactions to prevent the possibility of conflicts of interest. This includes disclosure of any involvement or significant economic interests of employees or their close relatives in partner companies with which TREPKO cooperates.





## Accounting Records

TREPKO ensures the integrity of business transactions by maintaining accurate and complete books and accounting records. This commitment to accuracy is essential for transparency and compliance. The company complies with all relevant laws, regulations, and reporting and accounting guidelines related to its business operations. This ensures that all financial records are in line with legal and regulatory requirements.



## Know Your Customer (KYC)

Implementing robust Know Your Customer (KYC) procedures is an essential element of an effective anti-money laundering (AML) and anti-terrorist financing (CTF) program. KYC procedures help TREPKO verify the identity of customers and business partners, assess their risk and ensure regulatory compliance. Before commencing cooperation, TREPKO verifies that the institutions it cooperates with are not connected to networks organized by cybercriminals or related to software abuse, money laundering or terrorist financing, or operate in terrorist organizations. By using this procedure, TREPKO avoids making a fraudulent transactions and being accused of participating in such proceedings.

## Anti - money Laundering

TREPKO is committed to preventing money laundering and maintaining a strong stance against it. Money laundering is a serious financial crime that involves disguising the origins of illegally obtained money, making it appear as if it comes from legitimate sources. It can have serious consequences for individuals and organizations involved in such activities.



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