

## CTDI Europe's Anti-Bribery Policy

---

CTDI Europe is committed to applying the highest standards of ethical conduct and integrity in its business activities worldwide. Every employee and individual acting on the organization's behalf is responsible for maintaining the organization's reputation and for conducting company business honestly and professionally.

CTDI Europe considers that bribery have a detrimental impact on business by undermining good governance and distorting free markets.

The organization benefits from carrying out business in a transparent and ethical way and helping to ensure that there is honest, open and fair competition in the markets in which we operate. Where there is a level playing field, the organization can lead the market through our innovative test and repair solutions and by delivering excellent services to our customers/clients.

Transparent, fair conduct helps to foster deeper relationships of trust between the organization and its business partners and customers. It is vital for the organization's reputation and future growth.

### Our Responsibilities

CTDI Europe does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf. The board and senior management are committed to implementing and enforcing effective systems throughout the organization to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010 and the EU Whistleblower Protection Directive.

The organization provides an anti-bribery policy and gift policy outlining the organization's position on preventing and prohibiting bribery. The anti-bribery policy applies to all employees, as well as agency workers, consultants and contractors. All employees and other individuals acting for the organization are required to familiarize themselves and comply with the organizations anti-bribery policy.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting on behalf of CTDI Europe are strictly prohibited from making, soliciting or receiving any bribes or unauthorized payments.

As part of its anti-bribery measures, the organization is committed to transparent, proportionate reasonable and bona fide hospitality and promotional expenditure. Such expenditure must be authorized in advance, in accordance with the procedures set out in the organization's anti-bribery policy.

The success of CTDI Europe's anti-bribery measures depends on all employees, and those acting for the organization, playing their part in helping to detect and eradicate bribery. Therefore all employees and others acting for, or on behalf of the organization are encouraged to report any suspected bribery in accordance with the procedures set out in the anti-bribery policy. The organization will support any individuals who make such a report, provided that it is made in good faith.

## Effectiveness of the Policy

To demonstrate the effectiveness of the policy and to drive the continuous improvement process, we use key performance indicators such as:

- % of compliance trainings finished in a year period.
- No reports are received from employees or supply chain via our grievance tool, Hintbox.

## Policy Violations

A breach of the organization's anti-bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal. Employees and other individuals acting for the organization should note that bribery is a criminal offence that may result in up to 10 years' imprisonment or an unlimited fine for the individual and an unlimited fine for the organization.

CTDI Europe will not conduct business with service providers, agents or representatives that do not support the organization's anti-bribery objectives. The organization reserves the right to terminate its contractual arrangements with any third parties acting for, or on behalf of, the organization with immediate effect where there is evidence that they have committed acts of bribery.

## Validity

This policy is valid as of 17.01.2025 and replaces the former policy from 02.12.2024



Eric Rositzki  
Chief Executive Officer



pp Daniel Fischer  
Vice President Corporate Human Resources