Code of Conduct

November 2026





Intro

As an internationally active family company with a long tradition, Truma attaches great importance to ethically irreproachable, legal and compliant action as the basis for long-term corporate success. Right from the start, since the company was founded in 1949, reliable products and good service have been of great importance to us. This is why quality is of great importance to us.

For us, quality includes, among other things, careful handling of the environment and resources as well as respect and appreciation of employees, which is why this behaviour is an integral part of the corporate culture at Truma. In addition, we strive to continuously optimise our business activities and our products in terms of sustainability and ask our suppliers to contribute to this with regard to a holistic approach and to do the same in their supply chains. Caravanning and keeping nature intact belong together.

This is why Truma thinks long-term and acts sustainably. We work intensively on leaving behind a healthy environment for the next generations, that they can enjoy when camping. Our Code of Conduct is based on all the relevant laws and regulations.

In addition, it also includes taking into account international treaties, such as the international conventions on civil, political, economic, social and cultural rights, the guidelines on the rights of the child and business conduct, the guidelines of the United Nations “Economy and Human Rights”, the work standards of the International Labour Organisation and the United Nations’ Global Compact.

Area of Application of the Code of Conduct

The following Code of Conduct is based on our core values, and closely related to our compliance system. Compliance system is understood to mean the management of appropriate structures and measures to make the code consistent with both legally binding and ethical regulations. As a consequence, this minimises liability risk, reputational damage and rule breaches. In this Code of Conduct we set out potential difficulties and how to avoid them.

All our employees and business partners are responsible for following these guidelines and complying with all regulations. The contents of this Code of Conduct also apply if behaviour or business practices that contradict this code are tolerated by authorities or the public in certain countries. If stricter regulations or principles of conduct apply in other countries than are enshrined in this Code of Conduct, these stricter regulations apply.

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1. Basic principles and behaviour requirements

For us, dealing with each other is the key to long-term success. At Truma we aim to pursue the protection of human rights throughout the entire global supply chain.

1.1 Dealing with each other

We treat each other with trust, empathy and openness. We treat each other with courtesy, dignity and respect and show respect for one another. Fairness is a fundamental principle of our teamwork. It is important to us to go to work together, with a team spirit and mutual respect. We expect our business partners to behave in the same way.

1.2 Leadership culture

Customer satisfaction is our top priority, which is why we focus our leadership on meeting or exceeding customer expectations to form trust in our company. In an environment characterized by change, we always act in a flexible and result-oriented manner to respond to new challenges and opportunities quickly. In order to reduce internal complexity and increase our efficiency, we focus on lean structures and processes. In addition, we always prioritize according to the situation at hand and make our decisions based on relevant data and facts.

In all our activities, we pay attention to the careful use of resources, such as time, capital, energy and materials. Another essential aspect of our management is the goal-oriented, reliable and efficient cooperation within the company and with our partners. This can only be achieved through trusting relationships that are continuously built and maintained. Managers create a framework in which employees can develop their full potential for the company. At the same time, we take



care to recruit suitable individuals in a targeted manner and actively promote them through coaching and mentoring measures. In response to a changing world, we are constantly updating and strengthening our skills, knowledge and capabilities to meet new requirements.

Overall, we consider a responsible leadership culture with respect, understanding and open communication as an essential prerequisite for the success of Truma.

1.3 Equal opportunities

Truma does not tolerate discrimination of any sort, regardless of the reason. We see diversity as a success factor. At Truma everyone has the same freedoms, scope for development and training. We also require this appreciation of equal opportunities from our business partners.

1.4 Trust and cooperation

A trusting and cooperative relationship with our business partners forms the basis for a long-term and successful collaboration. We see it as an opportunity to further expand our company's success. We foster professional and dependable collaboration with our business partners and support continuous professional development. Likewise, we want our partners to act cooperatively. Before any cooperation, we carry out a blocked list query to ensure that there have been no violations of laws or ethical regulations in the past. Truma regularly conducts audits to review compliance with these standards.

1.5 Occupational safety

The health of every employee is important to us. We therefore grasp all the necessary measures, to minimise the risk of workplace accidents. Examples of such measures are work instructions and regular occupational safety training, which is monitored by an occupational safety officer. We also request that our business partners comply with occupational safety standards. In addition, Truma promotes the health of its employees with the "Take Care" occupational health management system.

1.6 Careful handling of property

We look after our property and the property of others. We also expect this of our business partners. It is their responsibility to treat Truma property such as tools, equipment, sample parts, software data or intellectual property with care. Our business partners are required to inform their Truma contact immediately in the event of violations.



1.7 Training opportunities

Truma offers a variety of apprenticeships, dual study and trainee programmes. We meet our obligation under the Federal Education Act to create a system that enables trainees to achieve their training goals. Additionally, for all employees, Truma offers regular training opportunities and education, to enable continuous professional development.

1.8 Respect for human dignity

As a globally active company, we take our social obligations seriously, respect internationally recognized human rights, such as those of the United Nations, and demand that our suppliers also observe them, in particular:

1.8.1 Employees' rights

We do not tolerate any type of human trafficking, forced prostitution, bondage, forced or slave labour or illegal organ removal. All work must be voluntary, without threat of punishment, and must not involve any form of exploitation, begging or illegal activities. Employees must be able to end their work or employment at any time within the framework of labour law requirements. The pay for regular working hours and overtime must meet the national legal minimum wage or the industry minimum standards, whichever is greater. Deductions to pay as a punitive measure are not permitted. It must be ensured that employees receive clear, detailed, and regular written information on the composition of their pay.

Working times must correspond to the applicable laws or industry standards. Overtime is only permitted if it is performed on a voluntary basis and does not exceed 12 hours per week, during which employees are to be granted at least one day off after six consecutive working days. There must be no unacceptable treatment of workers, such as psychological pressure, sexual harassment, or humiliation. The appointment of security officers is not permitted if people are treated inhumanely or injured when they are used.

Freedom of expression and freedom of association are to be respected. Where this right is restricted by law, alternative means of independent and free association of workers for the purpose of collective bargaining shall be provided. Employees shall not be discriminated against for forming, joining or being a member of such an organisation.

Employee representatives are to be allowed free access to the workplaces of their colleagues, in order to ensure that they can exercise their rights in a lawful and peaceful manner. In addition, the ban on employing illegally resident third-country nationals must not be violated.

1.8.2 Prohibition of child labour

We will not accept any violations of the prohibition of child labour, in particular Convention 182 on the worst kinds of child labour. Suppliers are encouraged to adhere to the recommendation from the ILO Convention on the minimum age for employing children. According to this, the age of the employee should not be lower than the age at which compulsory education ends, according to the law of the place of employment, in any case not under 15 years old. Young employees, under 18 should not be given work that is damaging to their health, safety or child morality. Special protective regulations should therefore be observed.

1.8.3 Prohibition of illegal changes to the environment

Furthermore, we do not allow any illegal confiscation of land, forest, or water, especially if this threatens the vital conditions of the people living there. Harmful changes to the soil, water and air pollution, noise emissions and excessive water consumption must be avoided, if this is damaging to the people's health, if it significantly compromises the natural basis for food production or prevents people from having access to clean drinking water and sanitary facilities.

1.9 Risk analysis

Truma carries out regular risk analyses within its supplier base. Thus, potential risks can be identified, addressed and eliminated. We see this as part of our supplier due diligence, to carry out regular risk analyses in our supply chain and eliminate any risks detected.

There are practical methods that can be used to identify the risk of damage in our own business operations and throughout the supply chain. We can assess these and carry out due diligence.

1.10 Taxes

Truma requires its suppliers to comply with current applicable national and international tax laws. We do not accept unlawful disregard or avoidance of these laws.

1.11 Money laundering
Truma adheres to the applicable regulations of the Money Laundering Act and requires its suppliers to comply with the legal obligations in the fight against money laundering and terrorist financing, and not to participate in such illegal activities, but to actively prevent them.

1.12 Proper accounting
Truma adheres to the principles of proper accounting (GoB) and requires its suppliers to always comply with the applicable laws on proper accounting and, where applicable, financial reporting. Our suppliers are required to adhere to all applicable national and international laws.

1.13 Foreign trade regulations
Before data is created, Truma checks all addresses against a sanctions list program/blocked list as well as all sale items where new ones are concerned and annually according to the BAFA goods list (dual use regulation). All product classifications and codes are also checked annually. We also expect this of our business partners.

1.14 Export and import
Customers in embargoed countries will be blocked by the system and not supplied. All customers will be informed about compliance with the US Re-Export Regulation when supplying goods of US origin. Truma gives customers the necessary export documents and information for a smooth import into the recipient country.

Suppliers must supply the necessary and correct information about the respective deliveries on the shipping documents. All goods are regularly checked for import bans.

1.15 Corruption
Decisions are only and always taken based on objective criteria in the interest of the company. Neither pecuniary nor personal benefits of any kind may influence decisions about orders, projects or partnerships.

These regulations apply to both Truma and our suppliers. The internal guideline “Acceptance of gifts” is to be observed with regard to gifts.

1.16 Fair competition
The standards of fair business activities, fair promotion and fair and open competition must be complied with. In addition, the applicable anti-trust laws must be taken into account, which in particular outlaw agreements and other activities that influence prices or conditions when dealing with competitors. Agreements between business partners which can restrict their freedom to determine their prices and other conditions are to be avoided.

1.17 Conflicts of interest
We take care to separate personal and private interests from those of the company. However, Truma’s business interests may conflict with personal interests. A conflict of interests can lead to us no longer being in a position to take unbiased business decisions. We therefore disclose potential conflicts of interest immediately and coordinate with our superiors or the compliance department on how to proceed.

2. Dealing with information

At Truma we see dealing with information carefully as an essential component of our company philosophy.

2.1 Protection of company-relevant information

Truma requires its suppliers to protect company-related information and data and treat it as confidential. Non-public information is considered company related. That's why we always ensure that business data from business partners is reasonably protected from misuse, loss, deletion and manipulation.

2.2 Data protection

Truma regards respect for personal rights with regard to informational self-determination as a valuable asset. Linked to this is always a very economical and solicitous way of dealing with personal data according to the principles for the processing of personal data.

As a result, we adhere to the provisions of the current laws on data protection. We protect personal data, in particular, against loss, unauthorised access and improper disclosure.

We only collect, process and use personal data if allowed to by law or if the data subject has consented to the processing.

With this claim we ensure a uniform and reasonable level of data protection. We also expect this of our business partners.

2.3 IT security

We ensure cyber security with an information safety management system (ISMS) into which we have firmly integrated the protection goals of confidentiality, integrity and availability of data and information.



Information processing and digitalisation is of significant importance in production. Interconnectedness within the company, but also with business partners, essentially supports the provision of services. We comply with IT security and data protection standards. Regarding this, we can demonstrate to third parties a level of security that is state-of-the-art.

In order to ensure the best protection possible, we take the corresponding security measures in accordance with our IT security guidelines. We treat company documents and information as confidential. Negligent transfer or disclosure of information can have a critical impact on Truma's reputation, as well as having contractual consequences. We also require that our business partners have a protection-orientated, reasonable IT security system.

We are continuously working on improving the ISMS and security measures.

2.4 Open communication

We value clear and open communication with employees and business partners. We coordinate information, communication and marketing measures with the responsible specialist department in order to ensure consistent and clear communication.

When using social media, it is important to us to be mindful of the reputation of our company and our business partners. We protect the private lives of our employees and business partners when using social media and we do not disclose or disseminate either confidential or sensitive information or offensive content.

3. Nature and climate protection

Truma wants to take economic, ecological and social responsibility for its actions.

3.1 Sustainability

Our goal is to keep the burden on humans and nature as low as possible with our work, so that future generations can still enjoy camping in a healthy environment.

Our employees and business partners are therefore required to comply with all the relevant environmental laws and regulations. All required environmental certificates, permits and registrations must be in place, and operating and reporting requirements must be followed.

Products should always be designed more efficiently and in an environmentally friendly way. Equally, the use and consumption of resources during production, including water and energy, is to be reduced or avoided, as is the creation of waste and wastewater. This either happens directly at the place of origin, or through measures, such as changes to production and maintenance processes, the use of alternative materials or with the aid of recycling materials.

Economic solutions must be found to improve energy efficiency, minimise energy consumption and to create sustainable energy on site.

3.2 Approach to materials

There is a special focus, among other things, on the handling of so-called conflict minerals and generally critical minerals and materials, for which the entire supply chain is the key to more responsibility and care. Therefore, further requirements are placed on



transparency and cooperation. We require our suppliers to exercise due diligence with regard to the relevant raw materials, such as mercury, PFAS, tin, tantalum, tungsten, gold, cobalt and mica. This is done, among other ways, based on the principles of the Minamata Convention and in line with the Guiding Principles of the Organisation for Economic Cooperation and Development (OECD), to develop due diligence processes that promote responsible supply chains for minerals from conflict and high-risk areas.

Suppliers must guarantee that the materials they use only come from transparent and certified sources. In particular, minerals may not be sourced from named high-risk smelters. Sources of supply must always be compared with the regularly updated list of conflict and high-risk areas. Suppliers make their conflict mineral reports available upon request, so that Truma can meet the requirements of its own customers. On the basis of the Stockholm Convention, special care is also required when dealing with any production of pollutants.

Truma especially values compliance with the regulation regarding the handling, collection, storage, import, export and disposal of hazardous and other waste (Basel Convention). Chemicals and other materials, waste from company operations, production processes and sanitary facilities must be standardised, monitored, checked and as required, treated before discharge or disposal.

General emissions from company operations (air and noise emissions) and greenhouse gas emissions must be standardised, routinely monitored, checked and as required, treated before their release. Truma and its business partners are also tasked with monitoring their emission control systems and are required to find economic solutions to minimising any emissions.

3.3 Integration of sustainability requirements into the organisation and processes

Truma's energy and environmental management system is certified according to DIN EN ISO 50001 and DIN EN ISO 14001. Truma expects an environment-orientated management system from its suppliers, and compliance with and review of the applicable standards. Truma has an Energy and Environment Management Officer.

4. Due diligence to promote responsible supply chains

Our suppliers are required to comply with the behavioural requirements and principles agreed in our Code of Conduct and to implement them accordingly in their supply chains. Suppliers shall ensure that the corresponding content of this Code of Conduct is communicated to all employees, managers and sub-contracting companies, and impose the same obligations on them. In addition, suppliers shall take all the necessary precautions to ensure the implementation of and compliance with the requirements of this Code of Conduct.

5. Updates

(1) It may be necessary for Truma to make amendments to the Code of Conduct under the following circumstances:
   a) if there are new legal requirements, legally relevant official requirements or case law at European or national level,
   b) Truma has new insights into the risk situation in its supply chain and/or the effectiveness of its code or
   c) industry initiatives have entailed the evolution of more effective or more efficient due diligence measures, standards or strategies.

(2) Truma will inform suppliers of any such amendments with a reasonable lead time and be ready to discuss their practicality and provide reasonable support, where necessary.

(3) The amended code will automatically replace the previous one, unless the changes are incomprehensible to the supplier, or they are unreasonably disadvantageous to them. If the supplier does not raise any objections to this effect during the lead time, it will be assumed that the amendments are comprehensible and reasonable.

6. Notification of violations, information and contacts

Since Truma pursues a goal of a transparent corporate culture that has integrity, we greatly value the identification and remediation of problems and improper behaviour. To ensure Truma's sustainable success and to foster the prevention of damage, potential compliance violations must be recognised and remedied early. In order to be able to implement this claim, it is important to learn about possible misconduct or violations at an early stage. For this, we have put an independent whistle blower tool on our website, to give our employees, business partners and other third parties the opportunity to notify us of possible compliance violations. If desired, these messages and notifications can also be sent anonymously.

If a Truma supplier does not adhere to the requirements of this Code of Conduct, Truma reserves the right to take reasonable legal steps. It is within Truma's decision-making authority to refrain from such consequences and instead to take alternative measures if the supplier credibly assures and can prove that it has immediately initiated promising countermeasures to avoid future violations.

Contact
Our employees, business partners and third parties can use the form or the telephone number of the whistleblower tool to report possible compliance violations. In addition, our business partners can also contact their contact person at Truma and our employees can contact their supervisors.

telephone number: +49 800 8 84 74 96
truma.com/whistleblowertool

Status 09.11.2026

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