

TKMS



**CODE OF CONDUCT
OF TKMS AG & CO. KGAA**

Code of Conduct | 2026



Your Maritime Powerhouse

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PREAMBLE



PREAMBLE

Dear colleagues,

Our Code of Conduct works in a similar way to a compass: it shows us the way to act in such a way that we can improve the success of TKMS AG & Co. KGaA and its affiliated companies (hereinafter referred to as TKMS).

We are all responsible for TKMS. It is our joint task to protect TKMS and to maintain the trust of our colleagues, business partners, customers and our entire environment. This Code of Conduct is the foundation for this. In particular, personal responsibility, openness and transparency as well as at all times legally compliant and ethically correct behaviour play an important role.

Our Code of Conduct brings together our binding basic rules and principles. It thus provides important guidance for members of the Management Board and Executive Board, managers and all employees.

The Code of Conduct sets out our values and defines how we want to deal with each other. At the same time, it is a global promise of responsible behaviour towards partners and society and the environment. The behaviour of everyone at TKMS is important for our sustainable corporate success and the reputation of TKMS.

How to count on you!

The Management Board of TKMS AG & Co. KGaA



ABOUT OUR CODE OF CONDUCT

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ABOUT OUR CODE OF CONDUCT

The Code of Conduct sets our standards for ourselves and defines how we want to deal with each other. At the same time, it is a global promise for responsible behaviour towards partners and society and the environment. Even if the Code of Conduct does not provide a solution for every situation, it still contains important information and guidelines for all employees to act in accordance with the rules, with integrity and ethics. The Code of Conduct summarises the principles and rules that are essential to us. It demonstrates the demands we make of ourselves and our business partners and stakeholders. It applies to all TKMS companies, employees, executives and board members.

Rules and regulations governing individual situations and situations in the professional environment are clearly set out in internal policies and processes. These policies and processes are fully valid and binding for all managers, executives and employees of TKMS.

TKMS complies with all applicable local laws. In the event of a direct or indirect conflict between local laws, regulations or the internal rules and this Code of Conduct, the local law shall prevail. Neither the Code of Conduct nor the TKMS internal rules create legal rights or obligations that do not already exist under applicable local law.



WHAT WE STAND FOR

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WHAT WE STAND FOR

That's what makes us

TKMS comprises around 9,000 international employees with different life models and cultures. What unites us, however, is that we are a team. We work together, learn from each other and develop together. We're fair. We respect each other and communicate openly. We say what we do. And we do what we say. This framework of values binds us together and makes us successful. We have set out our values in our mission statement. It expresses what TKMS stands for today and in the future. Our business success depends heavily on these values.

We are the TKMS

- ◆ We are an international system provider in the underwater and surface shipbuilding industry as well as in the field of maritime electronics and safety technology.
- ◆ We are the leading supplier of conventional submarines worldwide
- ◆ We develop and build state-of-the-art surface vessels
- ◆ We support nations around the world and their armed forces in their efforts to make the seas safer for navigation and trade.
- ◆ We are one of the most successful companies in the field of sonar technology.
- ◆ We offer a range of products ranging from guidance and communication systems for submarines and surface vessels, mine defence systems, unmanned underwater and surface vehicles and torpedoes.
- ◆ We build on a long history of our company and have unique know-how



WHAT WE STAND FOR

We build on strong values: reliability and honesty, credibility and integrity

We are a role model and deliver what we promise. We take personal responsibility for our decisions and our actions and behaviour. In matters concerning TKMS, we always act to the best of our knowledge.

Our executives are aware that they have a special responsibility. They take their duty to care for their employees seriously. They set a good example and fulfil their corporate responsibility. In their actions, they can be measured in particular against this Code of Conduct. They create a trusting working environment and are always available as collegial contact partners.

Protection of freedom of expression, personal rights and privacy

We respect the dignity, privacy and individual rights of each individual. We protect and grant the right to freedom of opinion and expression.

Compliance is a matter of course for us and is our highest priority

We follow the law in force in the respective country as well as all company regulations. This means that all the necessary processes and controls must be adhered to. If national laws have stricter rules than those applicable to the TKMS, national law takes precedence.

However, compliance means far more to us than compliance with the law. Compliance is for us a question of attitude - every single day for every single person at the TKMS. Violations of internal instructions or legal or regulatory requirements can have serious consequences for TKMS or for employees, managers and other persons. Violations are not tolerated.

WHAT WE STAND FOR

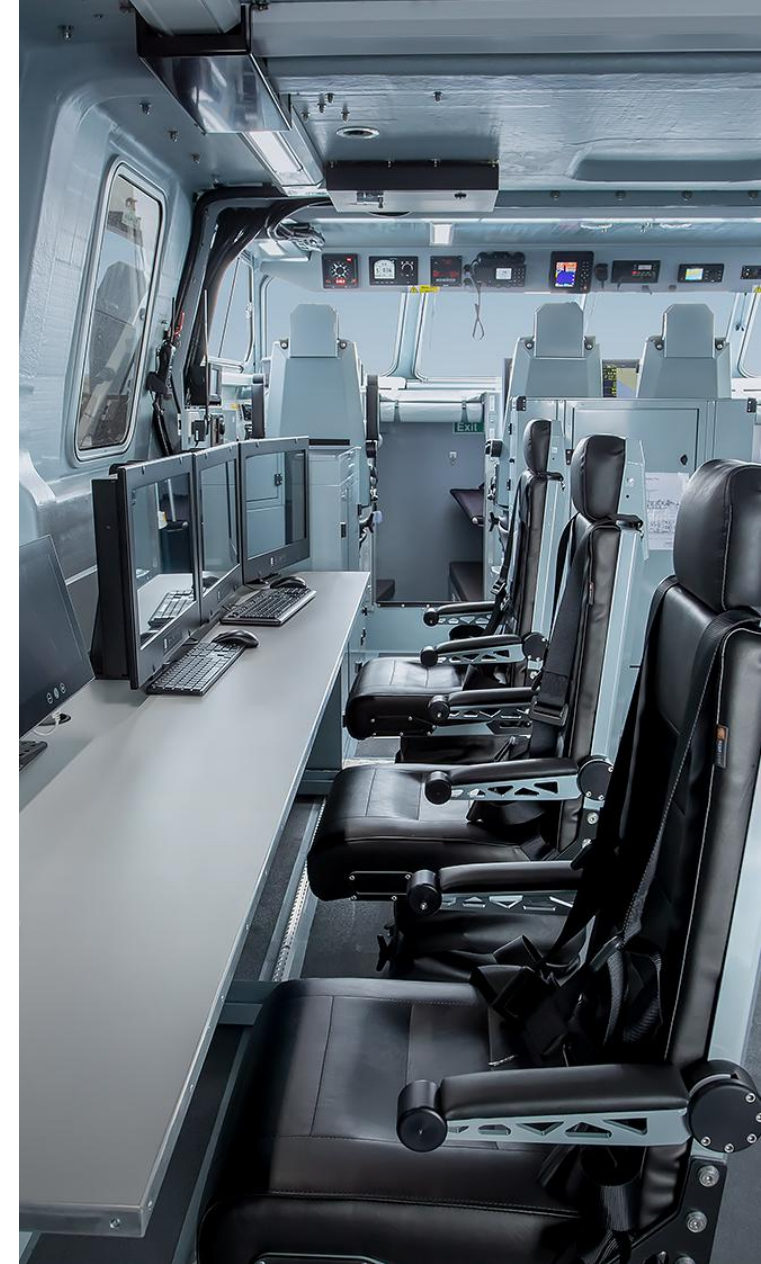
We take responsibility for society

TKMS develops, manufactures and markets products for maritime applications, and is committed to the highest quality and safety standards. Furthermore, TKMS strives to continuously improve its products with the aim of meeting the highest quality requirements.

The relationship with our business partners is characterised by respectful, reliable, competent, transparent and fair cooperation. By its very nature, this cooperation takes place in an ethical and legal environment. In order to ensure that laws, regulations and regional codes are recognised and complied with, TKMS has developed and implemented a compliance system based on country-specific regulations and complemented by the TKMS' internal rules. Openness and mutual appreciation shape our cooperation. We build on strong values: reliability and honesty, credibility and integrity. We take compliance for granted.

In its dealings with authorities, society and the public, represented by the press, media and social media, TKMS pursues a policy of timely information characterised by facts, transparency, honesty, fairness, compliance with the law and political neutrality.

We are committed to providing our shareholders with insight into TKMS and fulfil this duty by providing timely and comprehensive information. TKMS provides its shareholders with a reasonable economic return, taking into account our responsibility for the preservation of TKMS assets.



OUR BEHAVIOUR AND RESPONSIBILITY AS A MEMBER OF SOCIETY

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OUR BEHAVIOUR AND RESPONSIBILITY AS A MEMBER OF SOCIETY

TKMS is committed to the highest sustainability standards. This includes good corporate governance as well as environmental and social responsibility. As an international company, we source raw materials, goods and services worldwide. We put people at the centre of this. This applies to everyone equally - both our own employees and our suppliers.

In our TKMS policy statement, we describe what we mean by human rights and environmental due diligence obligations. It also sets out our expectations of our employees and our suppliers and their subcontractors.

Human rights and fair working conditions

As an international company, we are aware of our responsibility and actively contribute to improving human rights standards. We respect and support respect for internationally recognised human rights and fair working conditions.

We adhere to the principles of the United Nations Global Compact, the United Nations International Charter of Human Rights, the International Covenants on Civil and Political Rights, Economic, Social and Cultural Rights and the core labour standards of the International Labour Organisation (ILO). We expect this from our suppliers as well.

Protection of freedom of expression, personal rights and privacy

We respect the dignity, privacy and privacy rights of each individual person. We protect and grant the right to freedom of opinion and expression.

Forced and child labour

We strongly oppose all forms of forced, compulsory and child labour, as well as modern slavery and human trafficking.

Environmental and climate protection and environmental responsibility

Environmental and climate protection and environmental responsibility are high on the agenda of TKMS. We have set ourselves ambitious, science-based targets in order to become CO₂-neutral. For this reason, we pay attention to the careful use of natural resources throughout the entire product life cycle, both in the development of new products and services and in our operational processes. This is true from development through production to the end of the product life cycle with the re-use of valuable resources for a complete circular economy. In this way, we minimise climate and environmental impacts and make a positive contribution to climate and environmental protection with our products. Therefore, environmental and energy management systems according to ISO 14001 and ISO 50001 are implemented at relevant sites.

OUR BEHAVIOUR AND RESPONSIBILITY AS A MEMBER OF SOCIETY

Quality requirements and management of product risks

Our aim is to meet the legal requirements and expectations of our customers regarding product safety as well as product and process quality at all times. We continuously analyse feedback. This helps us to recognise errors and product risks early on or to avoid them altogether. In addition, we can improve the quality of our products and our performance in this way.

Sustainability in the supply chain

Sustainability is an integral part of our corporate strategy. It also plays an important role in choosing suppliers. We have firmly integrated good governance into our procurement processes. Our expectations of suppliers are formulated in the TKMS Supplier Code of Conduct. In accordance with legal requirements, we regularly check our requirements and their compliance by our suppliers.

We expect our suppliers to comply with their duty of care to promote responsible and responsible raw material supply chains and to comply with all applicable conflict minerals legislation.

Management of conflict minerals and high-risk raw materials

We expect our suppliers to comply with their due diligence to promote responsible raw material supply chains and comply with all applicable conflict minerals legislation.

Minerals, in particular tin, tantalum, tungsten, gold and the corresponding ores and metals, must have been acquired without conflict. Should a product be Conflict minerals or high-risk raw materials. We expect our suppliers to be able to ensure transparency over their supply chain up to the smelter and material source upon request.

OUR BEHAVIOUR AND RESPONSIBILITY AS A MEMBER OF SOCIETY

Social responsibility and civic engagement

The promotion of the community is of particular concern to us.

Political representation of interests

Our political commitment and lobbying are coordinated, open and transparent. We act in accordance with regulatory and ethical standards. With political commitment and lobbying, TKMS pursues the goal of achieving entrepreneurial goals by contributing our interests to the decision-making process of politicians in order to actively meet the challenges ahead and help shape the framework conditions of the future with our expertise. TKMS does not make any financial contributions to political parties, party-affiliated or party-like organisations, elected representatives or candidates.

TKMS is registered in the lobby register in accordance with the German Lobby Register Act (LobbyRG). In countries outside the EU, TKMS checks entries in national and international lobby registers and carries out registration if necessary.

We are aware that all employees can be perceived to represent TKMS in their everyday lives.

Through our behaviour and public relations - especially towards the media - we protect our own reputations and the reputation of TKMS. We take care not to make private statements about our business and activity at TKMS. We protect ourselves and TKMS by ensuring that we do not disclose any personal, confidential or proprietary information.

On social media platforms, we are also co-ambassadors for the TKMS - and thus also jointly responsible for the company's profile.

OUR BEHAVIOUR AND RESPONSIBILITY IN THE BUSINESS ENVIRONMENT

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OUR BEHAVIOUR AND RESPONSIBILITY IN THE BUSINESS ENVIRONMENT

Prohibition of corruption and bribery

Our business success is based on the quality of our products and services. We support the UN Global Compact and the UN Convention against Corruption. We are strongly opposed to corrupt behaviour.

Personal benefits are never a motive for a business relationship. We demand the same level of integrity from our customers and suppliers. We strongly reject any form of corruption, bribery, theft, embezzlement, fraud or blackmail, whether in relation to public officials or in the private sphere.

Invitations and gifts

Good business relations with our customers are important to us. The same applies to suppliers and other stakeholders. Invitations and gifts can strengthen these relationships, but we never use them to influence business relationships or decisions unfairly.

Avoidance of conflicts of interest

We take business decisions free of personal interests and motives and only in the best interests of TKMS to avoid conflicted decisions.

Transparent financial and sustainability reporting

Due to our worldwide business activities, we are obliged to keep accounts and report at home and abroad. Proper and complete records by all employees are also indispensable for the strategic planning and further development of the TKMS. The records not only serve to comply with regulatory requirements, but also help to improve our process processes.

Our approach to transparency also includes open and truthful reporting and communication on the sustainable performance of the company investors, employees, customers, business partners, the public in general and state institutions.

OUR BEHAVIOUR AND RESPONSIBILITY IN THE BUSINESS ENVIRONMENT

Data protection

The protection of personal data, in particular of employees, customers and suppliers, is of particular importance to TKMS.

We respect the right of our employees, customers and suppliers to freedom of expression.

We process personal data only in accordance with relevant laws.

Information Security

We understand the importance of information assets and ensure their appropriate technical protection against unauthorised access.

We consider data and information required in the course of our business activities to be essential in promoting productivity. That is why we protect them against alternation, falsification or loss.

To this end, we regularly train our employees and constantly check our systems and procedures for any need for action.

Prevention of money laundering and terrorist financing

We at TKMS guard against abuse from money laundering activities and terrorist financing. Through our security systems and controls, we are committed to preventing such abuses.

Foreign trade law

We comply with the foreign trade regulations of the countries in which we do business.

TKMS manages its responsibilities and internal processes in such a way that only legally permissible transactions that are compatible with the principles of TKMS are executed in accordance with the law.

OUR BEHAVIOUR AND RESPONSIBILITY IN THE BUSINESS ENVIRONMENT

Tax and customs compliance

Our business activities at home and abroad, are subject to a wide range of tax and customs duties.

In addition to tax legislation, we also comply with all relevant internationally recognised standards and principles. Moreover, we do not engage in aggressive tax and customs avoidance activities and do not use artificial arrangements.

Taxes are paid where the real economic value is created.

Confidential company and inside information

We take all necessary steps to protect confidential information and trade secrets from access and inspection by unauthorised employees and other third parties in an appropriate manner.

This also applies to the use of artificial intelligence. It brings us new opportunities, but it also brings with it a great responsibility. We ensure the careful handling and transparent use of company information. We ensure that data is correct and we respect the rights of data subjects.

Employees who have access to inside information do not trade in shares or other TKMS financial instruments and do not disclose this information outside their work for TKMS.

OUR BEHAVIOUR AND OUR RESPONSIBILITY IN THE WORKPLACE

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OUR BEHAVIOUR AND OUR RESPONSIBILITY IN THE WORKPLACE

Occupational safety and health

Human beings are at the centre of TKMS. All employees should be able to work well with us and return home safely. Therefore, our aim is to create safe and healthy working conditions in the spirit of a preventive approach.

Together, we strive for an advanced safety and health culture. Occupational safety, health protection and health promotion are management tasks. Employees take responsibility for themselves, are actively involved and help shape the working environment.

We work systematically for continuous improvement. We always comply with applicable law and other requirements. This also applies to the commitments we have made to ourselves. We will take appropriate action in the event of rule violations.

Occupational safety, health protection and health promotion are an integral part of all operations. They are a primary factor in all technical, organisational, economic and social considerations.

Fair treatment and non-discrimination

Employees shall not be disadvantaged, favoured or harassed on the basis of characteristics such as age, ethnic origin and nationality, gender and gender identity, physical and mental abilities, religion and belief, sexual orientation and identity, social origin, political or other convictions or membership of a trade union. We do not tolerate unacceptable treatment of employees or the threat of any form of negative treatment. These may include psychological or physical coercion, discrimination, sexual or personal harassment, abuse, verbal abuse, bullying, or other personal attacks.

OUR BEHAVIOUR AND OUR RESPONSIBILITY IN THE WORKPLACE

Cooperation with the employee representatives

We recognise the right of all employees to form or join trade unions and employee representatives on a democratic basis within the framework of national regulations and to engage in collective bargaining. For TKMS, a trusting and close cooperation with the employee representatives is a crucial component and a proven cornerstone of corporate policy. Mutual trust and co-operative engagement are based on open and constructive dialogue, characterised by mutual respect.

Working Hours

We comply with the applicable national laws on working hours, rest periods and recovery times. In the absence of national legislation, the standards of the International Labour Organisation (ILO) apply.

emolument

The right to equitable remuneration is recognised for all employees. Remuneration and other services are at least in accordance with the respective national and local legal standards or the level of the national economic sectors, industries and regions.

Use of external personnel

Regardless of the type of contract, the respective applicable national law is observed when foreign personnel (e.g. security personnel) are deployed in contractual and industrial relations. We manage foreign personnel through appropriate measures, especially with regard to human rights risks.

Protection of corporate property

We use the company's property and resources appropriately and carefully and protect it from loss, theft or misuse. The intellectual property of our company in the form of patents and other intellectual property rights, e.g. Brands and designs are one of our most important corporate resources. These protected assets are defended against unauthorised access by third parties. We also avoid unauthorised use of foreign intellectual property.

OUR BEHAVIOUR IN IMPLEMENTING THE CODE OF CONDUCT



OUR BEHAVIOUR IN IMPLEMENTING THE CODE OF CONDUCTS / CODE OF CONDUCT

We all have a responsibility to implement and adhere to this Code of Conduct.

TKMS actively promotes the communication of the regulations that comprise the Code of Conduct. The individual TKMS companies ensure their implementation. In addition, they must ensure that compliance with the regulations puts no employees at a disadvantage.

Our executives are the first point of contact when it comes to understanding the regulations. They ensure that all employees know and understand the Code of Conduct. They prevent behaviour that is unacceptable in the course of their managerial duties. Where necessary, they shall take appropriate measures to prevent breaches of the rules within their area of responsibility. Confident and good cooperation between employees and managers is demonstrated by honest and open communication and mutual support.

If you have any further questions about the Code of Conduct, the central e-mail address compliance@tkmsgroup.com is available to all board members, managers, employees and third parties.

All information will be kept strictly confidential.



REPORTING OF POSSIBLE MISCONDUCT

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REPORTING POSSIBLE MISCONDUCT

Serious information helps to counteract violations at an early stage. As a result, damage can be averted by TKMS, our employees and business partners. All TKMS employees have the opportunity to provide comments or complaints on any subject mentioned in the Code of Conduct or on broader topics. The same opportunities are available to customers and suppliers. There are several reporting channels available and reports can be made anonymously.

Direct contact to superiors or business partners

An open communication culture is an essential part of our cooperation and our corporate culture. Employees must be able to address mistakes openly and, above all, at an early stage. The first point of contact should therefore always be an employee's supervisor. As a third party, please contact your business partner at TKMS.

Central Reporting Unit

The Compliance Investigations organisational unit of TKMS is available as central reporting unit. The TKMS and the central reporting unit shall protect the interests of whistleblowers not only by establishing secure reporting systems, but also by agreeing to keep incoming information confidential and to protect whistleblowers, acting in the best of their knowledge, by all appropriate means from any potential disadvantage resulting from a notification.

The Compliance Investigations unit receives reports on compliance violations with a focus on anti-corruption, antitrust, data compliance, money laundering prevention and foreign trade law as well as environmental and human rights-related violations of obligations in the supply chain. The following contact options are available:

- ◆ TKMS electronic whistleblower system: Reporters have the option to report infringements through the electronic TKMS whistleblower system. The electronic whistleblower system can be accessed at: <https://sicher-melden.de/TKMS>
- ◆ E-mail: Contact TKMS Compliance Investigations via the following e-mail address: whistleblowing@tkmsgroup.com
- ◆ Post: Contact TKMS via the following postal address: TKMS GmbH, for the attention of Compliance Investigations, Werftstraße 112-114 24143 Kiel.
- ◆ Telephone hotline: A message can be sent by telephone: The telephone number is: (+49) 0173 356 9099

Employees of TKMS can also contact their Compliance Officer or Compliance Manager directly.



Your Maritime Powerhouse

Within our publications we rely on gender-appropriate language. For a consistently high reading flow, we dispense with the gender colon and use neutral language wherever possible to address all genders. When we talk about TKMS or TKMS Group, we mean TKMS AG & Co. KG. KGaA and all with her i. p. d. Paragraphs 15 et seq. AktG related domestic and foreign companies.

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