



TPA Code Of Ethics

Our Promise.
Our Values.

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Foreword

The story of the TPA Group's success and growth reflects the story of our Clients' success and growth. The basis for this sustainable, positive development was, and is, high-quality work coupled with professional, social and entrepreneurial competence that enables our Partners and Employees to recognize and fulfil the wishes and needs of our Clients correctly and at the right time.

Our work is based on values which are actually a matter of course for us. With the Code of Ethics the TPA Senior Management is making its commitment to these values clear and is presenting them in concrete, unambiguous terms for all Stakeholders. In this way we are ensuring that the legal and regulatory framework is adhered to within the Company.

At the same time we are demonstrating our responsibility for our Clients, society and the environment. Honest and legally correct conduct is thereby the benchmark for our actions and our daily cooperation.

On behalf of all TPA Senior Management

Karin Fuhrmann

Leopold Brunner

Anja Cupal

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In order to simplify the reading of this Code, the decision was taken to use the male form throughout. However, we are of course addressing all our Employees equally.



Areas of Application and Stakeholders

How is the TPA Code of Ethics to be applied?

This Code can only answer certain practice-oriented questions. It is also not possible to present all the relevant laws, guidelines and standards.

Therefore it is important that if a provision in this Code of Ethics deviates from applicable legal regulations, professional principles or other corporate policies, or if questions arise for which the answers are not deducible from the Code, then the responsible Partner or the responsible Risk Partner should be consulted.

Let's stay in contact!

To whom does the Code of Ethics apply?

The Code is binding for

- TPA Partners and Employees as well as
- Suppliers and Cooperation Partners.

It provides information for

- Clients, Authorities, Suppliers and other Stakeholders
- Potential Employees

about the way TPA works and its principles.

Where can I find the TPA Code of Ethics?

The Code is available on both the TPA Austria intranet (NAVI) and at www.tpa-group.at.

Our most important tools

Common ethical values are the basis of cooperation both within our Team and with our Clients, and they define

WHO

we are

&

HOW

we get things done.

Our most important tools here are not calculators and spreadsheets but rather:



These tools define our TPA Culture and obligate us to act with integrity and fairness not only amongst ourselves but also towards our Clients and our Cooperation Partners.

Our Values



Respect and Esteem



Trust based on Quality



**Objectivity and
Independence**



Integrity and Fairness



Zero Tolerance regarding illegal and unethical conduct



Social and Ecological Responsibility

Guidelines for Senior Management

The way that Senior Management interacts with its Employees has a direct effect on the conduct and the actions of the whole Team.

Therefore, **respect and esteem** characterizes interaction within our Company. The relevant **standards of behaviour** are also stipulated in the TPA **Leadership Guidelines**.

As a member of the TPA Senior Management I always act according to three basic principles:

INFORM

- I communicate in a clear and open manner, and I ask whether my message has been correctly understood.
- I take sufficient time for regular exchanges of information, and I actively encourage the transfer of information and knowledge between departments and sections.
- Together with my Employees I develop objectives that are explicit, attainable, comprehensible and clearly defined with regards to timing. I inform my Employees on a regular basis about both my objectives and those of the Department and the Company.

INVOLVE

- I give regular and prompt positive feedback and constructive criticism, and I actively ask my Employees for their opinions.
- I value the performance of every Employee. I show and openly communicate my recognition, and I thereby give every Employee the feeling that they are doing important and valuable work for the Company
- I actively listen and show interest in the thoughts and feelings of my Employees.

INSPIRE

- With the enthusiasm that I openly show for my Team as well as for the Company, I inspire my Employees.
- I encourage my Employees to bring their own ideas and proposals for solutions. I trust them, and I create the space that they need to work independently and to try out something new.
- I admit my own errors and in doing so create an atmosphere in which it is possible to own up to one's errors in order to learn from them.
- In this way I can be a good example to future Senior Management on how to interact respectfully and inspiringly with Colleagues, and in this way I can motivate them to act in the same way.

Respect and Esteem



Trust based on Quality

QUALITY



Our Promise of Quality

We only win and maintain the long-term trust of our Clients through the excellent quality of our work. We are able to achieve these quality standards solely and exclusively because of the Employees. In order that we can continue to satisfy these demands, we strive to provide the best possible framework conditions.

Training/Further Education

- We ensure that all our Employees are constantly trained so that they are always up-to-date and are able to realise their full potential. Access to external and internal libraries and/or the most modern online media is a matter of course.
- While we aim for the highest level of accuracy and conscientiousness in our work, mistakes can never be completely excluded. However, we try to learn from errors that do occur and to avoid them in the future.
- Open doors: Partners and Senior Management promise that their Employees can always turn to them with any questions and concerns.

Process Quality

We constantly ensure the quality of our work with standardised processes:

- For every significant area of our activity a standardised process for accepting, executing, reviewing and settling assignments has been implemented in our quality guidelines. These quality guidelines are binding for every Partner and Employee. There is regular training on the contents which are subject to a continual improvement process. The “4-eye principle” is a matter of course for us.

Solution-Oriented Approach

The Client is the focus of our daily work:

- For us it is a matter of course that our services are precisely and individually tailor-made for the needs of our Clients as only in this way can we offer them the best possible service

Clear Agreements

- For every assignment we reach an explicit, clear and transparent written mandate/fee agreement with our Clients.

Way of Working

We strengthen our reputation as a high-quality consulting company through our way of working:

- We stay in close contact with our Clients in order to be able to fulfil their consultancy requirements as best as possible.
- We research facts and get to the root of them. We question assumptions.
- We cope with critical situations with the appropriate measures. If necessary, we additionally consult experts within our network.

Working Environment

- We provide our Employees with modern workplaces and equipment, which conform to the current state-of-the-art technology.

Objectivity and Independence

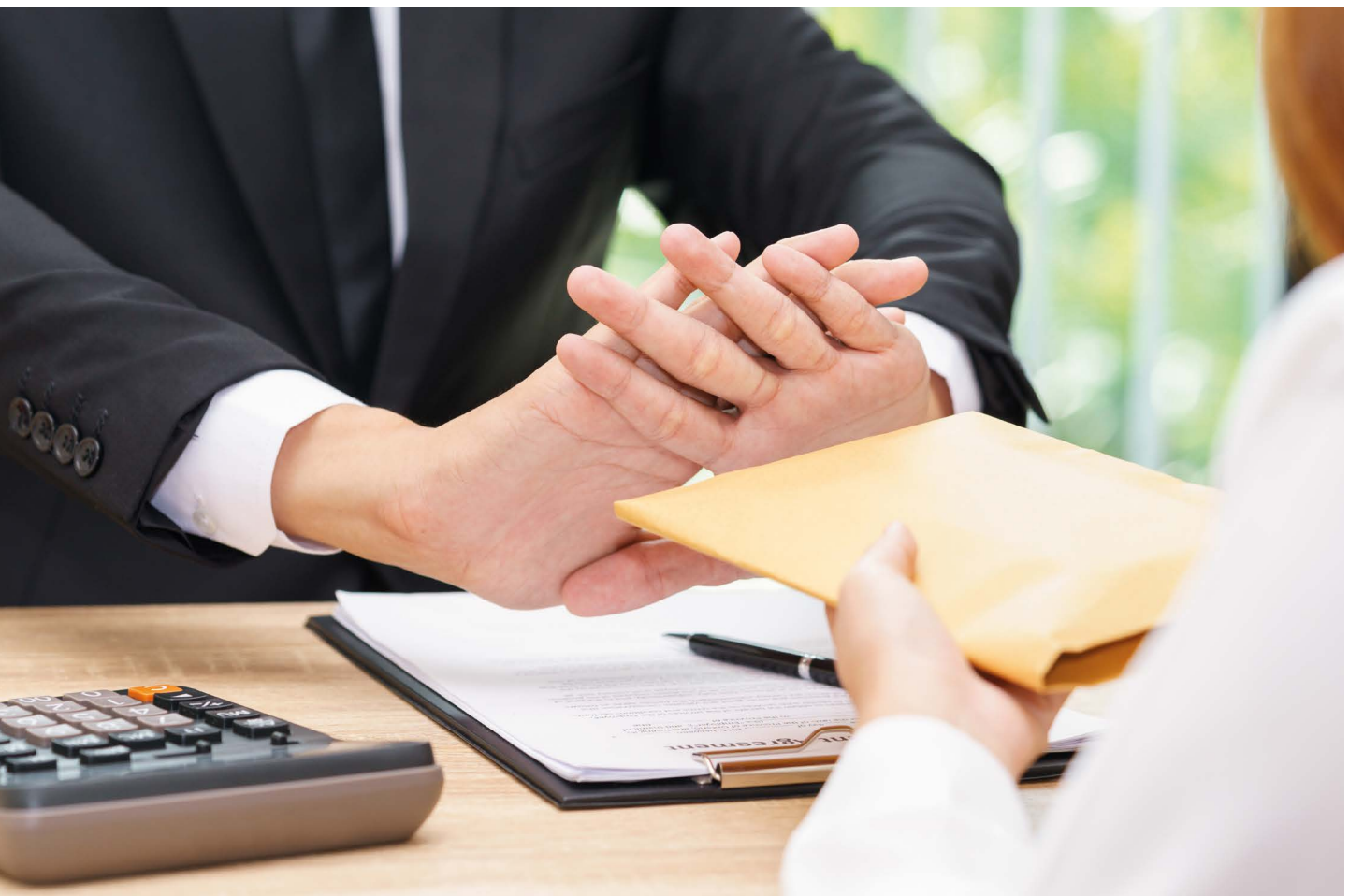
We pay attention to objectivity and independence and avoid Conflicts of Interest.

We avoid Conflicts of Interest

- When we accept assignments, we identify and rectify any Conflict of Interests at the beginning.
- We avoid any possible, actual or also only apparent Conflicts of Interest. Any possible Conflicts of Interest are exposed before or during any type of activity. We look for the best possible solution together with the Client.
- We do not use any information or opportunities, which we receive while executing our profession, to our own benefit or that of a Third Party.

We do not allow any influences

- We ignore inappropriate influences without exception. They do not have any impact at all on the quality of our work and on our decisions.
- If an attempt is made to exert an influence, then the necessary counter measures are taken together. The Employees concerned will inform their Senior Management and Partners immediately.





Integrity and Fairness

Facing up to fair competition

- We are committed to fair competition with our competitors. We use our competitive advantages constructively and to the benefit of our Clients.

We act with integrity

- All Partners and Employees at TPA respect and observe all the relevant laws as well as all other legal regulations and internal guidelines. The confidentiality obligation that is law for our profession is a matter of course for us.

- TPA Senior Management leads by example and takes care that a working atmosphere is created in which an excellent environment for our controlling and compliance can be maintained:

TPA Senior Management and Employees may not accept any benefits if these could have a potential influence on the procurement or extension of an assignment by the TPA Group. Here, material or nonmaterial benefits may not exceed a value of EUR 100 on a case-by-case basis and/or EUR 500 annually. Should this stipulated amount be exceeded in an individual case, then the approval of the responsible Partner has to be sought. The prerequisite is that any potential influence on the procurement or extension of an assignment is excluded.

Rules



Zero Tolerance regarding illegal and unethical conduct

We do not accept any unethical or illegal conduct from Partners, Employees, Clients, Officials or Suppliers:

- We are aware of, and strictly comply with, the legal provisions. We also require this conduct from our Cooperation Partners and Suppliers in the value-added chain.
- We do not tolerate any form of corruption or bribery, and we follow a zero tolerance policy regarding the granting of undue benefits to officials, arbitrators and experts.
- We do not tolerate any other form of illegal conduct. Should we discover illegal conduct, then we take all the appropriate measures that are required by law and by our profession.
- All Senior Management is obliged to guide their Employees in a way that any outstanding questions regarding this principle are solved.
- All Employees are encouraged to speak openly if, from their point of view, "something is not right". If conduct is observed that is incompatible with the law or our values, then the Employees are obliged to speak out.
- Senior Management will take sufficient time for all Employees' concerns, in order to analyse the content and to take the necessary appropriate consequences.

Social and Ecological Responsibility

We are aware of our social and ecological responsibility, and we conduct ourselves accordingly, both with regards to our Employees, society and the environment.

Our interaction with the Employees

- Each and every Employee is important to us as a person.
- Each and every Employee has the right to fair treatment.
- We do not tolerate any form of discrimination whether it is due to gender, ethnic or national origin, religion, sexual orientation or any other discriminatory differentiation.
- We do not tolerate any form of harassment and bullying of Employees, and we take all the necessary measures if we are made aware of any such grievances.
- We enjoy a celebration, but alcohol and work do not mix, so alcohol is forbidden on the job. On exceptional occasions the moderate consumption of alcoholic beverages during breaks is permitted, if there is a reason to celebrate together.
- Smoking is not permitted in any of the offices.
- We support our Employees at various sporting events such as, for example, the Cancer Research Run, the Vienna City Marathon, the Business Run and the Business Challenge x-cross run. We are also committed to, and like to encourage, activities such as the internal Ping Pong Tournament and football.

Our interaction with society

- We take our responsibility towards society seriously and extend it beyond the minimum legal obligations. To this end, we deliberately focus on the impact of our activities on our environment.
- With our business actions we want to contribute towards the positive development of society, because the economy and society are closely and reciprocally related. On the one hand, companies need a healthy social environment, and on the other hand, society must be based on a functioning economic foundation.

We support social initiatives

We encourage our Employees to be active for the Company as individuals, and we support them here in specific ways. As part of the Corporate Volunteering Project "Doing Good Together" teams of Employees are given an allotted number of paid hours for collective social voluntary work. Moreover, additional financial support for the project chosen by the team is both possible and customary. All TPA Employees and Partners thereby have the possibility of also getting involved in a good cause while they are at work.

In practice, social voluntary work at TPA is implemented in many very different ways. It ranges from cooking together for food banks to environmentally important clean-ups in the Alm Region to the collecting of donations as part of a Christmas campaign for disadvantaged children.

On a regional level TPA supports various clubs and social institutions with monetary and material donations

We assist people around us with spontaneous relief efforts in the case of severe misfortune and unexpected events.

The way we treat our environment

- We relieve the environment in that we handle the resources that we do use with care. For example, we limit the use of paper where possible, We only print out when it is absolutely necessary and then (with the exception of certain cases) we use double-sided printing.
- Where we cannot avoid waste, we separate it.
- Our Partners and Senior Management are also in demand abroad for international votings, important Client meetings or lectures. However, we limit business trips to what is absolutely necessary, and we use video and/or telephone conferences as environmentally friendly alternatives.
- One of the reasons why we decided on our office location in the ICON Vienna is that this pioneering, new building, which lies in close proximity to the Central Station in Vienna, also fulfils the highest requirements regarding construction economy and ecology. Amongst other features, geothermal heat and ground water are used to increase the energy efficiency and sustainability of the building. The proximity to the station facilitates environmentally friendly journeys to and from work and/or appointments.



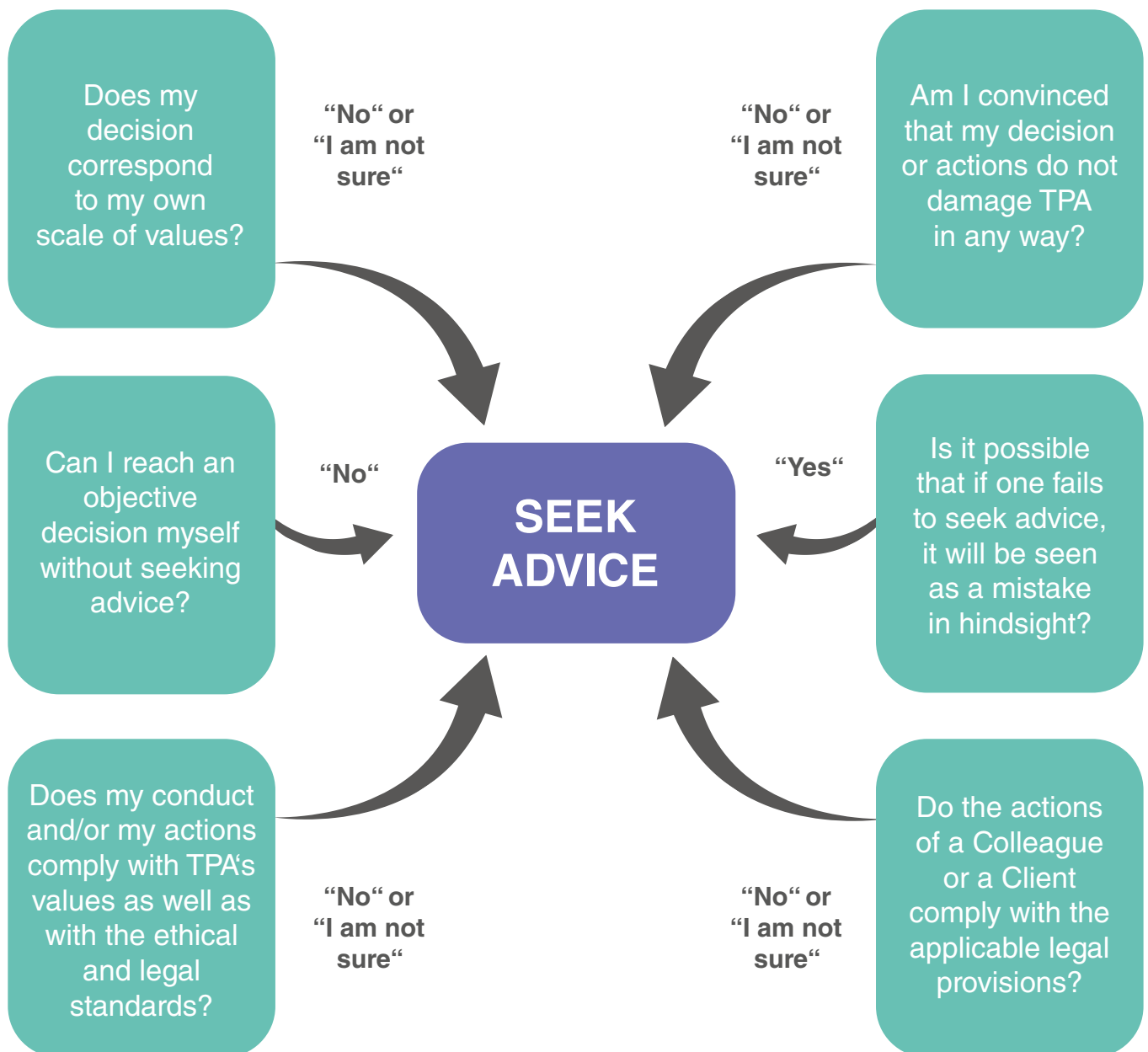
The TPA Code of Ethics as support on a daily basis

Relevant yes/no questions include, amongst others, the following situations:

- Applicable legal regulations or professional legal provisions are difficult to interpret or complex.
- The morally correct solution is hard to identify. Or there is not yet enough experience in the relevant area.
- Different opinions make the necessary further steps appear unclear.
- Potential decisions and/or actions are a cause of unease.



These questions provide clarification



Guidelines for Making Decisions

- All TPA Senior Management and Employees are obliged to adhere to the TPA Code of Ethics and to ensure its compliance. Any possible illegal actions against, or violations of, our values, applicable legal regulations or professional standards are to be reported. In addition all are obliged to keep up-to-date with the relevant legal regulations, professional standards and TPA Guidelines.
- Nobody can know everything. However, we create an environment in which advice can be sought without problem, if doubts are raised or errors are noticed.



Where can the Employees get support?

It is expected that that our Employees take every step which they consider to be appropriate. In the case of particularly difficult challenges suitable contact persons are available.

In some complex situations it may be necessary for reasons, such as professional legal principles or the TPA Guidelines, to seek advice.

Contact Partners are:

- The respective responsible Senior Management
- The Partners responsible for Risk Management
- The TPA Management Team





ETHICS
INTEGRITY
HONOR
FAITH
COURAGE
RESPECT
HUMILITY
PATIENCE
KINDNESS
GENTLENESS
GOODNESS
TRUTH
JUSTICE
LOVE

Imprint



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The TPA Code of Ethics

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