

## Statement provided by Trovicor, 26 March 2015

„We believe that human rights is an extremely important subject. The purpose of our products and solutions is to uncover and avert threats in the form of various criminal activities, e.g. drug and human trafficking, organised crime of all kinds as well as terrorist attacks. After many conversations with our customers, we are convinced that this is the case for our systems.

We always adhere to all laws relevant to our business - including export regulations and embargoes, both in Germany and in the countries in which we operate.

trovicor does not develop products that can be classified as "state trojans" or "online Intrusion".

Human rights are enshrined in our terms and conditions: "The Purchaser hereby agrees to follow the OECD Guidelines for Multinational Enterprises, in particular the sections employment, human rights, information disclosure, consumer interests, science and technology, competition and taxation."

Each trovicor branch, each trovicor organizational unit and each individual employee of the Group is obliged to recognize any emerging risks in daily operations, to evaluate them and to take measures to minimize them.

The handling of risks is based on the following three pillars of trovicor risk management:

- § **Compliance:** Ensure compliance with laws, regulations and ethical guidelines
- § **Export Control:** Before each delivery: review in accordance with legislation, regulations and embargoes under German, European and US law
- § **Management responsibility:** Maintain ethical and moral conduct in the business environment

### 1. Compliance

Compliance with all relevant legislation, regulatory and internal regulations as well as ethical guidelines is monitored by the Compliance Department.

The trovicor compliance principles are described in the "trovicor Code of Business Conduct," which is available on the website for everyone to view.

### 2. Export Control

The company's Export & Customs Control Department (ECC) rigorously checks all trovicor deliveries within the country and abroad according to the export control laws of the EU, the Federal Republic of Germany and the USA. The review includes the individual commodity items, the country of delivery and the end user.

By means of daily information on changes, the company's internal process and its support system, it is ensured that at no time can an illegal delivery take place.

### 3. Responsibility of Management

The trovicor management is aware that even with the strictest compliance with all current relevant regulations, the question of ethically or morally irresponsible business could arise.

This can, for example, be the case if international political decision-making lags behind current human rights problem areas.

For such cases, or where the situation escalates outside the organization, the trovicor Group management implements a separate policy. As a general rule:

- § trovicor does not deliver to countries that are involved in a civil war or in civil war-like conditions,
- § trovicor does not deliver to countries for which civil war or civil war-like conditions are foreseen to occur within the project and/or duration of the contract,
- § in hard-to-assess cases, trovicor takes the decision not to deliver.

The guideline for the Executive Committee is to always maintain ethical and moral conduct within the business environment.

**Finally, we would like to mention that in May 2014 the OECD – NKS [Organisation for Economic Co-operation and Development – German National Contact Point] rejected the Human Rights complaint filed against trovicor regarding allegations of human rights violations. “**