



# CODE OF ETHICS

VERSION 1.1. – JANUAR 2024



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## FOREWORD

# DEAR IGEL TEAM,



Klaus Oestermann  
CEO

I thank you all for your commitment and for doing your part to protect the integrity and heritage of the IGEL Technology Group.



## 2. ACTING BY OUR VALUES AND ETHICS

# BEHAVING ETHICALLY IN EVERYTHING WE DO

### IGEL'S VALUES

IGEL's high-quality solutions are the bricks of our success.  
And our global workforce is what keeps these bricks together.



**TRUST** is earned through action. We are keenly aware that it can be hard to acquire and easy to lose.



**INTEGRITY** drives our moral compass to do the right thing and treat others as we would want to be treated.



**INNOVATION** is our aspiration to deliver more value to our customers and creatively expand our ecosystem.



**PARTNERSHIP** means listening, paying it forward, lifting each other up, not keeping score, and working as a team.

Living our IGEL values and ethics is the foundation of our success.

## SCOPE OF OUR CODE OF ETHICS

Everything we do is driven by our values. These values shape our corporate culture and connect us across business units and geographies.

Succeeding with our values in day-to-day business only can be achieved when you as our employees, our leadership and also as our business partners comply with this IGEL Code of Ethics, our policies, and the laws and regulations of the countries where we do business (hereinafter together also referred to as the “Standards & Laws”).

Consequently, this Code is also subject to relevant local legislation. When the local law is more or is less restrictive than our Code of Ethics, for us at IGEL, the stricter rule prevails.

## OUR GOAL

It is our responsibility to comply with the Standards & Laws. Any misconduct can cause damage not only to the company but also to the entire IGEL Group. Preventing this and working hand in hand, with all our efforts combined, for the success of the IGEL Group is our goal.

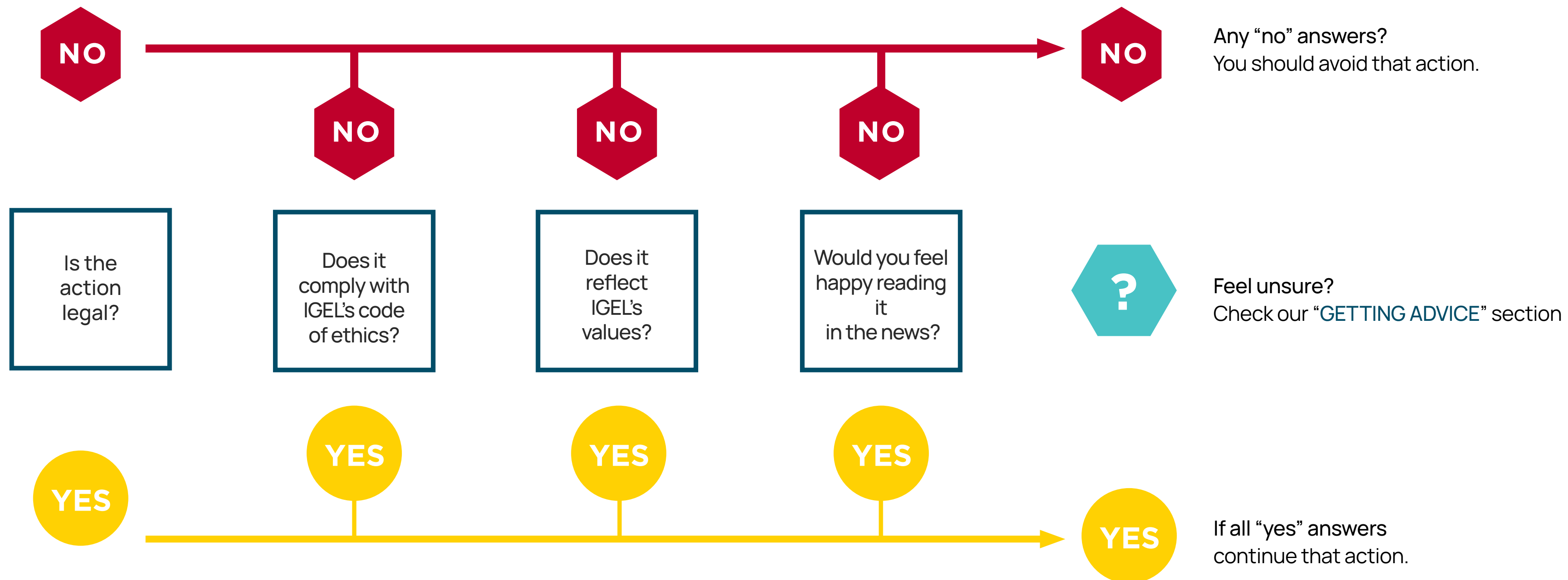
## APPLYING VALUES TO BUSINESS

In all your business dealings, in all that you do as a member of the IGEL team, you are bound to make decisions. You do not only make these for yourself, but also for the business, its leadership and, in the end, for all of your colleagues. If you are not aware of the Standards & Laws, a gut reaction of what feels right to you could actually lead into the wrong direction. This should not happen if you adhere to IGEL’s Code of Ethics. This Code shall assist:

- **You:** If you know what is allowed at IGEL and what is not, then you always are on the right, and most importantly, legal path. Misconduct can have serious consequences, and in certain circumstance, even you may be liable.
- **IGEL Group:** If business partners get the impression that a business is not obeying all applicable laws and regulations, this impacts the business’ reputation and good name, and can severely impact its financial performance. Partners may look elsewhere, and possibly take others with them. Consistently following our business ethics and complying with applicable laws, regulations and IGEL policies safeguards us. The more the culture of compliance is established, the more protected the company is. Our binding ethics and compliance framework exists as a reference for all – individual employees, the IGEL Group as a whole and our business partners. In our behavior, we show to all interested parties how we embed our values in our daily business and always adhere to the Standards & Laws.

## DECISIONS IN DIFFICULT SITUATIONS

When doing business, you are bound to make decisions. In some situations, potential future gains and current incentives may guide you in a certain direction, where you may feel uncertain whether it is covered by the Standards & Laws. Sometimes it seems easier to look away and do nothing, but that can have serious consequences. When confronted with such a challenging situation, you may ask yourself the following five questions along IGEL's ethics decision tree to decide the best course of action:



If you would answer just one of these questions with a "no", or feel unsure about answering "yes" to any of your answers, please avoid the action, until you can answer all these questions confidently with "yes". Do not hesitate to contact your manager or check the "FEEL FREE TO ASK" section at the bottom of this chapter for contacts to talk to and help you with your decisions.

## ASKING QUESTIONS AND RAISING CONCERNS

### Concerns are taken seriously

For IGEL to remain in compliance, it is important to ask questions and raise concerns whenever you feel that certain actions or omissions might not comply with the Standards & Laws or in any other way seem odd to you. If you are asked to commit to, or become aware of an illegal or unethical act, you are encouraged to raise your concern and speak up promptly. You should seek advice anytime you have questions about whether an action is lawful or complies with IGEL's policies.

Our group listens to concerns and takes questions seriously. Your inquiry will be investigated promptly and treated confidentially to the utmost extent possible by law. You can be sure that no inquiry based on your report made in good faith will result in retaliation of any kind.

Depending on your level of comfort and the content of your question, you may seek input from your manager or through the resources listed in the "GETTING ADVICE" section of this Code (or see Quicklink tab above).

### Expectations of leadership

Every member of IGEL's leadership team – whether it be manager or C-level – is a first point of contact who will listen and respond to your questions and concerns raised. IGEL's leaders are responsible and expected to apply the Code and IGEL's policies and procedures to daily business and be alert for any violations, in turn setting an example for their teams to follow.

As a manager, regular conversations with your direct reports about the relevance of integrity in the workplace are expected. In addition, remember to:

- Understand the Standards & Laws and promote the Code and IGEL's internal policies
- Demonstrate their application in day-to-day business by your own ethical behavior, also when interacting with third parties
- Make sure your team can come to you with questions and concerns, and that you will listen and respond appropriately
- Take action – report any non-compliant and unacceptable behavior in your area of business
- Not retaliate against an employee raising a concern

### Our Responsibilities in Reporting Misconduct

Open and honest communication and mutual support between all IGEL employees and our business partners are the foundation of trust and good teamwork.

A concern should be raised in “good faith”, meaning, if you have reason to believe it is true, even if it may later be determined that no wrongdoing had occurred. IGEL reserves the right to discipline any person who knowingly makes a false accusation of misconduct or provides IGEL with false information during an investigation.

Always stick to the facts, provide accurate information, and do not make untrue or misleading statements or encourage anyone else to do so. When involved in an investigation, prioritize its support to other obligations. Sometimes you may be approached by the authorities directly. In this case, please contact your local Legal and Compliance contact immediately for guidance and advice.

### Non-Retaliation

We do not tolerate any form of retaliation for raising concerns, asking questions, or participating in an investigation honestly and in good faith. Retaliation may take many forms, including but not limited to denial of benefits, termination, demotion, suspension, threats, harassment, or discrimination.

Anyone who engages in retaliation against someone for asking questions or raising a compliance concern will face disciplinary action, up to and including termination of employment. If you have been subject to retaliation, or know of someone who has, you should raise the issue promptly through the resources listed in the “[GETTING ADVICE](#)” section of this Code.



### FEEL FREE TO ASK

For questions related to “Acting by our Values and Ethics,” please reach out to one of the resources listed in the “[Getting Advice](#)” section of this Code or email [compliance@igel.com](mailto:compliance@igel.com).

**Please Note:** If you have noticed suspected or actual misconduct and you do not feel that the appropriate follow-up action has been taken by IGEL, please contact [igel@compliance-aid.com](mailto:igel@compliance-aid.com) directly.



# GETTING ADVICE

## HOW TO TAKE ACTION - IGEL EMPLOYEES

As an IGEL employee, you may ask questions or raise a concern by contacting any of the following resources that will support you with their professional guidance:

- Your manager, who should always be your first point of contact
- Your respective C-level manager, if your concern relates to your manager
- IGEL Legal and Compliance - [compliance@igel.com](mailto:compliance@igel.com)
- IGEL Human Resources - [HR@igel.com](mailto:HR@igel.com)
- IGEL Information Security - [security@igel.com](mailto:security@igel.com)

- IGEL's Raising Concerns Line - IGEL Employees and IGEL Business Partners

There may be situations where you feel uncomfortable reaching out to your leadership contact or above resources. If that is the case, you can approach IGEL's Raising Concerns Line by any of the following ways:

- Email: [igel@compliance-aid.com](mailto:igel@compliance-aid.com)
- Phone: +49 30 4036750-20
- Secure ombuds portal: [www.compliance-aid.com/igel](http://www.compliance-aid.com/igel). You have the option to do so anonymously.

IGEL's Raising Concerns Line is operated by an independent third party – our external ombudslawyer – and can be accessed in German and English language. The external ombudslawyer is available from Monday to Friday between 9 am and 6 pm CET (Tuesdays and Thursdays extended to 8pm CET), and a call back service is implemented. Anyone within or outside the company may use the Raising Concerns Line to raise a confidential concern. IGEL's ombudslawyer is Dr. Kathrin Niewiarra, German lawyer and Attorney-at-law (NY). She will consider your concerns confidentially.

The German Federal Office of Justice also receives information on potential misconduct as an external reporting channel:

German Federal Office of Justice, Externe Meldestelle des Bundes, 53094 Bonn, Phone: +49 228 99 410-6644

[https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes\\_node.html](https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html)

### 3. SERVING OUR COMMUNITY

# SHOWING INTEGRITY AND RESPECT



#### RESPECTING ALL

IGEL is firmly committed to treating everyone with integrity and respect. IGEL expects you to be respectful, fair, impartial, and honest to each other and to third parties, including customers, suppliers, their employees, and others with whom IGEL works. This way, every IGEL employee contributes to the preservation of IGEL's good name and reputation. We expect our business partners to treat our employees in the same respectful manner.



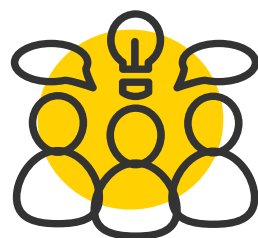
#### SUPPORTING HUMAN RIGHTS

IGEL strives to protect human rights and worker rights wherever we do business. Working with high quality suppliers and other partners that commit to operating under ethical standards equivalent to our own, IGEL does not tolerate the use of child or forced labor or trafficking in human beings in its business units or with its contract partners.



#### PREVENTING HARASSMENT

IGEL does not tolerate harassment or any form of violence in the workplace. Harassment may take many forms and can depend on the circumstances, but results in an offensive, intimidating, or uncomfortable working situation. Any type of harassment is a violation of IGEL's values and policies.



#### VALUING DIVERSITY AND NON-DISCRIMINATION

We value and derive significant benefit from our diverse skills, experiences, and backgrounds. Any sort of discrimination on the basis of gender, race, color, national origin, religion, sexual orientation, age, any form of physical or mental ability or any other basis protected by law will not be accepted.

Please Note: You should feel confident and safe, without fear of retaliation, in raising a concern through the resources listed in the “[GETTING ADVICE](#)” section of this Code.



## THINKING OF OUR ENVIRONMENT

The efficient use of resources is an important contribution to sustainable development. The protection of the environment as a basis of life for future generations is important to us. As supporting sustainability is woven into the very fabric of IGEL’s product and services strategy, IGEL is committed to designing its offerings in such a way that negative effects on the environment are minimized. Similarly, IGEL is committed to reducing its carbon footprint by reducing travel activity, energy, paper, water, waste, and component consumption in its manufacturing facilities as well as in its office locations wherever possible.



## HEALTH AND SAFETY IS KEY AT IGEL

The health and safety of every IGEL employee is our top priority. IGEL is committed to providing its employees with a safe workplace and minimizing the potential of negative impacts on health and the environment.

For the sake of themselves and others, every IGEL employee is expected to consistently comply with the health and safety guidance applicable in their workplace. The [IGEL internal emergency site](#) provides essential and business continuity information for critical situations such as a pandemic or natural disaster. Any potential safety hazard must immediately be reported to management and the local facility manager. Make sure that you also advise business partners and their representatives on our health & safety policies and procedures when applicable.



## FEEL FREE TO ASK

For questions related to “Serving our Community,” please reach out to one of the resources listed in the “[GETTING ADVICE](#)” section of this Code or email [compliance@igel.com](mailto:compliance@igel.com).

IGEL complies with the ISO 9001 and 14001 standards and is certified according to these standards.

## 4. DOING BUSINESS WITH INTEGRITY

# STAYING TRUE TO IGEL'S STANDARDS OF BEHAVIOR

### AVOIDING CONFLICTS OF INTEREST

Conflicts of interest can arise when employees, family members or friends are chosen as potential business partners, and thus professional objectivity may be harmed. Please avoid any current or potential conflicts of interest. Your business decisions must be based on business objectives and not be impacted by other interests, either personal or commercial.

To allow transparency in business decisions, you should disclose any situation that could be perceived as a conflict to your manager or any other of the resources listed in the “[GETTING ADVICE](#)” section of this Code or email [compliance@igel.com](mailto:compliance@igel.com) and seek guidance on the approach to the situation. Specifically, any business on behalf of IGEL with a family member or spouse, or a company owned by such person or yourself, should not be considered without prior approval from your manager and HR.

Employees may not work for another company without consent in writing from line management and HR. Such permission may be granted unless the work for the other business is contradictory to IGEL's justified interest or if it is in competition to IGEL's business activities.



### PREVENTING BRIBERY AND CORRUPTION

IGEL is convinced that any form of corruption or bribery, as well as any other inappropriate influence on business activities has a negative impact to competition, and severely destroys trust with customers, business partners and the public.

IGEL is committed to complying with all applicable laws and regulations related to preventing bribery and corruption. IGEL strives to always remain transparent in the way it conducts its business.



## ZERO-TOLERANCE FOR BRIBES

Following IGEL's philosophy that the stricter rule prevails, we commit to adhering to the strictest anti-bribery and -corruption standards applicable. This means that for us at IGEL, any kind of acceleration favors and bribes must never be considered, accepted or granted when interacting with a third party, whether they are public officials or not. This is the case even in those instances where (as in some jurisdictions) bribes or the granting of other benefits that do not exceed a certain threshold are not considered a criminal offence or even an acceptable approach to expediting low-level business decisions.

For all IGEL employees, it is strictly forbidden to offer or pay directly or indirectly any bribes, kickbacks or other improper advantages (active bribery) to any business partner or public official in exchange for any promised or anticipated advantages. It is also strictly forbidden to claim or to accept bribes, kickbacks or other improper advantages (passive bribery) in any form. IGEL expects that no employee will ever accept or give bribes, kickbacks or other improper advantages for any reason, for him/herself or others, or is part of any actions or omissions that include such behavior directly or via a third party.

Please take appropriate care when initiating business or dealing with public officials, government employees and in any business with public entities or government-owned private entities. To avoid any hint of a bribe potentially being involved, be mindful that local, state and federal government employees have strong restrictions limiting them from accepting even minor tokens of gifts including meal invitations. When in doubt, avoid offering any type of gift.

As such, please stay away from any sort of bribe: this applies to all business with private or public companies or persons. This includes also involving any sort of business agent or accelerator.

IGEL has a zero-tolerance view to these circumstances and will impose strong consequences to anyone violating this anti-bribery and anti-corruption guidance.

Make sure to consider in any interaction:

- Only deal with third parties where we have verified their reputation and integrity.
- Be vigilant of any potential corrupt behavior, report it in line with this Code, and include as much detail as possible.
- High fines for any involvement in bribery or other forms of corruption may be imposed, including jail sentences and public blacklisting, for any involved persons, including yourself.

You can find more information on this topic in the "Policy to prevent Bribery and Corruption".



## HANDLING GIFTS AND HOSPITALITY

Gifts and hospitality or other sort of entertainment are commonly used to strengthen business relationships when dealing with third parties. Appropriate and lawful entertainment of reasonable cost can build goodwill between companies. As an IGEL employee, you may provide or accept entertainment from business partners that is suitable and modest.

Gifts, amenities, hospitalities, or other sorts of entertainment offered or accepted may be considered suitable and modest, if they

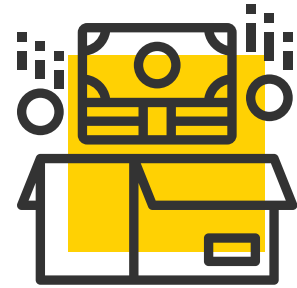
- remain within common commercial practice,
- are in line with the principles set out in this code,
- are not excessive in value, and would exclude any favors for spouses or other non-business relationships,
- do not allow the understanding that they would influence any business partner or public authority in decision making,
- are not offered in close relation to a respective deal closing, avoiding any hint of bribing by offering advantages.

IGEL does not allow employees to seek or solicit for gifts and hospitality from or to third parties, and we also ask you to be wary if you notice this from third parties. Gifts must never consist of (a) money or a (b) money voucher/gift card and must always be brought to the attention of your manager.

Always consider whether the gift or invitation offered is appropriate under these guidelines, and also check with your recipient whether it is within their policies to accept this gift or hospitality.

For any concern or level of gift you intend to offer that may override these guidelines, ask in advance for eligibility approval from your manager and follow the IGEL Gift and Hospitality policy. This applies also to any gift received.

You can find more information on this topic in the “Gifts & Hospitality Policy”.



## DONATING AND SPONSORING ON BEHALF OF IGEL

In case you are approached for donations, grants or other contributions on behalf of IGEL, you should be aware that IGEL only allows donations for charitable, scientific, and other non-profit purposes. They need to be recorded and must only be made with prior consent of a managing director and in accordance with applicable laws and IGEL internal procedures. Transparency must be followed for all donations. No donations of money, assets or services can be made to political parties, any political organizations, person or electoral campaign.

For sponsoring, dedicated internal approval procedures do apply. If the sponsoring event is organized by a non-profit or charitable organization, follow internal approval procedures for donations. If the event or the organizer does not meet the requirements set forth therein, please refrain from any involvement on behalf of or in connection with IGEL. No sponsoring activities should be made for any political party, political organization, or electoral campaign.

IGEL donations should not involve any past, actual or prospective IGEL business or business partner relationships, including representatives. For further guidance, involve your Legal & Compliance contact or check the “FEEL FREE TO ASK” section at the bottom of this chapter.

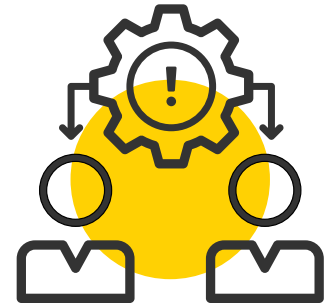


## PROTECTING INSIDER INFORMATION

Employees who have access to confidential or in any other way sensitive data and information (“Insider Information”) about the company or the companies with which we do business are not permitted to use or share that information for any other purpose except to conduct our business, and particularly not for stock trading purposes. You should consider all non-public information about the company or about companies with which we do business, as well as any information the confidentiality or sensitivity of which you cannot determine, as insider information.

To use Insider Information in connection with buying or selling shares, securities, certificates or any other financial investment instruments, including “tipping” others who might make an investment decision based on this information, is not only unethical, it is illegal under the jurisdictions applicable to our business. In addition, any other authorized disclosure or use of Insider Information for other than our business purposes is most likely to be considered a punishable offence under the applicable criminal laws. All these limitations include any electronic, written, or verbal information sharing. You must exercise the utmost care when handling Insider Information.

If you have any questions about Insider Information or would like to report a potential or actual violation of Standards & Laws in this respect, please reach out to your local Legal & Compliance contact or write to [compliance@igel.com](mailto:compliance@igel.com).



## MANAGING THIRD PARTY RISK

Strong business relationships with third parties are crucial to IGEL's success. Such relationships must be built on the basis of objective criteria.

These criteria include price, quality, reliability, technological standard, product suitability, the existence of a long and trouble-free business relationship and the willingness to commit to legitimate and ethical business practices. Please make sure you are aware of IGEL's policies and procedures, apply internal controls and processes and reach out to your contact in Legal and Compliance for guidance and training. Make sure we are following the above considerations at all times, including the initiating, conducting or closing of the business relationship.

If you notice any related misconduct, you should speak up and talk to your manager, or follow guidance from the [GETTING ADVICE](#) section of this Code. IGEL expects all third parties, including suppliers, alliances and guests, to comply with all applicable laws and regulations.



## FEEL FREE TO ASK

For questions related to "Doing Business with Integrity," please reach out to one of the resources listed in the ["GETTING ADVICE"](#) section of this Code or email [compliance@igel.com](mailto:compliance@igel.com).



## 5. PROTECTING ASSETS AND INFORMATION

### SECURING PRIVACY AT ALL TIMES

IGEL respects the privacy of all individuals, including its employees, customers, business partners, business leads and other parties, regardless of data origin. Please ensure that personal data is kept confidential at all times. It is collected and processed by IGEL only for specific business purposes and employment reasons and must be protected appropriately by everyone who accesses or receives this data.

“Personal data” includes all information related to an identified or identifiable individual. An individual is “identifiable” when a person can be identified directly or indirectly by specific data, such as name, address or social security number. Personal data may involve information about an individual’s occupational, financial, social and other circumstance. IGEL commits to treating all personal data with the highest sensitivity and in accordance with applicable law.

Make sure that any collection, processing, maintenance, or use of personal data is done only to the extent necessary for the business or employment purpose. Data should be kept only as long as necessary, and dedicated access & visibility limitation measures (need-to-know principle) are established within IGEL, depending on the type of personal data and associated risk.

All employees, consultants, advisors, and other business partners must adhere to their confidentiality agreement after their employment/ relationship with IGEL has come to an end.

### HANDLING ASSETS WITH CARE



IGEL’s assets are of high value and are, if not explicitly agreed upon otherwise, solely to be used for company purpose. Everyone at IGEL is responsible for using these assets carefully to prevent any loss, theft, misuse, harm or wasteful behavior.

IT hardware and software, mobile phones, vehicles, facilities, machinery, raw materials, inventory, intellectual property, supplies and other assets must only be used for legal and appropriate reasons and purposes, and may not be used outside of IGEL intended business purposes without prior consent of the respective manager.

When accessing technology tools or company information, remember that you may do this only within your assigned role at IGEL. Please ensure that you are not using third party applications without proper license.

When leaving IGEL, all IGEL assets must be returned to the company.

## PROTECTING INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

### CARING FOR IGEL'S IP AND CONFIDENTIAL INFORMATION

IGEL's intellectual property ("IGEL IP") and confidential information need to be handled by you with the highest level of care. IGEL IP may include software, software code, research and development information and materials, inventions, copyrights, patents, brand names and logos. Confidential information may include non-public trade and business data, trade secrets, project information, all kinds of technical know-how on products and software and any kinds of non-public information referring to IGEL group. IGEL IP and confidential information may be in written, electronic, or verbal form.

At all times, you should take precautions to protect IGEL's IP and confidential information against unauthorized disclosure by IGEL employees or third parties. IGEL employees should avoid talking about or sharing information about these items inside and outside of IGEL's premises, such as informal conversations in hallways, during breaks, in coffee shops, on trains or airplanes, or any public site, including internal and external chatrooms, to avoid any access to or disclosure of IGEL IP or confidential information by a third party or a non-authorized IGEL employee. Before you share information with a colleague, check whether the colleague is authorized to receive such information.

When leaving IGEL, any sort of intellectual property that belongs to IGEL as defined by this code or other agreements must be returned.

### IP OF PARTNERS OR THIRD PARTIES

IGEL employees must respect all IP and confidential information shared by business partners or other individuals or companies like clients, customers, distribution partners, suppliers, advisors and any other third party. Always treat such assets with due care and do not share the IP and confidential information of a third party with any unauthorized colleague or an unauthorized third party. You need to strictly adhere to any applicable license provisions or similar restrictions and guidelines.

We also work with IP from the public domain as well as open-source software and do not permit a use of such assets that is not in line with applicable license documentation, as well as the unauthorized collection of external information assets that are secured by any form of intellectual property rights. Working with these assets must always be performed within the scope of applicable licenses, laws and regulations.

In case of specific questions check for contacts in the "FEEL FREE TO ASK" section at the end of this chapter.

## ENSURING INFORMATION SECURITY

IGEL's own information security is essential for our name and reputation and to reach our targets. Our IT teams develop and support IT systems relevant for our product and service offerings and our security team protects them. You as well as every IGEL employee or business partner must comply with the security guidelines for the safe and proper use of our IT resources and access to company information. Access information like passwords must be kept confidential and at no time shared. You must refrain from any action that could impair the integrity of IGEL's or any of its customers' or business partners' IT infrastructure and systems.

Every employee commits to a "clean desk & screen policy" to reduce the risk of accidentally leaked or lost data. For example, you should lock away work materials, keys or documents at end of the day, and mobile devices should be locked or deactivated in public areas, in case of theft or loss of the device. These principles apply both for any business and personal data. Screens must be shut down when you leave your workplace.

Any visitors to IGEL sites must be recorded and should not access an office unaccompanied. Information security also requires careful handling of hardware and software access, when an employee is hired, moved, or departs. For specific guidance, check the "Feel Free to Ask" section at the bottom of this section.

## SECURING ACCURATE COMPANY RECORDS

IGEL is required by law to keep accurate records and reports of our decision-making. Therefore, please support IGEL's objective of ensuring that all business activities and transactions are recorded in a true, fair, accurate and timely fashion irrespective of whether the documentation is for internal or external purposes. This includes, but is not limited to, financial statements and related accounting entries and adjustments, expense reporting, time reporting, production and quality records and other documents submitted to a government or a regulatory agency. Inaccurate records can undermine confidence and reputation of IGEL and could lead to fines and penalties.

Regarding records:

- Records should be retained in accordance with IGEL policies and the locally applicable records retention schedule defined by law.
- Records that hold any personal data must be secured according to IGEL's data protection guidelines.
- Data that is held without a dedicated purpose must be deleted. Records that have a "Legal Hold" notice must not be deleted. Please contact the accounting department on accounting and controlling guidance for specific inquiries.

## MANAGING OUR GOVERNANCE

The management of contracts, agreements, and all other company records and transactions is key to our business success. Our Legal team must be involved in the early stages of document preparation, and the official, approved contract drafts and other supporting agreements must be used.

Please be clear to any business partner that agreements need to be in writing, and contracts need signatures of both parties. Ensure that contract copies are fully signed and recorded in IGEL's electronic contract repositories.

You may only sign documents, including contracts, which you have been explicitly authorized to sign and which are accurate and truthful. It is the responsibility of every employee and manager to ensure that documents are not signed without authorization.



### FEEL FREE TO ASK

Any questions on how to comply with our requirements on "Protecting Assets and Information" in certain situations?

- To report a potential information breach: [databreach@igel.com](mailto:databreach@igel.com)
- Privacy, GDPR or personal data questions: [compliance@igel.com](mailto:compliance@igel.com)
- Information security for data or other assets: [security@igel.com](mailto:security@igel.com)
- Contracts or IP: [legal@igel.com](mailto:legal@igel.com)
- For all other questions, please refer to the "GETTING ADVICE" section of this Code or email [compliance@igel.com](mailto:compliance@igel.com)

## 6. OBEYING ANTITRUST REGULATIONS

### ALLOWING FREE COMPETITION

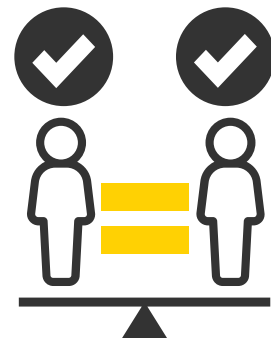
IGEL is committed to the principles of free competition. Violations of antitrust laws may result in heavy fines for the IGEL group, a loss in reputation and even criminal penalties. Antitrust law is designed to prohibit practices that restrict free trade and competition between companies. This is to ensure that customers receive the widest possible choice of products and services at competitive prices.

IGEL takes a firm stand against any sort of agreement, formal or informal, written or verbal, or any concerted practice with any business partner or competitor, which, directly or indirectly, in isolation or in combination with other factors under the control of the parties, could prohibit, distort or limit competition in any way. IGEL particularly condemns any:

- o business partner or competitor agreements on pricing, offerings, customer allocations, production and sales volumes, or the geographic segmentation of markets, or the submission of fictitious bids
- o restrictions on the ability of business partners to determine their sales prices or supplier relationships with other business partners as well as comprehensive exclusivity obligations
- o unequal treatment of business partners without objective reason or the enforcement of unreasonable conditions

Please inform yourself about any applicable Standards & Laws and stay vigilant to recognize any type of agreement, formal or informal, written or verbal, that may violate antitrust law.

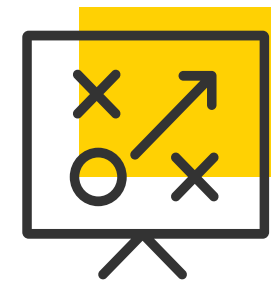
Check the “FEEL FREE TO ASK” section at the end of this section for further guidance.



## TREATING BUSINESS PARTNERS FAIRLY

When dealing with business partners, employees particularly must not unduly influence the price level at which IGEL business partners should buy, or resell IGEL products or perform their services. Please always ensure the following:

- o IGEL distributors and clients must remain free to determine the prices they charge their customers.
- o Never put pressure on IGEL resellers or distributors who do not apply recommended prices.
- o Be careful with any kind of agreement that may be or result in restrictions on local or regional markets like territory restrictions, customers, or distribution channels – these agreements are most likely illegal.



## DEALING WITH COMPETITORS

In all interactions with competitors, for example at trade fairs, trade association gatherings, or conferences, be careful to avoid exchanging, discussing, or agreeing on sales strategies, prices or other sales related sensitive information. Please be aware that suppliers or clients may be competitors in certain circumstances. As a matter of principle, either in dealing with competitors or other business partners, even informal conversations, concerted behavior, or informal agreements which could affect competition, must be avoided at all times. Even the impression of such conduct should be avoided.

This conduct could have negative impact across IGEL's business. Make yourself acquainted with competition law requirements that apply to the jurisdiction where you are doing business. Check the "Feel Free to Ask" section at the end of this section for further guidance, and feel free to report any concerns immediately.



## FEEL FREE TO ASK

Any questions on how to comply to our requirements on "Antitrust Regulations"?

Feel free to involve your contact in Legal & Compliance immediately when you need guidance about a situation or some interaction relating to competition, or email [legal@igel.com](mailto:legal@igel.com). For raising your concerns, you can also directly contact [igel@compliance-aid.com](mailto:igel@compliance-aid.com).

Feel free to reach out to one of the resources listed in the "GETTING ADVICE" section of this Code or email [compliance@igel.com](mailto:compliance@igel.com).

## 7. OBEYING TRADE COMPLIANCE

### SECURING RULES OF EXPORT COMPLIANCE

IGEL is committed to ensuring compliance with all applicable export control laws. IGEL also supports the efforts of the international community to prevent the production and proliferation of chemical, biological and nuclear weapons and to combat international terrorism.

The cross-border exchange of goods, services, technology and software with companies of the IGEL group and with third parties is subject to export control laws. Export controls can be imposed either multilaterally, e.g. within the framework of a United Nations resolution, or unilaterally, e.g. through EU sanctions against a certain country or certain persons. Export controls may impose restrictions and/or require government notification or approval of exports and re-exports of goods, technology and software to certain countries, organizations, and persons and for certain end uses.

### ENSURING BORDER CONTROLS

IGEL uses and trades in a number of goods, technologies and information that are regulated globally by export control laws. IGEL must comply with these rules with various documentation and information, which refer to the specifications of the product, the export classification of the intended use, and the country of origin and destination. You should prioritize supporting the collection of this information when involved to allow IGEL to stay in compliance and help expedite border controls.

Some of IGEL's products, dependent on its potential ability of use, need special data reported to customs authorities ahead or upon entry. The restrictions, which may be dependent on the designated target country or recipient, often apply to so called "dual-use items" as being transferred into a not-intended military use, for example.

To stay in compliance, make yourself acquainted with IGEL's internal policies and procedures and follow dedicated approval processes at all times, to avoid fines and reputational harm to our business.

For any further guidance, check the "FEEL FREE TO ASK" box at the end of this section.

## ACTING RESPONSIBLY IN THE SUPPLY CHAIN

### Integrity of third parties

IGEL undertakes strong efforts to obtain information on the integrity of their business partners or other third parties to conduct business only with persons and companies that conduct legitimate business with funds from legitimate sources.

Make sure that every business partner, client or other third-party relationship is checked carefully, and follow dedicated processes embedded to the organization. Some of IGEL's obligations in this regard include conducting third party screening to ensure IGEL is not transacting with entities or individuals on international sanctions or embargo lists.



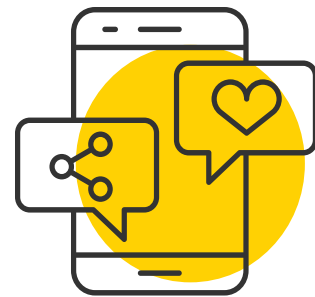
### FEEL FREE TO ASK

For questions related to "Obeying Trade Compliance," please reach out to one of the resources listed in the "[GETTING ADVICE](#)" section of this Code or email [compliance@igel.com](mailto:compliance@igel.com).



## 8. COMMUNICATING RESPONSIBLY

# DEALING WITH THE PRESS & SOCIAL MEDIA



A good flow of external and internal information and communication is part of IGEL's ongoing business. However, publicly sharing any information in connection with IGEL should be handled with utmost care and must comply with any external or internal imposed restrictions, to allow us to maintain our competitive advantage.

Information should only be disclosed to the general public by Marketing or an assigned executive. Also, any information request made by the press or other external entity should be referred directly to Marketing.

Please also be responsible when you are posting on social media. Never allow the impression you are speaking on behalf of IGEL, if not authorized to do so. To share pre-authorized media posts, use the Everyone Social platform provided to all employees.



### FEEL FREE TO ASK

For questions related to "Communicating Responsibly," please reach out to one of the resources listed in the "[GETTING ADVICE](#)" section of this Code or email [compliance@igel.com](mailto:compliance@igel.com).



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