

Code of Conduct



Preamble

The Code of Conduct is made as a translation of the german “Verhaltenskodex” signed on 24.08.2021

This Code of Conduct brings together our most important basic rules and principles in one document for the first time and is intended to be a guideline for the entire business activity of ITV Denkkendorf Produktservice GmbH (ITVP). It therefore applies equally to each and every one of us. Specifically, it is addressed to the management, the executives and all employees of ITVP as well as to our suppliers. On the one hand, it represents the standard we demand of ourselves to live the values and principles listed in this Code of Conduct and, at the same time, it indicates to the outside world responsible behavior towards our business partners, customers and employees.

The management, all executives and all employees of ITVP are committed to acting in an economically, socially and environmentally conscious manner. We strive to conduct our business competently and on an ethical and moral basis, and to compete fairly in all markets in which we operate. This includes compliance with applicable laws and acceptance of antitrust prohibitions or restrictions on competition. We avoid gaining undue advantages over our customers, suppliers or competitors.

We all share responsibility for the reputation of our company. The misconduct of individuals can cause enormous damage to our company. Therefore, we would like to ask you, dear colleagues: Read this Code of Conduct carefully and use it together with us as a guideline for our daily behavior.

The Denkkendorf logo, consisting of the word 'Denkkendorf' in a blue, stylized font.

24.08.21

Place, Date

A handwritten signature in blue ink, appearing to read 'G. Klein'.

Director

Product safety and quality

ITVP develops and produces innovative and high-quality pre-products for medical devices and offers other high-quality services. For us, quality means meeting our customers' requirements in the best possible way. This requires the precise coordination of our delivery commitments with the requirements of our customers as well as consistent fulfillment of the quality standards thus defined. The aim is to secure and strengthen ITVP's market position in the long term.

This requires products and services that are safe and reliable in their application and meet the highest quality standards in their function. Our products and services therefore comply with the legal and regulatory requirements applicable to them as well as our internal safety and quality regulations.

Compliance with applicable law

Compliance with laws and regulations is an essential basic principle for us. We observe the applicable legal prohibitions and obligations as well as regulatory requirements at all times, even if this may result in economic disadvantages or difficulties for the company or individuals.

We rule out violations of economic embargoes and trade, import and export control regulations, as well as the financing of terrorism.

Fair Competition

We are committed to fair competition and comply with these laws and rules. We refrain from agreements on prices, conditions and strategies with competitors, suppliers, other companies and dealers that hinder fair competition. We do not participate in any anti-competitive boycotts.

Bribery and corruption

We do not tolerate any form of corruption or bribery. Bribes or cartel agreements are not acceptable means for us to obtain orders.

All employees are obliged to refrain from any corrupt behavior.

No favors of any kind may be accepted or given (cash, travel, gifts, etc.) that result in an undue advantage (contract award, project award, etc.). Violations will not be tolerated and will result in sanctions against the employees concerned.

Our business partners are also required to avoid conflicts of interest that could pose a risk of corruption.

Receipt of gifts, donations

a) Gifts to our employees

Our employees do not demand or accept personal benefits from customers or suppliers that influence or could influence their own behavior with respect to their work for the company.

If gifts are offered by third parties, they may only be accepted if they are common practice and can be recognized as a courtesy or kindness.

- With regard to the value of gifts, the following rule applies: low-value benefits up to 10.00 euros (e.g. pens, calendars, bottle of wine, as long as the value does not exceed) are not subject to approval;
- Benefits with a value of 10.00 - 100.00 euros must be approved by the management;
- Benefits with a value exceeding 100.00 euros are to be approved by the shareholders.

b) Gifts by ITVP

Gifts on our part to customers or suppliers may also only be offered within a scope that is customary for the business relationship and to a materially appropriate extent. The recipient must not be able to associate any obligation with it that would influence his business decisions.

c) Donations

The granting of donations is always transparent.

ITVP does not make any financial contributions such as donations and sponsoring measures to political parties in Germany and abroad, to party-affiliated or party-like organizations, to individual elected officials or to candidates for political functions.

Customer focus

We behave fairly and honestly towards our customers and business partners.

We identify the wishes, needs and expectations of our customers and business partners in order to ensure a targeted implementation in products, services or other processes. Our primary goal is to build a long-term and stable relationship with our customers and business partners on the basis of trust.

Human and workers rights

We respect internationally recognized human rights and support their observance.

We strictly reject any form of forced labor and child labor and expect the same from our suppliers.

We recognize the right of all employees to form labor unions and employee representatives on a democratic basis.

The right to adequate remuneration is recognized for all employees. Remuneration and other benefits correspond at least to the respective national and local legal standards.

Prohibition of discrimination

Equal opportunities, mutual trust and mutual respect are of great importance to us. Any form of discrimination is generally prohibited.

We pay attention to equal opportunities when hiring employees as well as when promoting or granting training and further education measures.

We treat all employees equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religious affiliation or ideology.

Intimidation, violence and harassment are not tolerated and will be sanctioned.

Team spirit, constructive collaboration

In all our areas of activity, we promote constructive teamwork among our employees. We are successful in our cooperation due to the diversity of our employees and their engagement.

Standards of collaboration

We expect all our employees to behave in compliance with the law at all times.

Openness and mutual respect characterize our interactions. Reliability, honesty, credibility and integrity are the further principles of our conduct.

If employees violate existing guidelines, rules or regulations in the course of their work, they will be subject to disciplinary measures.

Appearance and communication in public

We respect the right to freedom of expression and the protection of personal rights and privacy.

All employees should be aware that they can also be perceived as part and representative of ITVP in private. Therefore, we commit ourselves to protect the reputation of ITVP by our behavior and appearance in public.

In the case of private expressions of opinion, we take care not to place the respective function or activity in ITVP in a context with the private expression.

Cooperation with employee representatives

For ITVP, close cooperation with employee representatives based on trust is a key component and proven cornerstone of corporate policy. The basis for this is an open and constructive dialog characterized by mutual respect.

Occupational health and safety

We comply with all laws and rules relating to health and safety in the workplace to protect our employees.

To guarantee this, measures are taken to create a healthy and hazard-free working environment for our employees (personal protective equipment, safety instructions, occupational safety committee, company medical check-ups).

All employees are encouraged to ensure safety and health in their working environment by complying with occupational health and safety regulations.

Every executive is obligated to instruct and support his or her employees in the fulfillment of this responsibility.

Protection of confidential information and data

We protect the business secrets of ITVP and those of our business partners by confidentiality and also oblige our business partners to confidentiality if we disclose business secrets to them.

Documents and (digital) data carriers containing business secrets are stored in such a way that they are not accessible to unauthorized persons.

We protect confidential information relating to our employees, customers and suppliers by means of suitable organizational and procedural measures, in particular against unauthorized use and processing.

We treat all personal data relating to our employees and business partners with the utmost care. This includes names, addresses, telephone numbers as well as date of birth or information on current health status.

No personal data may be collected or processed without a legal authorization or the consent of the person concerned.

Protection of the environment

The protection of the environment and the climate are important to us. Our employees are required to treat all natural resources used in ITVP (e.g. energy, water, ground) with care. Responsible handling in the production of our products and/or our services is expected from our employees.

We are committed to the proper disposal of chemicals and hazardous substances in accordance with the law.

Protection of company property

The property and assets of ITVP, such as know-how, patents, machines and other work equipment, form the basis of our entrepreneurial activities. In order to ensure our business success and the sustainable further development of the company, all employees are obliged to preserve and protect the property and assets of ITVP in a legally compliant manner.

Obligation to report

All employees are committed to reporting misconduct with respect to this Code of Conduct to management and to works committee.

If employees report actual or suspected misconduct in good faith, we will not tolerate intimidation or repressions against them. "in good faith" means that employees are convinced that their report is true. This applies regardless of whether a subsequent investigation confirms the allegation or not.

Contact persons

Our executives are the first point of contact for questions on understanding the rules of the Code of Conduct and ensure that all employees know, understand and apply the Code of Conduct.

As part of their management duties, they prevent unacceptable behavior or take appropriate measures to prevent violations of the rules in their area of responsibility.

Trusting and good cooperation between employees and executives is reflected in honest and open information and mutual support.