IBK-Innovation

Code of Conduct

IBK Innovation GmbH & Co. KG
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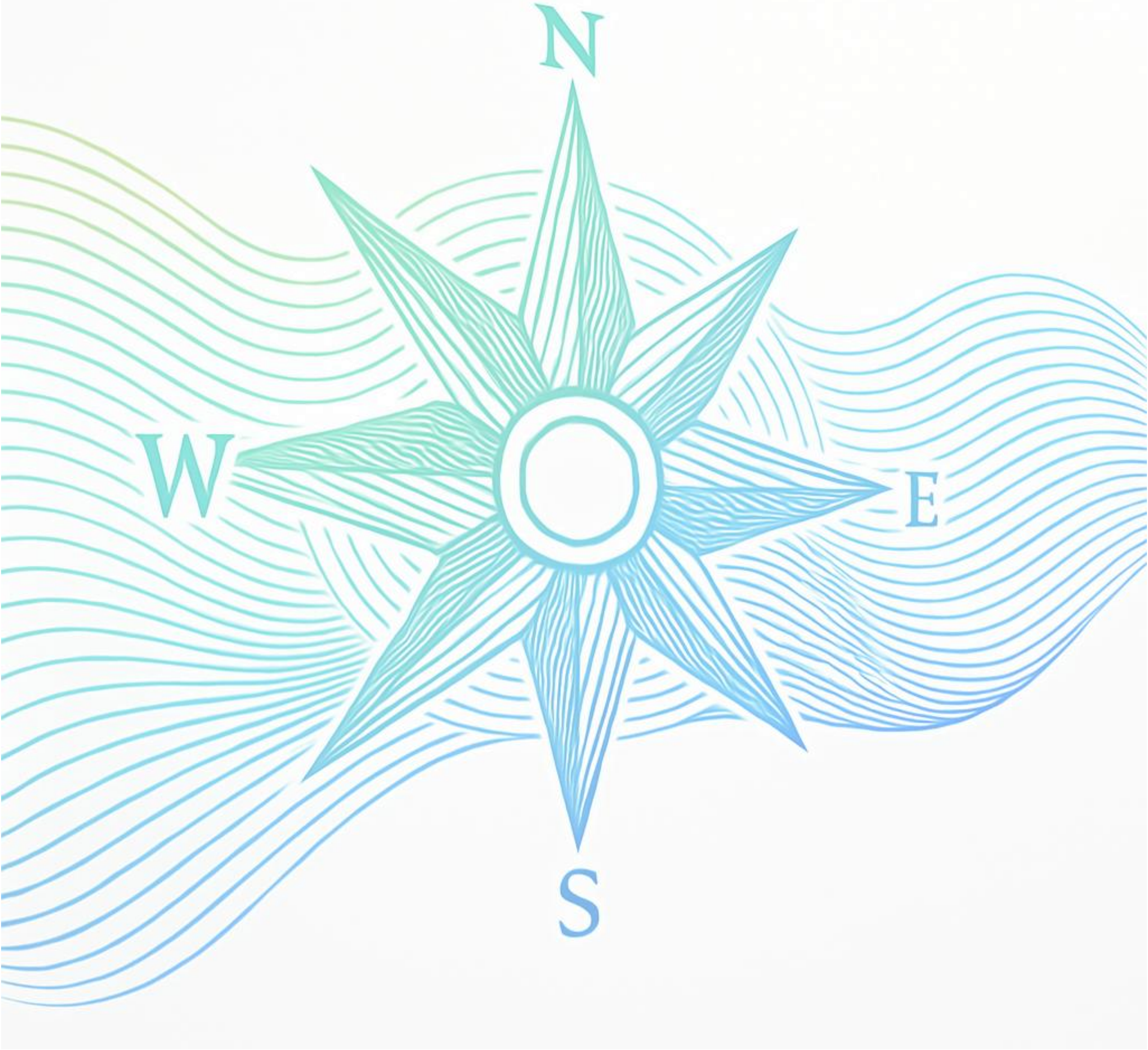
Records of Revision

Issue	Date	Affected Pages	Description of reason	Approved by

"Corporate Principles" are the fundamental guidelines that define the company's identity, shape its culture and anchor its commitment to responsible action. They transcend individual rules and serve as a compass for strategic decisions, everyday conduct and communication, both within the organization and with the outside world.



We do what is right: ethically, consistently and with conviction.

We aim for quality without losing sight of what’s practical.

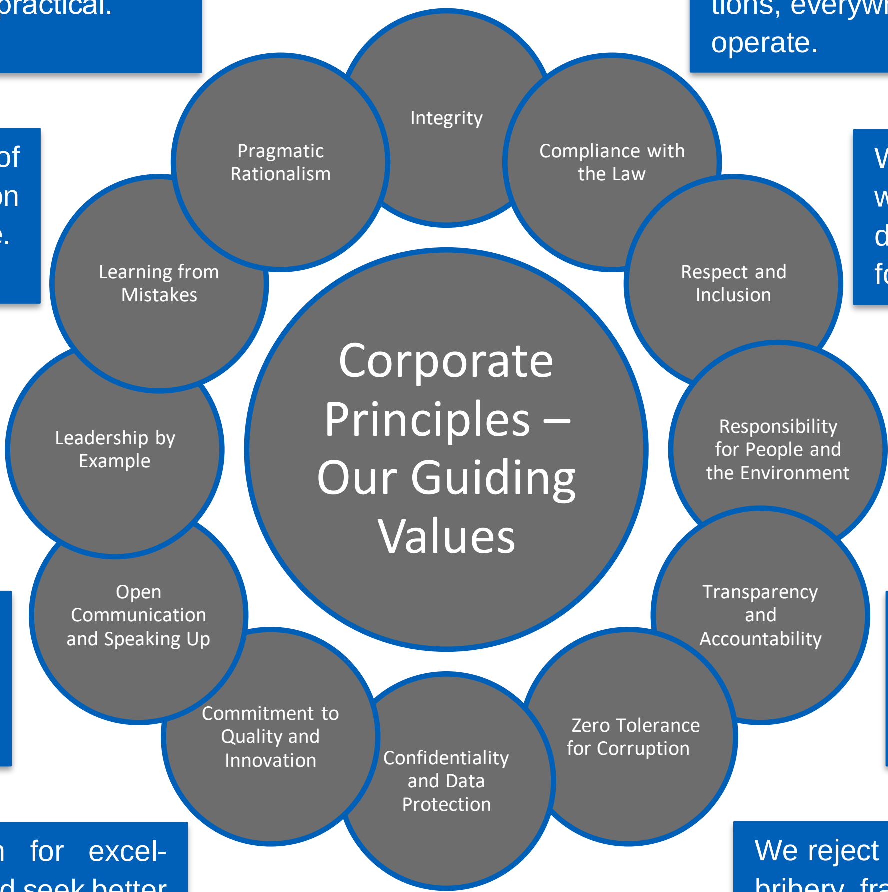
We follow all applicable laws and regulations, everywhere we operate.

Errors are part of growth, we focus on solutions, not blame.

We treat everyone with dignity and value diversity in all its forms.

Our managers lead by example and uphold our values.

We protect people, respect human rights, and act sustainably.



We address concerns openly and without fear of retaliation.

We communicate openly, document truthfully and take accountability.

We aim for excellence and seek better ways every day.

We reject all forms of bribery, fraud and undue influence.

We safeguard information and respect privacy and trust.

1 Preamble & Self-Understanding

1.1 Purpose of the Code of Conduct

This Code of Conduct serves as a binding framework for ethical, lawful and responsible behavior within our company. It applies to all employees: regardless of position, location, or type of employment, as well as to managers, executives and external partners acting on behalf of the company.

Our aim is to preserve the lasting trust of our customers, partners, employees and society. Integrity, transparency and fairness are central principles of our actions. This Code forms the foundation for daily decision-making and defines our understanding of responsible corporate conduct.

1.2 Scope and Applicability

This Code of Conduct applies to all parts of the company, business units, locations and subsidiaries. It extends to all employees, regardless of their function, contractual relationship or geographic location. Furthermore, our suppliers, service providers and business partners are expected to acknowledge and apply the principles of this code within their area of influence.

The content of the code complements applicable law and internal company policies. In the event of a conflict between national law and this code, the stricter standard shall prevail.

1.3 Responsibility of Managers

Managers bear a particular responsibility for ensuring compliance with and implementation of this code. They serve as role models and are expected to provide guidance through their behavior, raise awareness among employees and act as the first point of contact in cases of uncertainty or conflict. They are expected to foster an environment in which ethical behavior is encouraged and violations can be addressed without fear of retaliation.

1.4 Integration into the Compliance Management System

The Code of Conduct is an integral part of our Compliance Management System (CMS). The CMS ensures that all relevant legal requirements, internal policies and ethical standards are systematically identified, communicated, monitored and adjusted as necessary. Training programs, policies, audit mechanisms and whistleblower systems support the implementation of the code.

Strict adherence to this code is essential to sustainably securing the company's success: legally, economically and socially.

Summary: Why this matters

The Code of Conduct defines the foundation of our corporate behavior. It applies to everyone equally: employees, managers and partners. Thus ensures legal security, ethical clarity and social responsibility. Managers have a special role in leading by example and supporting compliance.

What to do: Example

You notice that a colleague is uncertain whether accepting a small gift from a supplier is allowed. As a manager, you take the initiative to explain the rules clearly and encourage the employee to check the compliance policy or contact the compliance team.

2 Integrity & Compliance with the Law

2.1 General Legal Compliance

We are committed to observing all applicable national and international laws, as well as industry-specific regulations and internal policies. This includes, but is not limited to, laws related to corporate governance, labor, trade, anti-corruption, environmental protection and data privacy.

Every employee is responsible for ensuring their actions are lawful and for seeking clarification in situations of legal uncertainty. Ignorance of the law does not protect against liability.

2.2 Acting with Integrity

Integrity means doing the right thing, even when no one is watching. All employees must uphold the highest ethical standards in all professional interactions, both internally and externally. We expect honesty, fairness and accountability in all business dealings.

Employees must not engage in activities that could harm the reputation or legal standing of the company, whether through action or omission.

2.3 Obligation to Report Misconduct

Any employee who becomes aware of a potential violation of the law, this code or internal guidelines is encouraged and, in some cases, obliged to report it without delay. Reports may be made to direct supervisors, the compliance team, HR or through designated whistle-blower channels.

Retaliation against individuals who report concerns in good faith will not be tolerated. All reports will be treated confidentially to the greatest extent possible.

2.4 Documentation and Record-Keeping

Proper documentation is essential to ensure transparency, traceability and compliance. Employees are expected to keep complete and accurate records of all business transactions, in accordance with legal requirements and internal guidelines. Falsifying records or concealing information is strictly prohibited.

In case of audits or regulatory inquiries, employees must cooperate fully and provide truthful and timely information.

Summary: Why this matters

Legal compliance and integrity are the foundation of trust, reputation, and long-term success. Acting unlawfully or unethically, whether intentionally or negligently can harm individuals and the entire company.

What to do: Example

You're asked to sign off on a project cost even though documentation is incomplete. You pause and inform your supervisor that you cannot approve the expense without the proper records and you request clarification from the Finance or Compliance team.

3 Ethical Conduct in Business Practices

3.1 Fair Competition and Antitrust Law

We are committed to fair and open competition. All employees must comply with applicable antitrust and competition laws, which prohibit agreements or coordinated behavior that may restrict market competition. This includes, but is not limited to, price fixing, market or customer allocation, bid rigging and information exchange with competitors.

Even the appearance of anti-competitive behavior can be damaging and must be avoided. In cases of uncertainty, employees must consult with the Legal or Compliance department before engaging in discussions with competitors.

3.2 Avoiding Conflicts of Interest

Business decisions must always be made in the best interest of the company. Personal interests, relationships, or activities that could impair impartial decision-making must be disclosed immediately.

Secondary employment, investments in competitors or partners, or close personal relationships with stakeholders may present a conflict of interest. Such situations require transparent disclosure and, if necessary, prior written approval.

3.3 Gifts, Hospitality and Other Benefits

Business courtesies such as gifts and hospitality must be appropriate, lawful and must not create the appearance of undue influence:

- cash or cash-equivalent gifts are never permitted
- modest gifts of promotional or symbolic nature may be accepted if they comply with local laws and cultural norms
- invitations to events, meals or travel must serve a legitimate business purpose and be proportionate in scope and value.

Employees must report and seek approval for gifts or benefits that exceed predefined thresholds or may raise concerns. Attempted bribery or influence must be reported without delay.

3.4 Anti-Corruption and Bribery

We have zero tolerance for any form of corruption or bribery—whether public or private, direct or indirect. This includes offering, promising, giving, requesting, or accepting anything of value with the intent to improperly influence business decisions.

Particular caution is required when dealing with public officials or representatives of state-owned enterprises. All interactions must be fully documented and conducted transparently.

Violations may result in severe legal consequences for both the individual and the company.

3.5 Transparency in Sponsorships and Donations

Sponsorships, donations and memberships in associations must be transparent, appropriately documented and must not be used to obtain business advantages. The following should be obliged:

- All such activities require prior review and written approval.
- Contributions must align with the company’s values and strategic objectives.
- No donations to political parties, organizations, or individuals are permitted unless explicitly authorized.

We maintain strict oversight to prevent any misuse of funds for unethical purposes.

3.6 Dealings with Public Authorities

Interactions with governmental bodies and public officials must be conducted with the highest level of integrity, transparency and in full compliance with applicable regulations.

Employees must refrain from offering gifts or other advantages to public officials. Business with authorities may only be conducted after all required permits or licenses are granted.

In case of regulatory inquiries or inspections, the Legal or Compliance department must be informed immediately.

Summary: Why this matters

Ethical behavior ensures fair competition, prevents corruption and protects both internal and external relationships. Conflicts of interest, bribery or manipulation damage trust and can lead to legal penalties.

What to do: Example

A long-time supplier offers you tickets to a major event shortly before a contract renewal. You politely decline the offer and inform your supervisor, since accepting such a gift could appear as undue influence.

4 Confidentiality, Data Protection & IT Security

4.1 Protection of Confidential Information

Confidential information includes all non-public data relating to business strategy, financials, product development, client relationships, intellectual property and internal processes. The protection of such information is vital for safeguarding the company's competitive position and reputation.

Employees are prohibited from disclosing confidential information to unauthorized parties, regardless internally or externally, both during and after the termination of employment. This also applies to information shared by business partners under confidentiality agreements.

Access to confidential data must be restricted to those with a legitimate business need.

4.2 Handling Personal Data

We process personal data with care, responsibility and in compliance with applicable data protection laws, including the EU General Data Protection Regulation (GDPR). Personal data includes any information that can identify an individual, such as names, contact information, health records and employment details.

Key principles include:

- lawful, fair and transparent processing
- data minimization and purpose limitation
- accuracy and storage limitation
- integrity, confidentiality and accountability

Employees who process personal data must receive appropriate training and consult data protection officers or legal when in doubt.

4.3 Responsible Use of IT Systems

Company IT resources, including hardware, software, email and internet access, are provided for business use. Reasonable personal use may be permitted within defined limits, provided it does not interfere with work duties or security.

Employees must:

- protect devices and accounts with secure passwords
- use only authorized software and IT infrastructure
- refrain from downloading or sharing pirated or illegal content
- avoid transmitting offensive, discriminatory, or harmful material

IT misuse, whether intentional or negligent, may result in disciplinary action.

4.4 Cybersecurity and Information Security

Digital threats, such as phishing, malware and data breaches pose significant risks. Every employee contributes to the security of our information systems.

Mandatory practices include:

- locking screens when unattended
- verifying email senders before clicking links or attachments
- reporting suspicious messages or system behavior to IT immediately
- not using external storage media or cloud services without approval

All employees must participate in regular cybersecurity awareness trainings and comply with internal information security policies.

4.5 Social Media and External Communication

When using social media or engaging in public communication, employees must act responsibly and in a manner that protects the company's reputation. The following applies to each employee:

- confidential or sensitive company information must never be shared
- only authorized personnel may speak on behalf of the company
- personal views should not be presented as company positions

Employees are encouraged to express themselves professionally and respectfully in all online interactions.

Summary: Why this matters

Confidential data, trade secrets and personal information must be protected to maintain trust and comply with privacy laws. IT misuse or data breaches can cause serious damage.

What to do: Example

You receive an email attachment from an unknown sender titled "Payroll Report." Instead of opening it, you report it to IT Security as a potential phishing attempt, protecting yourself and the company.

5 Responsibility Toward People and the Environment

5.1 Human Rights and Labor Standards

We are committed to respecting and promoting internationally recognized human rights, including those defined in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the core labor standards of the International Labour Organization (ILO).

This includes:

- prohibition of child labor and forced labor
- respect for freedom of association and the right to collective bargaining
- fair and humane working conditions
- protection from harassment, abuse, or exploitation

These principles apply to our own operations as well as to our suppliers and partners along the value chain.

5.2 Occupational Health and Safety

The health, safety and well-being of our employees are top priorities. We provide a safe and healthy working environment by complying with applicable occupational safety regulations and continuously improving workplace conditions.

All employees are responsible for:

- following safety instructions and using personal protective equipment
- reporting hazards, near-misses or incidents immediately
- participating in safety trainings and risk prevention programs

Managers must actively promote a safety culture and lead by example.

5.3 Diversity, Equity and Inclusion

We value the diversity of our workforce and are committed to providing equal opportunities to all employees regardless of gender, age, origin, religion, sexual orientation, disability, or any other characteristic.

Discrimination, bullying or harassment of any kind will not be tolerated. We foster an inclusive workplace where mutual respect, dignity and cooperation are the foundation of collaboration. Violations of these principles may result in disciplinary measures.

5.4 Environmental Responsibility and Sustainability

We recognize our responsibility to minimize our ecological footprint and actively contribute to environmental protection. This includes:

- efficient use of energy, water and raw materials
- avoidance and reduction of waste, emissions and pollutants
- use of renewable resources and climate-neutral practices
- compliance with environmental laws and standards (e.g., ISO 14001, ISO 50001)

Employees are expected to contribute to sustainability goals in their areas of work and to propose improvement ideas wherever possible.

5.5 Supply Chain and Responsible Sourcing

We expect our suppliers and business partners to uphold equivalent ethical, social and environmental standards. This includes compliance with:

- the German Supply Chain Due Diligence Act (LkSG), where applicable
- Conflict minerals regulations (e.g., Dodd-Frank Act §1502, EU Conflict Minerals Regulation)
- prohibitions on human rights abuses and unlawful labor practices
- environmentally responsible sourcing and production

Business relationships may be reviewed, suspended or terminated in case of persistent violations or lack of cooperation in remediation.

Summary: Why this matters

Human rights, workplace safety, inclusion and environmental protection are core responsibilities. They reflect who we are and what kind of future we shape as a company.

What to do: Example

You notice that a new machine at your workstation has no visible safety instructions. You immediately report the issue to your supervisor to ensure that safety training is provided and risks are minimized.

6 Handling of Company Resources

6.1 Responsible Use of Company Assets

All employees are entrusted with company property, whether physical (e.g., tools, vehicles, devices) or intangible (e.g., data, know-how, intellectual property). These assets must be handled with care, protected from damage, loss or misuse and used only for legitimate business purposes unless explicitly authorized otherwise.

Personal use of company assets is allowed only where expressly permitted by internal guidelines.

Any theft, embezzlement or unauthorized use of company property is strictly prohibited and may result in disciplinary or legal action.

6.2 Financial Integrity and Cost Awareness

We manage our financial resources responsibly and with full transparency. Employees involved in budgeting, accounting, procurement or financial reporting are required to ensure:

- accuracy, completeness and timeliness of all records
- full compliance with legal and tax obligations
- proper documentation and justification for all expenditures

Deliberate misrepresentation, manipulation or concealment of financial information is considered a serious breach of this code.

Employees are also expected to exercise cost-consciousness in daily operations and contribute to the efficient use of company funds.

6.3 Expense Management, Travel and Reimbursements

Travel expenses and business-related costs must be necessary, reasonable and incurred in accordance with applicable travel and reimbursement policies.

- only pre-approved business travel may be booked
- expenses must be documented with original receipts and submitted accurately
- misuse of the expense system, including false or inflated claims, is a violation of this code

Supervisors are responsible for reviewing and approving expense reports with due diligence.

6.4 Protection of Intellectual Property and Brand

The company’s intellectual property, including inventions, designs, software, trademarks, trade secrets and confidential know-how is a critical asset and must be safeguarded.

Employees must:

- ensure appropriate registration and protection of intellectual property rights
- refrain from unauthorized disclosure or use of protected content
- report suspected theft or misuse immediately

Similarly, the company name, logo and brand identity must be used responsibly and only in authorized contexts. Brand misuse whether internally or externally, undermines the company’s reputation and legal position.

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Summary: Why this matters

Careful and honest handling of resources, wether financial, physical or intellectual ones, ensures operational efficiency, protects value and upholds integrity.

What to do: Example

You accidentally damage a company laptop. Instead of trying to fix or hide it, you report it to IT and explain what happened, so the device can be replaced or repaired properly.

7 Sanctions and Enforcement

7.1 Consequences of Violations

Violations of this Code of Conduct, internal policies or applicable laws may result in disciplinary, civil or criminal consequences, depending on the nature and severity of the misconduct.

Disciplinary measures may include:

- verbal or written warnings
- suspension or reassignment
- termination of employment
- civil claims for damages
- referral to law enforcement or regulatory bodies

Sanctions will be applied fairly, consistently and in accordance with labor law and due process principles.

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7.2 Investigation Process

If there is a reasonable suspicion of misconduct, the company will initiate an internal investigation. The process will be:

- objective and impartial
- proportionate to the severity of the allegation
- respectful of the privacy and rights of all individuals involved

Employees are required to cooperate fully with investigations and provide truthful, complete information. Confidentiality will be maintained to the greatest extent possible throughout the process.

7.3 Handling Breaches by Business Partners

If suppliers, contractors or other third parties are found to have violated the principles of this code, the company may take one or more of the following actions:

- issue formal warnings or require corrective measures
- suspend collaboration until compliance is restored
- terminate business relationships
- report the violation to authorities, if legally required

Business partners are expected to support investigations and demonstrate transparency in their responses.

7.4 Role of Leadership and Accountability

Leaders and managers bear special responsibility for ensuring that violations are addressed consistently and decisively. Failure to take action in cases of known or suspected misconduct may itself constitute a breach of duty.

Executives and supervisors are accountable not only for their own behavior, but also for fostering a culture in which misconduct is actively prevented, detected and corrected.

Summary: Why this matters

Consistent enforcement of rules strengthens trust, fairness, and compliance culture.

Everyone must understand that violations have consequences and that investigations follow due process.

What to do: Example

You're informed that an investigation is being launched in your department.

You cooperate fully, provide all requested information truthfully and encourage your colleagues to do the same.

8 Governance, Validity & Revisions

8.1 Compliance Governance and Responsibilities

The implementation and oversight of this Code of Conduct are managed as part of the company's Compliance Management System (CMS). The CMS ensures that legal obligations, ethical standards and internal policies are systematically monitored, enforced and updated.

Key responsibilities:

- **Executive Management**: overall accountability for the compliance culture and enforcement of the Code
- **Compliance Function**: operational responsibility for training, monitoring, guidance and reporting
- **Managers**: role models who ensure Code awareness, lead by example and support enforcement
- **Employees**: duty to understand, follow and actively contribute to the application of this Code

Compliance is a shared responsibility across all organizational levels.

8.2 Entry Into Force and Legal Effect

This Code of Conduct enters into force on the date of official publication and applies immediately to all employees, managers and relevant third parties. It is legally binding within the scope of employment and may be referenced in contracts, guidelines or disciplinary proceedings.

Business partners may be required to formally accept this Code or a comparable set of principles as a condition of collaboration.

8.3 Monitoring and Continuous Improvement

The company commits to regularly evaluating the effectiveness of the code and the broader CMS. This includes:

- periodic internal audits and risk assessments
- review of compliance metrics
- benchmarking against evolving legal standards and industry best practices

Feedback from employees and stakeholders is actively encouraged and contributes to the continuous development of our compliance culture.

8.4 Revisions and Updates

This code will be reviewed at least once every two years or earlier if significant changes in law, business structure or risk landscape occur.

Revisions will be approved by Executive Management, communicated to all employees and integrated into training and onboarding programs.

The latest version is always available through internal systems and may be translated into multiple languages where required.

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Summary: Why this matters

Governance structures ensure that the Code remains relevant and effective. Continuous improvement and leadership accountability make the system robust and future-ready.

What to do: Example

You notice that the Code does not yet reflect changes in AI regulation relevant to your team. You inform Compliance, helping initiate an update and ensuring everyone stays aligned with the latest legal expectations.