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Foreword

Dear employees, dear business partners,

As an international company and employer, we feel obliged to take **responsibility for our actions** towards **the environment** and **society**. Our aim is therefore to conduct our business activities **responsibly**, transparently, **in compliance with** the law, **as well as** ethically, ecologically, **and** sustainably.

The INGUN Code of Conduct addresses the question "**How do we want to work?** ». It incorporates our most important **rules of conduct and principles** and is based on our **vision** and goals **and the fundamental** values of INGUN. It defines how responsible and sustainable behaviour is understood at INGUN. Thus, the Code of Conduct defines the **framework of our operational actions**.

The Code of Conduct sets out the principles that are put into practice at INGUN in day-to-day operations. It therefore also serves **as a guideline for all** INGUN employees and as a guide for legal and ethical questions that arise in everyday work.

Knowledge of the content and application of the principles **is obligatory for all persons associated with INGUN**: for the Board of Directors, the management, and supervisors for all employees as well as temporary workers and our business partners.

The principles create a **common understanding** of **responsible action** at INGUN and thus promote **security** and **transparency**. The principles are to be read carefully and applied by all INGUN employees in everyday operations. On the one hand, this serves the purpose of fulfilling our social and legal obligations and, on the other hand, to make a joint contribution to sustainable development.



Armin Karl
Owner



Jochen Müller
Managing director



Michael Eisele
Member of the Executive Board

Principles [↗](#)

Vision [↗](#)

All our activities follow the one **vision**: we want to be a **Partner for Future Technology** for our customers.

Shared values [↗](#)

The long-term success of INGUN requires all employees to act **sustainably** and **with integrity**. We are committed to acting in the interests of INGUN for the areas of responsibility assigned to us. We have defined our most important rules of conduct in our cultural principles.

Cohesion and leadership [↗](#)

In our dealings with our **colleagues** and our **employees**, we cultivate a **culture of openness** and **mutual trust**. In order to develop solutions to problems, we rely on **communication** and **inform** each other in order to achieve the best result together.

Our **supervisors** are aware of the special responsibility for the long-term success of INGUN and the well-being of all employees.

Occupational health and safety [↗](#)

INGUN takes all necessary precautions to ensure the **safety** and **health** of all employees using numerous measures.

We take responsibility for the health and safety of our employees in the workplace. We contain risks and ensure the best possible preventive measures against accidents and occupational illness.

In the form of training and written instructions, we ensure that all employees are knowledgeable when it comes to occupational safety.

The **occupational health and safety instructions** must be observed by all employees. This serves not only to protect the company and all parties involved, but also to protect employee's own health.

INGUN offers its employees various health-promoting services as part of its company health management.

Compliance with the law

As an international company, INGUN is represented in many markets around the world. Our actions are subject to various legal systems and legal and official requirements. In order to fully fulfil our social obligations, we therefore oblige all our employees, as well as our contractual partners, to consider and comply with **international and national laws and official regulations** in all business actions and decisions. In addition, we expect our employees to adhere to **internal guidelines and instructions**.

For us, **compliance with the law forms** the basis of integrity and responsible behavior. Failure to comply with these obligations can have significant negative consequences for both the persons involved and INGUN.

All business actions must be **transparent** and **traceable at all times**.

Conflicts of interests

Conflicts of interest can occur when employees pursue personal interests that conflict with the interests of a company. This may be the case, for example, if secondary activities are carried out or orders are awarded to relatives or persons with whom they have a close personal relationship. In such cases, there is an obligation to contact the supervisor, the HR department, or the management before carrying out the activity.

Conflicts of interest can also arise if, for example, owners, members of the management board or executives are owners or proportionate co-owners of companies that have a business relationship with INGUN. Therefore, private and business interests must be strictly separated. In case of doubt, there is an obligation to inquire with the respective supervisor.

Non-discrimination and equal opportunities

We treat our colleagues and employees **with respect** and **fairness**. INGUN does not tolerate **any discrimination** on the basis of **racial** or **ethnic origin**, gender, **religion** or **belief**, **disability**, or age in its own working environment and in its relations with its external interested parties such as suppliers, customers, municipalities, financial partners and others or **sexual orientation**.

We pay attention to **equal opportunities** in all aspects of the employment of our employees. Fair and timely **remuneration** as well as personal and professional **development opportunities** are a matter of course for us.

INGUN undertakes to pay at the very least the wages negotiated by the collective bargaining parties.

Our employees have the right and the opportunity to organise **themselves in trade unions** and to elect works councils **within the company**. This gives you the opportunity to submit anonymous complaints, which can be treated confidentially by the works councils if you wish.

If INGUN employees are not sure what the requirements are or whether their conduct is legally and ethically impeccable, they should contact their supervisor, the HR department, or a member of the management. These offices assure confidentiality and support to those reporting and asking questions. In addition, all employees are expressly encouraged to contact the above-mentioned departments or their supervisors if they notice that someone is not behaving in accordance with the rules. This can prevent small problems from becoming big ones. No one who makes a report in good faith has to fear disadvantages – even if the communication turns out to be unfounded.

The implementation of the Whistleblower Act (EU Whistleblowing Directive) is carried out by an external and independent body. Employees can anonymously forward information about real or alleged grievances in the company to them. The delegated body was obliged in writing to treat the information received to it confidentially and to continue to treat it anonymously.

Fair competition

We respect and protect the freedom and effectiveness of the market as well as the functioning of competition. All employees who are in contact with competitors or business partners are therefore obliged to comply with the rules of **competition** and **antitrust law**.

INGUN's products are sold at fair prices according to their performance and quality. INGUN does not participate in **illegal restrictive agreements and practices**. This means that none of our employees hold discussions with competitors in which agreements are made about prices, conditions, or market sharing.

We also expect our business partners to respect and maintain fair competition.

Prohibition of bribery and corruption [↗](#)

We conduct our business **fairly, honestly, and transparently**. Practices involving unfair transactions will not be tolerated.

For us, integrity takes precedence over short-term business success – if in doubt, we will forego an order.

INGUN employees may **not offer, receive or accept any benefits from business partners that could lead to any** impairment of an objective and fair business decision **or** even give the appearance of such an impairment. Donations and gifts to authorities or public officials are not permitted.

Corruption and money laundering [↗](#)

All employees undertake to avoid and prevent corruption and money laundering. The most common form of corruption in practice is **bribery**. It is defined as "accepting or offering money, gifts or other benefits with the aim of inducing someone to commit an act contrary to duty or breach of trust in connection with their business activities".

Child labour, slavery and forced labour [↗](#)

We observe compliance with human rights along the entire supply chain. If we notice behaviour in our customer and supplier relationships that is not in line with our moral principles, we will stop working with them at least until the grievance has been remedied.

Raw materials and materials used [↗](#)

We monitor the **legal requirements and restrictions of the substances** we use (**product-related materials and consumables**) in a **structured manner to protect our employees and the users of our products**.

We regularly update declarations of conformity **relevant to customers** and publish them on our website.

The **Conflict Mineral Reporting Template** is regularly updated and published on our website.

Protection of confidential information [↗](#)

For INGUN, know-how is a **resource with asset value**. Therefore, employees are obliged to handle internal knowledge confidentially and carefully. This information must be stored securely and is only passed on internally to those persons who need it for their professional activities.

The details regarding the handling of confidential data are regulated by the **IT Policy** working instructions.

When handling **personal data**, we collect and process this data only with the consent of the persons concerned. The protection of data and the continuous monitoring of the effectiveness of the processes is carried out by the data protection officer.

All INGUN employees have been contractually obliged to maintain data **secrecy** and receive data **protection-relevant training** at regular intervals (once a year) in order to increase awareness of data protection issues and to achieve a higher level of data protection.

INGUN adheres to the legal regulations and rules of conduct in the handling of personal data according to the GDPR, the BDSG as well as the legal requirements from the public areas (tax code, commercial law, criminal law, etc.).

We pass on our high standards to our subcontractors and cooperating companies. We document this on the basis of **order processing contracts**.

In order to be able to determine and document the how current our measures are, regular internal data protection audits take place. These are documented within our data protection management system and carried out by the management and our data protection officer.

The details regarding the handling of personal data are regulated by the **Data Protection Information** working instructions.

Environmental protection and sustainability

Sustainable and socially responsible business **practices are a long-term** success factor **and** innovation driver **for INGUN**.

After all, only those who operate economically can act in an ecologically and socially responsible manner. INGUN aims to combine the best possible product quality with effective environmental protection.

As a healthy family business, we are not only aware of our economic goals. It is equally important to us that our actions are **also socially and ecologically responsible**. We are committed and far-sighted in our contribution to shaping a future worth living in – sustainability is not an abstract concept, but a conscious way of securing the future.

Numerous national and international environmental regulations, in the form of ordinances, directives, laws, agreements or agreements, aim to ensure a high level of protection for human health and the environment. We are therefore committed to contributing to active environmental protection **and to fully complying with all legal requirements of environmental protection**.

INGUN considers this fundamental social goal to be very desirable and indispensable. For this reason, we always examine business decisions and actions for environmentally relevant aspects and impacts. Thanks to our environmental management, we are committed to reducing negative environmental impacts to a minimum and to continuously developing, maintaining, and improving our environmental management system. In all our environmental activities, we are guided by the **DIN EN ISO 14001 standard**.

As managers, we have a responsibility to do our best to achieve our **environmental goals** and to provide the necessary resources and to act as role models ourselves.

In addition to the above-mentioned regulatory requirements, INGUN is committed to aligning its change processes with the UN's 17 Sustainable Development Goals. The **Sustainable Development Goals** are the benchmark and orientation for all corporate planning and decisions.

Thanks to training and regular information updates, we ensure that our employees are also aware of the internal goals and specifications of environmental protection and sustainability so that they are implemented and lived in the respective business sectors.

Responsibility

The **management** is aware that, in addition to the organisational management of the company, it also bears a special responsibility for the protection of the company, its own protection, and that of its employees. For this purpose, it has implemented a risk monitoring system in the ISO 9001 management system, which ensures all essential change processes are considered and evaluated at regular intervals. In this way, the management ensures that at least the **dual-control principle** is applied to particularly risky processes.

Managers have a role model function. They are responsible for their own conduct and for the conduct of employees in their area of responsibility, as well as for proper compliance with all procedures provided there to avoid corporate risks.

In addition, all **employees are** responsible for knowing and following the rules and obligations in their respective areas of responsibility. These include:

- Applicable laws
- Basic international standards

- Internal company guidelines, working and procedural instructions, and regulations

A long-term successful existence of INGUN requires **sustainable** and **responsible action on the part of all employees**. Our daily activities and strategic projects enabling growth and continuous improvements can only be implemented based on legally compliant action.

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INGUN Prüfmittelbau GmbH | Max-Stromeyer-Straße 162 | 78467 Konstanz | Deutschland | Tel. +49 7531 8105-0 | info@ingun.com
