



# Compliance Booklet

*Corporate Values &  
Guidelines for Employees  
of the ITG Group*

**Dear colleagues,**

Welcome to ITG' Compliance Booklet. It is part of our Compliance Management System and offers an overview on the guidelines binding on our group and employees' behavior. It shall offer a first and quick guidance to do the right things in a challenging and changing business environment. It is the responsibility and duty of each of us to always

- comply with all applicable laws and regulations (including anti-trust and anti-corruption laws and regulations),
- observe and promote high ethical business standards and be honest and integer,
- respect and treat fairly all our colleagues, customers, suppliers, our business partners and various stakeholders,
- be loyal to ITG and protect our assets, confidential information, data and know-how,
- secure the health and safety of our colleagues and neighbors and
- protect the environment.

Only if we conduct our business observing these values and duties, we will be able to ensure the long-term success of ITG and its business units. In case of any questions as to how to behave in a special situation, please contact the relevant HR department, the local Compliance Representative or ITG' Chief Compliance Officer.

Thank you very much for your continuous dedication to our group.

Yours, [CEO]

# 1. Corporate Values



## **ITG' values are based on a common fundamental understanding of socially responsible corporate management.**

- ✓ We orientate ourselves at universal ethical values and principles, in particular integrity, honesty, and respect for human dignity.
- ✓ With the production of our fully recyclable goods, we are committed to making a positive contribution to the environment. By creating quality jobs, we also want to help increase prosperity in society.
- ✓ We treat our customers, suppliers, business partners and employees as we wish to be treated by them. When dealing with our internal and external partners we are always anxious to act with fairness and integrity.
- ✓ Our business conduct is always in compliance with current legislation and the rules of fair competition. Any mixing of private and business interests can lead to a conflict of interests and must be avoided.

## 2. Guidelines



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**All employees of the ITG Group are bound to observe the guidelines and standards of conduct.**

- ✓ All employees must familiarize themselves with the content of our guidelines, know them and act in accordance with them every day.
- ✓ The management bears particular responsibility for communicating and implementing these guidelines and standards of conduct.

### 3. Complying with all Laws



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**All employees of the ITG Group are obliged to strictly follow all applicable laws and regulations.**

This refers in particular to compliance with

- ✓ Anti-trust laws
- ✓ Anti-corruption laws
- ✓ Environmental laws
- ✓ Laws concerning product safety
- ✓ Employment law regulations (including occupational health and safety)
- ✓ Data protection laws
- ✓ Export control regulations
- ✓ but, also to the adherence to international standards (e.g., rejection of child and forced labor) as well as to ethical principles, such as diversity, equality, inclusion, respect, and fairness.



# 4. Fair Competition



## 4. Fair Competition

**ITG is committed to conducting its business in compliance with the principles of fair competition.**

- ✓ This includes rigorous adherence to antitrust laws protecting competition against any anti-competitive behavior.
- ✓ No agreements or arrangements, whether in writing or verbally, may be concluded with any competitor that restrict competition, limit business with suppliers or split customers, markets, regions or production.
- ✓ It is prohibited to discuss with competitors' prices, production volumes, production capacities, sales, bids, profits, profit margins, cost and other competitive relevant parameters.
- ✓ Arrangements and agreements that restrict the freedom of our distributors to determine resale prices are prohibited.
- ✓ Exclusivity agreements may be agreed upon only after having obtained legal advice.

# 5. Above Suspicion



## 5. Above Suspicion

**We strictly reject corruption and unfair business practices in any form.**

- ✓ Business partners must not be promised, offered or granted any personal benefits.
- ✓ Equally, it is prohibited to receive, request or accept promises of improper benefits from business partners.

## 6. Gifts to Business Partners



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### **Permitted without approval: gifts of moderate value**

- ✓ Reference value: not more than 200.– €, in total not more than 400.– € per person and calendar year.
- ✓ Benefit must be identified as gift from ITG or the respective business unit (logo imprint, card etc.).
- ✓ Name and company of gift recipient must be noted. Invoices must be issued to the respective ITG company with address.

### **Subject to prior approval: gifts of higher value and gifts during negotiations**

- ✓ Reference: 200.– € to 500.– €: approval by the local Compliance Representative.
- ✓ Gifts worth more than 500.– €: approval by the local Country Director in accordance with the Chief Compliance Officer.
- ✓ Gifts during ongoing or upcoming negotiations, independent from the value: always to be approved by the local Country Director in accordance with the Chief Compliance Officer.
- ✓ Prior permission from relevant superior with name and company of the recipient.

## 6. Gifts to Business Partners

### **Not permitted:**

- ✓ Offering or granting monetary benefits of any kind (cash, bank transfers, gift vouchers, loans, unjustified credits, cancellation of debts).
- ✓ Benefits of a sexual nature or with sexual background.
- ✓ All other gifts that do not meet local customs and rules.

# 7. Acceptance of Gifts





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## **Permitted without approval: accepting gifts of moderate value**

- ✓ Value per gift: less than 200.– €.
- ✓ Maximum value of gifts received from a business partner per calendar year: 400.– €.

## **Subject to approval: accepting gifts of higher value**

- ✓ Individual value more than 200.– €: acceptance of gift to be approved by the local Compliance Representative.
- ✓ Total value of gifts received from one business partner more than 400.– € per calendar year: approval by the local Compliance Representative.
- ✓ Value of gifts more than 500.– €: approval by the local Country Director in accordance with the Chief Compliance Officer required.

# 8. Hospitality



### **Not permitted:**

- ✓ Accepting any monetary benefits of any nature (transfers, gift coupons, cancellation of debts, use of company property, enjoyment of individual preferential rates).
- ✓ Benefits of a sexual nature or with sexual background.
- ✓ Requesting any benefits.
- ✓ Acceptance of benefits which do not meet local customs and rules.

## **Permitted without approval: invitation to customary business meals**

- ✓ Meal must be business related.
- ✓ Price for the invitation does not exceed the price of a customary local meal of good quality.
- ✓ Nature and scope must be compliant with local business practice.
- ✓ The invitation is not in expectation of a consideration/preferential treatment.
- ✓ When requesting the reimbursement of hospitality costs, the guest's name and company as well as the purpose of invitation must be specified.

## 8. Hospitality

### **Subject to prior approval:**

- ✓ The business reference of the invitation is not directly obvious or is doubtful.
- ✓ Approval by the local Country Director in accordance with the Chief Compliance Officer is required if the cost exceeds 400.– € per person or, in case of the invitation of a public official, if the cost exceeds 200.– € per person.

### **Approval must be obtained in advance:**

- ✓ Accepting invitations to business meals must be business related. The invitation must be compliant with local business practice.
- ✓ The ITG employee is not invited in expectation of a consideration/preferential treatment.
- ✓ Cost of the invitation does not exceed the price of a customary local meal of good quality.
- ✓ If cost is higher: offer to share the expenses and inform the local Compliance Representative.

# 9. Invitation to Events



## 9. Invitation to Events

### **Not permitted:**

- ✓ Hospitality without business reference.
- ✓ Hospitality at places which offer the opportunity of sexual interaction or are otherwise questionable from an ethical point of view.
- ✓ Requesting invitations of any kind.

### **Permitted without approval:**

- ✓ Events with direct business reference obvious to all (e.g. trade shows). Reference value: cost less than 200.– € per person. Invitation must only apply to the event as such, not to travel, hotel or social events.

### **Subject to prior approval:**

- ✓ Events with no obvious business reference, e.g. cultural or sportive events, social event at trade shows.
- ✓ Invitations with no obvious business reference: approval by the respective supervisor always required, independent from the cost.
- ✓ Additional approval by the local Compliance Representative is required if the cost exceeds 200.– € per person, or by the local Country Director in accordance with the Chief Compliance Officer if the cost exceeds 400.– € per person.
- ✓ Approval must be obtained in advance, except prior obtaining of the approval is not possible due to time difference or off-the-cut invitations (on short-notice).



# 10. Public Officials and Employees of State-Owned Companies



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**Any suspicion that public officials or employees of state-owned companies shall be influenced must be avoided.**

- ✓ No tangible or intangible benefits of any kind to public officials or employees or representatives of state-owned or controlled companies or to their family members, unless approved by the Chief Compliance Officer.
- ✓ No benefits to political parties, representatives thereof, mandate holders and candidates for political office.
- ✓ Exception: invitation of a public official or representative of a state owned or controlled company to a business meal if this is in compliance with local legislation and the price does not exceed the price of a customary local meal of good quality.
- ✓ Exception: invitation of a public official or representative of a state owned or controlled company to an event with direct business reference with prior approval by respective supervisor. Approval by the local Compliance Representative is required if the cost exceeds 200.– € per person.

# 11. Integrity of Business Partners



# 11. Integrity of Business Partners and Suppliers

**We only cooperate with partners and suppliers who are integer and operate their business in a legal manner.**

- ✓ All our business partners and suppliers are expected to observe the relevant laws, in particular anti-trust and anti-corruption laws.
- ✓ Any participation in or support of money laundering is strictly forbidden. All payments (especially cash payments) to ITG must derive from legal sources.
- ✓ In case of suspected money laundering we do not inform the respective person about such suspicion but notify the Chief Compliance Officer of the suspicion.

## 12. Records and Payments



## **We adhere to all accounting, recording and financial reporting duties.**

- ✓ All transactions shall be recorded in a correct, complete and timely manner as required pursuant to the accounting regulations and company rules.
- ✓ Unrecorded funds are prohibited.
- ✓ Cash payments are only permitted for minor expenses (e.g. taxi rides, business meals). Otherwise, payments shall be done only by bank transfer or check.
- ✓ Bank transfers shall be done only to the bank account of the business partner, never to a third-party account or numbered account.

# 13. Company Property



**We treat company property in the same responsible manner as if it were our own.**

- ✓ Each employee must protect all assets of ITG, treat them with care, and not use them improperly or for his/her own purposes without permission, or appropriate them.



# 14. Loyalty and Conflict of Interest



## **Every employee is obliged to act with honesty and loyalty towards ITG.**

- ✓ Business decisions must be taken solely in the best interest of ITG and not because of a personal benefit.
- ✓ Employees must avoid any conflict of interest and even any potential appearance of a conflict of interest.
- ✓ During employment, no employee may take part in any activities competitive to ITG, or support any company that competes directly or indirectly with ITG.
- ✓ Any employee who, directly or indirectly, holds or acquires an interest in a customer, supplier, service provider or other business partner of ITG, must without undue delay notify this to the relevant HR department and to the respective supervisor.
- ✓ This also applies if the interest is held or acquired by a spouse, partner or child.
- ✓ The purchase of stocks of a listed company, however, is exempted from this notification requirement.

# 15. Strictly Confidential



## **We treat all information regarding the activities of our company and business partners confidentially.**

- ✓ We do not gossip.
- ✓ We make it clear to our business partners that we expect similar conduct on their part.
- ✓ We only disclose confidential information to a third party if this is necessary and the recipient has committed to confidentiality.
- ✓ Confidential information of our business partners and other third parties is disclosed only if the concerned business partner or third party has given his consent.

# 16. Privacy & IT Security



## **We protect our company data as well as our employees' and business partners' data.**

- ✓ We protect personal data of our employees, customers and suppliers.
- ✓ We protect all confidential business, technical and other data of the ITG Group as they secure our competitive advantage.
- ✓ When leaving the workplace we lock away documents with confidential data.
- ✓ We prevent the access to the corporate network and computers by using appropriate passwords.
- ✓ We save company data only in the corporate network.

## Unacceptable and prohibited:

- ✓ We use on company computers only software approved by the company.
- ✓ We do not copy software procured by the company.
- ✓ We do not save private videos, images and music files on company computers.
- ✓ We do not access pornographic or illegal Internet websites.
- ✓ We do not operate private computers in the corporate network.

# 17. Fairness First





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**We always treat our colleagues, customers, suppliers and other business partners fairly and with respect.**

- ✓ We always treat our colleagues, customers, suppliers and other business partners respectfully and fairly – in the same manner as we would like to be treated.
- ✓ We respect the differences of opinion, race, gender, creed, social class, culture of others.
- ✓ We are open, and pursue good honest relations with others. We discuss possible issues directly with the relevant person, not with third parties.
- ✓ We always behave in a correct and appropriate manner.

## **Unacceptable and prohibited:**

- ✓ We do not prefer people arbitrarily.
- ✓ Insults, an insulting tone of voice, personal criticism, shouting or physical aggression and any type of harassment are absolutely forbidden.
- ✓ We do not “bang” down receivers or cut people off.

# 18. Unity in Diversity



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**We work as a team and do not tolerate any discrimination of persons, regardless of the nature or reason.**

- ✓ Our teamwork is based on mutual respect. We treat each other as partners and foster a positive working climate.
- ✓ We are aware that we can seldom achieve complex solutions on our own.
- ✓ So we approach many assignments as a team of colleagues of all colors, nationalities and origin, of all ages, gender, ethnic background and religion and use the strength of each team member.
- ✓ We do not tolerate any form of unjustified discrimination or unfair treatment of individuals or groups based on (for example) gender, age, ethnic background, disability, religious conviction or sexual orientation.
- ✓ We are committed to equal treatment in determining remuneration, voluntary social contributions, continuous education, promotions and also in the termination of the employment relationship.
- ✓ We do not tolerate any sexual or other kind of harassment.

# 19. Health and Safety at Work



## **We are protecting our employees' health and safety.**

- ✓ We protect our employees against danger to body and soul through our engagement for health and safety at the workplace.
- ✓ However, engagement for health and safety at the workplace is also the personal responsibility of each employee. Hazards must be avoided by forward- looking, cautious and safety-conscious behavior.
- ✓ Any shortcomings of health and safety issues should be notified to the responsible manager without undue delay.

## 20. Safe Products of High Quality



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### **We market only safe and high-quality products.**

- ✓ We market only products that are state-of-the-art and safe.
- ✓ We continuously strive to improve the safety and quality of our products.

# 21. Green Approach





## **We fulfill the requirements of sustainable environmental protection.**

- ✓ We constantly work to improve the environmental compatibility of our processes and products.
- ✓ ITG is committed to control, reduce and – to the extent possible – avoid environmental impacts.
- ✓ We use our means of production (like raw materials, energy) and office material (like paper, toner and writing utensils) in a responsible and effective manner.
- ✓ We adhere to an elaborated disposal concept in our sites and offices.

## 22. Strong Appearance



### **Every employee influences our company's public image.**

- ✓ We reinforce the appearance of our business units which use their own names and corporate designs by focusing on their identities and core competencies.
- ✓ Each business unit uses its individual appearance with the corresponding corporate design and standardized style sheets, which accompany the respective company processes.

## 23. Internal/External Communication



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- ✓ We promote and protect freedom of expression.
- ✓ When sending e-mails we use the same degree of care as with letters and always check the correctness of the recipient's address.
- ✓ We do not send e-mails to an unlimited number of addressees, but only to selected addressees.
- ✓ Communicating with the media (print, TV, ...) shall be done exclusively by the persons officially responsible for this at ITG.

# 24. Consequences



**Each employee must be aware that any violation of laws or guidelines will have consequences.**

- ✓ The violation of ITG' guidelines and standards of conduct may result in disciplinary action (up to a possible termination of the employment contract) in line with applicable local employment laws.
- ✓ Violations of laws (such as anti-trust laws and anti-bribery laws) often also result in criminal sanctions (fines, imprisonment) and may trigger third party claims against the relevant employee.

# 25. Reporting of Violations





# 25. Reporting of Violations

**All reports will be examined without undue delay. Corrective action will be taken as necessary.**

- ✓ Employees who know or have good reason to believe that laws or regulations, this Code of Conduct or other internal rules have been violated should inform the local Compliance Representative or Chief Compliance Officer about the relevant matter.
- ✓ As an alternative reports can also be made via the Integrity Line established by ITG Group
- ✓ Violations should be reported regardless of the position of the person responsible for them.
- ✓ All reports will be treated confidentially.
- ✓ We do not tolerate any retaliations against employees who have reported violations of any laws or our rules in good faith.