

# **CODE OF CONDUCT**

## Preface

iC Consult Group conducts business ethically, honestly, and in full compliance with applicable laws and regulations wherever we operate.

Capable and motivated employees are the core of our company. We expect our employees to act in an entrepreneurial manner. The use of "common sense", also referred to as the GMV principle, and independent action, are encouraged.

The following principles guide our business practices:

- **Excellence** – With the goal of zero-defect IAM, we set new standards and create added value for everyone.
- **Efficiency** – Successful service and project performance is the standard by which we measure ourselves.
- **Pragmatism** – We are solution-oriented and hands-on.
- **Freedom** – We cultivate openness, honesty, decisiveness, a sense of responsibility, and mutual respect.
- **Collaboration** – Successful internal and external collaboration is our recipe for success.

This Code of Conduct applies to all full and part-time employees of iC Consult Group as well as all contractors that conduct business for us. The Code of Conduct provides us with an orientation framework for our daily behavior, both within iC Consult Group as well as towards our customers, business partners and suppliers. It describes the important corporate values and rules of conduct at iC Consult Group. We are authentic and our actions are in the interest of our customers. We communicate actively and open. Our employees are involved in our decision-making processes as well as in goal setting and we strive to create equal opportunities across the entire business.

Every employee is important! Act courageously but not recklessly, make decisions, do not stay on the sidelines, and do not hide.

This Code of Conduct applies to every one of us. We thus ask of you to:

**Follow this Policy** – Comply with the content and spirit of iC Consult Group's Code of Conduct.

**Speak up** – If you see or hear of any violation of iC Consult Group's Code of Conduct, other iC Consult Group policies, or legal or regulatory requirements, report it immediately to your disciplinary supervisor or the Ambassador Team to enable an investigation. The report and your identity will be treated confidentially. iC Consult Group will act in each case, as necessary.

**Use common sense and ask questions** – Apply iC Consult Group's principles of business practice and review our policies and legal requirements.

## 1 Quality

We are known and appreciated in the market for the high quality of our services. Our projects and services are delivered on time and satisfy our customers' demands. We are specialized suppliers and achieve reasonable prices and do not address the low-price segment for mass-produced goods.

## 2 Customer Satisfaction

Our goal is the success of our customer. We facilitate the interests of different stakeholders, such as manufacturers and suppliers of our customers. However, we always represent the interests of our customers.

## 3 Transparency and Openness

Transparency is a top priority for us. We maintain an open and collaborative relationship with our customers, employees, suppliers, and business partners. We communicate our ethical and social principles as well as the quality of our services to our customers.

## 4 Anti-Corruption and Money Laundering (Anti Bribery)

Bribery is the offering, promising, giving, or accepting of an improper financial or other advantage to or by another person, such as, a national, local, or international public official; a political party, party official, or candidate; and a director, officer, employee, or agent of another organization or individual, to obtain or retain a business or other advantage that is not through legitimate and appropriate channels.

iC Consult Group has a zero-tolerance policy toward bribery and corruption. We do not give or accept bribes, including improper gifts, and we obtain the necessary approvals before offering gifts. iC Consult Group prohibits bribery and corruption at any time and in any form, whether directly or indirectly, including through agents, partners, or other intermediaries.

It is our policy to comply with all laws, rules and regulations regarding bribery and corruption in all countries where we do business. Bribery is illegal and can lead to severe penalties. This policy extends to all our business relationships and transactions in all countries in which iC Consult Group and/or our subsidiaries and affiliates operate. Local customs and practices are never a reason to deviate from this policy.

iC Consult Group will take any suspicion of bribery or corruption seriously. Any proven instance will result in disciplinary action against those involved, up to and including termination of employment or contract and reporting of such individuals to the appropriate regulatory and criminal authorities.

If bribery or corruption is identified, iC Consult Group will take prompt remedial and disciplinary action. For the avoidance of doubt, in the event of bribery or corruption, we will seek legal advice to dismiss the employees involved and instruct the relevant authorities to deal with such matters in accordance with the law.

Each of us must take personal responsibility for adhering to this policy. This includes our most senior leaders. iC Consult Group will routinely assess the risks of bribery and corruption. We will take action based on these assessments.

## 5 Conflicts of Interest

If you find yourself in a position where your personal and business interests potentially come into conflict, you are required to declare, obtain approval, and register these potential conflicts of interests. A conflict of interest is any activity that may damage iC Consult Group's reputation or financial interests or gives the appearance of impropriety or divided loyalty. Avoid any situation that creates a real or perceived conflict of interest.

## 6 Fair Competition

We are committed to fair competition and abide by these laws and rules. Relationships and agreements with competitors, suppliers, distributors, and other parties that impair fair competition are prohibited. This includes, for example, price fixing, sharing customers or sales territories between competitors, anti-competitive boycotts, and other unfair methods of competition.

## 7 Donations

We make charitable donations and other forms of social commitments solely for the positive impact they create. We do not make any financial contributions, in particular donations and sponsoring measures, to political parties in Germany or abroad, to organizations affiliated with or similar to political parties, to individual elected officials or to candidates for political office.

## 8 Intellectual Property

Our intellectual property is a valuable asset which differentiates us from our competitors. Each of us is responsible for ensuring we manage our intellectual property and prevent its unauthorized use. It is equally important that we respect third-party intellectual property. We do not use the intellectual property of any third party without permission or legal right.

## 9 Working Conditions

iC Consult Group offers its employees attractive working conditions and guarantees appropriate remuneration and the applicable national statutory minimum wage. Our work is based on mutual respect and honesty. Regarding working conditions and working hours, we comply with the applicable country-specific legal regulations. In accordance with individual agreements, employees are given the opportunity to reduce overtime in the form of free time. Employees are also entitled to parental leave in compliance with local laws and regulations.

The freedom of association and collective bargaining of our employees is always guaranteed. We comply with applicable law regarding the freedom of association of our employees and prohibit any restriction or suppression of employee representation activities. We respect the right of our employees to collective bargaining.

## **10 Human Trafficking and Child Labor**

We reject any form of human trafficking and strictly avoid any business activities that could be related to the consequences of such practices. The principle of freely chosen employment is a foundation of moral and sustainable business activity. We do not tolerate forced or child labor.

## **11 Diversity, Equity, and Inclusion**

The multicultural composition of our employees strongly influences our corporate culture. We recognize the importance of diversity in our workspaces. We will not tolerate any form of discrimination especially related but not limited to age, gender, disability, gender identity, sexual orientation, cultural background, or belief. We base relationships with and between employees on respect for individuals and their human rights. We must all challenge discriminatory behavior when we see it. We want everyone to feel able to raise any concerns. We respect the privacy and rights of every individual. We engage in ethical recruitment, hiring workers lawfully and in a fair and transparent manner that respects and protects their rights, while adhering to ethical and professional conduct.

## **12 Occupational Health and Safety**

Healthy employees are essential for the performance and thus the economic success of our company. We regard the protection of the life and health of our employees as a primary and axiomatic duty. iC Consult Group therefore takes all necessary measures to promote the health and well-being of employees in the workplace. Each of our employees contributes to this by complying with the communicated regulation on occupational health and safety.

## **13 Supply Chain**

We expect our suppliers to adhere to the same high standards as we do. As such iC Consult Group has developed a comprehensive Supplier Code of Conduct which we require all our suppliers to comply with.

## **14 Environment**

Wherever we operate we act in accordance with applicable national and international legislation and standards on environmental protection. We continuously work on minimizing our environmental impact and improving environmental protection. For further information see our Environmental Policy.

## **15 Information Security**

iC Consult Group and its business partners are highly dependent on the security of essential information. This information is predominantly stored in IT systems. Therefore, there is a high dependency on the corresponding IT systems and the secure and reliable functioning and application of these systems. The Executive Board bears responsibility for the appropriate handling of the information and, accordingly, its secure processing in these systems. Therefore, the management acknowledges its responsibility for ensuring the security of information.

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## 16 Data Protection

The protection of personal data is of particular importance to us. We have set out all the details in our privacy policy, which can also be found on our [website](#).

## 17 Whistleblowing

iC Consult Group complies with the EU Whistleblowing Directive through its Whistleblowing Policy and provides an independent, third party whistleblower system, which enables our employees to report misconduct anonymously.