



# iocto

# Code of Conduct

## Preface

What makes a company successful? A good product alone does not determine success or failure; it is not the only factor that determines a purchase decision. A poor or lacking reputation of a company endangers its success. Entrepreneurial success therefore requires that „certain extra“, namely the ethical and legally compliant conduct of all our managing directors, executives, employees and business partners.

Ethical and legally compliant behaviour creates trust, credibility, reliability, and reputation. This „certain extra“ also means integrity and personal responsibility of each individual for their actions. In less abstract terms, the sum of all these characteristics is iocto's value-based compliance culture. This also determines the business success of iocto. Business success is not above legal and law, and business success is not above morality, integrity, the wellbeing of people and the environment. The way in which iocto achieves business success is therefore just as important as the business success itself.

This Code of Conduct forms the guiding framework for iocto's business culture. It combines two important aspects: on the one hand, the demand for compliance with law and, on the other, special requirements in terms of ethics and integrity. For iocto, this is both an internal requirement and a promise to the outside world which also ensures that iocto is and remains transparent and comprehensible for everyone. The Code of Conduct applies to all employees. In addition, it also applies, for example, to temporary workers, i.e. persons who are functionally equivalent to employees.

This Code of Conduct provides an overview of iocto's understanding of values and the behavioural requirements of its employees and is substantiated by internal guidelines and regulations where necessary. This understanding of values includes mutual respect, recognition and appreciation in daily dealings with each other.

It is not sufficient to formulate the Code of Conduct as a guideline. It needs to be accompanied and supported by role models. This role model function is primarily the responsibility of iocto's managers, who credibly exemplify legally impeccable behaviour and integrity and at the same time ensure that the employees know and understand this Code of Conduct and the behavioural requirements described therein.

However, the contents and values of this Code of Conduct do not stop at any border. Therefore, iocto also expects its suppliers and consultants to comply with the requirements set out in its Code of Conduct and wants to ensure that they are also contractually obliged to comply with them. For this reason, iocto has established the following principles for its Code of Conduct.

Hofheim am Taunus,  
May 2024



A handwritten signature in black ink, appearing to read 'P. Nottarp'.

Paul Nottarp  
Managing Director




A handwritten signature in black ink, appearing to read 'S. Schmitt'.

Stefan Schmitt  
Managing Director



A handwritten signature in black ink, appearing to read 'Will Clark'.

Will Clark  
Managing Director



# Values and Behavioral Expectations of iocto.

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# Introduction

## What does „Compliance“ mean?

„Compliance“ means to comply with the applicable laws and internal regulations in all business activities. For iocto, „Compliance“ also means to act responsibly and impeccably towards society, particularly in the areas of labour and human rights, the environment, ethics, and sustainable procurement (Corporate Social Responsibility – CSR). iocto expects all its employees, whether temporary or permanent, to practise compliance in order to avoid economic and reputational consequences for iocto.

## Who is responsible for Compliance?

Compliance affects us all. All employees are responsible for compliance in their daily work. Only if we know, understand and comply with the applicable laws, regulations and our own rules and guidelines the goals pursued by iocto can be achieved. To behave and act compliant always and everywhere also protects every employee from personal liability. This requires from each of us to pay constant attention to the issues identified in this Code of Conduct and all other policies, rules and procedures regarding subjects linked to iocto.

## To what extent does the Code of Conduct apply?

This Code of Conduct (and all iocto policies, rules and procedures) applies to all internal, external, national and international matters, business relationships and situations. It represents the minimum compliance standard for the activities of all iocto employees. In all cases, the applicable laws of the country or countries with which a matter, business relationship or business situation is connected shall apply in addition and – insofar as they conflict or deviate – shall take precedence over this Code of Conduct.



**“For us, compliance means complying with applicable laws and internal regulations as well as acting responsibly towards wider society and the environment.”**

Paul Nottarp  
Managing Director

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# Commitment to Sustainability: People and Environment



# Compliance with the Law

We have high standards for the integrity of our actions. iocto and all our employees are obliged to comply with all applicable laws and regulations. This principle of compliance also expressly applies if iocto and/or one or more employees would gain (alleged) advantages by violating laws or guidelines.

- ▶ We are committed to complying with all applicable laws and regulations



# Human Rights and Labor Practices

## Respect of human rights

iocto supports and respects the protection of international human rights as laid down in the United Nations Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organization.

iocto expects all its employees to observe the above principles and to always respect the personal rights of every person. iocoto will not tolerate any offence under any circumstances.

▶ We uphold human rights and respect personal liberties

## Employee health and safety

Our employees are our most important value. That is why their health and safety are of particular concern to us. iocoto ensures exemplary occupational health and safety for all employees. We include occupational health and safety in all our business considerations. We establish processes that identify risks and develop and implement corrective measures. Our employees are also responsible for encouraging and ensuring occupational health and safety. All our employees are encouraged to submit suggestions for improvement to their supervisor. Our employees must comply with all applicable health and safety regulations and practices. Accidents, injuries and defective or unsafe equipment and behaviour must be reported immediately to the relevant manager or an employee responsible for occupational health and safety.

▶ Employee health and safety is a top priority



**We react immediately if safety concerns and/or risks of injury arise from our operating equipment. We constantly involve our employees in improvement processes and promote a corresponding feedback culture.**



### Working conditions

We at iocto ensure that fair working conditions prevail both in our company and with our business partners. We ensure compliance with all applicable legal regulations on fair pay, in particular compliance with applicable minimum wages, social security contributions and social benefits, as well as compliance with all applicable laws on working hours.

- ▶ We guarantee fair working conditions for our employees and our business partners

### Training and career management

We support our employees in order to increase both their professional success and the success of our company. For example, we provide our employees with regular general and specialised training, language courses and health promotion courses. As the professional and personal development of our employees is important to us, we promote their further development with personal coaching offers and programs, for example.

- ▶ We foster the professional development of our employees

### Child labour, forced labour and/or human trafficking

iocto expressly rejects child labour, forced labour or labour that favours human trafficking and makes this a criterion when selecting suppliers and business partners.

### Diversity, equality and inclusion

iocto stands for multicultural, supportive coexistence and equal opportunities. Discrimination on the grounds of race, ethnic origin, gender, religion, ideology, disability, age, sexual identity or other personal characteristics has no place at iocto. iocto and all iocto employees maintain a work environment that is free from discrimination, harassment and retaliation.

### Alcohol and drug abuse

Our company also stands for a safe, productive and drugfree working environment. No one may be under the influence of illegal drugs, alcohol, cannabis or illegal substances on iocto's premises.

**iocto guarantees fair working conditions, pursues a clear policy against involvement in child and forced labor, and promotes diversity and equal opportunity.**

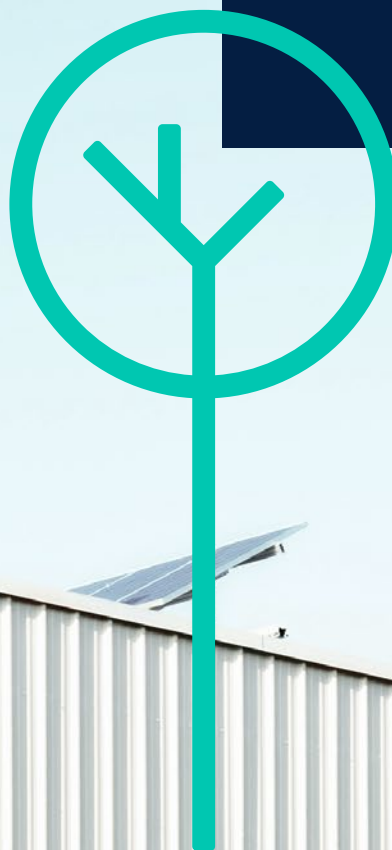




# Environmental Protection

- ▶ Sustainable environmental protection is a central part of our corporate strategy

Promoting environmental protection is an important task that also presents us as a company and the entire economy with several challenges. Sustainable action is a major concern in everything we do. Our aim is therefore to optimise our processes, products, and services responsibly and sustainably in order to protect and preserve the environment for the future.



# Building Sustainable Partnerships

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# Ethical Behavior

## Prohibition of bribe and corruption

iocto does not tolerate immoral business practices such as corruption, bribe and dishonest advantages. Therefore, ioceto will not improperly influence business decisions by using or accepting unlawful advantages of any kind. All employees of ioceto are strictly prohibited from exerting any unauthorised influence on public officials. Any appearance of an attempt at bribery must be avoided, e.g. when obtaining official authorisations.

- ▶ We reject any form of corruption, bribery, or unethical advantages

Our employees accept gifts and allowances only within the limitations of our Gifts and Allowances Policies. As a matter of principle, our employees do not accept any gifts or allowances that are not expressly permitted by this policy or that lie above the limitations set forth therein. If, in exceptional cases, we do receive gifts or allowances and if it would be inappropriate to refuse such for cultural reasons for example, we donate the equivalent value to offset any benefits.

The principles for accepting, offering, promising and giving gifts or invitations have been defined by ioceto on the basis of generally recognised market standards.

## Fair competition

All employees of ioceto must comply with the applicable laws on fair competition and antitrust law. All measures that are aimed at an unauthorised restriction of competition and/or violate legal regulations must be refrained from. In principle, agreements between companies, decisions by business associations and concerted practices that have the purpose or effect of preventing, restricting or distorting competition are prohibited.

- ▶ We are committed to fairness in all our actions

## Prevention of money laundering

iocto fully fulfils its obligations to prevent money laundering. Every employee is called upon to avoid unusual financial transactions and must demonstrate a keen awareness of this. This applies to cash transactions or indirect transactions carried out via third parties that could give rise to suspicion of money laundering. Possible suspicious cases must be reported to the supervisor and/or the management of ioceto.

- ▶ We take a proactive approach to preventing money laundering and fulfill our responsibilities with diligence

We regularly train our employees to recognise unusual financial transactions and react accordingly. The acceptance of cheques and/or cash is strictly forbidden. We are particularly thorough when it comes to clarifying unusual circumstances.

Money laundering is often a complicated matter and difficult to recognise. Our policy on the prevention of money laundering and financing of terrorism helps our employees to better recognise these risks; further support is provided by the Compliance Officer.

**We are convinced that a company can only be successful if it acts ethically, responsibly, and fairly.**

### Compliance with tax regulations

iocto does not tolerate tax evasion or similar legally prohibited activities. All employees of ioccto are prohibited from evading taxes or similar legally prohibited activities on behalf of ioccto, nor may they support, enable, favour, advise or promote tax evasion or similar legally prohibited activities with customers, business partners or other third parties.

- ▶ We enforce a zero-tolerance policy towards tax evasion and illegal activities

### Protection of confidential company information

Business and trade secrets, as well as confidential information, are important assets of ioccto. Every employee is obliged to treat non-public information about ioccto, its business and business partners as strictly confidential and to protect it from unintentional disclosure. This applies particularly to essential intellectual assets such as patents, trade secrets, intellectual property, trademarks, research and copyrights, but also to conditions granted to others and the content of agreements and documents.

- ▶ We treat business and trade secrets, as well as sensitive information, as strictly confidential and protect them from unintentional disclosure

We only grant access to confidential company and customer data as well as personal data according to a strict need-to-know approach. We regularly reassign access authorisations and passwords according to strict guidelines.



**„Our entrepreneurial action always takes into account the three aspects of our sustainability strategy: environment, economy and social responsibility“**



Stefan Schmitt  
Managing Director

# Conflict of Interest

We understand a conflict of interest to be a situation in which it is possible that the personal interests of an employee or a third party may affect the interests of iocto or our customers.

iocto respects the privacy of its employees and is not interested in personal matters outside the workplace. On the other hand, it is important for employees to ensure that professional and private interests are clearly separated. Conflicts of interest can raise doubts about the integrity and professionalism of iocto. They must therefore be recognised and avoided at an early stage.

Personal relationships with a business partner, e.g. with family members, must not lead to favouritism towards the business partner. Decisions must be made based on objective criteria. The professional position should not be used for personal purposes. This applies particularly to the selection of suppliers and service providers. Suppliers and service providers must be selected carefully in accordance with internal guidelines and based on objective criteria.

We promote personal relationships and long-term business contacts. In the case of relationships that are not purely professional, all our decisions are based on the principle of dual control.

We report potential conflicts or cases of doubt and resolve them together with our superiors or management. In this way, we ensure that business decisions are made neutrally and in the interests of iocto.

▶ iocto focuses on early conflict-of-interest prevention, promotes transparency in personal relationships, and ensures neutrality through the four-eyes principle



# Sustainable Procurement

Sustainability and acting accordingly is also a particular concern for us in our supply chain. We achieve this in particular by imposing the same obligations on our suppliers as we impose on ourselves by means of this Code of Conduct. We also ask our suppliers to confirm compliance with these obligations on an annual basis. We reserve the right to audit our suppliers in this regard, insofar as this is legal possible.

**Sustainable procurement is essential – we hold our suppliers to the same standards set in our Code of Conduct and regularly ensure compliance.**



# Donations and Sponsoring

Donations from and sponsorship by iocto serve the common good and its promotion. We are always aware of our responsibility for this. Our top priority is complete transparency. Donations for charitable purposes, in the field of sport or culture are always made voluntarily. Services in return must not be accepted.

- ▶ We are committed to supporting the common good

Donation to TU Darmstadt students to support a research project as part of the SensUs international competition.



# Integrity with Respect to Data and Financial Resources

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# Protection of Assets

Each of us is responsible for the protection and resource-conserving handling of assets. Assets and property may not be removed from the company. Everyone at iocto is obliged to use iocto's assets for legitimate business purposes and to protect them from loss, damage or unauthorised use.

► We handle company property and assets with responsibly



# Data Protection

## Data protection

iocto is aware that the personal data of its customers, business partners, shareholders and employees is highly sensitive and protects this data by handling it carefully and responsibly. Therefore, ioccto takes a variety of technical and organisational measures to ensure the confidentiality of personal data in these efforts. Everyone is responsible to ensure a high level of data protection at ioccto within the scope of their duties. The employees of ioccto strictly adhere to the data protection regulations and respect and observe particularly the extensive rights of those whose data they collect, process and use.

## Data security

Data security is of the greatest importance for ioccto. It is a decisive factor for the success and external image of the company. Therefore, ioccto uses all suitable and reasonable technical and organisational means to protect company data and the data of its customers, business partners, shareholders, and employees from unauthorised access, unauthorised or improper use, loss and destruction.

► Data security and protection are central to our operation



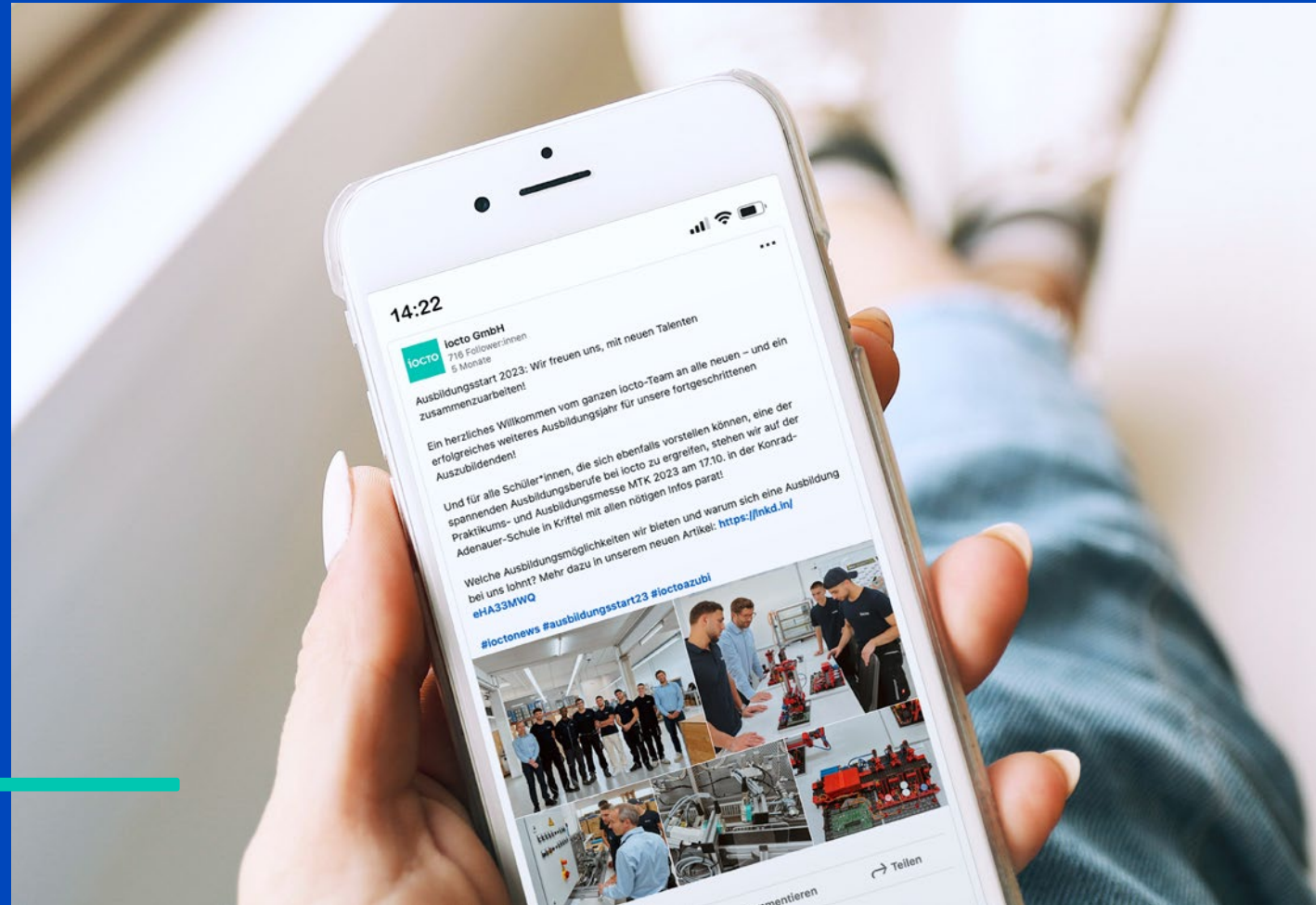
**We only collect personal data when we absolutely need it. We use our processes to ensure that personal data is deleted completely as soon as we no longer need it.**

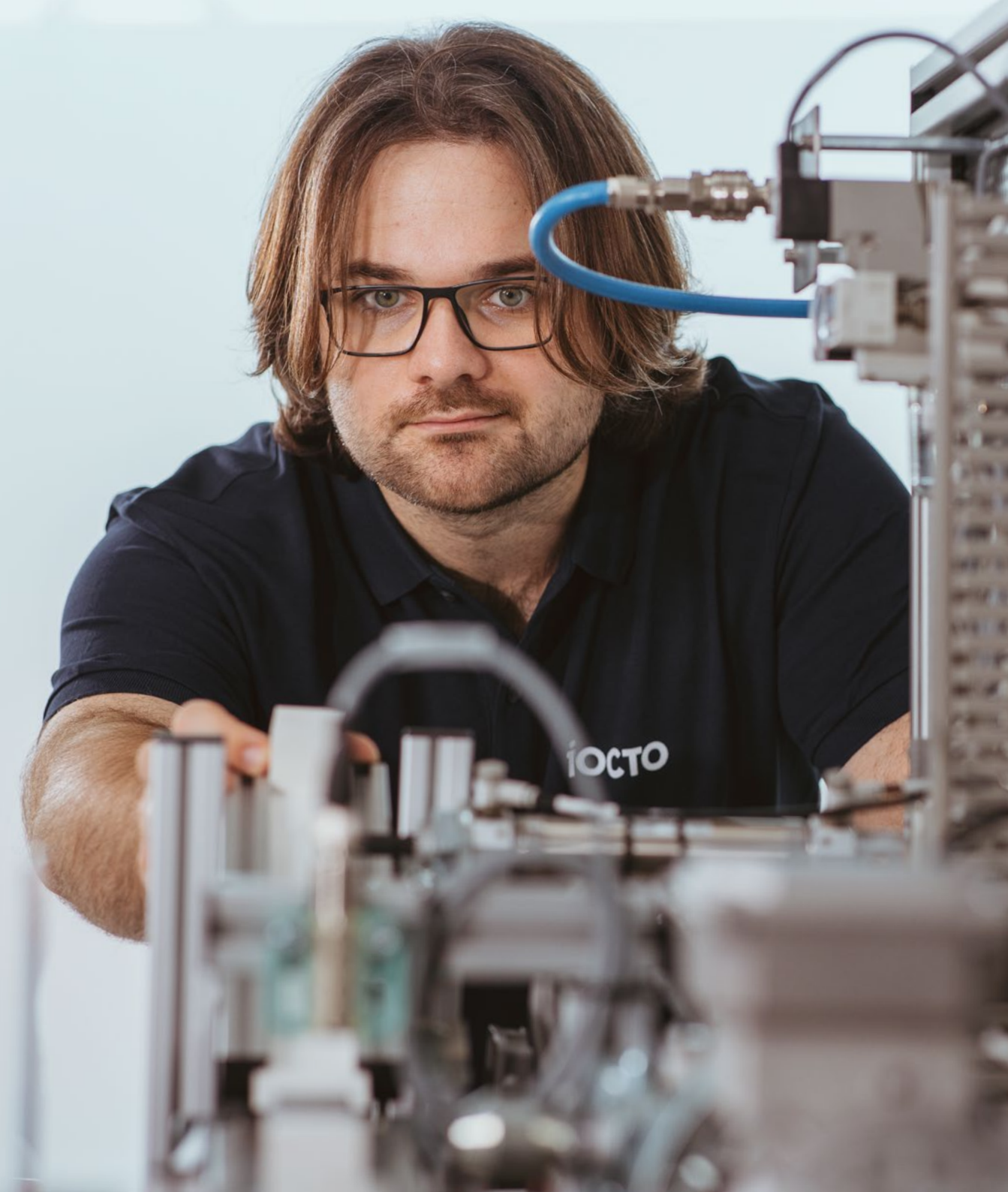
# Social Media

Social media offer us countless opportunities to communicate with our business partners, families, friends, and the public in general. Social media includes social media messenger services (e.g. WhatsApp Messenger, Facebook Messenger, Instagram), blogs, social network websites, wikis, photo/video sharing sites and other chat applications and chat rooms. Electronic messages are permanent records of our communications, which can have a significant impact on iocto's reputation. Our employees must not appear to speak or act in the name of or on behalf of iocto unless they are expressly authorised to do so.

We encourage our employees to socialise, whether in person or via social media. We are all the more pleased when our employees mention us on social media within our business area or because of one of our sustainability initiatives. However, we never express political opinions or comment on global events via social media.

▶ We value the role of social media and ensure it is used positively and responsibly





# Compliance with Rules of Behavior

iocto creates a climate and an atmosphere free of any fear of negative consequences to encourage employees to report violations and misconduct if necessary.

Violations of these rules, legal obligations or other internal guidelines and regulations can have serious consequences not only for iocto and the persons concerned, but also for employees. For this reason, iocto will investigate reports of violations of applicable law and/or the internal guidelines and rules of iocto and react accordingly if necessary.

iocto will treat reports from employees about their own errors and offences with the greatest possible care and will consider the corresponding „self-report“ with the utmost benevolence; this may even lead to a complete waiver of any consequences.

This Code of Conduct and the internal guidelines, training courses, etc. cannot cover all topics and questions. Every employee therefore has the opportunity and is requested to contact their supervisor, Compliance Officer at any time with questions and comments.

- ▶ We are available for any questions or concerns related to the Code of Conduct.

# Indications of Vulnerabilities, Contact Person, and Monitoring

If employees identify weaknesses in iocto's compliance management system or possible violations of laws or this Code of Conduct, iocto encourages them to report them confidentially to their supervisor, management, or the Compliance Officer. The report should describe the relevant information as accurately as possible.

When investigating a report, iocto and the employees/managers involved take care to protect employees who have made a report in good faith from harm of any kind. To this end, the confidentiality of the whistleblower's identity is guaranteed at all times, so that no conclusions can be drawn about the whistleblower and no disadvantages arise for the whistleblower due to the fact that he/she has made a report.

Compliance with the requirements of this Code of Conduct and the internal guidelines is regularly reviewed, e.g. by supervisors, the internal audit department or external auditors. The management is also informed about which measures are to be introduced and implemented to further develop and improve the compliance management system.

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