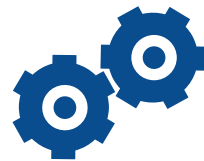


# CODE OF CONDUCT

## PRINCIPLES AND GUIDELINES FOR REGULATORY CONDUCT



**Immergut**



# CORPORATE GUIDELINES

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# CODE OF CONDUCT

## 1. INTRODUCTION

The values set out in the Corporate Philosophy are the guiding principle for all actions at Immergut. In addition to this, we are given direction in our daily work by a number of other guidelines. These include our CSR policies, our environmental protection guidelines, the principles of the United Nations Global Compact, the OECD Anti-Bribery Convention, as well as further guidelines that can be found in the Appendix of this document.

Our Code of Conduct sets out the main principles and thus serves us as a guideline for adherence to ethical standards and in creating a working environment characterized by integrity, respect, trust and sustainability. By keeping to the rules set out in the Code of Conduct, we ensure the long-term welfare of the company and its employees.

## 2. SCOPE

**Internal:** The rules formulated in the Code of Conduct apply without exception to all owners, managers, employees and all other persons engaged in company work. For clarity of understanding, all categories of persons – regardless of gender – are collectively referred to in what follows as “employees”.

**External:** The scope of these guidelines extends to all business sectors, all companies and all locations. This Code of Conduct does not replace any other behavioral guidelines, but complements them. We also apply the standards formulated in the Code of Conduct to our partners, suppliers and customers.









### 3. GENERAL REQUIREMENTS OF CONDUCT



#### 3.1. PRINCIPLES FOR DEALING WITH EACH OTHER

The way we treat each other is characterized by respect and acceptance. We respect social manners and strive for polite cooperation. We always act with integrity and are aware of our responsibility as role models.

#### 3.2. RESPONSIBILITY FOR THE COMPANY'S REPUTATION

All employees bear responsibility for the reputation of the entire company and their own person. For this reason, every one of us must behave in public at all times in such a way that his or her behavior does not reflect negatively on the company.

#### 3.3. OPEN COMMUNICATION AND DEALING WITH CRITICISM

We communicate in an open, goal-oriented and clear manner. We encourage the open exchange of opinions, criticism and ideas. Conflicts are inevitable in everyday dealings with each other. But they help us to look at our positions critically and to learn from them. We regard errors as an opportunity and we explain and eliminate their causes.

#### 3.4. PROMOTING INDEPENDENT ACTION

We encourage all colleagues to act on their own initiative. At the same time, we expect them to observe the responsibility that comes with this and to work towards our common goals.

#### 3.5. WORKING ENVIRONMENT

We strive in all areas to create a work environment that enables every employee to perform at his or her best. We support the personal development of all our employees, in particular the expansion of their professional expertise through advanced training. Vulnerable groups (adolescents, pregnant women, people with disabilities, etc.) receive special attention. We assess the performance and success of every employee according to factual criteria and try to minimize subjective factors.





## 4. SPECIAL REQUIREMENTS OF CONDUCT

### 4.1 COMPLIANCE WITH APPLICABLE LAW

We comply with applicable law. We respect the relevant national and international laws, regardless of our location or the location of the business. In addition, we also respect the international conventions referred to in the appendix. We cooperate with all competent authorities openly, constructively and reliably.

**Kodeks Karny**  
**BGB**  
**FCPA** **Code pénal**



**StGB**  
**UK Bribery Act**  
**UN** **OECD**  
**Codice penale**  
**Sarbanes-Oxley Act**

### 4.2 PREVENTION OF CORRUPTION AND CONFLICTS OF INTEREST

#### 4.2.1 Prohibition of corruption and personal gain

We condemn corruption, taking advantage and bribery. We respect the relevant laws and conventions. We neither offer business partners gifts or benefits with the aim of influencing a business decision, nor do we accept such gifts or benefits. Even the appearance of such influence is to be prevented. We will not tolerate application of unfair means.

#### 4.2.2 Conflicts of interest

We do not accept any benefits, gifts or entertainment that could lead to a conflict of interest. We avoid situations that could lead to conflicts of interest between our personal or financial interests and the interests of Immergut.

We do not solicit any personal benefits from suppliers, customers or others arising from affiliation with the company or which are linked to that affiliation.





#### 4.3 FRAUD PREVENTION

We do not tolerate fraudulent acts, such as embezzlement, misappropriation or other fraud – neither within our company nor in our cooperation with business partners.



#### 4.4 ADHERENCE TO ANTITRUST AND COMPETITION LAWS

We respect laws and regulations designed to safeguard fair competition, in particular anti-trust and competition law. We will not tolerate unauthorized preferential treatment or discrimination.





## 4.5 DEALING WITH INFORMATION

### 4.5.1 Dealing with internal knowledge

We do not pass on business information that has not been approved for publication by the relevant bodies within the company. Through careful handling, we protect business secrets: in particular, process and manufacturing knowledge, patents, plans, financial data and other information that has not been approved for publication. We do not accept inaccurate reporting – neither within our company nor in terms of information intended for external consumption.

### 4.5.2 Ensuring the confidentiality of data entrusted to us

We protect the secrets of our customers and suppliers. We do not use them to give ourselves an unfair advantage and we do not pass them on to third parties. We only ever use the information entrusted to us to perform the task for which it was entrusted to us.

### 4.5.3 Data protection and security

We comply with all legal requirements for data protection and relating to data security. Furthermore, the personal data entrusted to us by our employees and partners is solely used for the intended purposes to the extent legally permissible. In particular, we treat personal data confidentially.

### 4.5.4 Documentation and transparency requirements

We comply with documentation requirements arising from legal provisions comprehensively and with the necessary care. We also comply in full with any further documentation requirements arising from operational provisions. All our reports, records and statements are accurate, timely, understandable, comprehensive and true.

#### **4.6 OCCUPATIONAL HEALTH AND SAFETY, ANTI-DISCRIMINATION**

##### **4.6.1 Compliance with legal and operational safety policies**

We observe at all times all legal, trade association and occupational safety regulations.

##### **4.6.2 Working conditions**

We pay fair wages – at least the statutory and collectively agreed minimum standards, – and respect the statutory and collectively agreed standards on working hours, holidays and public holidays. We rigorously condemn child and forced labor and encourage our business partners to do likewise.

##### **4.6.3 Equal opportunities and antidiscrimination**

We consider a pluralistic personnel structure as an enrichment. We explicitly condemn any form of discrimination, regardless of whether it is because of the person, his or her behavior or his or her actions.







## 4.7 PROTECTION OF THE ENVIRONMENT

### 4.7.1 Compliance with legal and operational environmental protection standards

We adhere to or exceed the statutory environmental regulations.

### 4.7.2 Consideration of environmental impact in all operational decisions

When making operational decisions, we consider the impact on the environment and choose the most environmentally friendly alternative, where economically feasible.

### 4.7.3. Environmental activities

We acknowledge and commit ourselves to sustainable economic activity and actively pursue internal and external environmental protection projects within our environmental policy.

## 4.8 HANDLING COMPANY PROPERTY

We handle company property carefully and in accordance with the rules. Every employee is responsible for his or her own actions in this regard. We report damage, misuse, loss, theft, embezzlement or destruction of company property on our own initiative.





## 5. APPLICATION



### 5.1 RESPONSIBILITIES AND HELP

#### 5.1.1 Personal responsibility of every employee

Each individual is responsible for following the code of conduct in everyday working life and ensuring that he or she stays up to date with any changes. Ignorance does not protect against consequences. The company management provides the latest version of the Code of Conduct at appropriate points and provides information about any changes.

New employees will be familiarized with the Code of Conduct in writing, at the latest upon conclusion of the employment contract.

#### 5.1.2 Contact persons for clarification of questions

If you have any questions about how to apply the Code of Conduct, you are welcome to speak to your immediate supervisor, the site management, works council, compliance office or group management.

**Further information materials and application examples can be found here:**

The relevant guidelines are available on our website: [www.immergut.de/unternehmen](http://www.immergut.de/unternehmen) under 'Corporate Responsibility'

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#### **Contact:**

These can be found on the information panels at your location

as well as on the Internet: [www.immergut.de/unternehmen](http://www.immergut.de/unternehmen) under 'Corporate Responsibility'

### 5.2 REPORTING VIOLATIONS

#### 5.2.1 Reporting

We all work towards compliance with the Code of Conduct in direct contact with our colleagues. Where we cannot satisfactorily resolve an infringement of the **general requirements of conduct** via contact or via the supervisor, the case can be submitted to the Compliance Office or group management for clarification.



Breaches of the **special requirements of conduct** must be reported at once to the immediate superior. If the situation appears to make this action inappropriate, we can also contact the central Compliance Office or the management of our company or group management directly. Any suspicion of criminal activity must always be reported to the Compliance Office.

#### 5.2.2 Confidentiality

We treat all reported violations in confidence. Nevertheless, in some cases, disclosing this information to third parties may be unavoidable: for example, at the opening of an investigation in which the reporting person is to be heard as a witness. We can also report violations anonymously.

#### 5.2.3 Right to information

Anyone who reports a violation of the Code of Conduct is entitled to information about the result of the investigation. This does not apply if legal reasons, in particular data protection, preclude this.

#### 5.2.4 Protection against reprisals when reporting in good faith

We do not tolerate reprisals against employees who report a violation in good faith.

#### 5.2.5 Works council

Each employee has the right to consult a works council member regarding discussions with supervisors in connection with the reporting of violations of the Code of Conduct.

### 5.3 SANCTIONING OF VIOLATIONS

Reported violations of the principles of conduct will be clarified by the relevant superior or investigated by the Compliance Office. If during this process the suspicion of criminal conduct strengthens, the case will be referred to the authorities. An infringement can thus result in personnel as well as civil and criminal legal liability.





## APPENDIX:

### Relevant national and international conventions:

**German Corporate Governance Code**

[www.dcgk.de/en/code.html](http://www.dcgk.de/en/code.html)

**UN Convention Against Corruption (UNCAC)**

[www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026\\_E.pdf](http://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf)

**IDW AsS 980 (Principles for the Proper Performance of Reasonable Assurance Engagements Relating to Compliance Management Systems)**

<https://shop.idw-verlag.de/product.idw.jsessionid=6D69C1596E922A0DCF5955C24E470545?product=20229>

**ISO 19600: Compliance management systems - Guidelines**

[www.iso.org/iso/home/store/catalogue\\_tc/catalogue\\_detail.htm?csnumber=62342](http://www.iso.org/iso/home/store/catalogue_tc/catalogue_detail.htm?csnumber=62342)

**IFS – International Featured Standards**

<https://www.ifs-certification.com/index.php/de/standards>

**SMETA Sedex Members Ethical Trade Audit**

<http://www.sedexglobal.com/ethical-audits/smeta/>

**UTZ Standards for sustainable agriculture**

<https://www.utz.org/who-we-are/governance-committees/>

**ISO 50001 Energy Management**

<https://www.tuv.com/world/en/iso-50001-energy-management.html>

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