

# **IPTOR Code of Conduct**

## Our commitment

Iptor has always been committed to the rights and well-being of their employees. As such, we're committed to taking appropriate steps to ensure that everyone who works for Iptor – in any capacity, anywhere in the world – benefits from a working environment in which their fundamental rights and freedoms are respected.

Iptor complies with local legislation in all countries, where we have entities or are engaged.

The Iptor Code of Conduct consists of a summary of several global Iptor policies:

- a. Global Anti-Bribery and Corruption Policy \*)
- b. Iptor Privacy Policy \*\*)
  - i. General Terms for Process of Applications \*\*)
- c. Global Work Environment
- d. Health and Safety
- e. Diversity and Equal Opportunities
- f. Offensive Behavior and Harassment \*)
- g. UK Modern Slavery Act Transparency \*\*)

You may contact Iptor – [legal@iptor.com](mailto:legal@iptor.com) - to receive the separate full-length policies. Iptor employees can find them on the Intranet.

\*) Extract for Iptor Code of Conduct – full document is available upon request

\*\*) The full policy is available on Iptor homepage

## a) Global Anti-Bribery and Corruption Policy (extract)

In an effort to combat corruption and encourage high standards of business ethics, certain countries have enacted new laws and regulations specifically related to bribery and corruption.

To ensure our compliance with the law and to provide guidance on how these laws impact our day to day business activities, Iptor has put in place the Iptor Global Anti-Bribery Policy. Compliance with this Policy is expected from all Iptor employees.

If you have any questions, please feel free to contact the Legal Department or HR.

### Summary:

***This Summary is provided for informational purposes only. All employees of Iptor are expected to carefully read and to understand the Iptor Global Anti-Bribery Policy to ensure full compliance at all times.***

Iptor does business directly and indirectly in many countries around the globe, each of which has its own unique laws, customs and business practices. Iptor requires its employees and business partners in all geographies to conduct their affairs with uncompromising integrity and will not tolerate corrupt activities of any kind.

Iptor maintains a written policy against corruption that prohibits promising, offering, or giving to, or receiving from, any individual anything of value or personal benefit with the expectation of receiving a favor, a grant of business, or any other business advantage in return. Such actions are sometimes referred to as bribes, kickbacks, facilitation payments, or other improper *quid pro quos*.

Iptor is committed to complying with:

- The laws and regulations of each country where Iptor conducts business;
- All international anti-corruption laws and regulations, including the U.K. Bribery Act of 2010 and the U.S. Foreign Corrupt Practices Act; and
- Iptor Standards of Business Conduct.

Iptor permits certain bona fide and nominal hospitality gifts and promotional expenditures in connection with general Iptor operations; provided that such are reasonable. Lavish entertaining is inappropriate and not permitted. Further guidance on what may be considered reasonable is provided in the Iptor Anti-Bribery Policy.

The Iptor Global Anti-Bribery Policy incorporates the common elements of anti-corruption laws and regulations worldwide that apply to Iptor business. All Iptor employees are responsible for promoting awareness of and enforcing compliance with this policy and must not actively or passively authorize or ignore corrupt activities in their departments. All offers of bribes, requests for bribes or facilitation payments should be reported as soon as possible. Employees who violate the policy will be subject to disciplinary action, which may include termination of employment.

## b) Iptor Privacy Policy (extract)

Iptor Supply Chain Systems and our subsidiaries and affiliates ("Iptor" or "we") know that you care about how the information we receive from and about you are used and shared, and we take your privacy seriously. This policy demonstrates our commitment to your privacy, and covers how we collect and use your Personal Information, how

you can control its use, and describes our practices regarding information collected from the Iptor website at [www.iptor.com](http://www.iptor.com) ("Site"), any subdomains of [iptor.com](http://www.iptor.com), computer or mobile software applications, social media pages and HTML-formatted e-mail messages, as well as through offline sales and marketing activities (collectively, the "Channels").

Iptor complies with the EU General Data Protection Regulation ("GDPR") and will never provide unauthorized access to your personal data to any third party.

## c) Global Work Environment Policy

Iptor's goal in terms of work environment is to create a productive workplace that promotes physical, psychological and social health. A sound working environment contributes to efficiency and quality in our operations and is therefore an important competitive factor and of strategic importance for Iptor.

We believe that an exciting and stimulating work environment is critical to invention and to employee satisfaction.

Each unit is responsible for its physical and psychosocial work environment and shall comply with the respective labor laws, regulations and norms of the countries that Iptor operates in.

Both managers and employees are responsible for creating a productive and safe work environment for the employees. HR supports this by, for instance, providing tools such as performance appraisal reviews.

Everyone is expected to contribute to a good work environment through good work habits, professional approach, showing mutual respect for others, taking personal responsibility and by showing a good manner.

All employees must be aware of and report possible incidents and general health hazards to their managers.

**Creating a good working environment is a joint concern for management and employees, with everyone having a responsibility to contribute.**

## d) Health and Safety

Good health amongst competent employees is a prerequisite for efficiency and delivering quality, as well as to ensure continued profitability for the Iptor Group.

Iptor will provide a healthy, safe and productive workplace. We will endeavor to create and develop a working environment in which there is an awareness of the vital importance of health and safety and which encourages all employees to take responsibility for their own health and well-being. Maintaining good health requires an active effort from each employee.

By creating a working environment that promotes good health and safety, Iptor should also be able to reduce levels of sick-leave absence and improve productivity. Iptor will also endeavor to assist those who have been on long-term sick leave in returning to their job as quickly as possible.

Safety is every employee's responsibility. All employees are therefore requested to point out potential hazards and

do everything reasonable to keep Iptor a safe place to work.

In each country in which Iptor have offices, Iptor will comply with the local health and safety regulations.

## e) Diversity and Equal Opportunities

Iptor's employees represent a diverse workforce from different cultures. Iptor is an equal opportunity employer and an organization that welcomes the uniqueness of every employee. Iptor benefits from the creativity and innovation that result when employees with different experiences, perspectives and cultures work together. We believe that diversity helps the company realize its full potential and improves our business results.

Iptor has a policy of zero tolerance for discrimination based on gender, race, nationality, religious beliefs or sexual orientation.

### Equal Opportunities for men and women

Iptor strives to promote equal opportunities and a balance between men and women within the company. A balanced organization gives Iptor a more creative and productive work climate, which contributes to better results. To attract, recruit, develop and retain both male and female employees is a decisive success factor for Iptor business result.

Iptor will therefore actively work towards:

- A balanced spread of genders.
- Both men and women being provided with equal opportunities in terms of employment, training, promotion and advancement/development in their careers at Iptor.
- It will be possible to combine your job at Iptor with paternity or maternity leave.

## f) Offensive Behavior, Harassment incl. Sexual Harassment (extract)

### Purpose and target group

The purpose of this policy is to describe the employer's responsibility for preventing and managing incidents of offensive behavior or harassment, as well as clarifying responsibilities and roles within Iptor.

No employee or person who is connected to Iptor may be subject of offensive behavior or harassment. Every person is entitled to privacy and respect and every employee is obliged to contribute to the fact that neither offensive behavior nor harassment occurs in the Iptor workplace.

This policy is mainly aimed at managers and employees within Iptor.

Some countries have a very explicit local legislation related to offensive behavior and harassment that will supplement this Iptor policy. If you want to learn more about local law please check internet or contact local HR.

## **A workplace free of offensive behavior and harassment**

Iptor offers a workplace where employees treat each other with respect. This contributes to all employees' health, job satisfaction and opportunities for development at work. No form of offensive behavior or harassment is accepted at Iptor and all employees have a responsibility to make sure this doesn't occur.

If someone at Iptor is subject to harassment of any kind, the manager is obliged to investigate this and to take immediate action.

## **g) UK Modern Slavery Act Transparency Statement (extract)**

### **Commitment to Combating Modern Slavery**

Iptor recognizes that slavery and human trafficking are serious crimes which all of us have a responsibility to combat. It welcomes the UK Modern Slavery Act 2015 and is committed to ensuring that slavery and human trafficking do not occur in its own organization or supply chains.

The management of Iptor seeks to make yearly improvements on the steps Iptor takes to combat modern slavery and human trafficking in the organization.

### **Steps taken to ensure slavery and human trafficking is not occurring within Iptor's organization**

- Iptor checks that its employees have the right to work in the UK upon commencement of their employment.
- All employees are paid at least the applicable local minimum wage.
- All employees have an employment contract, which sets out their salary, main place of work, working hours and notice period.
- Employees are free to hand in their notice to leave the employment of the company for any reason.
- Iptor does not keep its employees' original documentation such as passports, ID cards or driving licenses.

### **Steps taken to ensure slavery and human trafficking is not occurring within Iptor's supply chain**

- Most of Iptor's suppliers sign its standard terms and conditions for suppliers, which state that suppliers must comply with all applicable laws.
- For such suppliers who do not sign Iptor's standard terms and conditions, we endeavor to ensure that the Modern Slavery Act obligations are reflected in the contract we do sign.

## **Policy Update**

We may update this policy from time to time. We will post a prominent notice in this section of the policy notifying users when it is updated. Last Updated: June 26<sup>th</sup> 2019.