

**DOING  
THE RIGHT  
THING**

OUR CODE OF CONDUCT



# A WORD, PLEASE

BOARD MESSAGE

Dear colleagues,

We are all responsible for the success of ista. That is why we comply with applicable rules, laws and fundamental ethical values at all times. **Compliance** is essential for our company and sustainable success.

We operate in a global environment and are all called upon to make decisions that affect our reputation and relationships with each other, as well as with customers, business partners and the public.

Our Code of Conduct is the **yardstick** for our actions and behaviour, both within and outside the company. In our business activities we are guided by our ethical principles. All members of the Management Team are fully committed to compliance with the law and the **Code of Conduct**.

Therefore, we also expect you to comply with the applicable laws, regulations and this Code of Conduct at all times in the course of your work.



# 01

## PURPOSE AND SCOPE



# SO WE DO THE RIGHT THING

## PURPOSE AND SCOPE

At ista, all of us, including all management levels, live a corporate culture defined by **respect, openness and trust**. This applies to dealings both with each other and all business partners. We act in ista's best interest. This applies in particular to its public image, reputation and financial interests.

This Code of Conduct serves as a basis for a **transparent** and legally compliant **corporate culture**, to which everybody at ista is committed. Whenever we do not know how we can do the right thing, we ask our manager or Corporate Compliance or ask a question using our whistleblowing system "Speak Up". Regular **training courses** are held on the Code, participation in which is mandatory. Whenever we make a business decision, we record and document it promptly, properly and correctly. Including all necessary approvals by the responsible persons.

When we work as a **manager** at ista, we act as a role model. Therefore, it is particularly important for us to always comply with this Code of Conduct, our guidelines, policies and applicable laws. We ensure that our employees understand their responsibilities. Furthermore, we create a work environment that enables them to comply with the Code of Conduct and, without hesitation, make suggestions for improving compliance with this Code.



# 02

## BUSINESS PARTNERS



# A PARTNERSHIP OF EQUALS

BUSINESS PARTNERS

Our business partners play an important role in **our success**. They include our customers, suppliers, ista service partners, consultants, agents and other contractual partners. We always treat them fairly.

We choose our business partners in a **professional manner** and only work with those who share our attitude with regard to compliance, quality and ethical business practices. The information we provide about our products and services is correct. We do not become involved in activities that unreasonably favour or influence our business partners or other third parties. In our dealings with our business partners we always follow the **transparency and disclosure standards** required by laws, directives or industrial standards. We always put the interests of ista before our personal preferences.



# 03

## AVOIDANCE OF BRIBERY AND CORRUPTION



# WITH HONEST MEANS

AVOIDANCE OF BRIBERY AND CORRUPTION

We stand for **fair competition** where the supplier with the best products and services prevails.

Therefore, we firmly reject any form of **corruption or attempts** to gain undue influence. We never make business partners or other third parties dishonest offers in order to influence their decision in our favour. We make sure that we receive orders only on the basis of our performance. We strictly reject inappropriate offers, gifts or benefits from external parties that are intended to or might influence us.

By the same token, we only give gifts or other benefits if all guidelines are observed and there is **full transparency**. This applies in particular to invitations to events or hospitality, the granting of commissions and discounts and the free delivery of goods.

Our commercial success enables us to support charities by making donations. We see donations as a **contribution to society**: for the benefit of all. Therefore, we donate voluntarily, without receiving anything in return and in compliance with local laws and regulations.

**Sponsoring activities** are different from donations. For sponsoring we expect something specific in return, for example the prominent positioning of our logo. We ensure that our contributions are proportionate to the value of what is given in return and we document our donation and sponsoring activities to ensure full transparency.



# 04

# FAIR COMPETITION



# HARD BUT FAIR

FAIR COMPETITION

We comply with antitrust laws.

We want to convince our customers with our **ideas, innovations and high-quality services** and thus strengthen our market position. This applies to all countries in which we operate. We expressly reject all illegal collusion with other market players.

If information jeopardises **fair competition** between potential suppliers, encourages illegal cooperation or harms the interests of customers, we do not share this information with competitors. Regardless of whether we meet them in a business or private setting.

This also applies to agreements with other market players designed to influence the market. With our customer-centric products and services we have managed to achieve a strong market position in several countries. We use this position **responsibly** and ensure that we do not unduly hinder other market players.



# 05

## COMBATING MONEY LAUNDERING AND COMPLYING WITH SANCTIONS



# FOR NO MONEY IN THE WORLD

COMBATING MONEY LAUNDERING AND COMPLYING WITH SANCTIONS

We comply with all applicable **anti-money laundering** and **anti-terrorism financing laws** and **regulations**. We only do business with those partners who are involved in legal activities and whose funds come from legitimate sources.

We are increasingly focusing our attention on identifying suspicious business activities – for example, attempts by business partners to conceal their true identity or the offer of cash exceeding the limits set by local regulations.

We do not work with business partners who are either on relevant sanction lists or whose main financial sources or activities are located in a sanctioned country.



# 06

# CONFLICTS OF INTEREST



# EQUAL OPPORTUNITIES FOR ALL

CONFLICTS OF INTEREST

We are aware that situations can always arise in which our professional judgment may conflict with our personal interests. For example, when we make business decisions that are driven by our personal interest in a (potential) business partner. When we gain a personal advantage from one of our business partners. Or when colleagues have or establish family or close personal relationships with one another. Secondary employment with a customer, supplier or competitor of ista may also potentially lead to a conflict of interest.

To avoid conflicts of interest, we are always committed to **fairness** and **equal opportunities**. We do not work in direct reporting lines with people who have family ties or a close personal relationship with us. We do not do business in the name of ista with members of our family, our partners or with companies in which we ourselves, members of our family or our partners have a stake of more than 1% or hold a management function.

Whenever a **conflict of interest** arises, we disclose it by informing our supervisor at an early stage. Our supervisor helps us to communicate with Human Resources, Corporate Compliance and Management in order to find an appropriate solution to avoid or manage the conflict of interest.



# 07

# ASSET PROTECTION



# BETTER SAFE THAN SORRY

ASSET PROTECTION

We **protect** ista's **property** from damage, loss, theft and misuse and do not use it for non-business purposes.

We ensure that we always conduct our business activities in a secure manner. We limit the risks of loss of **business data** or misuse of our information systems to a minimum. We take particular care to protect ista's confidential business data, which refers to all information that the company has not made generally accessible to the public or that might damage ista's interests in the event of disclosure.



08

**DATA  
PROTECTION**



# LET'S KEEP IT TO OUR- SELVES

DATA PROTECTION

We value and protect the **privacy** of our employees, job applicants, business partners and end customers. Therefore, when handling personal data, we adhere to the following **core principles**:

## Transparency

We comply with the applicable data privacy regulations for all personal data controlled or processed by ista in the course of its business operations.

## Responsibility

We process personal data responsibly and in compliance with applicable laws, privacy policies and other internal rules.

## Respecting the rights of data subjects

We give data subjects the opportunity to exercise their rights. In doing so, we ensure that requests from data subjects to exercise their rights are answered effectively in accordance with the applicable regulations.

## Risk-based approach to security for personal data

We take reasonable technical and organisational measures to protect personal data – using an approach based on the potential risk for data subjects.

## Transparent reaction to possible data protection infringements

We use the designated reporting channels when we identify possible data protection incidents.



# 09

# COMMUNICATION



# CAREFULLY CHOSEN WORDS

COMMUNICATION

Whenever we communicate about ista, we comply with the **applicable laws, regulations and internal guidelines and policies**. Only authorised people communicate on behalf of the company with media representatives, such as the press, TV and radio.

When **using social media platforms**, such as Twitter, Facebook and LinkedIn, we also comply with the guidelines and do not disclose any internal information from our work environment.

This also applies in times of crisis.



# 10 RESPONSIBILITY



# TOGETHER FOR EACH OTHER

RESPONSIBILITY

We act in accordance with the **UN Declaration of Human Rights** and **ILO Declaration of Principles** (the abolition of child labour, elimination of forced labour, ban on discrimination, freedom of association) and the **UN Convention** against Corruption.

This means that we treat each other at all times with **fairness** and **dignity** and we strongly oppose any form of discrimination or harassment. Not only when recruiting new employees, but also in our daily interactions, we respect and appreciate the different attitudes, characteristics and values, as well as the particular backgrounds of the individuals who work with us.

We make no compromises when it comes to the health and safety of our employees or business partners. We therefore observe all **precautions required by law** to ensure that our employees can always perform their work safely and securely.

We use the natural resources available to us responsibly and limit their consumption to the minimum necessary to perform our business activities. As a company, we play an active role in our community and demonstrate and support social engagement.



# 11

# REPORTING OF INFRINGEMENTS



# KNOWING WHEN TO SPEAK UP

REPORTING OF INFRINGEMENTS

The purpose of ista's **Code of Conduct** is to ensure that we all do the right thing. However, no set of rules can cover all circumstances. Therefore, if compliance with the Code is not in accordance with local laws, compliance with those laws will always take precedence.

If we notice any infringements of this Code, we express our concerns. We do this by contacting our supervisor, the Management and/or Corporate Compliance. It is also possible to use the whistleblowing system „Speak Up“.

Anyone who reports in good faith the **suspicion of an incident or conflict of interest** relating to compliance with legal or ethical requirements, whether or not such suspicion proves to be well-founded, does not have to fear any retaliation. We expressly guarantee this.

All allegations of potential infringements are **thoroughly investigated** by Corporate Internal Audit & Compliance.



# 12

# CONSEQUENCES OF NON-COMPLIANCE



# STAYING ON THE RIGHT SIDE

CONSEQUENCES OF NON-COMPLIANCE

If we do the right thing, we do not risk any consequences for our own status and ista's reputation. Therefore, in case of doubt, we involve our **supervisor**, the **Management** or **Corporate Compliance** in a timely and completely transparent manner. We can be sure that such communications will remain confidential.

There's one thing we should not forget: all infringements of this Code of Conduct are taken seriously and **carefully investigated**. The resulting measures include all disciplinary action up to and including termination of employment.



**Corporate Internal Audit & Compliance**

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