

Code of Conduct

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itp Code of Conduct

At itp, we believe in conducting business responsibly. Through a strong work culture, we encourage every member of our team to comply by the law and in accordance with our values.



In all that you do, make decisions that reflect who we are and what we value as a Company. In many situations, the right thing to do may be clear, but we understand that work can be complicated – and so can the laws and rules that apply to us. Sometimes it can be hard to know what to do or where to go for help.

Our Code of Conduct ('Code') is an important resource to help you make good decisions. It is designed with you in mind and will help you to:

- Comply with applicable laws, regulations, and Company policies.
- Promote integrity and the highest standards of ethical conduct.
- Address common ethical situations you could encounter in your work.
- Avoid even the appearance of anything improper in our Company's business activities.

Business Partner Responsibilities

itp expects its business partners to:

- Uphold high standards of ethical conduct with itp and other third parties.
- Understand and adhere to the principles of the Code of Conduct, or the business partner's equivalent code (including the principles regarding privacy, anti-bribery, anti-corruption, anti-facilitation of tax evasion, fair competition, sanctions, trade controls and the prevention of financial crime). Business partners must have in place appropriate controls to manage these risks.
- Respect and protect itp's brand, reputation, information and assets.

Equality, diversity, and inclusion

itp helps bring together employees with a wide variety of backgrounds, skills, and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results.

Our colleagues, job applicants, and business partners are entitled to respect. We are committed to ensuring that they feel welcomed and valued and that they are given opportunities to grow, contribute, and develop with us.

To uphold that commitment, we support laws prohibiting discrimination and provide equal opportunity for employment, income, and advancement. We base employment decisions solely on qualifications, achievements, demonstrated skills, and job knowledge and never on age, disability, gender reassignment, marital status, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.

Do the right thing

- Treat others respectfully and professionally.
- Do not discriminate against anyone – this includes not discriminating against characteristics protected by law or Company policy but covers any type of discrimination.

Harassment-free workplace

We all have the right to work in an environment that is free from intimidation, harassment, bullying, and abusive conduct. Verbal or physical conduct by any employee that harasses another, disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment will not be tolerated.

Sexual harassment

One form of harassment is sexual harassment, which in general occurs when:

- Actions that are unwelcome, are made a condition of employment, or used as the basis for employment decisions. This could include a request for a date, a sexual favour, or other similar conduct of a sexual nature.
- An intimidating, offensive, or hostile environment is created by unwelcome sexual advances, insulting jokes, or other offensive verbal or physical behaviour of a sexual nature.

Do the right thing

- Promote a positive attitude towards policies designed to build a safe, ethical, inclusive and professional workplace.
- Help each other by speaking out when a co-worker's conduct makes others uncomfortable.
- Demonstrate professionalism: for example, do not visit inappropriate internet sites or display sexually explicit or offensive pictures in the workplace or during office hours, and when travelling for business do not visit adult entertainment venues.
- Report all incidents of harassment and intimidation.

Health and safety

Ensuring safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others. No matter what job you do or where you do it, we count on every employee to actively promote a safe and healthy workplace, and report any situations that may pose a health, safety, or security risk.

Reporting risks and hazards is not just the right thing to do, it's a requirement, because a failure to Speak Up about an incident, or to participate in an incident investigation, can have serious consequences. Do your part to keep everyone in the itp community injury-free by reporting incidents, near misses and or accidents.

Alcohol and drugs

While at work

- Do not use, possess, or be under the influence of illegal drugs or any substance that could interfere with a safe and effective work environment or harm our Company's reputation.
- You should always be ready and able to carry out your work duties.

Personal protective equipment

The Personal Protective Equipment at Work Regulations (PPE) place duties on employers to take reasonable steps to ensure that PPE provided is properly used. PPE must be worn and used in accordance with the instructions and training provided:

- Employees must take all reasonable steps to ensure that PPE is returned to the rightful place after it has been used.
- All PPE must be examined before use.
- Any loss or obvious defect must be immediately reported to their manager.

Do the right thing

- Follow the safety, security, and health rules and practices that apply to your job.
- Maintain a neat, safe working environment by keeping workstations, aisles, and other workspaces free from obstacles, wires, and other potential hazards.
- Notify your manager immediately about any unsafe equipment, or any situation that could pose a threat to the health or safety of a person or damage the working environment. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.
- Cooperate with any investigations into incidents.
- Ensure you are aware and familiar with the Group Occupational Health and Safety Policy.

Personal information

itp respects the privacy rights of all individuals and is committed to using personal information in accordance with applicable global privacy laws. We are all responsible for respecting the privacy and protecting the personal information of all customers, suppliers, partners, colleagues, and other individuals.

Examples of personal information include:

- Contact details, job titles, employee numbers and operator IDs.
- Employment information such as salary, appraisals, sickness, and disciplinary information.
- Payment information such as bank account and credit card details.

Do the right thing

- Don't collect more personal information than you need, or retain it for longer than necessary.
- Immediately report any actual or potential breach.
- Be transparent about the way you will use personal information that you collect by using privacy notices.
- Never download, extract, or use personal information obtained in your role for your own purposes or those of a future employer.
- Ensure that we are legally entitled to process personal information for our purposes.
- Keep personal information up-to-date or enable individuals to update their own information.
- Keep personal information secure and only share it with those with a genuine need to know.

Intellectual property (IP) and confidential information

itp IP is one of its core assets and itp commits substantial resources to innovation. Employees have an obligation to: (i) disclose inventions during the course of their employment, (ii) ensure that IP rights are appropriately protected, and (iii) that itp has the requisite rights to use any third-party IP.

You must keep confidential information safe and secure. itp relies on each of us to protect confidential information belonging to the Company and others. This includes keeping information secure, limiting access to those who have a 'need to know', and only using it for lawful, authorised purposes. Be aware that your obligations to restrict your use of itp (and any third-party) confidential information, and respect itp IP, continues even after your employment ends. Our customers and business partners place their trust in us. We must protect their confidential information and respect their IP just as we protect and respect our own Company assets.

Examples of IP rights and materials which may contain confidential information

IP

- Patents.
- Trademarks.
- Copyright.
- Designs.
- Systems, software, and technology.

Confidential information

- Business and marketing plans and formulae.
- Company initiatives (existing, planned, proposed, or developing).
- Customer lists and details of contacts.
- Pricing and commercially sensitive data.
- Trade secrets, know-how, and inventions.

Do the right thing

IP

- Promptly disclose to the Company any inventions or other IP that you create.
- Follow the company policy on identifying, protecting and respecting IP.
- Always respect third parties' valid IP rights.
- Immediately bring to the attention of Group Patents or Group Legal any actual or suspected infringement of itp or third-party IP rights.

Confidential information

- Agree a non-disclosure agreement with third parties before disclosing any information which is not in the public domain.
- Mark documents as confidential where practicable and indicate how the document should be handled, distributed, and destroyed.
- Use and disclose confidential information only on a 'need to know basis' and only for the purpose for which it was disclosed.
- Immediately report any loss or theft of confidential information to Group Legal.
- Only store or communicate Company information using itp systems. Never download, extract, or use confidential information for your own purposes or those of a future employer.

Records management

The accuracy and completeness of our disclosures and business records are essential to making informed decisions and supporting investors, regulators, and other stakeholders. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some employees have special responsibilities in this area, but all of us contribute to the process of recording business results or maintaining records. Ensure that the information we record is accurate, timely, complete, and maintained in a manner that is consistent with our internal controls, disclosure controls, and legal obligations.

Records retention

Documents should only be disposed of in compliance with itp policies. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to – or in anticipation of – an investigation, lawsuit or audit.

Do the right thing

- Create business records that accurately reflect the truth. Be guided by the principles of transparency and truthfulness.
- Write carefully in all of your business communications. Write as though someday the records you create may become public documents.



Product quality, safety, and stewardship

We are dedicated to earning and maintaining the trust of our customers by ensuring the quality, safety, and performance of our products and services. Each of us, as well as our business partners, are expected to meet all quality and safety specifications and our customers' expectations.

Conflicts of interest

A conflict of interest can occur whenever you have a competing interest or activity that may interfere with your ability to make an objective decision on behalf of itp. Each of us is expected to use good judgement and avoid situations that can lead to the appearance of a conflict. Even the perception of a conflict can undermine the trust others place in us and damage our reputation when making independent good ethical business decisions. Conflicts of interest may be actual, potential, or even just a matter of perception. Since these situations are not always clear-cut, you need to disclose them to your manager so that they can be properly evaluated, monitored, and managed. Managing any conflicts of interests is our way of demonstrating we are responsible and transparent about how we do business.

Be alert to situations, including the following common examples of potential conflicts of interest:

Personal relationships

It is possible that you may find yourself working with a relative or someone you have a close personal relationship with who works for a customer, business partner, competitor, or even at itp. Since there are many scenarios that could create a potential conflict, you should disclose your situation to your manager to determine if any precautions need to be taken.

Outside employment

To ensure that there are no potential conflicts, you always need to disclose and discuss outside employment with your manager. Working for a competitor, business partner, or customer may raise conflicts. Any approved side or personal business should not compete with itp.

Personal financial interest

A conflict can occur if you have a significant ownership, or other financial interest, in a competitor, business partner, or customer. Make sure you know what's permitted by our policies and seek help with any questions.

Civic activities

Unless Company management specifically asks you to do so, you shouldn't accept a seat on the board of directors or advisory board of any of our competitors, business partners, or customers, especially if your current job gives you the ability to influence our relationship with them.

Do the right thing

- Avoid conflict of interest situations whenever possible.
- Always make business decisions in the best interest of itp.
- Think ahead and pro-actively address situations that may put your interests, or those of a family member, in potential conflict with itp.
- Discuss with your manager full details of any situation that could be perceived as a potential conflict of interest.

Anti-bribery and corruption

All forms of bribery and other corrupt practices are unacceptable, regardless of local customs. itp is committed to complying with all applicable anti-bribery and corruption laws.

We have a zero-tolerance approach to bribes and fraudulent behaviour. This applies equally to any person or firm who represents our Company or with whom we do business.

It is especially important that we exercise due diligence and monitor third parties acting on our behalf. We screen business partners who work on our behalf, particularly when dealing in countries with high corruption rates, and in any situations where 'red flags' would indicate further screening is needed before retaining the business partner. Our business partners must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions.

Key definitions

- Bribery means offering, promising, giving or accepting any financial, or other, advantage, to induce the recipient (or any other person) to act improperly in the performance of their functions, to reward them for acting improperly, or otherwise to cause to the recipient to act improperly through accepting the advantage.
- Corruption is the abuse of entrusted power or position for private gain.
- Facilitation payments made with the purpose of expediting or facilitating the performance by a public official of routine bureaucratic transactions. Be extra careful, as these payments can be dressed up as administration fees, commission payments or local taxes.
- Government officials is a very broad term and can include university staff, civil servants (for example, in defence departments) and individuals working for public bodies that provide research funding.

Do the right thing

- Understand that itp's zero-tolerance approach to bribery and corruption applies to your role at itp.
- Never give anything of value inconsistent with local laws and regulations to any government official or other third party. If you are not sure of the local laws, the safest course of action is to not give anything of value.
- Only offer and accepts gifts and hospitality that comply with our policies, and always complete the Gifts and Hospitality Register when required.



Global trade

itp has global operations that support a worldwide customer base. To maintain and grow our global standing, we must comply with all applicable laws that govern the import and export of our goods, software, services and technology (collectively 'products'). Failure to comply with applicable laws, could have serious consequences for you and long-lasting effects on itp's business. If you are involved in import and export activities (including sales), you are responsible for performing due diligence and checking for 'red flags' to ensure itp complies with all applicable trade compliance requirements.

Do the right thing

- Ensure that any information provided for customs purposes (such as product descriptions, weights, values, commodity codes and country of origin) is accurate.
- Obtain all necessary import/export authorisations applicable to import and export of products.
- Perform due diligence to ensure itp does not do business with persons or entities that are:
 - restricted parties as identified in applicable sanctions lists,
 - engaged in prohibited activities such as the development of weapons of mass destruction,
 - in a restricted destination according to itp's Group Sanctions and Restricted Destinations Policy as set out below,
 - intended to unlawfully divert products to a restricted destination or restricted party, or for prohibited activities.
- Record complete and accurate information regarding every import and export.



Restricted destinations

It is itp's policy not to export to / import from, or do business in or with, assign, transfer or sub-license to, permit access from, or transport via, the countries and regions listed below, either directly or indirectly, due to the current legal, business, and reputational risks associated with such countries and regions:

- Cuba.
- Iran.
- North Korea
- the Republic of South Sudan.
- the Republic of Sudan.
- Syria.
- Russia.
- Any region of Ukraine that is annexed or occupied by Russia.
- Afghanistan.
- Venezuela.
- Belarus.
- Myanmar.

Without prejudice to or limitation of the above, EU export laws prohibit the direct or indirect sale, export, re-export, assignment, transfer, or sub-licensing to:

(i) Russia or for use in Russia any goods supplied by itp that fall under the scope of Article 12g of Council Regulation (EU) No. 833/2014 as amended from time to time; and

(ii) Belarus or for use in Belarus any goods supplied by itp that fall under the scope of Article 8g of Council Regulation (EU) No. 765/2006, as amended from time to time.

Without prejudice to or limitation of the above, all suppliers of goods or services to itp must comply with Council Regulation (EU) No 833/2014, the Russia (Sanctions) (EU Exit) Regulations 2019, and all future amendments thereto.

We reserve the right to amend this list from time to time.



Competition and antitrust

We believe in healthy and fair competition. itp does not condone or engage in any activity that may prevent, restrict or distort competition. We will never seek to limit competition or try to gain competitive advantages through unethical or illegal business practices.

Competition laws are complex and require case by case assessment, such as consideration of relevant market share and relative market position and the relationship between parties. itp uses external specialist competition and antitrust counsel to support its compliance requirements and provide specialist advice when needed in this area.

The following activities are examples of red flags, which must be avoided, and, if detected, immediately reported to the Group Legal:

- Collusion or ‘cartels’ – when competitors secretly communicate, share or exchange commercially sensitive information and agree how they will compete.
- Bid-rigging – when competitors or service providers manipulate bidding so that fair competition is limited or not possible.
- Dictating or restricting a distributor or reseller’s ability to determine its own sale prices.
- ‘Abusing’ a dominant market position.

Do the right thing

- Do not enter into any anti-competitive agreements or discuss market share, including setting prices or dividing up customers, suppliers, or market sectors with a competitor.
- If you consider another party is acting in a way that is contrary to competition or antitrust laws, leave the meeting immediately and ensure your objection and absence is formally acknowledged and inform your usual contact in Group Legal as soon as possible.
- Do not discuss current or prospective tenders or contracts with competitors (including how much itp has, or intends to, bid).

Anti-money laundering

We are committed to conducting business in a way that prevents money laundering and complying with all anti-money laundering, financial crimes, and anti-terrorism laws wherever we operate.

Money laundering is a global problem with far-reaching and serious consequences. It is defined as the process of moving funds made from illegal activities through a legal business to make them appear legitimate. Involvement in such activities undermines our integrity, damages our reputation, and can expose our Company and the individuals involved to severe sanctions. This includes both the process of overt money laundering and the failure of otherwise legitimate business to identify and report suspicions of money laundering.

Do the right thing

- Report any suspicious financial transactions and activities to your local finance team.
- To avoid ‘tipping off’, do not share with any other persons that a suspicion has been formed, or that a suspicious activity report has been lodged.

Anti-facilitation of tax evasion

We are committed to conducting business in an honest and ethical manner. We take a zero-tolerance approach to tax evasion and the facilitation of tax evasion. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems to counter tax evasion facilitation. We take our legal responsibilities very seriously. We will uphold all laws relevant to countering tax evasion in all the jurisdictions in which we operate, including the Criminal Finances Act 2017.

Do the right thing

- Do not turn a blind eye or ignore anything that you suspect might be tax evasion or facilitation of tax evasion.
- Do keep complete and accurate records.
- Do complete all tax declarations and documentation accurately and in line with local legal requirements.
- Do watch out for diversion of funds which could potentially have a tax evasion motive.

Human rights

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights, including an absolute opposition to slavery, human trafficking, child labour and any other human rights abuses. We do this through a risk-based assessment of our supply chain. Each of us can help support efforts to eliminate abuses such as child labour, slavery, human trafficking, and forced labour.

Do the right thing

- Report any suspicion or evidence of human rights abuses in our operations, or in the operations of our suppliers, to the local purchasing manager and Sustainability Team.
- Respect for human dignity begins with our daily interactions with one another, our business partners, and our customers. It includes promoting diversity and doing our part to protect the rights and dignity of everyone with whom we do business.

Conflict minerals

Revenue from conflict minerals has been linked to funding for groups engaged in extreme violence and human rights atrocities. We work closely with suppliers of raw materials, parts, and components and communicate our expectation that suppliers and vendors will comply with all applicable laws, including laws aimed at providing conflict-free minerals.

Supply chain

itp engages with approved supply partners who are committed to conduct business in line with our core values, and to meet our business needs and technical requirements. Do your part to hold our business partners to our high standards and ensure they operate in an environmentally and socially responsible way, in compliance with the law, and in a way that's consistent with our Code, our policies, and our values.

Complying with laws and regulations

itp is committed to complying with all laws, rules, and regulations that apply to our business. It is impossible to anticipate every question you may have or situation you might face so, in addition to the Code, itp also has other resources to help. These additional resources are listed throughout the Code. As always, we rely on you to use good judgement and to seek help when you need it. We operate in multiple countries, so it's important to be aware of different laws and customs that may apply. While we respect the norms of our customers, business partners, and co-workers throughout the world, all employees must, at a minimum, comply with the standards and principles in this Code. If you have any questions about any provisions of our Code conflicting with a local law or requirement, you should seek further guidance from your local legal team. Where necessary, itp uses external legal counsel to support its compliance requirements and provide specialist advice.

Who must follow this Code

All employees of itp, including executives and temporary employees, plus non-executive directors are required to read, understand, and follow our Code. Consultants, contractors, agents, distributors, channel partners, and suppliers ('business partners') who serve as an extension of itp are also expected to follow our Code, as well as any applicable contractual provisions. If you supervise our business partners, you are responsible for communicating our standards and ensuring that they are understood. If a business partner fails to meet our ethics and compliance expectations, or their related contractual obligations, itp reserves the right to terminate their contract or refuse to do further business with them.

Accountability

Violating our Code, our policies, or the law, or encouraging others to do so, exposes our Company to liability and puts our reputation at risk. Anyone who violates our Code will be subject to disciplinary action, which may include termination of their employment. You should also understand that violations of laws or regulations may also result in personal legal proceedings and penalties including, in some circumstances, personal criminal prosecution. If you see or suspect a violation, please report it.

Responsibilities

Every employee has a responsibility to:

- Act in a professional, honest, and ethical manner.
- Read the Code and any Company policies applicable to their role.
- Complete all required training and keep up to date on current standards and expectations.
- Report concerns about possible violations of our Code, our policies, or the law.
- Cooperate and tell the truth when responding to an investigation or audit, and never alter or destroy records.

Additional responsibilities of managers

Managers have the additional responsibility to:

- Lead by example and demonstrate high standards of ethical business conduct.
- Help create an inclusive environment that values mutual respect, open communication, and promotes involvement.
- Be a resource for others. Communicate often with employees and business partners about the Code and other policies.
- Respond quickly and effectively. When a concern is raised, treat it seriously and with due respect for everyone involved.
- Be aware of the limits of your authority and don't take actions that exceed this. If you are unsure of the appropriate action, discuss this with your manager.



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