



IGEL[®] Velocity Partner Program
Code of Conduct

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Our Expectations

IGEL expects not only its employees but also all of its business partners, including suppliers, distributors, resellers and alliances, to comply with all applicable laws and regulations. IGEL furthermore expects every ***IGEL Registered Reseller*** under the ***IGEL Velocity Partner Program*** (“Program”), to comply with this Code of Conduct and its acceptance is a prerequisite for joining the Program. Non-compliance with this Code of Conduct may result in a termination of Program membership. In line with this, IGEL Registered Reseller status requires acceptance of this Code of Conduct which means that each IGEL Registered Reseller accepts to be included in the term “WE” in the following paragraphs.

Respecting All

WE are firmly committed to treat everyone with integrity and respect. WE are respectful, fair, impartial, and honest to each other and to third parties, including our business partners and their as well as our own employees.

Supporting human rights

WE strive to protect human rights and worker rights wherever we do business. Working with high quality suppliers and other partners that commit to operate under ethical standards equivalent to our own, WE do not tolerate the use of child or forced labor or trafficking in human beings in our business units or with our contract partners.

Preventing harassment

WE do not tolerate harassment or any form of violence in the workplace. Harassment may take many forms and can depend on the circumstances, but results in an offensive, intimidating, or uncomfortable working situation. Any type of harassment is a violation of our values and policies and will not be tolerated.

Valuing diversity and non-discrimination

WE value and derive significant benefit from our diverse skills, experiences, and backgrounds. Any sort of discrimination on basis of gender, race, color, national origin, religion, sexual orientation, age, any form of physical or mental ability or any other basis protected by law will not be accepted.

Thinking of our environment

Efficient use of resources is an important contribution to sustainable development. The protection of the environment as a basis of life for future generations are important to us. In our business operations and dealings, WE are committed to minimizing negative effects on the environment and to reducing our carbon footprint by reducing travel activity, energy, paper, water, waste, and consumption wherever possible.

Health & Safety

The health and safety of every of our employees is a top priority. WE are therefore committed to providing our employees with a safe workplace and minimizing the potential of negative impacts on health and the environment.

Avoiding conflicts of interest

WE avoid any current or potential conflicts of interest and our business decisions are based on business objectives. They must not be in conflict with other interests, either personally or commercially impacted, which may arise, for example, when employees, family members or friends are chosen as potential business partners, and thus professional objectivity may be harmed.

Preventing Bribery & Corruption

WE strictly commit to complying with all applicable laws and regulations related to preventing bribery and corruption and WE strive to always remain transparent in the way it conducts its business. WE are convinced that any form of corruption, bribery as well as any other inadequate influence on business activities has a negative impact to competition, and severely destroys trust with customers, business partners and the public. WE never consider, accept or grant any kind of acceleration favors and bribes when interacting with a third party, whether they are public officials or not – not even in those instances where (as in some jurisdictions) bribes or the granting of other benefits that do not exceed a certain threshold are not considered a criminal offence or even an acceptable approach to expediting low-level business decisions.

Protecting Sensitive Business Information

WE make sure that each of our employees who has access to confidential or in any other way sensitive data and information about us or our business partners, is not permitted to use or share that information for any other purpose except to conduct business, particularly not for stock trading purposes. Sensitive information may be in written, electronic, or verbal form and may include non-public trade and business data, trade secrets, project information, all kind of technical know-how on products and software and any kind of non-public information. WE consider as sensitive all non-public information about the Company or about companies with which we do business, as well as any information the confidentiality or sensitivity of which WE cannot determine.

Protecting Privacy

WE respect the privacy of all individuals, including our employees, customers, business partners, business leads and other parties regardless of data origin. WE ensure that personal data is kept confidential at all times and that all personal data is treated with the highest sensitivity and in accordance with applicable law. This includes that any collection, processing, maintenance, or use of personal data will be done only to the extent necessary for the business or employment purpose, that data will be kept only as long as necessary and dedicated access & visibility limitation measures (need-to-know principle) are established, depending on the type of personal data and associated risk.

Protecting Intellectual Property

WE respect all intellectual property (IP) and related confidential information shared between us and our business partners. WE always treat such assets with due care and do not share the IP and related confidential information of a third party with any unauthorized third party. WE strictly adhere to any applicable license provisions or similar restrictions and guidelines. In working with IP assets of others, we always respect the scope of applicable licenses, laws and regulations.

Free and Fair Competition

WE are committed to the principles of free competition as laid down in antitrust law which is designed to prohibit practices that restrict free trade and competition between companies. We take a firm stand against any sort of agreement, formal or informal, written or verbal, or any concerted practice with any business partner or competitor, which, directly or indirectly, in isolation or in combination with other factors under the control of the parties, could prohibit, distort or limit competition in any way. WE particularly abstain from, avoid, prevent and condemn all of the following:

- business partner or competitor agreements on pricing, offerings, customer allocations, production and sales volumes, or the geographic segmentation of markets, or the submission of fictitious bids,
- restrictions on the ability of business partners to determine their sales prices or supplier relationships with other business partners as well as comprehensive exclusivity obligations,
- unequal treatment of business partners without objective reason or the enforcement of unreasonable conditions.

Compliance with Export Control Rules

WE are committed to ensuring compliance with all applicable export control laws and regulations. WE support the efforts of the international community to prevent the production and proliferation of chemical, biological and nuclear weapons and to combat international terrorism and WE undertake strong efforts in obtaining available information on the integrity of our business partners or other third parties to conduct business only with persons and companies that conduct legitimate business with funds from legitimate sources. Given the fact that the cross-border exchange of goods, services, technology and software is subject to regulations set up within the framework of United Nations resolutions as well as through EU decisions imposing sanctions against certain countries and/or persons, WE engage in respecting and abiding by all export controls and/or restrictions, including the requirement of government notification or approval of exports and re-exports of goods, technology and software to certain countries, organizations, and persons and for certain end uses. WE are not transacting with entities or individuals on international sanctions or embargo lists.