

Code of Conduct

ICS Schneider Messtechnik GmbH

1. Introduction

ICS Schneider Messtechnik GmbH is an ISO 9001:2015 certified company based in Germany, specialized in the distribution of industrial measurement and calibration technology. This Code of Conduct defines the fundamental values, principles, and standards of behavior that apply to the management and all employees. It serves as a binding framework for responsible, lawful, and ethical conduct — both in daily work and in dealings with business partners, customers, and public authorities. ICS Schneider Messtechnik GmbH is committed to integrity, transparency, quality, and sustainability. These values guide all business decisions and interactions. The Code is based on applicable German, European, and — where relevant — U.S. legal requirements. It is reviewed regularly and updated as needed.

2. Legal Compliance

All employees and executives are required to comply with applicable laws, regulations, and internal company policies. This includes, in particular, German law (StGB, OWiG, HGB, ArbSchG, UWG), European law (e.g. GDPR, EU anti-corruption directives, environmental legislation), and, as a precaution, U.S. law (FCPA, EAR). Each individual bears personal responsibility for lawful and ethical conduct. Violations may result in disciplinary, civil, or criminal consequences.

3. Integrity and Ethical Conduct

ICS Schneider Messtechnik GmbH stands for fairness, honesty, and respect in all business activities. Business decisions must never be influenced by improper advantages or personal interests. Any form of bribery or offering/accepting undue advantages is prohibited. Gifts and invitations must remain within customary social limits and must not influence business decisions. Personal or family relationships with business partners must be disclosed if they could affect professional judgment. Honesty, reliability, and fairness guide all interactions with customers, suppliers, colleagues, and authorities.

4. Relations with Business Partners

ICS Schneider Messtechnik GmbH maintains business relationships based on fairness, transparency, and trust. There is no separate supplier code of conduct; cooperation is governed by good faith and compliance with applicable law. The company does not engage in business with partners who violate legal or ethical standards. Partner and supplier selection is based solely on objective criteria such as quality, reliability, and economic performance.

5. Data Protection and Information Security

The protection of personal data and confidential information is a top priority for ICS Schneider Messtechnik GmbH. The company strictly adheres to the General Data Protection Regulation

(GDPR) and its published privacy policy at www.ics-schneider.de/datenschutz. Personal data is processed only for legitimate purposes and in compliance with the principles of lawfulness, transparency, and data minimization. Trade and business secrets must be kept confidential and safeguarded against unauthorized access.

6. Human Rights, Working Conditions, and Environment

ICS Schneider Messtechnik GmbH respects human rights and is committed to fair and safe working conditions. No discrimination, forced labor, or child labor will be tolerated. Equality, diversity, and mutual respect are core principles of the corporate culture. Environmental responsibility forms part of daily operations: efficient use of energy and resources, waste reduction, and compliance with environmental regulations.

7. Whistleblowing and Reporting Misconduct

ICS Schneider Messtechnik GmbH encourages open communication and transparency. Employees are encouraged to report concerns or possible violations of this Code or applicable laws directly and confidentially to the management. The identity of whistleblowers will be treated confidentially. Whistleblowers shall not suffer any retaliation or disadvantage as a result of reporting in good faith. Malicious or false reporting is not tolerated.

8. Responsibility, Monitoring, and Sanctions

The management bears overall responsibility for implementing, communicating, and enforcing this Code of Conduct. It reports periodically on compliance effectiveness and any identified incidents. Violations may lead to disciplinary action, civil liability, or criminal prosecution. The company assesses each case individually, observing proportionality and legal requirements. Compliance with this Code is part of the company's ethical culture and subject to continuous monitoring.

9. Communication and Training

The Code of Conduct is made available to all employees and communicated through internal channels. New employees are informed about its contents and are expected to adhere to them. Key topics — such as data protection, anti-corruption, and occupational safety — are discussed regularly during internal meetings. The aim is to strengthen awareness and commitment to ethical and lawful behavior.

10. Review and Updates

The Code of Conduct is reviewed annually by management and updated as necessary to reflect changes in legislation or regulatory requirements. All amendments are communicated appropriately within the organization.

11. Final Provisions

This Code of Conduct is an integral part of the corporate policies of ICS Schneider Messtechnik GmbH. It complements applicable legal and contractual provisions, including the Imprint, Privacy Policy, and General Terms and Conditions (AGB). ICS Schneider Messtechnik GmbH stands for responsible, compliant, and ethical business conduct — in the interest of its customers, employees, partners, and society.

As of October 2025