

IMB - Industriemontagen Berger GmbH

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Compliance Policy

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1. Introduction	Industriemontagen Berger GmbH is committed to acting in a lawful and responsible manner. This framework defines the minimum standards that are binding for all members of management, employees, installers, temporary workers, and subcontractors. The goal is to manage risks appropriately, protect our reputation, and ensure a safe working environment.	
2. Responsibilities and Roles	Management: Overall responsibility, approval of all policies, leading by example Compliance Officer: Maintaining guidelines, providing advice, preparing annual reports, handling compliance reports Project Manager/Site Manager/Office: On-site training, first level of escalation, conducting occupational safety meetings All Employees: Compliance with all rules, immediate reporting of violations	
3. Code of Conduct	Compliance with the Law: We comply with all laws and contractual obligations	Example: A project manager insists on obtaining the necessary permits for a construction site, even though the client is pushing for work to begin immediately in order to save time.
	Fair competition: We conduct our business without engaging in price-fixing or anti-competitive practices.	Example: Project managers do not share cost estimate data with competitors.

	Anti-discrimination: No distinction based on gender, origin, religion, age, etc.	Example: When putting together a team and selecting our employees, qualifications are the sole determining factor.
	Environmental Protection: Resources are used sparingly and waste is disposed of properly.	Example: Every employee makes sure to use materials as completely as possible and properly sorts any waste generated.
	Protection of Assets: Operating resources and information are handled with care.	Example: Valuable equipment such as laptops, tools, or measuring devices is securely stored at the end of the workday - on construction sites, for example, in locked containers.
	Duty to report: Any suspicions must be reported immediately.	Example: An employee reports to the compliance officer that a supplier is attempting to influence decisions through personal gifts or favors – this applies to both the construction site and the office
4. Occupational Safety and Environmental Policy	4.1 Objective Accidents, occupational illnesses, and environmental damage must be prevented through proactive measures. Safety takes precedence over deadlines and costs. 4.2 Basic Principles • Zero-Accident Goal: Every hazard is assessed before work begins. • Safety-Related Work Stoppages: Every person is required to immediately stop unsafe work. • Personal Protective Equipment (PPE): Helmets, safety glasses, gloves, and safety shoes are mandatory on all construction sites. 4.3 Responsibilities • Project Manager / Site Manager: Conducts a daily visual inspection of the construction site and documents any deficiencies. • Employees: Immediately report unsafe situations to the team leader. • Occupational Safety Officer: Reviews implementation every six months using checklists. 4.4 Special Environmental Protection • Waste is sorted: metal / plastic / hazardous waste. • Hazardous materials are stored properly (special cabinets / drip pans).	

5. Anti-Corruption and Gifts Policy

5.1 Principle

We do not tolerate any form of corruption, bribery, or accepting bribes - "zero tolerance."

5.2 Permissible and impermissible benefits

Benefit	< 50 €	50–100 €	> 100 €
Promotional items (with company logo)	permitted	Approval by management	prohibited
Entertainment (business meals)	permitted	Approval by management	prohibited
Cash, gift cards, travel expenses	prohibited	prohibited	prohibited

5.3 Procedure and Documentation

- **Gift Register:** Any benefit received or granted with a value of € 50 or more must be reported to the Compliance Officer and recorded in the Gift Register within 5 days.
- **Approval Process:** Benefits valued at more than € 50 may only be accepted or granted with the approval of management.

Example: A supplier wishes to give a senior technician two VIP tickets to a soccer game (value €120). The senior technician politely declines the offer and reports the incident to management / the compliance officer.

6. Conflict of Interest Policy

6.1 Definition

A conflict of interest exists when personal or family interests could influence the objective performance of official duties.

6.2 Disclosure Requirement

- Employees must immediately report potential conflicts in writing to the project manager or managing director.
- This applies in particular to secondary employment, holdings of more than 5% in supplier or competitor companies, or in cases involving second-degree relatives (siblings, grandparents, grandchildren) and spouses within the supply chain (from supplier to customer).

6.3 Handling Conflicts

- **Assessment:** Management and the Compliance Officer jointly decide on measures, e.g., excluding the affected person from decision-making.

Example: The spouse of an office employee offers assembly materials through her company. The employee reports the situation, and management decides that he will not be involved in the selection of suppliers.

7. Data Protection and Information Security Policy	7.1 Scope This policy applies to all personal data of employees, customers, and suppliers, as well as to confidential technical documents. 7.2 Fundamental Principles under the GDPR • Data minimization: Only data necessary for the intended purpose is collected. • Purpose limitation: Use exclusively for the original purpose. • Integrity and confidentiality: Protection against unauthorized access. 7.3 Technical and organizational measures • Passwords must be created as follows: ○ Lowercase letters, UPPERCASE letters, numbers, special characters – 3 out of 4 criteria must be met ○ Minimum password length: 12 characters ○ The previous 20 passwords may not be reused ○ Maximum password age: 365 days – The password expires after 365 days ○ Minimum password age: 1 day – passwords may only be changed once per day • Laptops and smartphones are password-protected. • Do not use USB drives or external devices without consulting the IT department, as they may pose malware risks • Emails with confidential attachments may only be sent and received via your personal company email address • Photos of construction sites may only be taken after obtaining permission from the facility operator. Private use, e.g., for social media posts, is prohibited • Further provisions in accordance with the “Guidelines on the Private Use of Company Property” 7.4 Retention and Deletion Documents are retained in accordance with the retention periods specified in the GDPR. Example: A technician takes photos of the internal components of a customer’s system. The photos are uploaded to the company server and archived upon completion of the project; private storage is prohibited.
8. Whistleblower Policy	Reporting Channels: Email: compliance@imb-berger.at Compliance Officer: Ms. Martina Reinhardt
9. Sanctions and Consequences	Violations of this policy will be thoroughly investigated and addressed accordingly. Possible measures: • Warning or formal notice • Transfer • Termination • Compensation for damages • Criminal charges, where applicable

	For business partners: • Warning • Contractual penalty • Termination of contract • Exclusion from contracts Example: An employee repeatedly accepts improper gifts from a supplier → Formal warning or termination A site manager awards contracts without following internal approval processes → Disciplinary measures A subcontractor violates safety regulations on the construction site → Warning, contractual penalty, or exclusion Manipulation of invoices or expense reports → Termination and, if applicable, criminal charges All measures are taken in accordance with the principles of proportionality and applicable legal provisions.
10. Handling False Reports	Reports must be submitted to the best of one's knowledge and belief. Whistleblowers are protected. Well-intentioned false reports will not result in any consequences! Deliberately false reports will be sanctioned. Examples: An employee reports a suspected case of corruption that is later found to be unfounded → no disciplinary consequences A report is made due to a misunderstanding → no disciplinary consequences An employee deliberately makes a false accusation against a colleague for personal reasons → disciplinary action Repeated unfounded reports without sufficient basis → investigation and, if necessary, sanctions
11. Suppliers and Subcontractors	Suppliers and subcontractors must comply with applicable rules. Expectations: • Compliance with laws • No corruption • Compliance with safety regulations • Data protection Measures: • Contractual obligation • Review in cases of increased risk Example: A supplier offers an employee benefits in exchange for preferential contract awards → Business relationship is reviewed or terminated A subcontractor fails to comply with safety regulations on the construction site → Immediate measures and, if necessary, exclusion

	A partner cannot provide sufficient evidence of compliance with standards → No contract will be awarded Data protection violations by an external service provider → Contractual measures and reporting
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