



IC-Fluid Power, Inc.
Code of Ethics
IC-CEP.06.12.2026v1.0

Revision History

Changes	Role	Approving Manager	Date
Initial Publication	President	Bernd Hunger	06.12.2026
Next Review	President	Bernd Hunger	06.12.2027

PART 1: INTRODUCTION

At IC-Fluid Power, our success is built on more than the quality of the products we distribute. It is built on the trust we earn from our customers, suppliers, manufacturers, and each another.

PART 2: MISSION STATEMENT

Our mission is to solve unique hydraulic challenges by connecting North America to European technologies, spanning both niche and commodity components.

PART 3: VALUES

Our values define the culture at IC-Fluid Power. The reputation we've built relies on doing business the correct and ethical way. The following values define how we operate each day at IC-Fluid Power:

- **Integrity:** It is important that we are transparent in work that we do. Whether we're quoting a lead time, recommending a component, or representing the manufacturers we partner with, we act with honesty and hold ourselves accountable to the highest ethical standards.
- **Safety:** We prioritize the health and well-being of each person at our company. That means keeping our employees properly trained and up to date on safety procedures. We extend the same care to our customers through rigorously tested products and support from our team. Our work environment being safe and proactive is non-negotiable.
- **Accountability:** We take ownership of our actions and outcomes. As a small company, every employee represents IC-Fluid Power directly. We honor and take pride in our commitments. If something does not go as planned, we intend to make it right for all parties involved.
- **Environmentally Forward:** As a resource and energy intensive field, we recognize that the fluid power industry has a responsibility to reduce its impact on the planet. We work to minimize our carbon footprint where we can and continuously search for ways to do better for the environment. Our environmental policy details our progress and goals for cleaner operations and sourcing.
- **Responsible Sourcing:** As a global distribution partner, we have an ethical responsibility to source responsibly. We hold our manufacturers and suppliers to high standards for fair labor, human rights, and environmental stewardship. We choose to do business with partners who share in our values and mission. Our Supplier's Code of Ethics policy details our expectations of all those with which we do business.
- **Customer Commitment:** Our tagline, "Expect More from Your Hydraulics," defines how we serve our customers. We focus on high-quality, reliable components, and business decisions that put our customers' best interests first.

PART 4: VISION STATEMENT

Our vision is to be a trusted link between international hydraulic components and the industries that rely on them while serving as a central source of expertise for fluid power professionals.

PART 5: ETHICS POLICY STATEMENT

IC-Fluid Power is committed to conducting all business dealings and operations with integrity, transparency, and respect with full compliance regarding all applicable laws and regulations.

PART 6: PURPOSE

This policy defines the ethical standards that govern IC-Fluid Power's business operations and the conduct that is expected of those who represent the company.

PART 7: APPLICABILITY

This policy applies to all IC-Fluid Power employees, contractors, and representatives.

PART 8: ROLES

IC-Fluid Power's current leadership, Bernd Hunger (President), will oversee the managing, reviewing, and updating of this document annually.

PART 9: GENERAL ETHICS POLICIES

The following outlines IC-Fluid Power's policies that support an ethical and responsible workplace:

1. GENERAL COMPLIANCE

IC-Fluid Power adheres to all legal requirements in the areas where we do business. We will act honestly, fairly, and professionally in all business dealings.

2. MUTUAL RESPECT

IC-Fluid Power expects every employee, supervisor, contractor, and representative to treat colleagues, customers, suppliers, and visitors with professionalism and respect.

3. EQUAL TREATMENT

IC-Fluid Power does not discriminate against applicants or employees on the basis of any protected characteristic.

4. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

IC-Fluid Power does not allow bribery, kickbacks, or other corrupt business practices. No employee may offer, give, ask for, or accept anything of value that could improperly influence a business decision. Normal business courtesies are permitted when they are not intended to influence a decision. Anything more (defined as a Substantial Gift or Entertainment) must be reported to the President before it is given or accepted. Cash or gift cards may never be given or accepted in any amount.

5. FAIR COMPETITION/ANTI-TRUST POLICY

IC-Fluid Power commits to strict compliance with all anti-trust legislation. We compete on the merits of its products and services and prohibit price-fixing, bid-rigging, market allocation, and other anti-competitive practices.

6. USE OF INFORMATION

The following outlines the expectations for all company property, confidential information, trade secrets, and more.

1. **Ownership of company information and records:** We treat all records, data, and materials relating to IC-Fluid Power's business as company property, regardless of who created them. Employees must return company information and may not remove or copy it for personal use or outside purposes without authorization.
2. **Trade secrets:** We treat all records, data, and materials relating to IC-Fluid Power's business as company property, regardless of who created them. Employees must return company information and may not remove or copy it for personal use or outside purposes without authorization.

Trade secrets are confidential business information that gives IC-Fluid Power a competitive advantage and that the company takes reasonable steps to protect. Under the Ohio Uniform Trade Secrets Act (Ohio Revised Code Chapter 1333), the company's trade secrets include customer and vendor lists, the identity of individual customers and vendors, engineering drawings, technical specifications, design calculations, supplier agreements, pricing and bid methodologies, manufacturing processes, and product designs and technical know-how developed by the company. Trade secrets are also confidential information and company property, with additional legal protection under Ohio law.

3. **Confidential information:** Employees must not use confidential information for personal benefit or for the benefit of others. Confidential information includes non-public business, pricing, technical, and customer information and must only be accessed or shared for legitimate business purposes.

7. CONFLICT OF INTEREST POLICY

IC-Fluid Power expects employees to recognize and avoid conflicts of interest. Employees with influence over purchases, contracts, or leases must promptly disclose any actual or potential conflict so it can be reviewed and managed appropriately. Company property may only be transferred through authorized business transactions. Any improper transfer of property or disclosure of information, even without personal gain, is unacceptable conduct and may result in disciplinary action, up to and including termination.

8. INFORMATION SECURITY AND DATA PRIVACY POLICY

We will protect the confidentiality and privacy of company, customer, and supplier information. Sensitive information will only be accessed, used, or shared by authorized individuals for legitimate business purposes.

9. FRAUD, MONEY LAUNDERING, AND ACCURATE RECORDKEEPING POLICY

We expect all business transactions and records to be truthful, accurate, and complete. Fraud, money laundering, and any attempt to alter or hide business activity are strictly prohibited.

PART 10: PROBLEM RESOLUTION PROCEDURES

IC-Fluid Power supports an open workplace where employees can raise problems, complaints, suggestions, and questions without fear of retaliation. All employees, supervisors, and managers are expected to treat one another with mutual respect and honesty, and concerns will be handled as confidentially as possible, consistent with a thorough review.

1. Employees who are aware of suspected ethical misconduct are encouraged to report it promptly by presenting the problem to their immediate supervisor. If the supervisor is unavailable, involved in the matter, or the employee believes it would be inappropriate to report to that person, the employee may present the problem directly to the President.

If the President is unavailable, conflicted, or is the subject of the report, oversight of the matter will pass to the IC-Fluid Power legal team or designated attorney contact using the IC-Fluid Power Confidential Reporting Contacts located on the Z drive at Company > Shared > Employee Resources.

2. As soon as practical, the supervisor will respond to the reported concern during discussion or after consulting with appropriate personnel. All complaints will be reviewed as thoroughly and discreetly as possible, though full confidentiality cannot be guaranteed, as certain individuals may need to be interviewed as part of the investigation. All concerns will be addressed with discretion and sensitivity, and information will be shared only with those who require it to resolve the matter.
3. If the employee believes the matter has not been resolved satisfactorily, the employee may present the problem to the President in writing. Reports may also be made directly to the President at any time when the nature of the concern warrants escalation.
4. The President reviews the problem, informs the employee of the decision, and forwards a copy to the employee's file. The President has full authority to make any adjustments deemed appropriate. Not every problem can be resolved to everyone's satisfaction, but open discussion builds the confidence necessary for an efficient and harmonious workplace.

ACKNOWLEDGEMENT for RECEIPT
OF THE IC-FLUID POWER CODE OF ETHICS POLICY

By signing below, I acknowledge that I have received, read, and understood the IC-Fluid Power Code of Ethics Policy. I agree to comply with its provisions and understand that it is my responsibility to familiarize myself with its contents and to seek clarification from my supervisor or the President if any portion is unclear.

I understand that this policy supports a safe, respectful, and professional workplace, and that violations may result in disciplinary action, up to and including termination of employment.

The materials, resources, and information contained in this collection are intended solely for IC-Fluid Power employees. This content is confidential and may not be shared, distributed, or reproduced outside of the company without prior written approval from management.

Employee Signature

Date

Employee Name (Printed)