Code of Conduct - IMO Group for Business Partners

This Code of Conduct defines IMO Group's understanding in terms of socially, ethically and ecologically responsible, sustainable corporate governance. We also require our business partners to observe and actively practice the principles of social, ethical and ecological behaviour set out in this Code of Conduct.

The following Code of Conduct therefore forms the basis of our business relationship and is an integral part of any collaboration. Our business partners consequently undertake to observe the principles and requirements of this Code of Conduct and to strive to oblige their business partners in the wider supply chain to comply with the same standards and regulations.

1. Corporate concept of IMO Group

IMO Group expects its business partners to consistently align their behaviour with the following principles and requirements:

Compliance with the law

The statutory provisions and regulations of the applicable legal system(s) must be complied with at all times.

Prohibition of corruption and bribery

IMO Group does not tolerate and strictly opposes any form of corruption or bribery. It is strictly prohibited to demand, accept, offer or grant unlawful payments and advantages from or to public officials and members of the public sector or decision-makers and employees in private companies, in any form whatsoever, with the aim of obtaining or granting advantages in business transactions as a result.

Invitations and gifts

No invitations or gifts may be accepted or granted that could create a conflict of interest or jeopardise personal integrity or independence. Invitations and gifts may not be accepted or granted in return for an unlawful advantage and must be appropriate, i.e. of minor value and an expression of generally recognised local business practice. Otherwise, invitations and gifts may not be granted and/or must be rejected.

Avoiding conflicts of interest

Decisions must be made exclusively on the basis of objective criteria and not based on personal interests. Any private, business or other conflicts of interest that could influence decision-making must be avoided from the outset.

Prevention of money laundering

The relevant legal obligations in place to prevent money laundering must be observed. Money laundering activities are strictly forbidden. Suspicious behaviour must be reported to the management and the relevant authorities.

Compliance with export control and customs regulations

National and international rules on trade, import and export control, capital and payment transactions, combating the financing of terrorism, as well as economic embargoes, sanctions and customs regulations must be complied with. The requirement for official authorisation must be checked and observed.

When selling, supplying, transferring or exporting goods or technologies as per Article 12g of Council Regulation (EU) No. 833/2014 and/or Article 8g of Council Regulation (EU) No. 765/2006 to a third country (non-EU state), with the exception of the United States of America, Japan, United Kingdom, South Korea, Australia, Canada, New Zealand, Norway, Switzerland, Iceland and Liechtenstein the re-exportation to Russia and/or Belarus and re-exportation for use in Russia and/or Belarus is strictly prohibited.

Furthermore, the use of confidential information in connection with or relating to such goods or technologies which are intended for sale, supply, transfer or export, directly or indirectly, to Russia or for use in Russia is prohibited as per Article 12ga of Council Regulation (EU) No. 833/2014.

Fair competition

Free and fair competition on the national and international markets must be respected, the relevant requirements and statutory regulations on competitive behaviour must be complied with and, in particular, no agreements or arrangements may be entered into that unlawfully restrict or exclude competition.

Data protection and confidentiality

IMO Group handles data responsibly; this applies both to its own corporate information and to confidential information of third parties.

IMO protects confidential information from unauthorised access by third parties, loss, misuse and manipulation.

When disclosing information, care must be taken to protect confidential information. Checks should be carried out to determine in particular but without limitation whether a confidentiality agreement exists or should be concluded.

Any collection, storage, processing and utilisation of personal data is only carried out in accordance with the applicable data protection regulations and data protection laws.

Intellectual property

Intellectual property rights must be respected. Technology and know how must be transferred in such a way that intellectual property rights and customer information are protected.

Treatment of employees

IMO Group provides fair working conditions. Compliance with basic labour rights in accordance with the applicable national statutory provisions must be secured.

In particular, IMO Group ensures that all employees are appropriately remunerated. The appropriate wage is at least the minimum wage stipulated by the applicable law and is otherwise determined by the law of the place of employment. Employees' statutory entitlements to minimum leave must be fulfilled and measures must be in place to ensure that the working time and health and safety regulations applicable under the law of the place of employment are observed.

The prohibition on disregarding the applicable obligations applies in particular but without limitation if this leads to the risk of accidents at work or work-related health hazards, e.g. due to obviously inadequate safety standards in the provision and maintenance of the work premises, the workplace and work equipment, the lack of suitable protective measures to prevent exposure to chemical, physical or biological substances, the lack of measures to prevent excessive physical and mental fatigue, in particular due to unsuitable work organisation with regard to working hours and rest breaks, or the inadequate training and instruction of employees.

IMO Group ensures equal opportunities and equal treatment for all employees.
The personal rights of every individual must be respected. Unequal treatment and discrimination in any form is not permitted unless justified by the requirements of the employment. Discrimination on the grounds of national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or ideology is prohibited. The same applies to any other unacceptable treatment of employees, such as psychological hardship, sexual or personal harassment, and degrading treatment. Unequal treatment also includes, in particular, the payment of unequal pay for work of equal value.

The freedom of association, under which employees are free to form or join trade unions, as well as the establishment, joining and membership of a trade union, may not be used as grounds for unjustified discrimination or retaliation. The right to organise freely and in accordance with the law of the place of employment, including the right to strike and collective bargaining, must be respected.

Prohibition of child and forced labour

IMO Group strictly rejects any kind of child, forced or slave labour as well as similar practices and other forms of domination or oppression, for example through extreme economic or sexual exploitation and degrading treatment, and also calls on its business partners to prohibit and refrain from such acts. The employment of children under the age at which compulsory schooling ends according to the law of the place of employment, and in any event the employment of children under the age of 15, is prohibited. The rights of young employees must be protected. Young people under the age of 18 may not be employed for work that is harmful to their health, safety and morals; special protective regulations must be observed.

Security forces must not be commissioned or used if their deployment involves cruel, inhuman or degrading treatment of persons or injury to life or limb, or if the freedom of association and union is impaired as a result.

Environmental and climate protection, preservation of natural resources

Protecting our environment and natural resources by acting in an environmentally sound way, minimising environmental pollution and continuously improving environmental protection measures form part of our corporate responsibility. All laws and regulations for the protection of the environment, people and energy must be complied with and sustainability aspects must be taken into account in our business activities and business decisions. We want to make an active contribution to reducing waste, water and energy consumption and cutting greenhouse gas emissions. Waste must be disposed of properly

Mercury shall be used in accordance with the prohibitions of the Minimata Convention of 10 October 2013 and persistent organic pollutants in accordance with the Stockholm Convention of 23 May 2001, as last amended (POPs Convention). The prohibition on the non-environmentally sound handling, collection, storage and disposal of waste in accordance with the regulations that apply in the

applicable legal system in accordance with the provisions of Art. 6 para. 1 lit. d (i), (ii) of the POPs Convention must be observed, as must the prohibition on the import and export of hazardous waste in accordance with the Basel Convention of 22 March 1989, as last amended.

The natural environment in the form of land, forests or bodies of water, the utilisation of which secures the livelihood of people, may not be unlawfully removed or forcibly cleared. Harmful changes to the soil, water and air pollution, harmful noise emissions or excessive water consumption that significantly impair the natural basis for the preservation and production of food, impair people's access to safe drinking water or sanitary facilities or damage a person's health must be avoided.

2. Cooperation in the supply chain with obligated companies under the German Act on Corporate Due Diligence in Supply Chains

The companies of IMO Group are not obligated companies under the German Act on Corporate Due Diligence in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG).

Nevertheless, IMO Group acknowledges the principles of the LkSG and, as a direct supplier in the supply chain, will cooperate with obligated companies under the LkSG (obligated companies) and, as far as appropriate, support obligated companies in fulfilling their due diligence obligations under the LkSG.

IMO Group will therefore, taking into account data protection, the protection of (competitively) sensitive data and confidentiality interests as well as the protection of other legitimate interests of IMO Group and its employees, provide appropriate (i) disclosures and information to obligated companies, (ii) carry out checks risk-based on itself and, as far as possible, on its suppliers, (iii) take preventive measures risk-based on itself and, as far as possible, on its suppliers and (iv) participate appropriately in the development of a joint remedial action plan with the obligated company, if and insofar as this is necessary to fulfil the due diligence obligations of obligated companies under the LkSG. However, this only applies to measures that fall within the sphere of responsibility and influence of IMO Group and its suppliers and that are actually possible for IMO Group and its suppliers. IMO Group expressly does not assume the duties and responsibilities of the obligated companies under the LkSG (principles of cooperation).

IMO Group's cooperation with obligated companies also requires that, in the event of a risk, obligated companies provide IMO Group with their policy statement on their human rights strategy, including their expectations on suppliers, in accordance with their risk analysis.
In addition, cooperation requires a specific written request of the obligated company with detailed justification of all circumstances of the individual case.

3. Cooperation in the supply chain with suppliers/business partners of IMO

With regard to supply chains, IMO Group expects its suppliers to identify risks within supply chains in accordance with the LkSG and to take appropriate measures. In the event of suspected violations and to safeguard supply chains with an elevated level of risk, the supplier will inform IMO Group in a timely manner about identified violations and risks, as well as the measures taken.

Suppliers to IMO Group undertake to cooperate with the IMO Group accordingly.

In the event of a proven violation of legal requirements for which a business partner is responsible, IMO Group reserves the right to terminate the business relationship, including all supply contracts, immediately after setting a reasonable deadline for remedial action, if necessary, and, where appropriate, to assert claims for damages. Further claims and/or rights remain unaffected.

IMO Group is entitled to carry out risk-based audits at suppliers during normal business hours after giving reasonable advance notice in order to review the compliance with this Code of Conduct, taking into account the principles of cooperation.

Consent

We hereby declare our agreement with the principles and requirements of this Code of Conduct, which we duly acknowledge.

Company: _____

Name: _____

Job title: _____

Signature: _____

Place, date: _____