



# CODE OF CONDUCT FOR

# SUPPLIERS OF THE IMO GROUP



Rev. 2 | March 2024  
for suppliers of the IMO Group

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### PREAMBLE

The IMO Group (referred to as IMO hereinafter) has grown since its beginnings in 1973 to become a leading global service provider in the electroplating industry. Compliance with the law as well as responsible and fair business practices have always been our guiding principle and part of the IMO values. The sustainability of our actions is a central component of our identity and our corporate strategy. Our business partners and suppliers make an essential contribution to our success. A shared understanding of what constitutes ethical and sustainable conduct is therefore an indispensable foundation.

The following Code of Conduct defines IMO's principles and requirements for our business partners and employees, suppliers and service providers. It is based on the Code of Conduct of the IMO Group and specifies in concrete terms the compliance and adherence we expect of our business partners. In the event that laws or other regulations stipulate more extensive provisions, those provisions take precedence over this Code of Conduct.

The following companies are associated with the IMO Group:

- IMO Ingo Müller Oberflächentechnik e. K.
- IMO Oberflächentechnik GmbH
- Müller Spot-Plating GmbH
- Müller Entwicklung und Service GmbH

### 1. PRINCIPLE OF STRICT LEGALITY AND PROHIBITION OF CORRUPTION

IMO adheres to the principle of strict legality for all actions, activities, contracts and other transactions at IMO. Compliance with the law includes, among other things, the payment of applicable taxes and customs duties; compliance with fair competition and anti-trust legislation; the strict prohibition of corruption and money laundering; obtaining all necessary official permits; adhering to the export control law; and respecting the legal rights of third parties. Accordingly, we expect our business partners to comply with all applicable national and international laws and regulations as well as with this Code of Conduct within the scope of their business interactions with IMO, and to urge third parties employed for the fulfilment of IMO contracts to comply with this Code of Conduct.

### 2. LEGALLY COMPLIANT CONDUCT

Compliance with the laws, corporate policies, basic ethical principles and international standards that are applicable to IMO and its activities is of the highest priority for the activities of our suppliers. Our suppliers obey all national and international trade and commerce regulations, laws and provisions and act responsibly. This includes in particular the ESG standards based on the ten principles of the United Nations Global Compact initiative, the guiding principles of the United Nations for business and human rights, the ILO (International Labour Organisation) Declaration on Fundamental Principles and Rights at Work, as well as the Responsible Care® programme of the chemical industry. To ensure the required compliance, our suppliers shall implement a suitable compliance management system.



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### 3. HUMAN RIGHTS, LABOUR STANDARDS AND SOCIAL STANDARDS

Within their scope of influence, our suppliers respect and support the protection of international human rights and ensure that we do not become complicit in human rights violations. They respect and undertake to observe the corresponding applicable laws and regulations in all their business activities and decisions. Our suppliers do not engage in forced labour or child labour and do not tolerate any form of discrimination or harassment, including at their partners. Unfair treatment on the basis of ethnicity, gender, gender identity, religion, beliefs, disability, age, sexual orientation or membership in a trade union is prohibited. Our suppliers promote an inclusive work environment, equal opportunities and equal treatment. They establish and maintain an adequate health and safety management system and apply it rigorously. Our suppliers respect and protect the dignity of each individual. Our suppliers and their partners comply with all laws and regulations concerning the limitation of working hours and the granting of rest times, breaks and holidays. Our suppliers ensure safe work procedures and the required technical protective measures; they provide protection from risks that arise from the use of the infrastructure made available at the workplace. They comply with the provisions for whistleblower protection and enable their employees to communicate concerns or report illegal practices in the company. IMO business partners undertake to remunerate their employees in accordance with applicable laws and regulations and guarantee a living wage according to the local living conditions.

### 4. SUSTAINABILITY, CLIMATE AND ENVIRONMENTAL PROTECTION

Our suppliers comply with all applicable provisions for environmental protection and international conventions for environmental standards. They avoid hazards for people and the environment; they minimise environmental effects along the entire value creation chain; and they use energy and resources sparingly. Our business partners' processes, facilities and resources comply with the applicable legal regulations and standards for fire safety, environmental protection and energy efficiency. Energy consumption must be documented. Our suppliers prefer the use of renewable energies and play an active part in driving the expansion of renewable energies. The conservation and protection of natural resources and the responsible utilisation of raw materials are primary goals. For this reason, our suppliers prioritise the reduction, reuse and recycling as well as the proper disposal of hazardous substances and waste as well as the best-possible prevention of environmental incidents along their entire supply chain. To ensure proper handling, our suppliers establish suitable control systems. They implement a management system according to international standards such as ISO 14001 or ISO 50001. With a view to the responsible use of raw materials, our suppliers undertake to obtain such materials from conflict-free sources and to comply with regulations concerning prohibited and notifiable substances and to keep corresponding evidential records. They act in compliance with the Dodd-Frank Act (Article 1502) and the provisions of the Securities and Exchange Commission (SEC). Our suppliers are aware of their responsibility towards society and the environment. They avoid hazards to the public and their employees that can be caused by their manufacturing processes and products during their entire life cycle.

Our suppliers take active responsibility in the implementation and achievement of the CO<sub>2</sub> targets. They support the implementation of climate neutrality along the entire supply chain.

### 5. AVOIDING CONFLICTS OF INTEREST

Our suppliers take decisions based on factual considerations and shall not be unduly guided by personal interests. If our business partner learns about a potential conflict of interest that could or does affect the business relationship with IMO, they shall notify IMO's Management at once.



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## 6. FREE COMPETITION

Our suppliers compete fairly and comply with the applicable laws protecting free competition. In addition, they do not coordinate activities or enter into agreements with other companies which would create or aim to create obstacles, restrictions or distortions of the competition according to applicable anti-trust laws; they do not abuse any dominant market positions.

## 7. BRIBERY AND CORRUPTION

Bribery and corruption refers to the acceptance or granting of items of value to business partners or officials if these items of value are of a nature that can influence decisions taken by the recipient.

Our suppliers ensure compliance with the applicable anti-corruption laws. They ensure in particular that their employees, subcontractors and representatives do not offer or accept any items of value with the goal of obtaining contracts or preferred treatment in business interactions. These principles also apply if our business partners cooperate with other third parties in the course of their activities on behalf of IMO.

Any gifts and business entertainment must reflect appropriate business practices and must not influence or appear to influence business decisions. Applicable laws and regulations as well as any prohibitions and value limits must be observed.

Decisions are taken solely on the basis of factual criteria; any and all conflicts of interest must be avoided.

## 8. MONEY LAUNDERING

Our suppliers observe the applicable laws and regulations regarding the prevention of money laundering.

## 9. FINANCING OF ARMED GROUPS

Our suppliers ensure in all their actions and business activities that any direct or indirect financing of armed groups is avoided. In this context, they observe and comply with the applicable legal regulations concerning 'conflict raw materials' (Dodd-Frank Act).

## 10. PRODUCT QUALITY AND PRODUCT SAFETY

Customer satisfaction, process-oriented management, error prevention and continuous improvement as well as comprehensive quality management are indispensable. Customer requirements in particular with regard to quality, reliability, delivery periods and prices must be implemented. With regard to product safety, suppliers and their employees are responsible for preventing as far as possible any health and safety risks and hazards that can arise from the use of the products. The applicable technical and legal standards and regulations must be identified and observed.

## 11. DATA PROTECTION, IT SECURITY, INFORMATION SECURITY

Personal data may only be collected, processed and used in compliance with the applicable data protection laws. Due to the great importance of IT systems and the growing threats against IT systems in the form of viruses, sabotage, hacking and financial crime, suppliers have a duty to be security-conscious whenever they are using IT systems. Our suppliers protect confidential information, handle sensitive data responsibly and protect such data from misuse. They implement an adequate security system to ensure information security.



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All information obtained in the course of the business relationship between the suppliers and IMO is subject to confidentiality and non-disclosure.

## 12. IMPORT AND EXPORT

Our suppliers act in compliance with various international and national laws, regulations, embargoes and anti-terrorism provisions regarding international trade. These provisions restrict or prohibit the trade, export or import of technologies, goods or services as well as capital or payment transactions. Such restrictions or prohibitions can be based on the type of goods, the country of origin, the ultimate use, or the identity of the business partner; they are always observed and complied with. Our suppliers are themselves responsible for obtaining any required permits, licences and similar. Our suppliers have a duty to notify IMO in writing if any of their goods are subject to trade restrictions or export controls. In order to ensure compliance with any such provisions, the suppliers shall proactively provide IMO with the required documents, records and information.

## ADHERENCE TO THE CODE OF CONDUCT

Our suppliers ensure adherence to the principles defined in this Code of Conduct or equivalent principles. They communicate this Code of Conduct or equivalent principles to their employees, suppliers and subcontractors and ensure compliance. A violation of this Code of Conduct represents an impairment of the business relationship with IMO. In this case, irrespective of any other rights, IMO reserves the right to demand an investigation into the matter as well as the implementation of counter-measures.

In case a violation of this IMO Code of Conduct is suspected or for the purpose of securing the supply chain, suppliers consent to audits conducted by IMO that verify compliance. Such audits extend to the business partner's business properties, offices and other buildings used for business purposes during normal business hours and with at least two weeks' notice.

We confirm receipt of the '**Code of Conduct for Suppliers of the IMO Group**':

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Company

\_\_\_\_\_

Place, date

\_\_\_\_\_

Name

\_\_\_\_\_

Function

\_\_\_\_\_

Signature

Company stamp