

# Code of Conduct for Business Partners

This code of conduct defines the self-image of the IMO group of companies and the policies which underlie their business operations. It also places expectations upon our business partners (e.g., suppliers, service providers, representatives, consultants, distributors and other providers of goods and services) with regard to their conduct and sense of responsibility when conducting business. The code of conduct forms the basis of every business relationship and a binding and integral part of all forms of collaboration. The IMO group of companies reserves the right to immediately terminate business relationships and claim damages, if applicable, for the infringement by business partners of the subsequent principles and requirements.

The IMO group of companies has established internal codes of conduct and expects its business partners to adhere to the following basic principles and requirements:

## **Compliance with laws**

Compliance with the legal provisions and regulations of the applicable legal system(s).

## **Prohibition of corruption and bribery**

Strict prohibition and prevention of corruption and bribery. Unlawful payments and advantages from or to public officials or office holders as well as decision-makers and employees of the private sector may not be requested, accepted, offered or provided for the purpose of achieving or guaranteeing business advantages.

## **Invitations and gifts**

Invitations and gifts which represent a conflict of interest or which may call into question personal integrity and autonomy may not be accepted or provided. Invitations and gifts may not be accepted or provided in return for an unlawful advantage and must be appropriate, that is, of minimal value and considered to be customary in the local business culture. Any invitations or gifts in excess must not be provided or should be declined/returned.

## **Preventing conflicts of interest**

Decisions should be made exclusively on the basis of subjective criteria and not on the basis of personal interests. Private, commercial and any other justified conflicts of interest which might influence decisions should be avoided right from the outset.

## **Money laundering prevention**

Compliance with the relevant legal obligations to prevent money laundering and not to take part in money laundering activities and to report suspicious behavior to the appropriate authorities.

## **Compliance with export control and customs regulations**

Compliance with national and international regulations on trade, import and export controls, capital and payments, to combat the financing of terrorism as well as economic embargoes and customs regulations must be observed. The requirement for government approval must be checked and observed.

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### **Fair competition**

Respect for free and fair competition in domestic and international markets, compliance with relevant specifications and legal regulations regarding conduct in competition and refrain from making arrangements or agreements which prohibit or restrict free and fair competition.

### **Data protection and confidentiality**

Collecting, storing, processing and using personal data is only allowed in compliance with data protection laws.

The confidentiality of information should be observed when disclosing information. An existing confidentiality agreement or the requirement to conclude such an agreement should be taken into account.

### **Employee policies**

Compliance with fundamental workers' rights according to applicable national laws must be ensured, in particular with regard to the provision of adequate compensation, observance of the legal minimum wage and compliance with working hours and health and safety regulations. Promotion of equal opportunity and equal treatment and respect of personal rights of every individual.

### **Bans on child and forced labor**

Child and forced labor of any kind must be banned and discouraged.

### **Environmental protection**

The protection of our environment and natural resources through environmentally-friendly practices, minimization of pollution, continuous improvement of environmental measures and compliance with all laws and ordinances involving the protection of the environment, human health and energy.

### **We hereby agree to comply with the principals and requirements of this Code of Conduct and recognize them as binding:**

Company: \_\_\_\_\_

Name: \_\_\_\_\_

Function: \_\_\_\_\_

Signature: \_\_\_\_\_

Location, date: \_\_\_\_\_