



# **CODE OF CONDUCT**

IMT Masken und Teilungen AG

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## **“Message from Peter Kirkegaard regarding rules of conduct at IMT”**

Dear employees,

As a manufacturing service provider focusing on special skills, we are called upon from many angles - there is always a risk of losing focus. The world we operate in and the problems we face are constantly growing in complexity. We need fixed points of reference so we can stay focused and ensure that complex does not become complicated.

Common values form such a point of reference.

The people at IMT are well aware that the willingness to innovate, to push boundaries and to go the extra mile are the foundations of our success. We aim to achieve excellence in everything we do - including in our dealings with one another. These rules of conduct describe the corporate values and the company's wishes (requirements) when it comes to the actions of each and every one of us.

Let us put these rules of conduct into practice so we can tackle the projects that come our way as a team.

Peter Kirkegaard, Chief Executive Officer



# INTRODUCTION

## Objective

Our vision is to serve our customers as an agile high-tech partner for excellent solutions through microstructuring.

The success of IMT relies on the trust of all stakeholders: from our customers, employees, the owner of the company, service providers, business partners, civil society and the authorities. This Code of Conduct for IMT lays the foundation for trust, which we strive to continuously strengthen by adhering to these rules.

The purpose of our Code of Conduct is to raise awareness among all IMT employees of the rules we have set, which are based on our values, and to ensure that they conduct themselves in an ethically correct manner. The rules of conduct we have adopted constitute the foundation of our activities for IMT and form the basis for our cooperation with customers, employees and business partners.

## Application and responsibility

The rules of conduct are put into practice by all IMT employees. This ensures that employees understand how they are expected to behave and what responsibilities each individual has within the company.

Compliance with these rules among all employees forms part of the annual employee appraisals by superiors, whereby employees also assess their superiors with respect to compliance with these rules of conduct.

The rules of conduct are applicable to both managers and senior management in equal measure. They ensure that managers uphold the company's values and fulfil what is expected of them as role models by making decisions in line with the Code of Conduct and aligning their expectations of employees accordingly. Managers bear responsibility for

ensuring that their internal and external employees are aware of and comply with the rules of conduct, the applicable legal provisions as well as the internal regulations, directives and guidelines. Furthermore, they support a working culture that encourages open discussion about how to behave and conflicts. They also keep an eye out for signs of unethical or unlawful behaviour, especially when competitive pressure is high. They also support a work culture conducive to open dialogue about behaviour and conflicts. Furthermore, they look out for signs of unethical or unlawful behaviour, in particular when competitive pressure is high.

All of us take our personal responsibility seriously and implement the principles of the Code of Conduct as part of our daily work. Managers set an important example when it comes to complying with rules of conduct and behavioural guidelines.

The rules of conduct are also aimed at our customers, suppliers and the public so they can more easily understand how we work at IMT and what kind of organisation they are interacting with.

## Ambiguities or uncertainties

The management of IMT is fully aware that the rules of conduct do not encompass all critical situations that IMT employees may face in the course of their daily work. When in doubt or in an uncertain situation, employees should raise questions, in which case superiors and HR employees will answer them and provide assistance in finding a sensible and appropriate solution for all parties involved in a dilemma situation.

The management also reserves the right to make changes to this document as required, in which case employees will be actively informed of these changes.

## OUR VALUES AS A FOUNDATION



### Community

- We are committed to working together for the collective.
- People as employees are important to IMT.
- We act together for IMT and the future.



### Responsibility

- IMT sets high standards.
- We stand up both for ourselves and for IMT as a whole



### Trust

- We grant trust and receive trust.
- Integrity is our number one priority.
- Predictability is important to us.



### Passion

- We work for IMT with passion every single day.
- Our passion for performance motivates us every day.



### Uniqueness

- We deliberately do things differently and feel at home at IMT.

## INTERNAL CONDUCT

### Conduct towards employees, superiors and work colleagues

IMT recognises and protects the personal integrity of all employees while taking their health and well-being into account. IMT protects the health and safety of employees in the workplace.

IMT safeguards equal treatment and equal opportunities for all employees. It does not tolerate any form of discrimination based on gender, religion, age, race, background, disability, sexual orientation, political or trade union activity. Under no circumstances will any form of bullying or sexual harassment be tolerated, and it will be consistently penalised.

### No tolerance towards unethical, illegal behaviour and vandalism

Violence and misconduct of any kind play no part at IMT. We do not tolerate any:

- Intimidation or threats
- Physical violence
- Making inappropriate comments about the use of violence of any kind
- Arson, vandalism or other criminal acts
- Theft
- Alcohol/drugs during working hours

We conduct ourselves professionally and, for instance, do not access any inappropriate websites or display any sexually offensive images.

IMT invests in its employees to ensure that they can realise their full potential and supports their personal and professional development. Potential and performance behaviour as well as the needs of the company form the basis for promoting development.

We must be able to conduct our professional duties at work without any impairment whatsoever at all times. As part of our professional activities for IMT, it is prohibited to consume or carry drugs, medication or other substances that could jeopardise the working environment or the reputation of IMT.

IMT takes into account absent persons or departments and informs them promptly about what is happening in the company.

### Mutual support

We support each other within IMT by cultivating an open culture that makes it possible to address professional problems without reprisals. Our colleagues are treated with respect and decorum. We behave in a way that is characterised by reliability and mutual trust. Our communication is open and honest. We promote integrity, a sense of responsibility, fairness and teamwork by actively putting these values into practice.

### Data security

We are also mindful of the privacy of all employees. The confidentiality of personal data is respected by everyone. The personal information provided by employees must not be used for purposes other than internal use. Any processing or use of personal data has to be transparent for the person concerned, while respecting their rights of objection or deletion, for example.

Our employees inform themselves about which types of data are subject to special protection (e.g. account numbers) and take corresponding measures to protect this data. Employees who have questions or concerns about employee privacy and data protection can turn to our data protection advisor (in accordance with the GDPR).

## **Protection of IMT's assets**

We undertake precautions aimed at protecting and safeguarding IMT's assets. Tangible assets, intellectual property rights and information are to be handled with care. This helps us to avoid loss, theft or damage. Employees of IMT are obliged to use the assets and resources of IMT exclusively for business purposes and not for their private or professional gain or for inappropriate or unlawful purposes. Any limited private use of the infrastructure is only permitted to the extent that this is explicitly stipulated in regulations, directives or guidelines. The conditions set out here must be complied with.

The name of IMT, logo, trademarks, business secrets, documents and copyrights must not be used or disclosed without authorisation or in an unauthorised manner.

## **Disclosure of private links and to organisations, companies etc.**

IMT insists on disclosure and full transparency from its employees when it comes to secondary employment, their own companies, work in other economically active organisations (foundations, organisations, etc.). This is the case if employees receive salaries, fees, etc. from these and to ensure that no conflicts of interest arise.

# EXTERNAL CONDUCT

## Conduct towards customers

IMT consistently puts customers and their concerns at the centre of its activities and focus. It is our aim to gain and retain the trust of our customers. The integrity of IMT as well as all employees is an essential prerequisite for this.

We shape customer relationships in an active, sustainable and cooperative manner. We win them over with understandable, customer-centred and needs-based solutions.

We always deal with our customers' concerns and enquiries seriously and handle them fairly, quickly and competently. We set high standards for the quality of our actions.

## Service providers and business partners

IMT fosters a constructive, critical, transparent and open dialogue with service providers and business partners in a spirit of fairness, respect and professionalism.

## Ethical and moral conduct

We are firmly bound to ethically and morally sound conduct in our business dealings and in our dealings with customers, employees, service providers, business partners, civil society and the authorities. We always apply the standards of decency, honesty and integrity when safeguarding the interests of IMT.

## Conduct of business in accordance with the regulations

All IMT employees are committed to adhering to the internal regulations, directives and guidelines as well as the contractual agreements.

## Conflicts of interest

Conflicts of interest may be encountered when personal interests, family or other

commitments that the employee has conflict with the interests of IMT. Generally speaking, situations should be avoided where personal interests, activities outside IMT, financial self-interest or personal relationships may conflict or give the appearance of conflicting with the interests of IMT. Any business activities carried out on behalf of IMT must not be influenced by personal considerations or relationships. Most conflicts of interest arise when employees commission work, hire staff or receive offers of employment from competitors by virtue of their position. Employees who feel that they are in a 'conflict' are required to inform their superior in a timely and appropriate manner. Following this, IMT assesses whether a conflict of interest actually exists and initiates the necessary measures.

## Gifts and corruption

It is prohibited in any case to accept gifts or other benefits (e.g. gifts in kind, discounts, invitations to trips or meals) if it is not possible to rule out a connection between the benefit being granted and a decision-making or procurement process.

Gifts of up to CHF 100 are allowed. Employees must report any gifts received to a member of the management.

If it is possible to rule out a connection between the granting of a benefit and a decision-making or procurement process, then gifts, invitations and other benefits may be accepted if they

- are in line with customary social behaviour and are of low commercial value;
- do not compromise independence, objectivity and freedom of action in professional activities;
- do not convey the appearance of corruptibility or bias.

Cash must not be accepted under any circumstances.

Should there be any doubt about the value of a gift, invitation or other benefit, this will be refused or authorised by the superior.



No gifts or other benefits are to be given or offered, either directly or indirectly, to officials or decision-makers in the public or private sector for the purpose of obtaining a benefit in violation of the law.

work-related documentation must be prepared in German or English. All other languages must only be used during private time (breaks).

### **Free and fair competition**

IMT, the members of the management and the employees abide by the principles of free and fair competition. We avoid situations that are questionable under competition law. Agreements or coordinated behaviour with other companies that have the purpose or effect of unduly restricting competition are prohibited.

### **Reporting and documentation in accordance with the regulations**

We strive to ensure the integrity of financial reporting. Every employee plays a part in ensuring that business transactions are handled in a way that is up-to-date, complete and reflects the actual circumstances.

We retain business records and documents subject to archiving requirements in accordance with the legal requirements and in compliance with the pertinent regulations, directives and guidelines.

### **Collaboration with third parties**

IMT only engages in relationships with third parties to the extent that they comply with all relevant legal requirements and those in this Code of Conduct.

### **Communication**

We provide open, fact-based communication to internal and external stakeholders. Employees shall never provide information to media personnel themselves. We forward written or verbal queries from media personnel immediately to the Communications Officer, HR or the CEO. All communication with supervisory authorities is conducted via the Management Board.

### **Language at IMT**

Employees at IMT communicate with each other in German or English during working hours. Any foreign language spoken is permitted in contact with external parties. All

# PERFORMANCE ORIENTATION

## Open feedback culture

There is a culture of open feedback at IMT. The working environment is therefore characterised by trust and equal communication. It goes without saying that employees are constantly given the opportunity to provide and request feedback and status reports. It is not just feedback and status reports that we solely focus on. We also share praise and constructive criticism. Feedback is given across all hierarchical levels and the general principle applies: Don't talk about each other, talk to each other. This ensures that satisfaction within the company increases and that employees feel a greater connection with IMT.

## Reliability

Employees at IMT expect a high level of reliability from each other and with each other when it comes to honouring deadlines and completing tasks and orders. This reliability holds true both externally and internally.

## Meeting culture

Conducting and participating in meetings is part of our corporate culture. The purpose of meetings is to coordinate, reach decisions as well as agree and accept tasks with deadlines. Having said that, we only hold meetings that are of value to the organisation.

The target group and relevant participants are determined prior to each meeting. The organiser sends out an invitation including an agenda. The agenda sets out the background and objectives of the meeting. The organiser also specifies whether any preparation is required. If this is the case, this is mentioned within the subject field.

Any invitation to a meeting can be declined by stating reasons. Attendance at meetings that have been confirmed is binding. Participants should arrive on time and be prepared. If a participant is due to attend a follow-up meeting, this will be mentioned at

the beginning so that they are able to leave 5 minutes early. If a follow-up meeting takes place in the same location, this is mentioned in advance to ensure that the room is vacated in good time to allow the next meeting to start promptly.

Only the topic for which the invitation was issued is discussed during a meeting. In the event that other related topics come up, then the person chairing the meeting may decide to include them in the agenda, depending on their relevance. All other topics are added to the agenda for later meetings.

No further communication takes place during the meeting.

The organiser shall prepare minutes for each meeting in accordance with the format provided. The minutes have to be distributed to the participants and other relevant recipients as swiftly as possible and within 3 working days at the latest. The participants shall accept task(s) in the meeting and deliver the agreed service(s) recorded in the minutes by the agreed date.

The effectiveness of series meetings is regularly scrutinised to determine their continued relevance.

## Compliance with the official channels

To ensure that we operate in a way that focusses on performance, all issues and orders are processed through official channels. In doing so, we respect the role and responsibility of employees. It is not permitted to disclose information without following the official channels. This ensures that our processes are transparent and comprehensible.

Official channels may only be bypassed in cases of escalation.

## Etiquette (internal & external)

We place the highest priority on politeness and respect towards employees and external parties. This is also promoted at IMT

through appropriate clothing. Every employee is obliged to wear protective clothing when this is a requirement in their department. If protective clothing is not required, we wear suitable clothing at IMT and maintain a smart appearance within the company and towards customers.

## **DEALING WITH CONFIDENTIAL INFORMATION**

We do not disclose any non-public information to unauthorised third parties that concerns customers, employees, partners or the business interests of IMT - except where this is required by law. All members of the Management Board and all employees of IMT treat every piece of information in accordance with its classification and maintain business confidentiality. The corresponding legal provisions and internal rules of conduct (regulations, directives and guidelines) must be strictly adhered to.

We rigorously adhere to data protection and the duty of confidentiality. We do not pass on any information about customers or employees to unauthorised third parties. Customer data must only be processed in accordance with legislation and instructions (especially in compliance with behavioural guidelines).

### **Insider trading**

Employees must not use any information that is material or not publicly disclosed that they have obtained as part of the business relationship for the purpose of trading in shares or securities of a company or to facilitate trading by others. This is explicitly in connection with companies that have some kind of business relationship with IMT.

## **ENVIRONMENT, HEALTH, OCCUPATIONAL SAFETY**

### **Occupational safety takes top priority in the company**

IMT strives to ensure a safe workplace for its employees and to keep accidents to 'zero' by implementing various measures and utilising the function of the safety officer. Workplaces are kept free of avoidable health risks by ensuring that IMT is in compliance with all statutory and corporate health and safety regulations and conducts regular training sessions. Employees are also obliged to adhere to all safety regulations and to follow them strictly.

## **TAX PAYMENT**

IMT ensures that it is in compliance with all applicable tax laws and regulations in the countries where it operates and is open and transparent with the tax authorities. IMT never engages in wilful tax evasion under any circumstances. As such, IMT ensures that effective controls are in place in order to minimise the risk of tax evasion.

## **ON-TIME PAYMENT**

IMT keeps to agreed payment terms and expects fair and reasonable payment practices from all business partners and punctual payment of uncontested and valid invoices as per the agreed payment terms.

## GLOBAL TRADE COMPLIANCE

### Management commitment to the objectives of export control - ICP Internal Compliance Programme

Compliance in foreign trade legislation must emanate from the company management, which means that compliance with the law and adherence to rules must be specified as values and anchored in the company.

The following outlines the management's commitment to compliance in foreign trade law, which is based on the objectives of export control and the underlying commitment to compliance. This commitment is laid down in IMT Code of Conduct and in the company handbook.

#### Objective of export control and commitment to compliance

As a company operating internationally, we are aware of the responsibility of cross-border trade, all exports are made in accordance with applicable law, we are explicitly committed to adhering to national and international export control and customs regulations and have introduced an internal export control system ICP with the purpose of ensuring the strict application of national and international export control regulations.

The same commitment is also enshrined in IMT's company handbook.

### Sourcing of minerals

Business partners are required to comply with applicable laws and regulations with respect to direct and indirect sourcing of critical minerals and conflict minerals (i.e., when incorporated into purchased products). These materials include 'conflict materials' (tin, tungsten, tantalum and gold), rare earths as well as other minerals or metals (e.g. bauxite, cobalt, titanium, lithium). Should the supply chain of the delivered material be 'indeterminable' or otherwise unknown, then the business partners are required to either obtain the relevant certifications or exclude this source of minerals.

## DUE DILIGENCE OBLIGATIONS & RESPONSIBILITY IN THE SUPPLY CHAIN

We expect our business partners to conduct their business and activities in such a way that respects human rights, based on internationally recognised human rights and the UN Guiding Principles on Business and Human Rights, as well as the four fundamental principles of the ILO core labour standards.

### Due diligence obligations under human rights law

We and our business partners are committed to upholding:

- the prohibition on the employment of children under the age specified in the Swiss Youth Labour Act
- the prohibition of the worst forms of child labour
- the prohibition of the employment of persons in forced labour
- the prohibition of all forms of slavery
- the prohibition of failure to comply with the occupational health and safety obligations in force under the law of the place of employment
- the prohibition on flouting freedom of association
- the prohibition of unequal treatment in employment on the grounds of national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political affiliation, religion or beliefs, except where this is justified by the requirements of the employment; unequal treatment covers in particular the payment of unequal remuneration for work of equal value. This is something that is ensured within IMT through the regular equal pay analysis of the Swiss Confederation as well as the incorporation of a salary benchmark.
- the prohibition of withholding an appropriate wage

- the prohibition of bringing about harmful changes to the soil, water pollution, air pollution, harmful noise emissions or excessive water consumption
- the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and waters in connection with the acquisition, development or other use of land, forests and waters, where the use of such land, forests and waters ensures a person's livelihood

### Due diligence obligations relating to the environment

We and our business partners are committed to upholding:

- the prohibition of the manufacture of products containing mercury
- the prohibition of the use of mercury and mercury compounds
- the prohibition of the treatment of mercury waste
- the prohibition of the production and use of chemicals in accordance with the Stockholm Convention on Persistent Organic Pollutants and the Council on Persistent Organic Pollutants (Commission Delegated Regulation EU 2020)
- the prohibition of handling, collection, storage and disposal of waste in an environmentally unsound manner in conformity with existing regulations and conventions
- the prohibition of exports of hazardous waste under the Basel Convention
- the prohibition of imports of hazardous waste in accordance with conventions and laws

## EMPLOYMENT PRINCIPLE

### We support private and professional family relationships

IMT strives to achieve the best possible combination of family issues and business interests within the framework of mutual flexibility.

The employment/placement of family members within IMT is welcome, to the extent that performance and time flexibility are assured. The management of IMT hereby reserves the right to decide on the employment of a family member on an individual basis.

## VIOLATIONS AND REPORTING VIOLATIONS

Violations against the rules of conduct will be addressed in the first instance by raising mutual awareness. In the event of repeated offences and serious breaches of our regulations, directives and guidelines, penalties will be imposed. This also applies to violations of the law. IMT pursues the company's internal disciplinary process, which is equally applicable to all employees. Serious violations may result in consequences under labour law as well as civil and criminal law. In particular:

- Summons
- Warnings
- Terminations
- Compensation for damages
- Criminal complaints

Every employee has the right and the obligation to report any such violations. The employee can report the violation to

- the superior,
- the HR representatives of IMT
- the HR anonymously.

The reporting employee has no reason to be concerned about any adverse consequences, providing the report is made to the best of their knowledge and in good faith. Employees should proceed in a considered, responsible and careful manner. Reports that are obviously unfounded must be avoided. A process for reporting directly to the Administrative Board via the management has been established.

Any reports relating to bullying or other cases where the employee would like a neutral opinion can be addressed to the corresponding external specialist centre, which deals with the issue in question in a

neutral and professional manner. The contact details of the external specialist centre will be made available to employees (personnel documents and notice board).

IMT Management

Greifensee, 01.06.2024