

Code of Conduct



The point of contact for this Code of Conduct is the imc Compliance Office, which can be reached via the following contact details:

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Compliance in the imc group

Foreword

All employees of the imc group¹ contribute to our company's success every day through their commitment and passion for digital learning. However, we can only be successful if all of us always put our best foot forward. Legally compliant and ethically impeccable behaviour is essential for our success.

We want to be perceived worldwide as a trustworthy, reliable and honest partner. As a shared guideline for our decisions and our actions, this Code of Conduct therefore names binding standards for responsible behaviour towards business partners and the public, as well as for our behaviour internally at imc. By raising awareness for legal risks, violations of the law can be prevented.

Compliance and ethical behaviour are prerequisites for our modern, diverse and barrier-free corporate culture. Compliance with the principles described here is also a crucial prerequisite for maintaining sustainable business success. Violations of the Code of Conduct can therefore lead to disciplinary measures, which may extend to termination of employment, in accordance with the principles applicable to the respective subsidiary.

Our Code of Conduct is binding for all imc employees and gives our staff members and managers a common guideline for responsible behaviour with regard to the legal framework, business partners, colleagues and the public. This guideline is fleshed out by further internal guidelines. We as Executive Board of the parent company, the executive bodies of our subsidiaries, our managers² and all the employees of imc, are all obligated to be mindful of these standards and implement them in our daily work.

The Executive Board of imc AG

1) Hereinafter referred to as imc.

2) In this policy, the term „manager“ refers to all employees who manage teams, departments or areas.



Christian Wachter



Sven R. Becker



Dr. Wolfram Jost

Our Values

We view ourselves as a brand that stands for open dialogue – a brand that is not just a sender, but the content itself; a brand that gets involved and engages people. We are on the move, we think and live digitally. For us, a brand is not a static structure but a living interface. Together we want to ensure success.

To achieve this, we have built our brand identity on three values: **engaging, bold, reliable**. These are also of crucial importance for our ethical behaviour.

For us, reliability and thus trustworthiness are an expression of positive expectations: that one can rely on another person's word. At the same time, one gives them the opportunity to trust their statements which are initially new to them. In addition, our work is characterised by the highest level of quality and sustainability. Stability and longevity are reflected not only in the use of the defined elements of the brand, but also in our daily actions and cooperation. Our communication is characterised by trust and authenticity.

Courage is a central element of our corporate growth strategy, and this also means having the courage to call difficulties by their name and openly

address challenges. Only in this way can new approaches be ventured and challenges seen as opportunities for permanent improvement. Our goal is to keep inspiring our target groups. In order to achieve this, we are motivated but also courageous when trying out new approaches.

Inspiring people is a daily requirement for the work we do together and for our cooperation with our business partners, colleagues, applicants and other stakeholders. This underscores our promise of innovation and quality and the chance for everyone to develop further through our innovative training opportunities. We want to be a source of inspiration every day, over and over again, with actions that speak of commitment, passion and enthusiasm.



Principles of Our Actions



Compliance with the Law

Acknowledging the rule of law and the free and democratic basic order is of eminent importance for us. We respect the applicable law and will not accept violations without consequences. This includes compliance with all laws and rules that affect our business areas as well as fulfilling the contracts we have concluded and other self-imposed obligations.

Every imc manager is responsible for knowing the applicable legal provisions and rules in the context of his tasks and areas of responsibility, and for ensuring that they are communicated to and implemented by his staff.

Role Model Function of Our Managers

Our managers have a special responsibility in their function as role models. This applies in particular to the implementation of this Code of Conduct. imc managers must “live” the values presented here. Our managers are responsible for ensuring that the staff members under their supervision know and comply with the regulations of this Code of Conduct. They are also the first point of contact for questions on this topic.

Reflecting on One's Own Actions

We always question our own actions to ensure that they are correct. Our corporate values and our defined goals are the guidelines for our actions. By constantly reflecting on our actions, we ensure that we align both our immediate and future actions to our system of values and goals, thereby laying the basis for our business success.

Open & Appreciative Communication

We talk to each other about all the relevant topics that affect our work. We always maintain an open and friendly approach. We are not afraid to openly address challenges and their obstacles along the way.

We want to make ourselves understood to our counterparts and explain how we perceive and see things. If anything is unclear, we ask again – instead of making do with assumptions. When we express criticism, we make sure it is well-founded and done objectively. This helps to openly address misconduct without harming the dignity of the person we address. The person we address must deal with the criticism and reflect on his behaviour and actions.

Integrity & Independence

We understand the term integrity to mean legally and morally impeccable behaviour, which is characterised in particular by values such as justice, loyalty and honesty. We therefore all work together to align our actions in the professional environment with the principles set out in this Code of Conduct.

Appreciative Mistake Culture

Mistakes are human. We do not see them as defeat and feel no shame if they happen to us. At the same time, we don't judge others for their mistakes, but see them as an opportunity for positive change. We understand mistakes to be necessary experiences on the way to success.

Our managers have a special responsibility in this regard – they are role models for their staff members and as a rule have extensive experience in dealing with conflict situations. They place great trust in the members of their teams, regularly giving appreciative feedback and openly addressing opportunities for improvement.

Protection of Information

Confidentiality

All imc employees are obligated to maintain secrecy about confidential information that they become aware of in the course of their work and to protect it from unauthorised access. Confidential information may only be disclosed to authorised recipients. In this way, we protect the interests of imc and our business partners.

Data Protection & IT Security

As a provider of digital learning solutions, data protection and IT security are of fundamental importance to us. Keeping the trust of our business partners depends on their expectation that their data will have adequate protection with us. All imc employees are obligated to comply with the applicable legal provisions on data protection when handling personal data. Each employee is responsible for ensuring a high level of data protection within the scope of their area of responsibility. Employees of imc always treat personal data as confidential information and only collect data when it is necessary for the performance of their operational tasks.

In addition, we have implemented security measures that are primarily intended to ensure the pro-

tection of our IT systems and the information we process in these systems. This includes technical and organisational measures such as password rules, the introduction of software to protect end devices and the establishment of emergency concepts. In particularly critical business areas, we have also implemented an information security management system in accordance with the requirements of the ISO/IEC 27001 standard. All imc employees are obligated to comply with the rules and precautions taken to ensure IT security. In this way, we protect the information and resources available to us from unauthorised and improper use, loss and destruction and guarantee their availability.

By regular training and other measures, we create awareness of the issues around data protection and IT security.

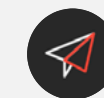


Protection of Information

Behaviour on Social Media

Social media is of paramount importance to us as drivers of digital innovation. It offers us an enormous opportunity to present our products and services – and also the everyday life of imc – to a great many different people.

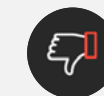
The good reputation of our organisation depends on an appropriate and professional self-image on social media. Everything that is published in connection with our company must therefore adhere to the following standards:



Our behaviour on social media is in principle such that imc or third parties do not suffer any damage as a result of our actions



When we post content, we check in advance whether it is factually correct (prevention of 'fake news')



We do not post any discriminatory, offensive, racist, sexist or abusive content



We respect all other democratic opinions and religious or ideological views, and also respect people's individual differences



The content we post always respects the privacy of other people.

Protection of Company Property

Use of Company Resources

All our employees must treat work tools and other property belonging to imc appropriately, economically and within the framework of the regulations laid down in each individual case. This also includes protection against loss, damage, destruction, theft, misuse or misappropriation.

It is not allowed to use work tools for private purposes unless explicit permission has been given for the respective purpose.

Protection of Intellectual Property

Since our intellectual property is the foundation of the success of our business, it is the duty of every imc employee to ensure that our intellectual property is used exclusively for imc purposes and is adequately protected. This also applies to the intellectual property of our business partners. Intellectual property may only be disclosed to authorised recipients.

In addition, we respect the intellectual property of third parties as part of our daily work and only use it if we are authorised to do so.



Dealing with Business Partners & Third Parties



Business Relationships

The basis of our business relationships is always the mutual expectation of being able to rely on and trust one another. We meet these expectations by fulfilling agreements we have made and acting in accordance with the law at all times. We expect the same from our business partners. We strictly reject business relationships with individuals or organisations that violate for example human rights, employee rights, data protection regulations or regulations to ensure fair competition. Within the framework of our business relationships, we ensure that we do not violate the applicable law.

Competition & Antitrust law

We are committed to the rules of fair competition and see these as an indispensable advantage for all market participants. The applicable regulations on competition and antitrust law follow this principle and must be observed by all imc employees. The applicable law prohibits, among other things:

- Price-fixing and agreements on regional market sharing with competitors;
- Exchanging information with competitors on products and margins;
- Exploiting of a dominant position.

In case of doubt, we do not undertake a transaction and decline cooperation. We provide our employees with regular training to create the necessary awareness for this topic.

Corruption

We do not tolerate corruption. We do not base our business activities on or practice unlawful preferential treatment in any form. We win over our business partners exclusively through honesty, reliability and the quality of our services. imc does not tolerate any corrupt practices by its employees or business partners and takes decisive action against it.

No grants whatsoever may be given to or accepted from authorities and public officials or individuals or companies working on their behalf.

We do not grant our business partners advantages in the form of, for example, gifts or bribes in order to create a personal or business advantage, nor do we accept advantages for ourselves for such purposes. The granting and acceptance of cash grants is prohibited under all circumstances.

Minor conveniences may be exchanged with our business partners – provided that this is customary in the individual case, it is in line with custom and it serves to initiate or improve the business

relationship. However, exchanging these conveniences must in no case lead to an obligation for the recipient.

Money Laundering & Terrorist Financing

It is our objective to prevent money laundering and terrorist financing in connection with our business activities.

In order to meet this objective, we take various measures to prevent money laundering and terrorist financing as part of our business activities. To start with, we generally do not accept cash payments.

We only accept transfers after verifying the identity of the person who makes the transfer and the business purpose.

If there is any suspicion that potential business partners are involved in money laundering or terrorist financing, we will not establish a business relationship.

Avoiding Conflicts of Interest

We expect that the personal interests of our employees do not conflict with the business interests of imc or our business partners. Potential or existing conflicts of interest must be disclosed immediately and resolved as quickly as possible.

We take every necessary measure and organisational precaution to avoid conflicts between the interests of our employees and those of customers, business partners or other employees.



People, Health & Safety



Acceptance & Diversity

We respect the diversity of people and recognise it as an aspect that makes our company more vibrant and successful.

The diversity of our employees makes us what we are: a Saarland brand that is at home all over the world. Just as diverse as our business partners around the world are, so diverse are our teams, who on a daily basis again and again manage to empower people and organisations around the world to develop their full potential in a constantly evolving world. Their experience, their knowledge and their creativity are the basis for our competitiveness and our success.

We treat people the same, regardless of their social or ethnic background, their gender, their sexual orientation, their religion or worldview, their age and their psychological or physical abilities. With us, everyone should be able to contribute and embody their individual potential. For us, diversity is part of our corporate culture.

We strictly oppose any form of discrimination, for whatever reason.

Occupational Health & Safety in the Workplace

We ensure occupational health and safety protection at all workplaces within the framework of the applicable legal provisions. We ensure this objective through proper workplace design, appropriate selection and instruction of our service providers, as well as continuous review of our work processes. Our managers have a duty of care towards our employees. Part of this task is to keep the stress and working hours of our employees within an acceptable range and to be available as a contact person

for personal concerns and needs that endanger the mental and physical health of our employees.

Human & Children's Rights

Compliance with human rights and the protection of physical and mental health are part of our identity and our self-imposed obligation.

We respect and protect the applicable regulations for the protection of human and children's rights. We reject child labour, forced labour and compulsory labour, as well as all forms of modern slavery and human trafficking. This applies not only to people working at imc, but of course also to business partners and their behaviour. We do not tolerate discrimination and exploitation. Maintaining business relationships with business partners who have been proven to violate human and children's rights is prohibited.

Compliance with this Code of Conduct & Reporting of Violations

We expect all members of the Executive Board, executive bodies of our subsidiaries, managers and staff members of imc to align their professional activities with this Code of Conduct and unconditionally adhere to the regulations laid down here. This Code of Conduct is not to be seen as an exhaustive set of rules. Instead, it forms the basis for our daily actions.

We appeal to all employees to report any violations of the Code of Conduct, internal regulations or legal requirements.

We have established a Compliance Office compliance@im-c.com that monitors compliance with the provisions of this Code of Conduct and initiates appropriate investigations and measures in the event of anomalies. As part of its work, the Compliance Office will work towards ensuring that this Code of Conduct is complied with and should

thus protect imc and its reputation from damage.

In principle, the aim of this Code of Conduct is to create an open corporate culture in which everyone tolerates and respects the views of others. Every report of possible compliance violations is treated neutrally and in principle confidentially.

Reprimands in response to reporting compliance violations are strictly prohibited. This also applies to any improper use of the reporting processes. Both scenarios can result in disciplinary consequences.



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We make learning better – by redefining the way we learn. Experts in the fields of technology, e-learning content and strategy work hand in hand to provide holistic and customized e-learning solutions worldwide.

Learning technologies

Our solutions for learning management, performance support and authoring help you design an even more effective training strategy.

Learning strategy

Our consultants support you in every step of professional development strategy planning and implementation – From learning concepts like blended learning to guidance for establishing a learning & development academy.

E-learning content

The digital learning content we develop for you is as individual as your company. We also offer more than 2,000 hours of standard learning modules you can utilise off the bat.

