

Code of Conduct

Principle 1: Honesty, Integrity and Fair Play

IMPAG and its employees are fully committed to the principle of honesty, integrity and fair play in the delivery of services and goods. All employees should ensure that the business operations, applications for services, procurement or HR, are dealt with in an open, fair and impartial manner.

This Code of Conduct sets out the basic standard of conduct.

Principle 2: Equal Opportunity for All Employees

IMPAG is an equal employment opportunity employer. Employment opportunities are available regardless of race, color, sex, religion, national origin, age, disability or other legally protected status. This Principle applies to all aspects of the employment relationship, including recruiting, hiring, training, work assignment, promotion, transfer, termination, and wage and salary administration. IMPAG treats its employees with respect and honesty, comply with all applicable laws and regulations and conduct their business in an ethical manner.

Principle 3: Safety, and Health Practices

IMPAG is committed to an injury-free and illness-free workplace that is operated in an environmentally sound manner in compliance with all relevant laws and regulations that protect worker safety and the environment. Employees should perform work in a safe manner.

Principle 4: Fair Competition

IMPAG's policy will prohibit any anticompetitive practices which could effect in bounding, restraining or distorting competition, as well as any practices of an unfair competition. Accordingly, our employees cannot agree (formally or informally) with competitors to x prices or any other conditions of transaction; to limit or control the production, commercialization, technical development or investment; to manipulate or divide markets or sources of provisioning; to participate with fake offers in tenders or any other forms of competitions for offers; to limit or restrain access to market and freedom of competition for other enterprises; to apply unequal conditions for equivalent performance to commercial partners, creating in this way a disadvantage in competition; to condition signing of acceptancy contracts by the partners for supplementary obligations which, by their nature or according to commercial usage, have no connection with the subject of such contracts.

Our employees are prohibited from performing any act of unfair competition manifested through: misappropriating clients of a company by using the relations established with such clients within the function previously held at IMPAG, dismissal or attracting employees of a company for the purpose of setting up a competing company to capture customers of that company. At the same time, our employees must not take actions that harm the legitimate interests of consumers or other operations in breach of the competition law.

Principle 5: Governance and anti-corruption

IMPAG has zero tolerance for corruption. All employees must never offer to provide anything of value directly or indirectly to government officials and business partners to secure an undue advantage. IMPAG prohibits payment, offers of payment as well as anything of value directly or indirectly with the purpose of influencing or obtaining undue business or personal advantage.

Third parties will only be contracted to perform tasks which aid business interests provided: fees to be paid are reasonable; all arrangements are clearly documented; arrangements are in compliance with company's policies.

Principle 6: Financial Reporting

All transactions of IMPAG must be duly recorded so as to permit preparation of clear financial statements in conformity with generally accepted accounting principles. No false or misleading entries may be made in the books and records of IMPAG for any reason, and no employee may engage in any arrangement that results in such a prohibited act.

No undisclosed or unrecorded fund or asset of IMPAG may be established for any purpose. No payment on behalf of IMPAG (including those by cash) may be done without adequate supporting documentation or made with the intention or understanding that any part of such payment is to be used for any purpose other than as described by the documents supporting the payment.

From time to time, IMPAG may publish or inform of policies on financial reporting, disclosure and compliance to reinforce the financial reporting expectations in this Code. All employees at any level are expected to implement and strictly follow these policies.

Principle 7: Restrictive Agreements with Third Parties

IMPAG does not condone activities that seek to gain an unfair competitive advantage. No individual may engage in any activity which violates any valid restrictive agreements entered into by that individual for the benefit of a third party, and no individual may, directly or indirectly, use or disclose any confidential information or trade secrets of a third party that the individual obtained while employed by or associated with such third party.

Principle 8: Government Contracts and Services

IMPAG is committed to complying with all applicable laws and regulations relating to government (public procurement) contracts and services and to ensuring that its reports, certifications and declarations to government officials are accurate and complete and that any deviations from contract requirements are properly approved.

Principle 9: Acceptance of Advantages

It is the policy of IMPAG to prohibit all staff from soliciting or accepting any advantage from any persons having business dealings with IMPAG (e.g. clients, suppliers, contractors).

Any gifts offered voluntarily to the staff in their official capacity are regarded as gifts to IMPAG and they should not be accepted without permission. By default, staff should decline the offer if the acceptance could be perceived as against the interest of IMPAG, or that of society, or lead to complaints of bias or impropriety.

For gifts presented to staff in their official capacity and of low nominal value, the refusal of which could be seen as unsociable or impolite, can be exceptionally accepted.

Principle 10: Conflict of Interest

A conflict of interest situation arises when the "private interests" of the staff compete or conflict with the interests of IMPAG. "Private interests" means both the financial and personal interests of the staff or those of their connections including: family members and other close affiliates; personal friends; the clubs and societies to which they belong; and any person to whom they owe a favor or are obligated in any way.

Staff should avoid using their official position or any information made available to them in the course of their duties to benefit themselves, their affiliates or any other persons with whom they have personal or social ties. They should avoid putting themselves in a position that may lead to an actual or perceived conflict of interest with IMPAG. Failure to avoid or declare any conflict of interest may give rise to criticism of favoritism, abuse of authority or even allegations of corruption.

In particular, staff involved in the procurement process should declare conflict of interest if they have beneficial interest in any company which is being considered for selection as IMPAG supplier of goods or services

Principle 11: Misuse of Official Position

Staff who misuses their official position for personal gains or to favor their relatives or friends are liable to disciplinary action or even prosecution. Examples of misuse include a staff member responsible for the selection of suppliers giving undue favor or leaking information to his/her relative's company with a view to giving away an undue advantage.

Principle 12: Handling of Classified or Proprietary Information

Staff is not allowed to disclose any classified or exclusive information to anybody without authorization. Staff who have access to or are in control of such information should at all times provide adequate safeguards to prevent its abuse or misuse. Examples of misuse include disclosure of information in return for monetary rewards, or use of information for personal interest. It should also be noted that unauthorized disclosure of any personal data may result in a breach of the applicable legislation on privacy.

Principle 13: Property of IMPAG

Staff given access to any property of IMPAG should ensure that it is properly used for the purpose of conducting IMPAG's business. Misappropriation of the property for personal use or resale is strictly prohibited.

Principle 15: Compliance with the Code

It is the personal responsibility of every staff member to understand and comply with the Code of Conduct. Every member of the staff shall sign a declaration of Principle to this purpose.

Higher ranked employees should ensure that their subordinates understand and comply with the standards and requirements stated in the Code. Any doubts of interpretation or problems encountered, as well as any suggestions for improvement, should be addressed to Head of SHEQ.

Any staff member who violates any provision of the Code will be subject to disciplinary action. In cases of suspected corruption or other criminal offences, a report will be made to the appropriate authorities.

Principle 16: Sanctions

IMPAG can take prompt and appropriate remedial action in response to violations of the Code. Any employee who engages in conduct prohibited by the Code as determined by the ethics officer will be subject to discipline actions and sanctions in accordance with the labor law.

Principle 17: Reporting

Employees have a responsibility to promptly report to IMPAG any violation of the Code. Employees will not be disciplined or retaliated against in any way for reporting violations in good faith. Retaliation against any employee for reporting policy violations, or for testifying, assisting or participating in any manner to inspections is strictly prohibited. Any employee who believes he or she has been subjected to or has witnessed retaliation must immediately report the alleged retaliation to the ethics officer.

Principle 18: Evaluation of new suppliers

By evaluating and selecting new products and suppliers, IMPAG places a strong focus on suppliers that comply with all applicable environmental, health and safety regulations. In addition suppliers shall ensure in all of their operations, procedures, services and products the protection of the health and safety of employees, suppliers, customers, subcontractors, neighbors and the general public. To ensure this, suppliers shall use resources efficiently, reduce waste and minimize continually environmental impacts in all fields. Due to principle 2, IMPAG desires equal exportations from their suppliers, which shall treat their employees in consideration to the before mentioned criteria. Suppliers shall support the protection of internationally proclaimed human rights and will not be complicit in human rights abuses. Suppliers shall not engage in any kind of compulsory or child labor and fight discrimination at the workplace. Suppliers shall comply with social and minimum standards, such as minimum wages, fair working hours and freedom of association and collective bargaining.

Zurich, 24.06.2024

Dr. Reto Hess
COO
Member of the
Executive Board

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