
IMS group – Code of Conduct

English

1. Scope

This procedure describes the Code of Conduct of the IMS Group and its subsidiaries.

2. Purpose

The purpose of the procedure is to make visible to all employees, customers, and business partners which Code of Conduct apply to IMS as a group.

3. References

The UN's sustainability goals, the UN Convention on Human Rights, the ILO-the international Labour Organization's central conventions and the OECD's guidelines for multinational companies.

4. Definition

N/A

5. Responsibilities

All employees of IMS Group and its subsidiaries are responsible for compliance according to this procedure.

6. Personal qualification

None

7. Procedure

Introduction

Among IMS Group's visions, creating lasting value and robust growth are important. We will achieve this by combining healthy and innovative business operations with a clear focus on sustainable societal development. Good business culture is a basic prerequisite for this.

Who do the guidelines apply to?

The guidelines apply to all employees at all levels, shop stewards, hired labour, board members, etc. who act on behalf of IMS Group and its subsidiaries. We also expect customers, suppliers, and other business partners to comply with the corresponding Code of Conduct in their business and among their employees.

Employee responsibility

Our employees are expected to familiarize themselves with this Code of Conduct, as well as to act in accordance with these principles. You should exercise common sense and ask for guidance if you are unsure or get into unclear situations.

Management's responsibility

The Code of Conduct has been adopted by the Management Review in the IMS Group. Group CEO and CEO's for the subsidiaries are responsible for implementing the Code of Conduct in the various companies, including communicating it to employees and providing regular training. Furthermore, the management must continuously assess how well the Code of Conduct has been implemented in the companies and measure the level of compliance.

Consequences of violating the Code of Conduct

Violation of the wording of the Code of Conduct will be met with appropriate responses. Evidence of infringements may lead to investigation. Which in turn may lead to disciplinary action if the infringement proves to be correct.

Relationship to other regulations

All employees must follow the rules, laws and regulations that apply to ethical conduct in the countries that the company operates.

Guidance and notification

The Code of Conduct contains rules and principles for ethical conduct. The guidelines do not always address every situation that our employees may find themselves in. If something unclear, or there is doubt regarding ethical dilemmas, it is important that our employees show good judgement. If you are unsure, it is important to discuss the situation with your immediate manager. Our Employees and partners are encouraged to notify if suspicious matters are discovered.

Sustainability, human rights, and the workplace

All companies in IMS Group are committed to following and respect the human rights in our companies. This applies also to the principles enshrined in the UN Convention on Human Rights, the international Labour Organization's central conventions of the ILO and the OECD's guidelines for multinational corporations. No form of child labour is allowed in our companies. If children under the age of 18 are engaged (typically a summer job) special measures must be taken. These must not perform dangerous work or night shift works.

Environment

All companies in IMS Group must conduct their business in accordance with current environmental legislations as well as carry out their business in a sustainable manner. We will always try to find solutions to reduce the environmental impact on the society around us.

Trust and transparency.

For all the companies in the IMS Group, trust and transparency are important. It is important for the individual's security and motivation. It is important with a view to retaining our good employees, but also to attracting new employees. Everyone is expected to behave respectfully towards business associates and each other.

HSE (Health, Environment and Safety)

Working in IMS Group and its subsidiaries must be safe and secure. We must follow all relevant laws and regulations. In addition, we have established systems for HSE and internal control. Employees who have work tasks that require it, must be given the necessary and sufficient protective equipment. Adequate training in use of the protective equipment must be provided by the individual company.

Bullying, discrimination and harassment

IMS Group and its subsidiaries have zero tolerance for bullying, discrimination, and harassment. Discrimination based on ethnic origin, nationality, age, gender, sexual orientation, or religion is prohibited and shall not occur. Everyone should be treated with respect. We must have a working environment without bullying and harassment. It is a shared responsibility we have. If employees are bullied, discriminated against, or harassed, IMS Group and its subsidiaries undertake to take this seriously and implement the necessary investigations and actions.

Anti-corruption and Integrity

Employees must be loyal to IMS Group's ethical values and guidelines, as well as to colleagues and managers. Conflicts of interest that could harm the company should be avoided. All employees must exercise a high ethical standard both commercially and personal when exercising such and their responsibility in the company's service. Employees must always act independently when acting on behalf of the companies and must seek to avoid any conflict of interest. This is to avoid ending up in a situation where their integrity may be called into question at a later stage.

IMS Group and its subsidiaries have zero tolerance for any form for corruption and bribery and are committed to combating such practices through attitude-building work and preventive actions. Current corruption legislation in Norway and other countries in which we operate to be followed without exceptions. Corruption means directly, or indirectly through a third party, offering, giving, accepting, receiving, soliciting, or agreeing to receive any form for of undue advantage.

Definition of discount, gifts, and hospitality

Discount: Employees shall not receive discounts a personal purchase of goods and services from the companies' connections unless the discount scheme is generally applicable to all employees.

Gifts: A gift can be anything that has value and that, regardless of value, can appear as an advantage. Without the written consent of the immediate manager, gifts should never be offered and received. However, this does not apply to advertising effects with little value, or other smaller gifts with a value below NOK 500, or the gift is a thank you for contribution to events, courses, etc. and it will appear rude not to accept the gift.

Hospitality: Care must be taken when offering and accepting hospitality and entertainment such as e.g., dinners and/or tickets to events. A clear business justification is required, and the costs must be reasonable.

Sponsorship and donations

IMS Group and its subsidiaries shall not sponsor or donate to religious and political groups or parties. Sponsorship or donations can only be given if it is in line with legitimate and publicly available criteria.

Personal behaviour

A great deal of caution must be exercised in disseminating company-internal information in a way that may involve a risk that unauthorized persons may become aware of it. Employees undertake to familiarize themselves with and comply with the companies' policy for information security

Personal data shall be processed with the company's privacy policy and applicable privacy legislation (GDPR). Employees with access to personal information shall have a stricter duty of confidentiality. Employees shall not seek personal information about other employees or business associates when it is not necessary to perform the person's work tasks in the company.

Alcohol and other drugs

No one should be under the influence of alcohol and drugs during working hours. Such misuse can give the employer a bad reputation in the market and the society.

Alcohol should be served in limited quantities according to normal practice. Moderation is the responsibility of the individual employee.

8. Records

Compliance with the company's Code of Conduct shall be monitored by the Management Review. Any changes and updates to this document must be approved in the Management Review.