



# IMI Code of Conduct

Version 1.6  
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About this Handbook

# Introduction

**This Code of Conduct is a policy that defines how we - as a company and as employees - should act, towards each other, towards our customers, partners, subcontractors, suppliers, and authorities, and in every other situation where we represent Industri-Matematik International AB (IMI).**

The purpose is to ensure that IMI as a company is successful and operates in a sustainable way. It defines our corporate responsibility in society and constitutes our quality, environment, and health & safety policy.

Understanding and complying with this code is mandatory for everyone working for IMI. This includes employees, subcontractors as well as partners. It is a personal responsibility to comply. It is IMI's expectation that our managers, as part of their leadership responsibilities, act as role models and support team members to comply with the code.

The CEO is ultimately responsible for this Code and its implementation, and every employee working at IMI is expected to live up to the Code.



# Words from the CEO

Our success is due to the fantastic team of people working at IMI. Together we build the company culture, and we take great pride in doing so.

The IMI Code of Conduct is important for all of us and our stakeholders. It helps to build our business and it helps to protect us. We comply with all laws, regulations, and IMI policies and guidelines. And if we come across something, that we suspect could be in breach of the IMI compliance program, we report it.

We treat our colleagues, customers, and vendors with respect, dignity, fairness, and courtesy. We are reliable, committed, flexible and creative and we stand together as one team.

- Niklas Rönnbäck, CEO.



# Our vision

Our vision is to enable our customers to become world leaders in sustainable supply chain execution. We provide software and knowledge to distribution operations that aim for the most effective and sustainable supply chain solution.



# Our company

While our main business of operation is in Sweden we are also supported by valuable employees in Norway, Poland, the UK, the Netherlands, the US and Canada. Through close cooperation we support customers throughout Europe and North America.

We service a diversified customer base operating in different segments and markets. The fast-moving domain in which IMI operates, requires for decisions to be made quickly. Our employees are empowered to make such decisions together with our customers. This means that each employee has far reaching responsibility for both IMI's and the customer's business.

In the role we take towards our customers as trusted advisors, we are responsible for keeping up to date with the latest in sustainable Supply Chain solutions. IMI strives to continuously improve our way of working. This together with our ambition, to contribute to the sustainable development of society, serves as a basis for all our actions.

All IMI employees represent the company's brand and reputation. Not only by the solutions we create, but also through our behavior and the knowledge that we convey to those around us, both at work and to some extent even when we are not working.



# Sustainable operations

IMI's ambition is to minimize negative environmental impact and create a positive footprint wherever possible. IMI encourages its employees to systematically and proactively work toward a safe and environmentally protective community.

IMI strives to systematically and proactively work with ESG (Environment, Social, and Governance) and to integrate ESG into our business strategies.

IMI's Code of Conduct summarizes our requirements regarding human rights, employee rights, the environment, the impact on children's rights, and business ethics.

The Code applies to IMI's entire value chain and is based on the UN Declarations of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the UN Convention on the Rights of the Child. IMI supports the UN Global Compact.



# The Ten Principles of the UN Global Compact

01

## Human rights Principle 1.

Businesses should support and respect the protection of internationally proclaimed human rights; and

02

## Human rights Principle 2.

make sure that they are not complicit in human rights abuses.

03

## Labour Principle 3.

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

04

## Labour Principle 4.

the elimination of all forms of forced and compulsory labour;

05

## Labour Principle 5.

the effective abolition of child labour; and



# The Ten Principles of the UN Global Compact

06

## Labour Principle 6.

the elimination of  
discrimination in  
respect of employment  
and occupation.

07

## Environment Principle 7.

Businesses should  
support a  
precautionary  
approach to  
environmental  
challenges;

08

## Environment Principle 8.

undertake initiatives to  
promote greater  
environmental  
responsibility; and

09

## Environment Principle 9.

encourage the  
development and  
diffusion of  
environmentally  
friendly technologies.

10

## Anti-corruption Principle 10.

Businesses should work  
against corruption in all  
its forms, including  
extortion and bribery.





# Our people.



Diversity is an important asset both within the company and in its relationships with clients and other external stakeholders. IMI promotes equal rights and opportunities of employees in the workplace regardless of their gender, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age, etc. This is further described in IMI's Equal Opportunity Policy.

We all have the right to work in an environment that is free from intimidation, harassment and abuse. IMI strives to maintain a working environment where our employees can develop and thrive in a climate of physical and emotional well-being. We want our employees to feel proud of their work and to feel that their work is meaningful, both to themselves and to society in general. We all have the right to work in an environment that is free from intimidation, harassment and abuse.

The health of all IMI employees is a top priority. This is a responsibility shared by IMI as an employer and by IMI's managers and employees. IMI works systematically to prevent illness and accidents on the job.



# IMI's core values are;



Reliable

We are always here for you.



Together

We create ideas, joy, and success.



Committed

To our customers, team, and partners.



Flexible

We can do everything - for your every need.



Creative

Inventions, ideas, and improvements are what makes us better - each and every day.





When it comes to how we treat each other, this means that we are one team, and should be loyal to and stand by our colleagues. We treat our colleagues, customers, and vendors with respect, dignity, fairness, and courtesy. We are professional in our attitude to each other, we keep our promises and deliver what we have promised on time, and if any obstacles should arise, we inform those affected.

IMI's leaders should be role models for the behaviors we would like to see in our organization. They are committed to a working environment free from discrimination, harassment, and retaliation. They foster open communication where everyone's opinion is welcome and respected. Once a decision is made, we respect it and act together in accordance with the decision.



# Information and IT Security.

Employees must show due care when sharing information, for example via social media and other digitalised platforms, to avoid conflicts of interest with the company and ensure that the IMI brand is strengthened and not weakened.

All employees should be vigilant for cyberattacks and other digital threats and take reasonable measures to protect the company from such risks. This is further described in IMI's Information and IT Security Policys.



# Legal Compliance

IMI monitors and complies with the applicable laws, regulations, and other requirements applicable to operations in the countries where IMI is active.

IMI does not accept fraud, money laundering, corruption, bribes, public procurement offenses or unpermitted competition-restricting practices. We must never commit to activities that we cannot defend or account for, and we must not make decisions based on personal interests or improper relationships.

Employees must not engage in activities where there is a risk for conflict with IMI's interests. To comply with existing laws, rules and regulations is an absolute requirement for all IMI's employees.

No employee may, directly or indirectly:

- 01 exploit his or her position for personal gain at the expense of the company, the clients or business partners,
- 02 request or accept improper payment or other types of improper gifts,
- 03 offer or provide facilitation payments, even though in some countries they are legal,
- 04 offer or provide payment or other types of compensation that can be regarded as improper to individuals, organizations or companies, or persons closely linked to them,
- 05 engage in any activity which would create a real or potential conflict of interest or give the appearance of a real or potential conflict of interest.



# Legal Compliance

IMI undertakes correct and accurate accounting and reporting in accordance with the accounting rules in each country. All managers and employees must conduct their business in such a way, that IMI can produce correct and accurate accounting. All employees must abide by IMI's authorization arrangement.

We respect the privacy of individuals and recognize the importance of the personal data entrusted to us by our customers, our employees and other parties. This is covered in detail in our GDPR policy.



# Blowing the whistle when something isn't right.

At IMI, you have a responsibility to speak up and raise concerns promptly about any situation that may violate our Code of Conduct, our values, the law, regulations, best practices in accounting, auditing and financial reporting, and safety standards. Speaking up helps IMI maintain a healthy, ethical, and compliant company and it is part of our culture. It benefits all of us if we raise our concerns so IMI can consider them carefully and address them properly. As a result, it is important that we have a process to communicate serious concerns and this process is governed by the whistleblower policy outlined in our Whistleblower Guidelines.

You may report concerns about actual or potential breaches of law, regulation, corporate policy, ethics or safety standards to your leader first. If that is not possible, you do not feel comfortable doing so, or your leader is not able to resolve the concern, you may contact IMI Confidence Line directly or anonymously at [Lantero](#).

The Confidence Line is administered, independently monitored and staffed by a third party and is intended to provide a confidential, anonymous means of submitting concerns under the whistleblower guidelines. You can contact the Confidence Line 24 hours a day, seven days a week, 365 days a year and we encourage you to provide as much specific information as possible when communicating concerns, including names, dates, places, events that took place, witnesses and supporting documents, as well as your perception of why the incident may be a violation, so that a meaningful investigation can be conducted. All reports are referred to IMI's Chief Financial Officer and Legal Counsel.



# Compliance to the Code


Following this code is important for all of us at IMI and to our stakeholders. It helps to build our business and it helps to protect us. We comply with all laws, regulations, and IMI policies and guidelines. And if we come across something, that we suspect could be in breach of the IMI compliance program, we report it.

Compliance with this code of conduct is a matter for the executive management, and for managers at all levels down to the individual employee. All managers are responsible for ensuring that their employees have everything they need to comply with IMI's policies and guidelines. All employees are obligated to familiarise themselves with the contents of the policies and guidelines, accept and follow them. As employees, we also have an obligation to help our colleagues and external business partners to do the same.

Executive management and managers at IMI have a particular responsibility in always leading by example and in ensuring that the code is put into practice in their teams. All managers are responsible for making sure that employees, partners, and other relevant parties are informed about this code. In the case of employees, this should be a part of recruitment, on-boarding and discussed during performance reviews.







This code provides guidance about the standards of integrity and business conduct expected by IMI but is at the same time, not a substitute for using good judgment. When in doubt, we seek additional guidance and support from colleagues, managers, Legal or HR.

## **Consequences of non-compliance**

When non-compliance with IMI's Code of Conduct is reported or suspected, we will take measures to investigate and, if appropriate, remedy the situation. Those who violate our Code of Conduct, other policies and guidelines, or any laws will be subject to appropriate disciplinary action, which may include termination of employment. If any of IMI's business partners violates our Code of Conduct, we consider this to be reason for terminating our business relationship.

