

# **Guidelines of IMM Photonics GmbH** (as of November 4, 2022)

## **1. Introduction / Preamble**

IMM Photonics GmbH is committed to ecologically and socially responsible corporate management. We also expect our employees to observe the principles of ecological, social, and ethical behavior and to integrate them into the corporate culture. Furthermore, we strive to continuously optimize our corporate actions and our products and services in terms of sustainability. The guidelines are based on national laws and regulations such as the Supply Chain Sourcing Obligations Act (LkSG) as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the International Labor Standards of the International Labor Organization, and the United Nations Global Compact.

## **2. Our responsibility**

### **2.1 Social responsibility**

#### **No forced labor**

We exclude forced labor, slave labor, or any such comparable work at our company and at our suppliers. All work must be voluntary and without threat of punishment. Employees must be able to leave work or employment at any time. Unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment, and humiliation, is excluded.

#### **No child labors**

No child labor will be used at any stage. We adhere to the recommendation from the ILO conventions on the minimum age for the employment of minors. The rights of young workers are specifically protected.

#### **Fair remuneration**

Remuneration for regular working hours and overtime is above the national statutory minimum wage and in line with industry standards. The pay for ordered overtime exceeds the pay for regular hours in all cases. Employees are provided with all benefits required by law.

#### **Fair working hours**

Working hours shall be in accordance with applicable laws or industry standards. Overtime is permitted only if it is worked on a voluntary basis and does not exceed 12 hours per week, while employees must be granted at least one day off after six consecutive working days. Weekly working hours may not regularly exceed 48 hours.

#### **Freedom of Association**

The right of employees to form and join organizations of their choice and to bargain collectively and to strike is respected. Employee representatives shall be protected from discrimination. Employees shall not be discriminated against because of formation, joining or membership in such an organization. Employee representatives are granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

**Prohibition of discrimination**

Discrimination and unequal treatment of employees in any form are prohibited unless they are justified by the requirements of employment. This applies, for example, to discrimination based on gender, race, caste, national, ethnic, or social origin, skin color, disability, health status, political conviction, origin, ideology, religion, age, pregnancy, or sexual orientation. The personal dignity, privacy, and personal rights of everyone are respected.

**Health protection, safety at work**

We take responsibility for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the activity. Excessive physical or mental fatigue is prevented through appropriate measures. In addition, employees are regularly informed and trained about applicable health and safety standards and measures.

**Preserving the natural basis of life**

We are committed to taking appropriate measures to protect land, air, and water, thereby preserving the livelihood of our employees.

**Grievance mechanisms**

The grievance procedure is accessible to employees while maintaining confidentiality of identity and effective protection against discrimination.

**Dealing with conflict minerals**

For the conflict minerals tin, tungsten, tantalum, and gold, as well as other commodities such as cobalt, we have established processes in line with the Organization for Economic Cooperation and Development's (OECD) Guiding Principles on Due Diligence to Promote Responsible Supply Chains for Minerals from Conflict and High-Risk Areas. Smelters and refiners without adequate, audited due diligence processes are avoided.

**2.2 Environmental responsibility****Treatment and discharge of industrial wastewater**

Wastewater from operations, manufacturing processes and sanitary facilities is treated in accordance with current legal requirements. In addition, continuous checks are carried out to determine how wastewater can be reduced and avoided.

**Dealing with air emissions**

Air and noise emissions are handled in accordance with legal requirements. Constant efforts are made to reduce or eliminate harmful emissions.

**Dealing with waste and hazardous substances**

We take a systematic approach to identifying, handling, reducing and responsibly disposing of or recycling solid waste. The prohibitions on the export of hazardous waste in the Basel Convention of March 22, 1989, as amended, are observed. Chemicals or other materials that pose a hazard when released into the environment are identified and managed in a manner that ensures safety during their handling, transport, storage, use, recycling or reuse, and disposal. Mercury is used in accordance with the prohibitions of the Minamata Convention of October 10, 2013, as well as persistent organic pollutants in accordance with the Stockholm Convention of May 23, 2001, as amended.

**Reduce consumption of raw materials and natural resources**

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, is reduced, or avoided. This is done either directly at the point of generation or through processes and measures, for example by changing production and maintenance processes or procedures in the company, by using alternative materials, by savings, by recycling or with the help of the reuse of materials.

**Dealing with energy consumption/efficiency**

Energy consumption shall be monitored and documented. Economic solutions are constantly being searched for to improve energy efficiency and minimize energy consumption.

**2.3 Ethical business behavior****Fair competition**

The standards of fair business, fair advertising and fair competition are observed. The applicable antitrust laws are applied, which prohibit agreements and other activities that influence prices or conditions in dealings with competitors. Furthermore, these regulations prohibit agreements between customers and suppliers aimed at restricting customers' freedom to determine their prices and other conditions autonomously when reselling.

**Confidentiality/Data Protection**

Supplier agrees to comply with the reasonable expectations of its customer, suppliers, customers, consumers, and employees with respect to the protection of private information. The supplier shall comply with data protection and information security laws and governmental regulations when collecting, storing, processing, transmitting, and disclosing personal information.

**Intellectual property**

Intellectual property rights shall be respected; technology and know-how transfers shall be made in a manner that protects intellectual property rights and customer information.

**Integrity/Bribery, Taking Advantage**

The highest standards of integrity shall be applied in all business activities. The supplier shall have a zero-tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards shall be in place to ensure compliance with anti-corruption laws.