

As a technology and trading company, the IMR Group is fully integrated into the processing chain of the non-ferrous metal industry, from mining to metalworking and processing semi-finished products. During the more than 30 years of our existence, we have developed into a leading provider of industrial metals, semi-finished products and metal powder.

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Code of Conduct of the IMR Group

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Beachtung des geltenden Rechts

Compliance with the applicable law

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Sicherheit und Umwelt

Code of Conduct of the IMR Group

The IMR Group operates globally. When undertaking their activities, the companies in the IMR Group come into contact with a large number of different legal systems and regulations. With this Code of Conduct, the management of IMR Group GmbH provide guidelines for the conduct of all executive bodies, managers and employees of the companies in the IMR Group. If any employee is in doubt about the meaning of the guidelines below, they should seek the advice of their superior.

Our mission

is the trading, manufacture, storage, distribution and refining of metals and alloys, as well as taking back the residues from these that occur in our customers' ongoing production process. This consolidation in a dynamic market environment has enabled us to operate at different levels of the value creation chains in the non-ferrous metal industry. The security of the supply of metals combined with our technical and solution-oriented expertise creates a significant connection between us and our business partners. The development of trade and the expansion of our production are the focus of the activities of our management and all our employees.

Corporate governance with integrity

Our decisions build on correct and accurate invoicing records and financial data in our accounting department. These data are presented and audited in accordance with recognised principles.

High standards ensure high quality. Our ISO 9001-certified management system helps us to work on achieving our objectives in planned steps. Aspects of environmental management and occupational safety are integrated into the existing management system.

Compliance with the applicable laws

Compliance with the applicable laws is an essential basis for every action of the companies in the IMR Group in all their activities globally. We respect human rights, and in particular we strictly reject any form of child or forced labour without exception, and we expect the same from our business partners. Employees of the IMR Group are expected to familiarise themselves with the legal regulations in force for their area of responsibility, and to keep themselves constantly updated on these. Managers bear a particular responsibility for keeping their employees informed.

Fair competition

The IMR Group is committed without restriction to competition by fair means, and also expects this of its business partners. For us it is a matter of course to observe the regulations of competition and anti-trust law in our dealings with our customers, suppliers and competitors. Likewise we comply with all the applicable regulations concerning international trade (relevant import and export regulations) in the respective valid version. No employee of the IMR Group may offer, request or accept advantages that are intended to unfairly influence a business decision.

Companies and employees

Mutual respect is a basic principle of the corporate culture in the IMR Group. We are committed to fair labour conditions and equality of opportunities. Discrimination of whatever kind is not tolerated in the companies in the IMR Group. Fair working conditions also mean that we enable flexible working hours and working from home, and support our employees' work/life balance. Our employees' training and development matter greatly to us. Pay and other benefits correspond at least to the respective national standards. The company recognises the employees' rights to freedom of assembly, to found or join work organisations, and

to conduct collective bargaining in accordance with the respective national laws.

Conflicts between the interests of the IMR Group and the personal interests of the employees must be avoided. Any conflicts that nonetheless occur must be disclosed in order that they can subsequently be resolved. All employees are obliged to handle the property and all assets of the IMR Group with care and protect them.

Information and data protection

All employees are obliged to respect business secrets and other confidential information of the companies in the IMR Group and its business partners. Confidential information of any kind (e.g. contracts, correspondence and technical information, etc.) is only intended for internal use. All employees are obliged to respect and protect the intellectual property and expertise of the IMR Group and its business partners. The unauthorised disclosure or use of confidential information is strictly forbidden. This also applies in particular to intellectual property and expertise.

The companies in the IMR Group comply with all the provisions for the protection of personal data (EU General Data Protection Regulation and all relevant national regulations) and also require this of their employees.

Concerns, complaint, whistleblowers

Concerns and/or complaints in connection with Regulation (EU) 2017/821 can be reported via an email address provided on the website or via a telephone number also available there. They will be dealt with by the officer appointed for this subject.

A special email address has been set up for reporting internal concerns and complaints, but these can also be reported directly to the management. The respective trusted persons for health and safety also act as additional points of contact on the subject of occupational safety. Whistleblowers do not need to fear any reprisals.

Safety

The IMR Group attaches great importance to safety in every respect. This applies to the operational safety of our production installations and also to occupational safety and health protection. The companies in the IMR Group therefore in particular observe all the safety regulations for their operating equipment and installations (machine safety), the provisions of the law on hazardous goods, as well as the regulations on worker protection, health protection and fire prevention.

The use of the personal protective equipment provided by the company is demonstrated in regular training.

We record accidents at work and near-misses, and evaluate the reasons and risk factors for their occurrence in order to develop continuous improvement measures. Fire prevention plans, information on conduct in the event of fire and the emergency telephone numbers are available at all times via the infoboard.

Environment

For IMR the protection of the environment is of just as great importance as the topic of safety, therefore the companies in the IMR Group observe the relevant environment protection regulations in particular. Our objectives in terms of the environment are the sustainable use of raw materials, the systematic recording and improvement of the environmental impacts of our activities, and the further development of our processes. When making changes to installations and/or products, we give prior consideration to the aspects of environmental relevance along with other aspects.

Companies and business partners

We develop our customer and supplier relationships into long-term partnerships. Ethically correct conduct forms a basis for this. We therefore apply the standards defined in this Code of Conduct not just to ourselves, but also to our business partners.

The management

November 2022