



CODE OF CONDUCT

FOR IMEC'S PARTNERS

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Introduction

This Code of Conduct describes imec's values, mission, vision, and general ethical working principles for imec's partners.

Imec is a world-leading research and innovation hub in nanoelectronics and digital technologies, headquartered in Leuven, Belgium. Imec consists of distributed R&D groups at several Flemish universities and has affiliates in the Netherlands, Taiwan, USA, and offices in China, India, and Japan. Reference to "imec" in this Code of Conduct means the imec group except where otherwise indicated.

Through its research and associated efforts, imec aims to achieve a long-term perspective leading to a better life in a better society. Imec's research activities and services strive to achieve a positive impact on future society.

To this end, imec works closely with various suppliers, research partners, customers, and other partners ("partners"). Therefore, this Code of Conduct describes, in general terms, imec's expectations of every partner regardless of the type of partnership.

Imec expects full compliance from its partners with all applicable laws and regulations of the countries where they operate. Regardless of our partner's physical location, all business with imec shall be conducted in a manner compatible with this Code of Conduct. Additionally, imec encourages its partners to go beyond legal compliance, drawing upon internationally recognized standards and ethical practices, to advance in social and environmental responsibility for the benefit of society and our planet.

These values, mission, vision, and general working principles are also described in imec's internal regulations, policies, and internal Ethics Code of Conduct.

Imec believes that mutual respect for this Code of Conduct is a guarantee for building a trustworthy, fruitful, and professional collaboration between imec and its partners.

1. Business and research integrity

1.1. Research and technology organization, delivering outstanding value

In Belgium, imec is an independent non-profit research organization funded by the Flemish government and a European Research and Technology Organization (RTO). Imec complies with all applicable legislation, such as the state aid legislation based on Article 107 of the Treaty on the Functioning of the European Union.

At imec, quality means meeting the needs of internal and external customers within the boundaries of integrity and ethics without denying imec's other values. Imec adopts a customer-focused attitude and contributes constructively to a customer-friendly culture. Imec does this independently concerning internal and external customers, public and private customers, industry and academia.

Imec expects commitment from its partners to deliver outstanding value when conducting business and research with imec.

1.2. Research integrity

Research integrity is an integral part of imec's organizational culture. Adhering to the highest ethical standards is the norm at imec, and imec expects its partners to observe the same standards when performing research with imec:

- conduct research and publish results with precision,
- exercise caution—act with foresight and precaution to avoid causing harm to anyone,
- demonstrate dependability in scientific work and reporting,
- submit verifiable research results,
- conduct research honestly and autonomously,
- conduct research from an impartial standpoint.

Imec's policy on research integrity focuses on stimulating 'good research practices' and preventing research misconduct. Research misconduct is the fabrication, falsification, or plagiarism in proposing, conducting, reviewing research or reporting research results. It also includes avoiding questionable research practices. Questionable research practices are research practices that do not conform with generally accepted research practice standards (e.g., ghostwriting, questionable authorship, improper data management, incorrect citing of peers, duplicate publications, and others). Imec has installed a Commission on Scientific Integrity (CSI), which is responsible for imec's policy on research integrity and has a procedure in place for dealing with research integrity problems.

Imec's 'Shared Values' concerning research integrity are based on the European Code of Conduct for Research Integrity. Imec endorses the ethical code drawn up by the Royal Flemish Academy of Belgium for Science and the Arts" drawn up by the European Science Foundation (ESF) and All European Academies (ALLEA). In Belgium, imec is also a member of the Flemish Commission of Scientific Integrity (VCWI) (Vlaamse Commissie Wetenschappelijke Integriteit), that is part of the KVAB (Royal Flemish Academy for Science and the Arts of Belgium).

1.3. Clinical research and animal welfare

Imec treats the subjects of clinical research and experiments with the highest ethical and safety standards. Imec complies with its internal policies about the ethical conduct of experiments involving human subjects, which defines the framework for research performed using human subjects and human body material. Imec also complies with data protection laws to protect the confidentiality and privacy of the subjects involved in studies. Imec only performs research with human subjects and human body material upon approval by independent ethics committees or institutional review boards in observance with laws, regulations, and standards.

Animals used in experiments are treated according to the principles of the 3R's (Reduction, Replacement, and Refinement) as embodied in imec's internal policies for in-vivo experimentation. The Animal Welfare Body of imec oversees all animal research at imec, and animal experiments can only start after explicit approval by an authorized ethics committee.

1.4. Business integrity

Imec upholds the highest standards of integrity in all business interactions. Imec has a zero-tolerance policy concerning all forms of bribery, corruption, extortion, and embezzlement. Imec expects from its partners a commitment to the same standards of integrity that we hold ourselves.

Imec chooses its partners free of personal interests, based on objective and transparent criteria. Imec values the integrity and reliability of its partners. Imec conducts legally required inspections, such as sanction list screening.

Imec expects its partners to comply with relevant legal requirements and mandatory regulations, to instruct their personnel to take lawful and responsible actions, and to refrain from expecting or demanding unlawful actions from imec.

1.5. Export compliance

All transactions, regardless of whether they are cross international borders or are transferred within the same country, may be subject to national and international customs, trade, export control, and/or sanctions regulations. Imec is committed to complying with all applicable customs, trade, export control, and sanctions regulations.

1.5.1. Customs and trade

Imec operates worldwide and processes daily imports, exports, and transits of a variety of goods for which imec shall ensure adherence to national and international regulations.

1.5.2. Export control

Imec refrains from transactions recognized as impermissible by the national or international export control regulations. These regulations aim at achieving various objectives such as national security, preventing the proliferation of weapons of mass destruction, implementing anti-terrorism and crime controls, and protecting human rights.

Imec will not engage in research for military purposes in the design, development, production, stockpiling, or use of weapons of mass destruction, such as nuclear, chemical, or biological weapons, as those terms are defined in the following link or if there is a connection to offensive weapon systems.

To this extent, research must not be:

- used to perpetrate actions in breach of international humanitarian law,
- employed by any means as an anti-personnel landmine,
- used to provoke, aggravate or prolong armed conflicts,
- utilized aggressively against another country or used to assert a territorial claim by force,
- engaged to adversely affect regional peace, security, and stability (excluding use for the legitimate defense and national security interests, including involvement in UN or other peace-keeping activity),
- used in internal repressions (torture and other cruel, inhuman and degrading treatment or punishment, summary or arbitrary executions, disappearances, arbitrary detentions, and other significant violations of human rights and fundamental freedoms),
- diverted to terrorist organizations or used to facilitate terrorism and international organized crime.

Imec expects its partners to ensure at least the same principles. Imec expects its partners' compliance with applicable international trade regulations, including export controls, embargoes, and sanctions, and to disclose any restrictions that may be imposed on the export or re-export of their supplies of products or services. Partners shall provide truthful and accurate information and obtain export licenses and/or consents where necessary. Imec requires its partners to identify and disclose any part of the delivery or service subject to export regulations when a contract is signed, or at the receipt of a purchase order. Further, imec partners are required to update such information in the event of a change in export regulations or classifications, and to inform imec on the applicable export regulations.

1.6. Competition law

Imec is committed to observing applicable anti-trust or competition laws, upholding standards of fair business and competition.

Imec expects its partners to carry out their activities in a manner consistent with all applicable competition laws and regulations, and account for competition laws of all jurisdictions in which the activities may have anticompetitive effects. This expectation includes avoiding business practices such as entering into arrangements that unlawfully restrain competition, improper exchange of competitive information, price-fixing, bid-rigging, or improper market allocation.

1.7. Anti-corruption laws

Imec complies with the anti-corruption laws, directives, and regulations that govern operations in the countries in which it does business, and expects the same compliance from its partners. Partners must refrain from offering or making improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This requirement includes a prohibition on facilitating payments intended to expedite or secure the performance of a routine governmental action like obtaining a visa or customs clearance, even in locations where such activity may not violate local law.

Imec expects its partners to exert reasonable due diligence to prevent and detect corruption in all business arrangements.

1.8. Fraud and deception

Imec has a zero-tolerance policy concerning fraud and deception and expects the same from its partners. Partners may not seek to gain an advantage of any kind by acting fraudulently, deceiving people or making false claims, or allowing anyone else to do so. This policy includes defrauding or stealing from imec, a customer, or any third party, and any misappropriation of property.

1.9. Bribery

Bribes or other means of obtaining undue or improper advantage must not be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

Imec also prohibits all forms of money laundering, which involves disguising, unlawfully channeling obtained money, or transforming such money into legitimate funds. Imec expects the same from its partners.

1.10. Gifts and business courtesies

Imec competes on the merits of its research and does not use the exchange of business courtesies to gain unfair competitive advantages. Imec undertakes to remain free from influence, the appearance of influence, or any conflicting interests. Imec avoids any form of incentives that could, in any way, influence business decisions in favor of imec's partners. Imec will not pay or accept any unreasonable direct financial or non-financial incentives from its partners.

Imec also expects its partners to compete on the merits of their products and services. The exchange of business courtesies must not be used to gain an unfair competitive advantage. In any business relationship, suppliers and research partners must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, are consistent with reasonable marketplace customs and practices, and will not adversely impact imec's reputation.

1.11. Conflicts of interest

To maintain our reputation for integrity, both imec and its partners must identify and declare any instances of apparent or actual conflicts of interest. Conflict of interest means any circumstance that could cause doubt on the ability to act with total objectivity concerning imec's interests. This includes a conflict between the interests of imec and personal interests or that of close relatives, friends, or associates.

1.12. Insider trading

Imec prohibits its personnel from using any material or non-publicly disclosed information obtained in the course of their business relationship with partners as the basis for trading, and from enabling others to trade in the stock or securities of any company. Imec expects the same from its partners.

1.13. Maintain accurate records

Imec aims to create accurate records and does not allow the alteration of any record entry to conceal or misrepresent the underlying transaction it represents. Imec expects the same from its partners. All records, regardless of format, made or received as evidence of a business transaction, must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.

1.14. Audits

Imec performs periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of this Code of Conduct, and contractual arrangements between imec and its partners and expects the same from its partners.

1.15. Quality

In imec's quality policy, imec uses its best efforts to deliver research results that meet the demands and expectations of its partners. For this purpose, imec uses a structured and documented quality management system based on the NBN-EN-ISO 9001:2015 standard.

The ISO 9001 certificate strengthens imec's competitive position as an international research center. The imec organization established in Leuven has an ISO 9001 certificate for the following activities: training, consulting, design, research, development, integration, characterization, prototyping, and low volume production. These activities apply to processes, systems, and software in the field of nanoelectronics and digital technologies.

Imec expects its partners to proactively invest in and maintain a state-of-the-art quality management system within their organizations, and to ensure that appropriate quality resources are available to meet imec's requirements, today and in the future.

1.16. Contract framework

Imec considers clarity and transparency in commitments as mutually essential for imec and its contractual partners. A written agreement or a purchase order allows transparent financial planning, avoids unnecessary risks, and is the formal commitment from imec to its partners and vice versa; therefore, only an approved purchase order or a signed agreement guarantees payment and the performance of activities. Starting work before receiving a purchase order or entering into a written agreement violates imec's business principles and puts imec's partners at risk for delay or rejection of payment or delay or rejection of research activities. Imec intends to uphold the highest professional standards in working with its partners, providing them with the security and commitment that a purchase order or written agreement with imec provides. Imec asks its partners to be vigilant and start work only when a purchase order or written agreement is in place. Unless explicitly otherwise agreed upon in writing, imec's general purchasing conditions apply to all purchase orders issued to imec's partners, and imec's general terms and conditions of sale apply to all quotations issued to imec's partners.

In an early stage of cooperation with a partner during which parties intend to exchange confidential information, a Non-Disclosure Agreement will be signed to protect both imec's and its partner's confidential information.

Where there is any inconsistency between two or more legal and/or non-legal documents, the order of precedence is typically established in the legal document. In general, the contents of the legal document will always prevail over any non-legal document.

2. Confidential information, intellectual property rights, personal data and information security

2.1. Confidential information

Confidential information is of great value to imec. The diligent protection of such information is crucial. This protection applies to imec's information, but also third-party information entrusted to imec. Imec aims to be a trusted partner for its partners and wants to secure its long-term position as a global outstanding research partner. Therefore, imec ensures that the information that imec receives during its research collaborations is used only within the legal and contractual boundaries as agreed upon with its partners.

Imec expects its partners to take all appropriate measures to protect imec's confidential information and information from other imec partners to which they might have access to under confidentiality restrictions. Imec's partners should only share confidential information within their company to persons on a strict need-to-know basis. Partners should not use confidential information for any purpose other than the purpose it was intended for unless there is a prior written authorization from the owner of the confidential information.

2.2. Intellectual property rights

Imec respects the intellectual property rights of its partners, and imec expects its partners to respect imec's intellectual property rights. Imec's intellectual property rights may not be used by its partners without written permission or outside the scope of the agreed-upon collaboration between imec and its partner. In the course of conducting research together with imec, partners are not allowed to use intellectual property rights from third parties without authorization.

Partners should conduct business in a manner that protects intellectual property rights. Partners must comply with all the applicable laws governing intellectual property rights assertions, including without limitation, patents, copyrights, and trademarks.

2.3. Personal data

Privacy is a fundamental right of each individual. Imec processes personal data with respect, in a correct, ethical, and transparent manner, to safeguard the privacy of each individual and to prevent misuse of personal data. Imec's privacy charter is compliant with the General Data Protection Regulation (GDPR). Imec expects its partners to protect the privacy of personal information of everyone with whom they do business.

2.4. Information security

Imec processes various digital and non-digital information and wants to be a trusted partner for both internal and external stakeholders, ensuring that information assets are safeguarded from unauthorized disclosure, modification, or destruction throughout the entire information life cycle. R&D information and information, in general, are one of imec's critical assets. They represent great value and should, therefore, be adequately protected from many risks, including information security and compliance risks.

Information security is defined as the process of protecting information and associated assets (i.e., storage, transmission, and other control facilities) from accidental or intentional breaches in order to ensure the confidentiality, integrity, availability, and traceability of information. Imec achieves information security by implementing an

adequate set of technical control measures (e.g., perimeter control, access control, monitoring, secure coding) and non-technical measures (e.g., policies, processes, procedures, guidelines, organizational governance).

These control measures are based on international standards (such as ISO 27000 series and NIST 800-53) and implemented, monitored, reviewed, and improved when necessary to:

- safeguard partners' data and IP,
- protect the reputation of imec and its partners,
- maintain business continuity,
- minimize the potential impact of information security incidents,
- ensure compliance with laws and regulations.

Imec expects its partners to observe similar information security principles—based on international standards—to assure the safeguarding of imec's assets and assets of imec's partners when present at imec premises by designing and implementing the right controls, policies, processes, procedures, and standards.

3. Labor and human rights

3.1. Freely chosen employment and human trafficking

Imec refrains from using forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or human trafficking and expects the same from its partners. This includes transporting, harboring, recruiting, transferring, or receiving persons through threat, force, coercion, abduction, or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility or unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process and before the worker departs from his/her country of origin, workers must receive a written employment agreement, in the language as legally due so with—and if required—a translation in English for non-native speakers, containing a description of terms and conditions of employment. Furthermore, there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless changes serve to meet local law and provide equal or better terms.

All work must be voluntary, and workers shall be free to leave work at any time. Workers may terminate their employment without penalty if legal notice is given or a mutual agreement is reached. Partners may not hold or otherwise destroy, conceal, confiscate or deny access by employees to employees' identity or immigration documents, such as government-issued identification, passports, or work permits unless the holding of work permits is required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. Such fees and expenses include, but are not limited to, expenses associated with recruitment, processing, or placement of workers.

3.2. Child labor and young workers

Imec ensures that illegal child labor is not used in the performance of its work and expects the same from its partners. The term "child" refers to any person under the minimum legal age for employment where the work is performed, provided the legal age is consistent with the minimum working ages defined by the International Labour Organisation.

Imec supports the use of legitimate, properly managed apprenticeship programs that comply with applicable laws and regulations. Imec embraces students of all nationalities for internships from all relevant fields in line with the research or daily operation of imec. Partners shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights per applicable laws and regulations. Imec provides appropriate support and training to all student workers.

3.3. Humane treatment, non-discrimination, diversity and inclusion

At imec, we are all on the same team, one imec, with a shared vision and mission and a shared, standard set of goals and core values. As such, imec creates an environment of mutual trust and respect. Imec promotes an environment that encourages open dialogue and the sharing of insights and knowledge across imec.

Imec recognizes the vital role diversity plays in renewal, creativity, innovation, and its long-term vitality. Imec is committed to ensuring that employees can carry out their assignments in an environment free of discrimination based on: gender, ethnicity, age, religion, sexual orientation, disability, union membership, political affiliation, and free from harassment or conduct that will likely cause offense or humiliation. At imec, we treat each other with respect, fairness, and dignity and refrain from mobbing or emotional abuse practices. Imec promotes and accepts equal opportunities for all. It is imec's responsibility to value people for their integrity, talents, and commitments while respecting what makes them individuals. In conflict or confrontation, imec deals with it openly and constructively.

Imec expects its partners to be committed to a workforce free from physical, psychological, and verbal harassment or other abusive conduct. Imec expects its partners to deter themselves from all types of discrimination, to provide equal employment opportunities to workers and applicants for employment, and to treat their workers and applicants for employment with respect and dignity.

3.4. Working hours

Imec acknowledges studies of business practices that clearly link high workload to reduced productivity and increased injury and illness. Except in an emergency or unusual situation, work weeks are not to exceed the maximum allowable hours set by applicable law. Within imec, the daily working hours regulation is agreed between employer and employee, in the function of the work organization and considering the needs of the job. Workers should be allowed to have at least one day off every seven days.

Imec expects its partners to adopt a similar policy and comply with applicable laws and regulations of the host country.

3.5. Wages and benefits

A rewards strategy must be deliberately created to support an organization's unique human capital strategy. For imec, this means that a strong recognition culture is required, and a rewards policy that accounts for all potential reward elements (pay, benefits, lifestyle elements, and personal development).

An effective total rewards package is an integral part of imec's human capital strategy because:

- It connects with the business strategy to create a high-performance culture.
- It generates maximum return on the rewards program investment. Large people-related investments such as compensation, benefits, and training can be measured just like any other significant capital investment.
- It creates affordable and sustainable costs. An effective total rewards strategy helps organizations evaluate and better manage the overall costs of the total rewards package and make smarter choices about where to direct reward investments.
- It supports the employment brand.

Imec expects its partners to comply with all applicable laws when rewarding its workers.

3.6. Freedom of association and collective bargaining

Imec believes that open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers are permitted to openly communicate and share grievances with management about working conditions without fear of reprisals, intimidation, or harassment.

Imec expects the same from its partners. Workers should be allowed to associate freely, bargain collectively, and seek representation and join workers' councils under local laws.

4. Health, safety and physical security

4.1. Compliance with safety and health laws and regulations

Considering that all employees have the right to a safe and healthy work environment, free of the risk of violations to their personal integrity, imec complies with applicable safety and health laws, regulations, policies, and procedures and expects the same from its partners. Imec's partners agree to establish and maintain an occupational health and safety policy or, when appropriate, a safety management system.

4.2. Drug-free, tobacco and alcohol-free work environment

Imec has a preventive alcohol and drug policy which prohibits:

- The use, sale, or possession of alcoholic drinks, narcotics, psychotropic (medical) substances, or other controlled substances at the workplace, at places of work outside imec premises, or in imec vehicles.
- Employees being under the influence of alcohol, illegal drugs, or any other controlled substance on the job.

Imec does not make alcoholic beverages available to employees, either free of charge or in return for payment. Exceptions can only be allowed by imec's CEO. No alcoholic drinks are dispensed by automatic drinks dispensers at imec.

For reasons inherent to the imec activity and under the general statutory provisions, there is a general smoking ban in imec buildings and on the company grounds, except for areas where smoking is explicitly permitted.

4.3. Maintain a safe and healthy work environment

Safety, health, and wellbeing are of paramount importance to imec, its employees, customers, and the surrounding community. When developing products and processes, imec always strives to apply safe work methods and fully adheres to the legislation governing safety and health. These principles apply to the technological research groups, supporting logistics groups and third parties carrying out work at imec.

Additionally, imec must take adequate steps to minimize the causes of hazards inherent in the working environment, prevent workplace accidents and injuries, and promote safe and healthy workplaces.

Imec expects its partners to have and maintain a safe and healthy work environment and to have appropriate security measures in place.

4.4. Health and safety communication and training

Imec trains its employees to identify, assess, eliminate, and control safety risks. Additionally, employees and other persons present at imec's premises receive training from imec to carry out their jobs and safely use their installations and tools.

All workers have a responsibility concerning safety, health, and wellbeing. They must fully commit to this responsibility and ensure that their jobs and those of their co-workers and third parties are carried out safely, following all regulations and procedures, and using all means at their disposal. Everyone present at imec shall be encouraged to raise safety concerns. Imec commits to continuously improve and correct the safety of processes and work methods based on experience and available knowledge and know-how.

Imec expects its partners to provide its workers with appropriate workplace health and safety information and training in the language of the worker or in the language the worker can understand.

4.5. Sanitation, food and housing

As far as applicable, imec provides its employees with clean sanitation, access to potable water and sanitary food preparation, eating facilities, and storage facilities. Imec expects the same from its partners. If a partner provides its workers with residential facilities, those facilities must be clean and safe, with adequate personal space, emergency egresses, heat and ventilation, and hot water.

4.6. Physical security

Imec's policy on physical security is applicable for all persons present at imec premises in Leuven (Belgium), including industrial residents, students, and contractors. Each person will receive a badge to gain access to imec buildings and parking lots in Leuven. This badge displays the person's name, picture, and, if applicable, the name of that person's external company/organization. An entrance policy defining how and when people should enter the imec buildings is in place to ensure the safety and security of all imec employees, visitors, and partners. This policy will be provided to imec's partners before they are granted entrance. Each person visiting imec for the first time, will receive introductory training such as security training and dedicated training to enter the cleanroom and chemical labs, depending on the type of presence at imec.

Entering the cleanroom and labs are subject to strict security measures. Therefore the use of smartphones and cameras is strictly forbidden in imec's cleanroom and labs and cannot be used for recording or taking pictures of confidential information.

Imec expects its partners' compliance with imec's health, safety, and physical security measures when present at imec's premises in Leuven (Belgium).

5. Sustainability

5.1. Sustainability – imec, embracing a better life

Imec is setting up its strategy and organization to enable long-term growth and sustainability. Over the last several years, sustainability has become a key priority for imec, not just in its core research and innovation activities, but also in how imec executes and manages its operations. Moreover, it has evolved into the corporate mission and is reflected in imec's values and corporate tagline: "Embracing a better life."

Imec firmly believes that technology and innovation should contribute to solving societal challenges. Imec achieves this by offering new solutions to complex problems and reducing bottlenecks, hurdles, and emissions. Since the beginning, imec held the ambition to become a world leader in semiconductor technology and to apply the power of semiconductor technology to various application domains. For these reasons, and together with our partners, imec is firmly committed to paving the way towards a sustainable world for current and future generations.

Sustainability is essential for imec and society in general, and in that sense, it is a global responsibility. No single organization, region, or country alone can tackle the enormous challenges that we are facing today. All companies, research institutions, regions, countries, and governments must join forces. For this reason, imec subscribes to the UN SDG's (United Nations Sustainable Development Goals), which provide useful guidance to define strategies under a common language and a framework to monitor progress. They help organizations to select the right topics and focus in everything they do. Imec decided to focus on a select number of sustainability goals, where it can make the most impact, without losing sight of the others.

Imec has a long tradition of collaboration and co-creation, with commercial and non-commercial partners. Together with these partners, imec is committed to developing nano-enabled solutions that improve and ensure a better future quality of life in the mobility, healthcare, industry, energy, city life, and education domains. Imec is convinced that cooperation is the cornerstone of a better world and the only way to achieve revolutionary breakthroughs is to contribute to sustainable development.

5.2. Social responsibility

Imec's internal focus on social responsibility is driven by its values that define imec's way of working. Imec strives for integrity, passion, connectedness, and excellence. It cares for the wellbeing and education of its people and avoids leaving anyone behind. Imec values diversity in the workplace and endeavors solidarity around the globe.

Imec requires its partners also to have a focus on social responsibility.

5.3. Environmental responsibility

To create a more durable lifestyle, imec continually evolves how it consumes and produces. When it comes to the sustainability of imec's production activities, imec believes it starts at the moment of purchasing its raw materials. Imec, therefore, selects suppliers that guarantee that their products (e.g., tantalum) are mined and traded in a humane, responsible, and conflict-free manner.

Imec optimizes its production processes to make better use of raw materials and thus reduce waste flows. The ideal is to move towards a circular economy where one waste flow becomes a resource for a second production process.

Imec strives to operate in a manner that actively manages risk, conserves natural resources, and protects the environment. Imec expects its partners to apply the same environmental management system principles to establish a systematic approach to managing risks or hazards and opportunities associated with the environment, including potential risk from regulatory non-compliance, reputational loss, and opportunities for business growth through operational and product stewardship.

5.3.1. Environmental permits and reporting

Imec obtains and keeps current required environmental permits, approvals, and registrations and follows their operational and reporting requirements. Imec expects the same from its partners.

5.3.2. Pollution prevention and resource reduction

Imec strives to minimize emissions and discharges of pollutants and generation of waste or to eliminate them at the source or by practices such as adding pollution control equipment, modifying production, maintenance, facility processes, or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved or minimized by practices such as modifying production, maintenance, and facility processes, materials substitution, reuse, conservation, recycling, or other means. Imec expects the same from its partners.

5.3.3. Hazardous substances

Imec is committed to complying with EU legislation regarding hazardous substances. Chemicals and other materials posing a hazard to humans or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling, or reuse and disposal.

Hence imec also requires from its partners to provide the following documents as evidence of their products' compliance: (i) Declaration of conformity to state that the RoHS requirements have been met, (ii) REACH statement to give information on SVHCs (Substances of Very High Concern) and to confirm that restriction conditions laid down in the restriction list of the REACH have been met, and (iii) a Material Safety Data Sheet (MSDS) according to the requirements of REACH, if applicable.

5.3.4. Conflict minerals

Imec has a policy to reasonably assure that the minerals used for the products they manufacture do not directly or indirectly finance or benefit armed groups or contribute to serious human rights abuses in Conflict-Affected or High-Risk Areas. According to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (DDG), conflict-affected and high-risk areas (CAHRAs) are characterized by "the presence of armed conflict, widespread violence or other risks of harm to people." Imec expects its partners

to adopt a similar policy. Partners shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to imec and other partner customers upon request. Partners shall provide documents or declaration of conformity.

5.3.5. Solid waste

Imec implements a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous), and imec expects the same from its partners.

5.3.6. Air emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals, and combustion by-products generated from operations are to be characterized, routinely monitored, controlled, and treated as required before discharge. Imec conducts routine monitoring of the performance of its air emission control systems and expects its partners to do the same.

5.3.7. Materials restrictions

Imec adheres to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal. Imec expects the same from its partners.

5.3.8. Water management

Water management is important to imec. Imec expects its partners to implement or have a water management program that documents, characterizes, and monitors water sources, use and discharge, seek opportunities to conserve water, and control channels of contamination. All wastewater must be characterized, monitored, controlled, and treated as required before discharge or disposal. Partners shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

5.3.9. Energy consumption and greenhouse gas emissions

Imec tracks energy consumption and greenhouse gas emissions, and imec expects its partners to track and document the energy consumption and greenhouse gas emissions at the facility and/or corporate level. Imec seeks ways to improve energy efficiency and minimize its energy consumption and greenhouse gas emissions and expects its partners to do the same.

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