



Information Management Corporation (IMC)

Company Code of Conduct

This Company Code of Conduct (the “Code”) applies to all directors, officers, and employees of Information Management Corporation- IMC (the “Company”). The purpose of the Code is to ensure that all directors, officers, and employees of the Company conduct themselves ethically and in compliance with all applicable laws and regulations, including those designed to prevent bribery and corruption.

As a company, we are committed to complying with all applicable laws and regulations related to international trade, including sanctions laws, and prohibiting business with certain countries, entities, and individuals. To this end, we have developed the following Code of Conduct clause related to trade compliance:

1. **Integrity:** All employees must always act with integrity when representing the company and must not engage in any deceptive, unethical, or illegal behavior.
2. **Confidentiality:** All employees must maintain the confidentiality of sensitive information and must not divulge any information obtained in the course of their work to unauthorized persons.
3. **Anti-Bribery and Corruption:** It is the Company’s policy to comply with all applicable anti-bribery and corruption laws and regulations, including the Foreign Corrupt Practices Act (FCPA). The Company prohibits bribery and corruption in all business dealings, which includes offering, promising, authorizing, or giving anything of value to any government official or another person, directly or indirectly, for the purpose of improperly obtaining or retaining business.
4. **Gifts and Entertainment:** The Company does not condone the offering of gifts or entertainment that may be interpreted as intended to influence a business decision. All gifts and entertainment must be reasonable and appropriate and must not be given with the intention of obtaining or retaining business.
5. **Conflicts of Interest:** The Company requires its directors, officers, and employees to avoid any activity, interest, or relationship that could conflict with the interests of the Company. The Company requires its directors, officers, and employees to disclose any potential conflict of interest; and will take appropriate action to address any actual conflicts of interest that arise.
6. **Compliance with Laws and Regulations:** The Company requires its directors, officers, and employees to comply with all applicable laws and regulations in the conduct of the Company’s business.
7. **Reporting of Misconduct:** The Company encourages its directors, officers, and employees to report any suspected violations of this Code, including violations of anti-bribery and corruption laws and regulations. All reports of suspected violations will be investigated promptly and in accordance with applicable laws and regulations.
8. **Retaliation:** The Company prohibits any form of retaliation against any individual who in good faith reports a suspected violation of this Code.



9. **Enforcement:** The Company will take appropriate disciplinary action against any director, officer, or employee who violates this Code.

10. **Sanctions Compliance:** We will comply with all applicable sanctions laws, including those imposed by the United States, the United Nations, and the European Union. We will not conduct business with individuals or entities subject to sanctions, including those located in embargoed or sanctioned countries. Additionally, we will not engage in activities that could contribute to the proliferation of weapons of mass destruction or their delivery systems.

11. **Prohibited Countries and Entities:** We will not conduct business with entities located in countries that are prohibited by law or regulation. This includes countries subject to comprehensive sanctions, as well as those designated as state sponsors of terrorism or involved in illicit activities such as money laundering or human trafficking.

12. **Prohibited End Users:** We will not sell products or services to end-users who are prohibited by law or regulation. This includes individuals or entities involved in activities related to weapons of mass destruction, terrorism, or other criminal activities.

13. **Due Diligence:** We will conduct appropriate due diligence to ensure that our customers and partners are not subject to sanctions, prohibitions, or restrictions. This includes screening customers and partners against relevant government lists of sanctioned individuals and entities.

14. **Training and Awareness:** We will provide appropriate training and awareness to our employees and partners to ensure they understand their obligations related to trade compliance and sanctions laws.

15. **Prohibited Countries and Entities:** We will not conduct business with entities located in countries that are prohibited by law or regulation. This includes countries subject to comprehensive sanctions, as well as those designated as state sponsors of terrorism or involved in illicit activities such as money laundering or human trafficking.

16. **Prohibited End Users:** We will not sell products or services to end-users who are prohibited by law or regulation. This includes individuals or entities involved in activities related to weapons of mass destruction, terrorism, or other criminal activities.

17. **Due Diligence:** We will conduct appropriate due diligence to ensure that our customers and partners are not subject to sanctions, prohibitions, or restrictions. This includes screening customers and partners against relevant government lists of sanctioned individuals and entities.

Any violations of this trade compliance clause will be taken seriously and may result in disciplinary action, including termination of employment or partnership.

The Company reserves the right to modify or amend this Code of Conduct at any time.

ENFORCED BY: [Name of the employed]

Date: [Date]