



Information Management Corporation (IMC)

Company Code of Conduct for Resellers

We, at Information Management Corporation, are committed to ensuring that our resellers abide by the highest standards of ethical conduct. We expect our resellers to adhere to the principles outlined in this Code of Conduct to uphold our values and protect the reputation of our company.

As a Dell distributor, we are committed to conducting our business with the highest level of integrity and in compliance 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 for our resellers related to trade compliance.

All resellers must abide by all applicable laws, regulations, and ethical standards. This includes anti-bribery and corruption laws and regulations, as well as the Dell Code of Conduct available on the Dell Partner Portal.

1. **Anti-Bribery and Anti-Corruption:** Resellers of the company must refrain from offering, giving, receiving, or accepting any bribes, incentives, or gifts to obtain an undue advantage. This includes any offer, promise, gift, or incentive, whether in cash or in kind, to any government official, employee, agent, customer or any other person or entity. This also includes offering payments to any government official to gain an undue advantage in awarding contracts.

Resellers must comply with all applicable laws relating to bribery and corruption, including in the Foreign Corrupt Practices Act (FCPA) and European Union laws.

2. **Compliance with Applicable Laws:** Resellers must comply with all laws and regulations applicable to their business. These laws include, inter alia, the protection of competition, consumer protection, environmental protection, the prevention of discrimination and the prevention of unfair commercial practices. All resellers must abide by all applicable competition laws and regulations.

3. **Dell Code of Conduct for Resellers:** Dell Resellers must comply with the Dell Code of Conduct for Resellers. This code sets ethical and behavioral standards for Dell resellers, covering topics such as confidentiality, data integrity, intellectual property protection, compliance with applicable laws, respect for customer privacy, honest advertising, and environmental protection.

4. **Data Security and Privacy:** Resellers must protect the security and privacy of customers' personal data and confidential information. This includes the use of appropriate security measures to protect customer data and information from unauthorized access or unlawful disclosure.

5. **Responsible Business Practices:** All resellers must conduct their business in an ethical and responsible manner, including but not limited to, fair pricing and advertising practices, proper use and protection of confidential information, and respect for intellectual property rights.

6. **Reporting:** All resellers must promptly report any known or suspected violation of this Code of Conduct to the appropriate authorities.



7. Sanctions Compliance: Our resellers must comply with all applicable sanction’s laws, including those imposed by the United States, the United Nations, and the European Union. They must not conduct business with individuals or entities subject to sanctions, including those located in embargoed or sanctioned countries. Additionally, they must not engage in activities that could contribute to the proliferation of weapons of mass destruction or their delivery systems.

8. Prohibited Countries and Entities: Our resellers must 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.

9. Prohibited End Users: Our resellers must not sell Dell 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.

10. Due Diligence: Our resellers must conduct appropriate due diligence to ensure that their 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.

11. Training and Awareness: Our resellers must provide appropriate training and awareness to their employees and partners to ensure they understand their obligations related to trade compliance and sanctions laws.

12. Record-Keeping: Our resellers must maintain accurate records related to their transactions with Dell products and services, including customer information, and provide such records to us upon request.

Any violations of this trade compliance clause will be taken seriously and may result in termination of the reseller agreement. It is the responsibility of our resellers to ensure that their business operations are following all applicable trade compliance and sanctions laws, and we reserve the right to terminate our relationship with any reseller that fails to comply with these requirements.

ENFORCED BY: [Name of the Reseller Representative]

Date: [Date]