IMI

WE CREATE
THE FUTURE
HERE

CODE OF CONDUCT

FORGING AHEAD

Engineered for Execution
Delivered with Purpose



LABOR

ETHICS

ENVIRONMENT

MANAGEMENT SYSTEM

HEALTH & SAFETY

EFFECTIVE

SEPTEMBER 2026

REVISION NO. 03

About IMI

Integrated Micro-Electronics, Inc. (IMI), the electronics manufacturing subsidiary of , provides comprehensive manufacturing and engineering solutions to customers worldwide. Its capabilities span the entire product lifecycle, from new product introduction and advanced prototyping to high-reliability production, testing, systems integration, and aftermarket support. IMI serves the mobility, connectivity, power electronics, communications, and medical industries, including applications that demand exceptional performance and reliability.

Through its global manufacturing operations, IMI combines deep engineering expertise, advanced testing capabilities, vertical integration, and data-driven supply-chain management to deliver flexible and scalable solutions. This integrated approach helps customers accelerate product launches, manage total costs, meet global compliance requirements, and maintain dependable product quality.

Based on 2023 revenues, IMI ranked 23rd among the world's leading electronics manufacturing services providers, according to Manufacturing Market Insider. IMI also ranked 9th globally in the automotive EMS sector, according to , reinforcing its established position in high-reliability automotive electronics manufacturing.

For more information, visit global-imi.com.

IMI's Purpose

We partner with global organizations to provide manufacturing solutions to SAVE LIVES, CONSERVE ENERGY, and IMPROVE QUALITY OF LIFE

IMI's Vision

The leading INNOVATIVE partner for customized solutions. Our PEOPLE deliver the highest quality experience

IMI's Mission

Passionately create a unique product realization experience that our partners love

Our Core Values

INTEGRITY

Honesty, trustworthiness, and consistency in words and actions

CUSTOMER FOCUS

Building a strong partnership with customers by providing excellent and mutually beneficial solutions

CONCERN FOR OTHERS

Caring for co-employees, community, and country

EXCELLENCE

Doing the best and continuously exceeding expectations

IMI's Code of Conduct

The IMI Code of Conduct provides a clear, consistent, and comprehensive framework for ethical behavior, responsible decision-making, and accountability throughout the organization. It defines the standards expected of all employees and individuals acting on behalf of IMI, while promoting alignment with applicable laws, international standards, company policies, and responsible business practices. These standards also extend to IMI's suppliers, vendors, contractors, and other business partners, reinforcing a shared responsibility to conduct business lawfully, ethically, and with integrity.

Guided primarily by the Responsible Business Alliance Code of Conduct, the Code brings together IMI's commitments to Labor, Health and Safety, Environment, and Ethics, supported by an integrated Management System. Together, these areas help ensure that people are treated with dignity and respect, workplaces remain safe and healthy, manufacturing operations are environmentally responsible, and all business activities are conducted according to the highest standards of integrity.

More than a statement of principles, the Code provides a foundation for translating IMI's commitments into consistent action across its global operations. Through defined responsibilities, training, communication, risk management, audits, corrective actions, and continuous improvement, IMI works to ensure that the standards contained in the Code are effectively implemented, monitored, and maintained.

A. LABOR	B. HEALTH & SAFETY	C. ENVIRONMENT	D. ETHICS	E. MANAGEMENT SYSTEM
We foster a workplace built on fairness, respect, and equal opportunity for all employees.	Protecting the health and safety of our people is a shared responsibility and top priority.	We strive to benefit the natural order or at least does not harm and minimize environmental impact.	Integrity and ethical conduct guide every decision and interaction.	Our strong management systems ensure accountability, compliance, and continuous improvement.

IMI'S STANDARDS OF RESPONSIBLE CONDUCT

People are the foundation of our success. By respecting human rights, promoting fair employment practices, and fostering a culture of diversity, inclusion, and equal opportunity, we create a workplace where every employee is valued, respected, and empowered to reach their full potential. A positive and supportive work environment strengthens employee engagement, collaboration, and innovation. When people feel safe, fairly treated, and heard, they are more motivated to contribute their best work, helping the organization achieve sustainable growth and long-term success.	The health and safety of our employees is a fundamental responsibility and a key priority. By identifying risks, preventing workplace incidents, and promoting employee well-being, we create an environment where individuals can perform their duties safely and confidently. A strong safety culture goes beyond compliance. It protects our workforce, minimizes business disruptions, strengthens operational performance, and demonstrates our commitment to caring for the people who make our success possible.	Environmental responsibility is essential to creating a sustainable future. Through responsible resource management, waste reduction, pollution prevention, and environmental compliance, we strive to minimize our impact on the environment and conserve natural resources. Our commitment to environmental stewardship supports long-term business resilience while contributing to the well-being of the communities we serve. By integrating sustainable practices into our operations, we help create lasting value for future generations.	Ethics guide the way we conduct business and interact with others. By acting with integrity, honesty, transparency, and accountability, we build trust with employees, customers, suppliers, shareholders, and the communities in which we operate. Strong ethical standards help protect our reputation and support responsible decision-making at all levels of the organization. A culture built on trust and accountability enables sustainable business relationships and reinforces confidence in everything we do.	An effective management system provides the structure needed to translate commitments into measurable actions. It establishes clear processes, responsibilities, and controls that help ensure compliance, manage risks, and achieve organizational objectives. Through continuous monitoring, evaluation, and improvement, a management system enables operational excellence and drives consistent performance. It helps ensure that our commitments to labor, ethics, environment, and health and safety are embedded into everyday business activities.

The Integrated Micro-Electronics, Inc. (IMI) Code of Conduct outlines the standards to ensure good governance that working conditions in the Company are safe, employees are treated with respect and dignity, and manufacturing processes are environmentally responsible.

The sustainability efforts are focused on the quadruple bottom line framework to evaluate its performance in a broader perspective and create greater sustainable business value with its customers and suppliers which are the following:



PURPOSE

IMI is committed to the larger global community evident in its faithful dedication to good governance and corporate social responsibility. IMI places a high priority in doing sustainable business in all the sites where it operates.



PEOPLE

IMI exercises fair and beneficial practices toward its labor and community where it conducts its business. IMI takes care of the well-being of the corporate, labor, and other stakeholders' interests.



PLANET

IMI strives to benefit the natural order or at least does not harm and minimize environmental impact. IMI implements sustainable environmental practices in a safe and legal manner.



PROSPERITY

IMI due diligently monitors its real economic benefit, that is, the economic value created after deducting the cost of all inputs and its capital, and the real economic impact it has on its economic environment.

IMI CODE OF CONDUCT- REVISION 03

GOVERNANCE • SOCIAL • ENVIRONMENTAL • ECONOMIC

"We create the future now with our collaborative strengths aiming towards a sustainable ecosystem for all."



A. LABOR

IMI is committed to respect the human rights of employees and to treat them with dignity and respect as understood by the international community.

- INTEGRITY
- CUSTOMER FOCUS
- CONCERN FOR OTHERS
- EXCELLENCE

LABOR

Our Commitment

IMI is committed to upholding the human rights of employees and to treat them with dignity, respect, equal opportunity & inclusion as understood by the international community.

This applies to all employees including temporary, project, migrant, student, direct employees, and any other type of employee.

It also recognizes international standards (e.g., Universal Declaration of Human Rights (UDHR), Social Accountability International (SAI), UN Global Compact, and the Ethical Trading Initiative (ETI)) as references.

A.1 Prohibition of Forced Labor

IMI shall not use forced labor in any form, including but not limited to bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or human trafficking.

Trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

IMI shall not tolerate unreasonable restrictions on employees' freedom of movement within the facility nor unreasonable restrictions on entering or exiting company-provided facilities, including, where applicable, workers' dormitories or living quarters.

All work shall be voluntary, and employees shall be free to leave work at any time or terminate their employment in accordance with the Company's policies. Employees shall not be required to pay employer or agency recruitment fees or other related fees for their employment.

A.2 Young Workers

The Company's minimum hiring age follows the mandatory requirement of the country where it operates, e.g., at least 18 years old in the Philippines.

The Company shall not use child labor at any stage of its manufacturing process. It also supports the use of legitimate workplace learning programs that comply with applicable laws and regulations. The wage rate for interns and apprentices shall comply with applicable local laws.

Child Remediation Program

Although stringent measures are put in place to ensure that no minors are employed, IMI has developed and integrated a remediation program in its recruitment process to protect the rights of children.

A.3 Working Hours

The Company's workweek shall not exceed the maximum set by local law, i.e., one (1) rest period of not less than twenty-four (24) consecutive hours for every six (6) consecutive normal workdays.

Further, a workweek is defined to be 60 hours per week inclusive of overtime, except in emergency or unusual situations necessitated by exigencies of business operations, catastrophic cases or as may be required by the customers

A.4 Wages and Benefits

The Company shall pay no less than the applicable minimum wage in all sites where it operates. Compensation paid to employees shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

In compliance with local laws, employees shall be compensated for overtime. Deductions from wages as a disciplinary measure shall not be permitted as a general rule except when allowed by the applicable local legislation and as warranted by the circumstances.

A timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed is provided.

A.5 Non-Discrimination/Non-Harassment/Humane Treatment

IMI shall not practice harsh or inhumane treatment, including violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of employees nor shall it tolerate threats of any such treatment. Policies and procedures supporting these requirements are defined and communicated to employees.

IMI is committed to a workforce free of harassment and unlawful discrimination. IMI is a non-discriminatory employer and shall not discriminate on the basis of race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, labor organization membership, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.

Employees shall be provided with reasonable accommodations for religious practices and disability. In addition, employees or potential employees will not be subjected to medical tests including pregnancy or virginity tests, or physical examinations that could be used in a discriminatory manner.

A.6 Freedom of Association and Collective Bargaining

IMI respects the rights of employees to associate freely, form or join labor organizations of their own choosing, to bargain collectively and to engage in peaceful assembly in accordance with local law, as well as respect the right of employees to refrain from such activities.

Employees may communicate openly with management regarding working conditions without fear of discrimination, reprisal, intimidation, or harassment. IMI believes that open communication and direct engagement between employees and management are the most effective ways to resolve workplace issues.



IMI recognizes that the quality of products and services, consistency of production, and employees' retention and morale are enhanced by a safe and healthy work environment.

HEALTH AND SAFETY

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How does IMI ensure everyone's health and safety?

IMI recognizes that the quality of products and services, consistency of production, and employees' retention and morale are enhanced by a safe and healthy work environment. IMI also recognizes that, input from employees and education are keys to identifying and solving health and safety issues in the workplace.

C.1 Occupational Health and Safety

IMI ensures that employees' potential exposure to hazardous conditions (e.g., chemical, electrical and other energy sources, fire, vehicles, fall hazards, biological and physical agents) is identified, assessed, and controlled through proper design, engineering and administrative controls, preventive maintenance, safe work procedures (including lockout/tag out), and ongoing safety training. An industrial hygiene program is established and implemented in the workplace.

Hazard communication systems and procedures (e.g., labeling, training) are in place to ensure that employees are aware of workplace hazards and follow safe work practices. Reasonable steps are taken to remove pregnant women and nursing mothers from working conditions involving significant hazards. Workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, are eliminated or reduced where possible. Reasonable accommodations are also provided for nursing mothers.

C.2 Emergency Preparedness

Potential emergency situations and events are identified and assessed, and their impact is minimized through the implementation of emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, employee training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures focus on minimizing harm to life, the environment and property.

C.3 Occupational Injury and Illness

These are in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage employee reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of employees to work.

C.4 Physically Demanding Work

Exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is identified, evaluated, and controlled.

C.5 Machine Safeguarding

Production Machine safeguarding, production machinery and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers shall be provided and properly maintained where machinery presents an injury hazard to employees.

C.6 Sanitation, Food, and Housing

Employees shall have ready access to clean toilet facilities, safe drinking water and sanitary food preparation, storage, and eating facilities. Company-provided staff houses or dormitories shall be maintained in a clean, safe, and secure condition and shall include appropriate emergency exits, hot water for bathing and showering, adequate lighting, heating and ventilation, secure storage for personal belongings and valuables, sufficient personal living space and reasonable freedom of entry and exit.

C.7 Health and Safety Communication

IMI shall provide employees with appropriate workplace health and safety information and training in the language of the employee or in a language that the employee can understand for all identified workplace hazards that employees are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards.

C.8 Industrial Hygiene

Employee exposure to chemical, biological, and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls. If any potential hazards are identified, responsible parties shall look for opportunities to eliminate or reduce them.

If elimination or reduction of the hazards is not feasible, potential hazards shall be controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, employees shall be provided with appropriate, well-maintained personal protective equipment, free of charge, and shall be required to use it.

IMI shall provide occupational health monitoring to routinely evaluate if employees' health is being adversely affected by occupational exposures. Protective programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards.

IMI maintains a safe and healthy workplace through hazard prevention, employee training, risk management, and continuous improvement of health and safety practices.

IMI strives to benefit the natural order or at least does not harm and minimize environmental impact. IMI implements sustainable environmental practices in a safe and legal manner.



ENVIRONMENT

ENVIRONMENT

"We create the future now with our collaborative strengths aiming towards a sustainable ecosystem for all."

What is IMI's goal for the Environment?
IMI recognizes that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

C.1 Environmental Permits and Reporting
All required environmental permits (e.g., discharge monitoring), approvals and registrations shall be obtained, maintained, and kept current and their operational and reporting requirements shall be followed.

C.2 Pollution Prevention and Resource Conservation
Emissions and discharges of pollutants and generation of waste shall be minimized or eliminated at the source through practices such as adding pollution control equipment, modifying production, maintenance, and facility processes, or by other means.

The use of natural resources, including water, fossil fuels, and minerals, shall be conserved through practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, waste recycling and recovery or other means.

C.3 Hazardous Substances
Chemicals and other materials posing a hazard to humans or the environment shall be identified, labelled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse and treatment disposal.

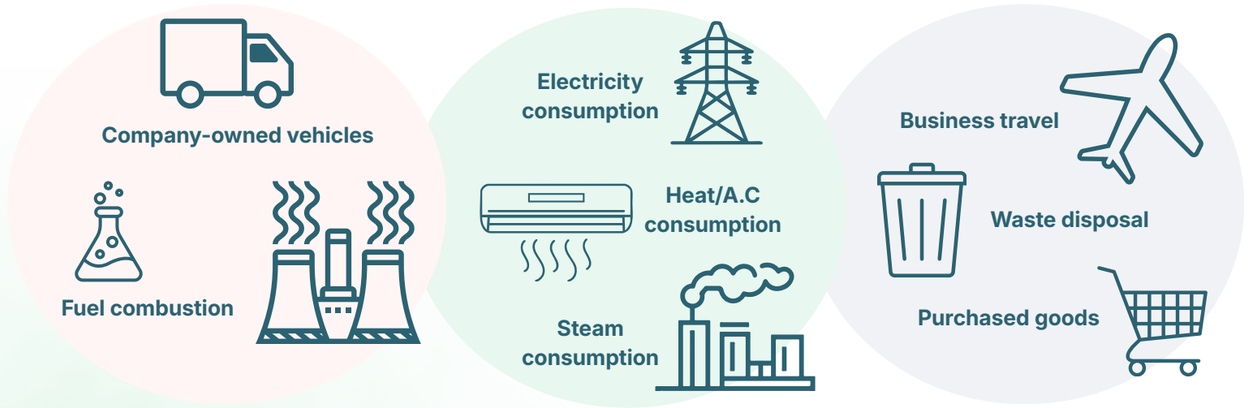
C.4 Solid Waste
IMI implements a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle non-hazardous solid waste in accordance with the applicable local regulations. Waste data shall be tracked, monitored and documented.

C.5 Air Emissions
Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations shall be characterized, routinely monitored, controlled, and treated as required prior to discharge. IMI shall conduct routine monitoring of the performance of its air emission control systems.

C.6 Materials Restrictions
IMI shall adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling, treatment, and disposal.

C.7 Water Management
IMI implements a water management program that documents, characterizes, and monitors water consumptions, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewaters shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Responsible parties shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

C.8 Energy Consumption and Greenhouse Gas Emissions
Consumption and all relevant Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. IMI shall look for cost-effective methods to improve energy efficiency and to minimize energy consumption and greenhouse gas emissions.



SCOPE 1
Direct emissions from sources that are owned or controlled by organization.

SCOPE 2
Indirect emissions resulting from the consumption of purchased steam, heat, or electricity.

SCOPE 3
Indirect emissions resulting from the activities of the organization but not included in Scope 2

Our Code of Conduct reflects the values that guide every decision, action, and interaction across IMI.

- INTEGRITY
- CUSTOMER FOCUS
- CONCERN FOR OTHERS
- EXCELLENCE

ETHICS

IMI promotes ethical conduct and responsible decision-making, fostering trust, accountability, and respect across our organization.

How does IMI comply with ethical standards?

All directors, officers, employees, and consultants of the Company are expected to comply with the highest standard of ethics, laws, rules, and regulations that are applicable to the Company or its business. The Ethics Policy Statements enumerated below do not summarize all laws, rules, and regulations applicable to the Company and its employees, officers, directors, or consultants. All covered individuals must refer to the various policies of the Company such as IMI's Corporate Values Statement, Code of Conduct, Code of Discipline, Conflict of Interest, Standards of Purchasing Practice, and the Non-Disclosure Agreement.

D.1 Business Integrity

The highest standards of integrity shall be upheld in all business interactions. IMI shall have a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion, and embezzlement.

D.7 Protection of Identity and Retaliation

IMI provides and maintains a Whistleblower Policy that ensures the confidentiality and protection of whistleblowers in sites where it operates, unless prohibited by law. Communicated processes are in place for raising of any concern without fear of retaliation.

D.10 Privacy

All directors, officers, and employees are committed to protecting reasonable privacy of personal information of partners we do business with, including suppliers, customers, consumers, and employees. IMI commits to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

All employees signed a Non-Disclosure Agreement (NDA) upon joining the Company which provides among others that the employee must maintain the confidentiality of "private and confidential information" entrusted to them by the Company, or its suppliers and customers. Unauthorized disclosure or use, of these confidential information or trade secrets or assisting any person to have unauthorized access to such confidential information is strictly prohibited.

D.8 Responsible Sourcing of Minerals

IMI supports the responsible sourcing of minerals to ensure that tantalum, tin, tungsten, gold, and cobalt used in the products it manufactures do not directly or indirectly finance or benefit armed groups that perpetrate serious human rights abuses in the Democratic Republic of Congo.

IMI exercises due diligence on the source and chain of custody of these minerals and makes relevant information available to customers upon request.

D.3 No Improper Advantage

Bribes or other means of obtaining undue or improper advantage shall 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.

Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

D.4 Disclosure of Information

All business dealings shall be transparently performed and accurately reflected on business books and records. Information on labor, health and safety, environmental practices, business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices.

Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

D.5 Intellectual Property

Intellectual property rights shall be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and customer and supplier information is to be safeguarded.

Protection and Proper Use of Company Assets
All directors, officers and employees shall protect the Company's assets and ensure their efficient use and to use these for legitimate business purposes. Theft, carelessness, and waste have a direct impact on the Company's profitability.

D.2 Conflict of Interest

Each of us has a responsibility to the Company, its shareholders, and each other. Although this duty does not prevent us from engaging in personal transactions and investments, the Company prohibits conduct that constitutes a conflict of interest, as well as conduct that could be perceived as creating a conflict of interest with its interests.

We should always exercise sound judgment guided by the highest standards of honesty and integrity in all matters affecting the Company and all its subsidiaries. We should not abuse our corporate position for personal advantage or to promote any action contrary to Company's ethical standards. The Company is subject to scrutiny from many different individuals and organizations. We should always strive to avoid even the appearance of impropriety.

All directors, officers, and employees shall:

1. Act in the best interest of the Company and its shareholders.

2. Avoid situations of conflict of interest or impropriety, whether actual or apparent. There is conflict of interest when a director, officer or employee has a personal or pecuniary interest, which influences or could influence his ability to exercise objectivity and perform his responsibilities in the best interest of the Company.

3. Observe the following guidelines:

• Directors, officers, and employees shall not acquire any personal or pecuniary interest in conflict with their duty as such directors, officers or employees.
• Directors, officers, and employees shall not take as their own any business opportunity that belongs to the Company.
• Directors, officers, and employees shall not use material company information of which they may have knowledge and/or access by reason of their office in, or employment with, IMI to their personal advantage or to the advantage of any third party, to the prejudice of the Company.
• Directors, officers, and employees shall not take part in any transaction of the Company with any enterprise with which they have personal or pecuniary interest. This prohibition extends to participation in the negotiation and approval of the transaction and to its implementation. In the case of the directors, they shall strictly comply with the provisions of Section 3.1 of the Charter of the Board of Directors.

The same rule shall be observed in the case of transactions between the Company and any subsidiaries owned by family or close personal relations of the directors, officers and employees of IMI, or in which such family or close personal relations have pecuniary interest. Family relations include fourth civil degree of consanguinity and affinity, legitimate and common-law. Close personal relations include close personal friends and other social and fraternal connections.

• Directors, officers, and employees who have personal or pecuniary interest on any enterprise with which the Company has an existing or intended transaction shall fully disclose the relevant facts of the situation to the Chairman of the Board in the case of the directors, President, and CEO, to the President in case of the Managing Directors, and to the Business Unit Heads in the case of employees.

All disclosures of directors, officers, and employees shall be submitted to the Compliance Officer. Any information disclosed under this rule shall be treated confidential except to the extent necessary to evaluate the situation and pre empt the conflict of interest.

The disclosure requirement provided above shall apply to transactions between the Company and any subsidiaries owned by, or in which there is pecuniary interest in the part of, any family or close personal relations of the directors, officers and employees.

• Outside Employment. Any employee should not engage in any business outside of IMI if it interferes with his job performance or responsibilities. This policy prohibits any employee from accepting simultaneous employment with another company.

• Outside Directorships. Any employee cannot serve as a director of another company without prior approval from the Function Head and Chief Human Resource Officer. If an employee serves as a director at the request of IMI, said employee should not accept any remuneration for service.

• Business Interests . As a matter of policy, an employee cannot invest in the business interest of any non-public company that is a customer, supplier, business partner or competitor of IMI. This restriction does not apply to investments in publicly held companies if the investments constitute less than two percent (2%) of the total outstanding shares in the companies listed in the national or international securities exchanges.

• Related Parties . As a general rule, an employee should avoid conducting business with a family member or with a company in which a family member or a person an employee has close personal relationship is associated in any significant role. If such transaction is unavoidable, said employee must obtain prior approval from the Chief Financial Officer. Any dealings with a related party should be conducted in such as a way that no preferential treatment is given to this business that would not otherwise be given to another business.

• Other Situations. Because other conflicts of interest may arise, it would be impractical to attempt to list all possible situations. If a proposed transactions or situation raises any questions or doubts in your mind, you may refer the situation/transaction to the Chief Human Resource Officer or the Chief Financial Officer before entering such transaction or situation in question.

All employees shall annually submit to the Head of Human Resources a statement confirming they have received a copy of this Policy, have read, and understood this Policy, are in compliance with the Policy and have agreed to comply with this Policy.

In connection with any actual or possible conflict of interest, all covered employees must disclose and obtain clearance from the Chief Financial Officer or the Chief Human Resource Officer. Failure on an employee's part to disclose and obtain clearance will subject the same employee to appropriate disciplinary action, up to and including termination of our employment.

D.12 Counterfeit Parts

IMI does not tolerate the use, manufacture, purchase, or distribution of counterfeit or suspect counterfeit parts in any of its operations or products. IMI is committed to ensuring that all parts, materials, and components are genuine, authentic, and meet applicable quality and regulatory requirements.

Employees must ensure that all materials are sourced from approved and qualified suppliers and that appropriate verification, inspection, and traceability processes are followed. Any suspected counterfeit parts must be reported immediately in accordance with established procedures. Failure to comply with this policy may result in disciplinary action and may expose IMI and the individual to legal and regulatory consequences.

D.6 Fair Business, Advertising and Competition
Each director, officer and employee shall endeavor to deal fairly with the Company's customers, suppliers, competitors, officers, and employees. No one shall take unfair advantage of anyone through bribery, manipulation, concealment, misinterpretation of material facts or any other unfair dealing practices.

Accepting gifts or gratuities, and entertainment
Directors, officers, and employees may accept gifts and entertainment that are of token value when it is lawful and ethical, occasional, customary and in support of IMI's business and not just for the employee's well-being or use. Cost of travel and overnight accommodation shall not be accepted as these are considered more than token value.

There are cases when directors, officers and employees are sent gifts or are invited to lunch or dinner by Company clients or suppliers. A director, officer or employee may only keep a gift or accept an invitation if:

- It is directly attributable to purely familial or personal relationships;
- Its value does not exceed reasonable limits of propriety.
- It is a simple promotional item or is part of the supplier's promotional program;
- It is part of business meetings or discussions

However, if the gift does not fall under any of the above-mentioned conditions, employees shall report to the Chief Human Resource Officer or Ethics Officer all gift items received, in cash or in kind for proper disposition.

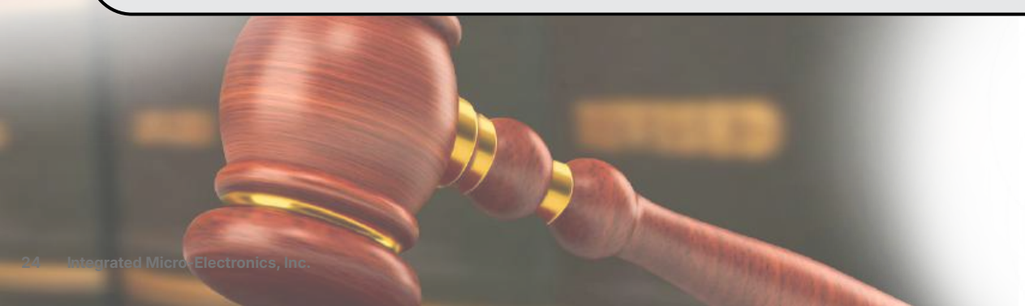
Giving gifts or gratuities, and entertainment
Gifts, favors and entertainment may be given to customers and suppliers if:
- It is consistent with customary business practice;
- It is of minimal value;
- It is not in violation of applicable law or ethical standards; and
- It would not embarrass the Company or employee if publicly disclosed.

Gifts to government officials are not permitted. On exception basis, gifts of minimal value may be provided subject to approval of the Chief Human Resource Officer or Compliance Officer.

D.13 Export Controls and Economic Sanctions
IMI complies with all applicable export control and economic sanctions laws and regulations in the jurisdictions where it operates, including those of the European Union (EU), United States (US), United Kingdom (UK), Australia, and other relevant authorities.

IMI does not engage in transactions that violate export control laws or sanctions regulations, including dealings with restricted or sanctioned countries, entities, or individuals, or the unauthorized export, re-export, or transfer of controlled goods, software, or technology.

Employees must ensure that all required licenses, approvals, and due diligence processes are completed prior to conducting cross-border transactions. Any suspected violations must be reported immediately. Failure to comply with this policy may result in disciplinary action and may subject both the individual and IMI to severe legal and regulatory penalties.



D.9 Information Security
Information Security is Everyone's Responsibility. All directors, officers, employees, and other authorized users are responsible for protecting the Confidentiality, Integrity, and Availability (CIA) of IMI's information, information systems, and assets. Compliance with IMI's information security policies, standards, procedures, and applicable legal and regulatory requirements is mandatory.

Employees must safeguard all Proprietary/Internal Use, Confidential, and Highly Confidential information from unauthorized access, disclosure, alteration, loss, misuse, or destruction. Information assets shall be accessed, processed, stored, and transmitted only through authorized systems and for legitimate business purposes.

Company resources must be used responsibly, ethically, and in accordance with approved policies and procedures. Any actual or suspected information security incident, data breach, unauthorized activity, policy violation, or other security concern must be reported immediately through the established reporting channels to enable timely investigation, response, and remediation.

Failure to comply with information security requirements may result in disciplinary action and other corrective measures in accordance with company policies and applicable laws.

Responsible Use of Artificial Intelligence (AI):
Employees must use Artificial Intelligence (AI) tools responsibly, ethically, and in compliance with IMI's Information Security Management System (ISMS) policies. Employees shall use only authorized AI applications, tools and services for business purposes and must protect the confidentiality, integrity and availability of Company information.

Employees remain accountable for all AI-assisted outputs and must review, validate and approve such outputs before use. Confidential, proprietary, and personal information shall not be entered into AI systems unless authorized and appropriately protected through approved controls such as masking or anonymization. Any suspected misuse of AI, information security incident, or policy violation must be promptly reported through established IMI's reporting channels. Failure to comply may result in disciplinary action, up to and including termination of employment or contractual engagement



D.11 Insider Trading

It is the policy of IMI that all incumbent directors, officers, employees, consultants, and advisers of IMI who are considered to have knowledge, from time to time, of material facts or changes in the affairs of IMI, which have not been disclosed to the public, including any information likely to affect the market price of IMI's securities, cannot buy or sell ("trade") IMI securities, except in accordance with this policy.

Securities:
Securities shall include shares of stocks, bonds, debentures, notes, evidences of indebtedness, asset-backed securities; investment contracts, certificates of interest or participation in a profit sharing agreement, certificates of deposition for a future subscription; derivatives like option and warrants; certificate of assignments, certificates of participation, trust certificates, voting trust certificates or similar instruments; and other instruments that may, in the future, be determined by the Securities and Exchange Commission.

Covered Persons:
For the purpose of this Policy, an "insider" will be defined as follows:

i. All incumbent members of the Board of Directors;
ii. All Key Officers of IMI who are or may be in possession of material non-public information about IMI because of their responsibilities. Key officers of IMI include the Chief Executive Officer, President, Senior Managing Directors, Managing Directors, Vice Presidents, Assistant Vice Presidents and managers wherever they be assigned or seconded to the subsidiaries;
iii. All consultants and advisers of IMI, and other IMI employees who are made aware of undisclosed material information from time to time until such information has been publicly disclosed.
iv. Member of the immediate families of the abovementioned Covered Persons who are living in the same household as the Covered Persons

Material Non-public Information:
Information is deemed to be material non-public if it has not been generally disclosed to the public and would likely affect the market price of IMI securities after being disseminated to the public and the lapse of a reasonable time for the market to absorb the information; or would be considered by a reasonable person as important, under the circumstances, in determining his/her/its course of action whether to buy, sell or hold IMI securities. As a general rule, information required to be disclosed under the rules of the Securities and Exchange Commission and the Philippine Stock Exchange should always be considered material in nature.

Material Information
i. Financial results
ii.Projections of future earnings or losses
iii. Mergers/Acquisitions/Divestitures/Joint ventures
iv. Dividend declarations and changes in dividend policy
v. Stock splits
vi. Material equity investments or debt offerings (involving amounts equivalent to 10% or more of the Company's total assets)
vii. Material litigation exposure (involving amounts equivalent to 10% or more of the Company's total assets) viii Major changes in key senior management positions

Restrictions and Obligations on Trading:
1. All Covered Persons, from the time they obtained knowledge of such Material Non-Public Information, are: 1.1 Not allowed to trade in the Company's Securities. Directly or indirectly; and
1.2 Not allowed to communicate, directly or indirectly, such Material Non-Public Information to any person.

Until the Material Non-Public Information is disseminated to the public and two (2) trading days have lapsed from the disclosure thereof for the market to absorb such information.

Until the Material Non-Public Information is disseminated to the public and two (2) trading days have lapsed from the disclosure thereof for the market to absorb such information.

2. All Covered Persons are prohibited from trading the Company's Securities during the following blackout periods:
2.1.For structured disclosures - Five (5) trading days before and two (2) trading days after the disclosure of quarterly and annual financial results;
2.2.For non-structured disclosures - Two (2) trading days after the disclosure of any material information other than quarterly and annual financial results. Office bulletins for special blackout periods pertaining to these will be issued by the Compliance Officer.

The sale of shares acquired from options is subject to the above-mentioned blackout periods. However, the exercise of stock options may be done at any time even during blackout periods

3. Any director or Officer is prohibited from profiting from the purchase-and-sale or the sale-and-purchase of the Company's Securities within a period of less than six (6) months regardless of the intent. The exceptions are: (i) if the Company's Securities were acquired in good faith in connection with debts previously contracted or obtained; and (ii) the transactions arise from compensation arrangements between the director or Officer, and the Company, previously approved by the Board of Directors or the Executive Committee.

In addition to any disciplinary action that may be imposed for violation of this particular restriction, all profits realized within that period should be disgorged in favor of or turned over to the Company.

4. All directors and Reportable Officers wherever they be assigned or seconded to the subsidiaries, shall report their trades and the trades of their respective immediate family members who are living with them in the same household to the Office of the Compliance Officer within three (3) business days from dealing with the Company's Securities.

All other Officers and employees shall likewise report to the Office of the Compliance Officer within ten (10) days from the end of each quarter their trades and the trades of their immediate family members who are living in the same household vis-à-vis the Company's Securities during such quarter.

5. All directors, officers, and employees are required to report suspected or possible violations of this policy directly to the Office of the Compliance Officer or through the various whistleblower channels of the Company.

6. When in doubt, the Covered Persons are enjoined to consult the Office of the Compliance Officer, prior to transacting Securities of the Company in order to determine if the planned trade will or will not violate this policy.

7. In addition to the foregoing requirements, Officers of the Company who intend to or are trading the Securities of the Company are required: (i) to open an account with and trade the Company's Securities only through BPI Securities; (ii) execute the necessary waivers to allow the Company to examine such trades at any time; and (iii) seek approval from the Compliance Officer before trading the Company's Securities. The Company shall conduct regular compliance audits in this regard.

Reportorial Requirements:
1. Within five business days after the end of each month, the Office of the Compliance Officer will submit to the Corporate Governance and Nomination Committee a consolidated list of notices received from Covered Persons pursuant to this policy, if any.

2. At the end of each year, the Compliance Officer shall, as the case may be:
i. submit a report to the Board of Directors disclosing to the best of his/her knowledge (1) the names of Covered Persons who, during each fiscal year, committed violations of this Policy, reported transactions late or failed to make the necessary disclosures, and (2) the number of violations or delinquent filings and transactions for each such Covered Person, or
ii. submit a Certification under oath that to the best of his/her knowledge, there were no insider trading violations committed during the year and that all whistleblower reports received in relation to possible violations of this policy, if any, had been duly investigated and were not found to be meritorious.

IMI uses risk-based thinking and continual improvement activities in the way it conducts its business.

MANAGEMENT SYSTEM

MANAGEMENT SYSTEM Featured image: Serbia Site, 2025

MANAGEMENT SYSTEM

How does IMI ensure a quality management system?

IMI integrates CSR into the existing Management Systems. The management systems are designed to ensure (a) compliance with applicable laws, regulations and customer requirements related to the IMI's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. IMI also uses risk-based thinking and continual improvement activities in the way it conducts its business.

E.1 Company Commitment
IMI articulates its commitment to social, environmental, health and safety responsibility, including compliance with applicable requirements and continual improvement.

E.2 Management Accountability and Responsibility
IMI identifies its company representative/s responsible for ensuring implementation and periodic review of the status of management systems and associated programs.

E.3 Legal and Customer Requirements
IMI continuously identifies, reviews, evaluates, and monitors its compliance with applicable laws, regulations, and customer requirements.

E.4 Risk Assessment and Risk Management
As part of its risk assessment and management, IMI continues to determine the applicable and associated CSR (Governance, Supply Chain, EHS, Labor and Ethics) risks and its relevant significance, to determine and implement appropriate controls and ensure regulatory compliance appropriate to business risks.

E.4 Improvement Objectives
There are written standards or performance objectives, targets and implementation plans including a periodic assessment against set objectives.

E.5 Training
There are programs to train managers and employees to implement policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements of this code.

E.6 Communication
There are processes for communicating clear and accurate information about IMI's policies, practices, expectations, and performance to employees, suppliers, and customers. The approved IMI Code of Conduct Policy is distributed to all employees for awareness through HR Intercom, email blast, New Hire Onboarding Program and Corporate websites.

E.7 Worker/Stakeholder Engagement and Access to Remedy
Continuous improvement programs are in place to assess employees' understanding of the practices and conditions covered by this Code, obtain feedback, identify and report violations and foster continuous improvement. Communication programs are also in place to encourage employees to participate and provide inputs for improvements.

IMI established a Global Whistleblower Policy to encourage all stakeholders of IMI to report any illegal act, wrongdoing, unethical practices, or any violation to the Code of Conduct without fear of retaliation, harassment, discrimination, and reprisal.

E.8 Audits and Assessments
Periodic audit and self-evaluation shall be conducted to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

E.9 Corrective Action Process
There are established adequate and effective corrective action processes for timely correction and closure of deficiencies identified by internal and external assessments, inspections, investigations, and reviews.

E.10 Documentation and Records
All system procedures and records shall be formally established, documented, maintained, and controlled in accordance with applicable regulatory requirements and company policies. Records must be accurate, complete, current, and readily retrievable to support operational, audit, and compliance needs. Appropriate controls shall be implemented to ensure the integrity, security, and confidentiality of all documents and records, including the protection of personal and sensitive information in accordance with applicable data privacy requirements.

E.11 Supplier Responsibility
This Code applies to the Company's suppliers and subcontractors. IMI requires its suppliers to acknowledge and integrate this Code into their management systems. IMI communicates and promotes its sustainability initiatives and programs to suppliers and monitors their implementation to ensure alignment with and achievement of IMI's sustainability objectives.

E.12 Declaration of Compliance to the Code
Employees' declaration of confirmation and compliance with the IMI Code of Conduct and Conflict of Interest policy must occur annually.

E.13 Review and Evaluation
The IMI Code of Conduct Policy shall be subject to review and evaluation every 3 years to assess the operational effectiveness.

E.14 Sanctions for Policy Violations
Violation of this policy shall be subject to disciplinary action under the Company's Code of Discipline, without prejudice to any civil or criminal proceedings which the Company or regulators may file for violation of existing laws. Penalties under existing laws include fine and/or imprisonment.

REVISION HISTORY

Affected Page	Description of Change	Revision Level	Originator	Published Date
Page 1	Updated the Objective of the Code of Conduct Updated the Scope's definition and further specifying the individuals included Added the Responsible Business Alliance Code of Conduct version 8.0.1 (2025) & Ayala Corporation's Code of Conduct and Ethics on Related Documents	03	Anna Cristina Requijo	16-Sep-26
Page 2	Revised the Corporate Social Responsibility Functional Working Group definition			
Page 3	Added a newly revised Code of Conduct and Sustainability Framework			
Page 4	Revised the content of Clause A.1 (Prohibition of Forced Labor) Added Diversity, Equity, and Inclusion (DEI)			
Page 5	Added a minor change in the content within Clause A.5 (Non-Discrimination/Non Harassment/Humane Treatment)			
Page 6	Added a minor change in Clause B.1, (Occupational Health and Safety) and Clause B.2 (Emergency Preparedness)			
Page 7	Revised the content of Clause B.5, (Machine Safeguarding Production) Clause B.6, (Sanitation, Food, and Housing) and Clause B.8 (Industrial Hygiene)			
Page 8	Revised the Section "Environmental" to "Environment" Changed Clause C.2 from "Pollution Prevention and Resource Reduction" to "Pollution Prevention and Resource Conservation" along with content revision. Revised the content of Clause C.4 (Solid Waste)			
Page 9	Changed Clause C.8 from "Energy Consumption and Greenhouse Gas Emissions Energy" to "Energy Consumption and Greenhouse Gas Emissions"			
Page 13	Revised the Clause D.9 (Information Security)			
Page 19	Revised E8.Worker/Stakeholder Engagement and Access to Remedy			
Page 20	Revised the entire provision of Clause E.11 (Documentation and Records) Changed Clause E.12 from "Supplier Responsibilities" to "Supplier Responsibility"			
N/A	Adjust revision number to align with the revision number in the system	02	Anna Cristina Requijo	
Page 1	Added Responsible Business Alliance Code of Conduct version 8.0 (2024) in 3.0 Related Documents	01	Anna Cristina Requijo	29-Aug-24
Page 2	Changed the definition of Code of Conduct and Corporate Social Responsibility.			
Page 4	Revised contents of c) Planet (environmental) on the Doing Sustainable Business part Revised contents on A. Labor Revised title from 1. Freely Chosen Employment to Prohibition of Forced Labor Revised contents of 2. Young Workers Added clause on 3. Working hours and 4. Wages and Benefits			
Page 5	Revised title and contents of number 5. Humane Treatment to Non-Discrimination/ Non Harassment/ Humane			
Page 6	Added "Collective Bargaining" and other contents in number 6. Freedom of Association.			
Page 7	Added clause on 1. Occupational Safety Added statements on 2. Emergency Preparedness Revised the whole statement on 3. Occupational Injury Illness. Added statements on 2. Emergency Preparedness Revised the whole statement on 3. Occupational Injury Illness			
Page 18	Revised statement to include ISMS policy and possible sanction: "This includes IMI Employee Acceptable Use of Asset Policy (ISMS-POL-026) and all other applicable Information Security Management System (ISMS) policies. Any violation of policies may be subject to disciplinary action and sanctions." Revised contents of number 1. Company Commitment			
Page 19	Added statements on 2. Management Accountability and Responsibility Change the whole clause in number 9. From Employee feedback, Participation and Grievance to Worker/Stakeholder Engagement and Access to Remedy Added statement on 10. Corrective Action Process			
Page 20	Revised title and contents of number 12. From Supplier Communication to Supplier Responsibilities.			
Page 4	Transferred to the new GDCC Template / Supersedes IMI Code of Conduct 410 1 08 001 Rev E / Change Profit to Prosperity	00	Anna Cristina Requijo	12.12.2022
Page 5	Update working hours clause			
Page 21	Added 8.0 Supplementary Information/Attachment			

DECLARATION OF COMPLIANCE TO THE IMI'S CODE OF CONDUCT

This is to acknowledge that I have received and reviewed the IMI Code of Conduct.

I understand that:

• I am expected to comply with and enforce IMI's Code of Conduct (COC) in its entirety.

• It is my responsibility to create an atmosphere free of misconduct and ethical violation.

• It is my responsibility to promptly report any incident of misconduct or perceived misconduct or ethical violation that I may experience or witness.

• I may make confidential and anonymous submissions of reports of misconduct that I may experience or witness.

• Violations or infractions of this COC shall be considered a serious breach of Company policy and may result in disciplinary action including termination of employment.

By signing this acknowledgment, I am indicating that I have read and will abide by the IMI's Code of Conduct.

PRINTED NAME	SIGNATURE	DATE