



United Nations Global Compact
United Nations
New York, NY 10017
USA

Saarbruecken, 13 December 2018

Communication on Progress, Year: 2018

To whom it may concern:

Being a good corporate citizen is an ambition enthusiastically embraced at all levels within our company. As a member of a Global Compact, we believe that our business policies incorporate the ten principles.

We are pleased that in 2018, we have published the following policy documents, thus officializing already existing good practise in the company:

- IMC Sustainable Development Policy
- IMC Health and Safety Policy
- IMC Equality and Diversity Policy
- IMC Environmental Policy Statement
- IMC Environmental Management Policy (IMC APAC), see all attached.

Our board fully supports our actions in working towards sustainability goals – in particular those contained in the UN Global Compact – and endorses the future priorities and specific targets we set out in our report. Through our support of the United Nations Global Compact, we also aim to move the agenda forward on performance related to human rights, labor rights, the environment and the fight against bribery and corruption. Here we summarize the progress we have made against these principles and we will continue to follow them up in the future.

Yours sincerely,

Christian Wachter, Member of the Board, IMC AG

**imc information multimedia
communication AG**
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IMC Tax Number
040/100/00969

Vorstand
Executive Board
Christian Wachter (Vorsitzender)

Aufsichtsratsvorsitzender
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Company Profile

IMC is one of Europe's largest providers of comprehensive **solutions for technology-enhanced learning, training, education, and staff development**. The company was established in 1997 by Professor August-Wilhelm Scheer, internationally recognized scholar, entrepreneur and expert in business process management. Since then, IMC has developed solutions related to the development of e-learning courses as well as to the design and implementation of technical and professional infrastructures (e.g. learning management system design and implementation; implementation of integrated e-learning infrastructures etc.) for e-learning, distance education, and staff development. IMC operates from its **headquarters** in Saarbrücken, Germany. Further offices and **subsidiaries** are located in Freiburg, Munich, Essen, Zurich (Switzerland), Graz (Austria), London (UK), Sibiu (Romania), Melbourne (Australia), Auckland (New Zealand), Scottsdale (USA), and Singapore.

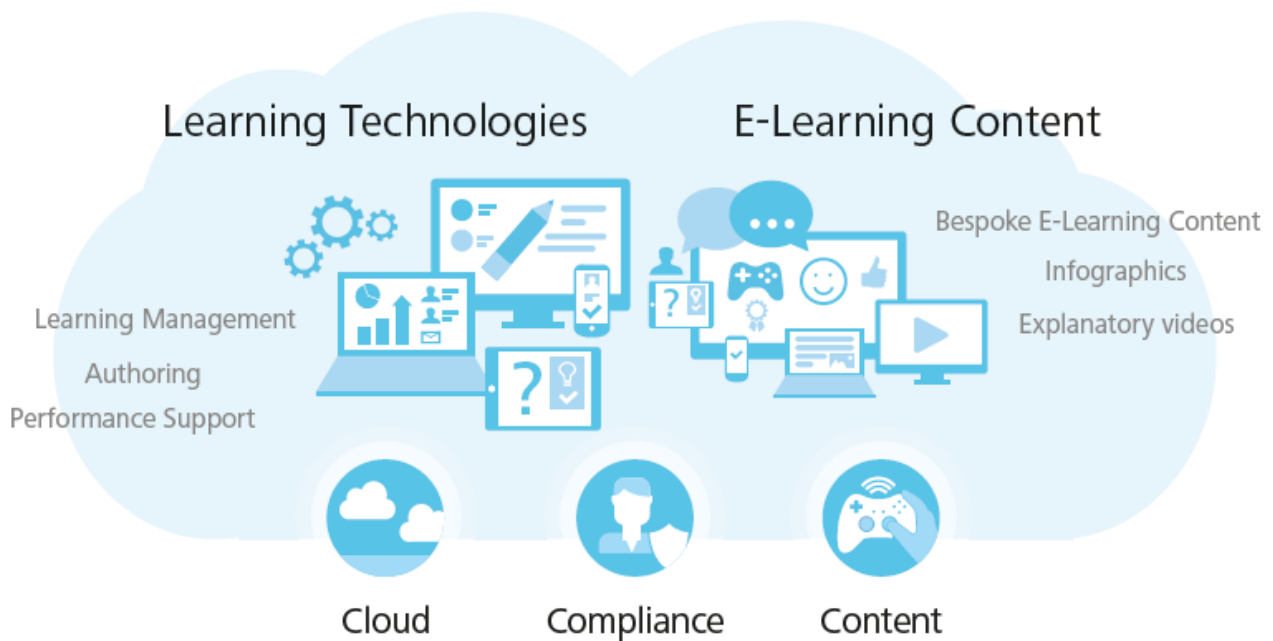


Company	IMC Information Multimedia Communication AG
Address	Scheer Tower, Uni-Campus Nord 66123 Saarbrücken Phone: +49 681 9476-0, Fax +49 681 9476-530 E-mail: info@im-c.de www.im-c.com
Founding year	1997
Associates	Scheer GmbH (60%); Dr. Wolfgang Kraemer, Frank Milius, Dr. Volker Zimmermann (13,33% each)
Executive Board	Christian Wachter
VAT No.	DE 812 187 208
Commercial Register No.	HRB 13338
UNGM Registration No.	161680

Products and Services

IMC's focus is on providing customers with a comprehensive portfolio of innovative products and services:

- **New Media and e-Learning Content Production:** IMC provides professional services covering the whole value chain of bespoke e-learning content design and production. IMC runs content projects from customized planning to instructional design, storyboard development and realization up to the roll-out, dependent on customers' requirements and timeframe. IMC is experienced in working with different learning content formats, i.e. classic e-learning programs (web-based training courses), serious games, smartphone apps, interactive video, e-books, as well as games and training content for mobile websites.
- **Consulting Services:** IMC helps organizations to (re)organize their learning processes and to select, implement, adapt and integrate suitable software systems and technologies. IMC's consultants perform in-depth need analyses before proposing the right learning management strategy, always considering client-specific demands and learning cultures. Consulting services range from the technical implementation of our products to the conceptualization of an organization's complete e-learning offering; they include training and coaching services on the instructional design and technical implementation of interactive training content. Service implementation and project management are based on PRINCE2.



IMC Products and Services

- **E-Learning Authoring tools:** The IMC Content Studio is a high-end e-learning authoring tool able to meet the highest demands. It is a multiple test winner in usability, productivity, functionality and price-performance ratio. The authoring environment is also the perfect solution for the easy and efficient creation and evaluation of exercises, tests, exams and assessments.
- **Learning Management System:** The IMC Learning Suite (ILS) is one of the leading Learning Management Systems (LMS) on the market. It is a state-of-the-art software solution that enables decentralized implementation of multimedia-enhanced teaching and learning offerings within a centrally coordinated organizational framework and organization-wide administration structures. The ILS is top-ranked in the Gartner Group's market survey on Corporate Learning Solutions and has received high marks in other market analyses (e.g. Bersin & Associates).
- **Electronic Performance Support:** The IMC Process Guide is a software solution for the process-oriented, workplace-integrated support of users of software systems, e.g. SAP, MS Office, Peoplesoft, as well as a broad range of legacy systems.
- **On-demand Learning Services** include hosting services for learning environments as well as "Software as a Service" arrangements for our customers. IMC implements ITIL guidelines for IT services; a 24/7 ITIL-based service desk for software products is available.

Standards

Quality management at IMC is organized on the basis of the international ISO 9001 standard. IMC holds a recognized **DIN EN ISO 9001:2008 quality management certificate** and applies a regular schedule for external audits. Since 2015, IMC has also been **ISO / IEC 27001:2013** certified, proving the implementation and maintenance of a state-of-the-art **Information Security Management System**.

In December 2015, IMC underwent an Energy Efficiency Audit according to **DIN EN 16247-1** in order to implement **EU Directives on Energy Efficiency (2012/27/EU)** and **Energy Service Providing (2006/32/EG)**.

To ensure the quality of services we follow the **PRINCE2** project management standard. IMC's consultants are PRINCE2 trained and certified. Finally, IMC supports the **United Nations Global Compact** and the **Women's Empowerment** principles.

Reference Projects with United Nations Organizations

Since 1997, IMC has conducted a great number of projects related to the design and development of interactive, multimedia e-learning content. The **following figure shows some projects IMC has implemented with UN organizations:**

	UNICEF Design and development of e-learning modules on Results-Based Management. Two Long-Term Agreements on "Rapid e-Learning development of online self-learning modules" and "Video-based Learning Production".		WFP Three-year Long-Term Agreement on Design and Development, Instructional Design and Localization of interactive E-learning courses and blended learning programmes.
	UNHCR Long-Term Agreement covering the instructional design and development of e-learning products and courses on behalf of UNHCR's Global Learning Centre (GLC).		UN WOMEN Design and development of several self-paced e-learning courses, e.g. on Care Economy, Masculinities, The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW).
	UNPD Long-Term Agreement on the design, delivery, and maintenance of web-based learning solutions.		UNFPA Analysis, design and development of a game-based e-learning course for fixed assets practitioners at UNFPA. Three-year Long-Term Agreement on maintenance and localization of e-learning modules.
	UNODC Design, development and localization of interactive multimedia training courses for law enforcement officers. Topics e.g.: Smuggling of migrants, Human Rights, Risk Management. Five-year contract.		UNIDO Business process and IT support for SAP ERP implementation. Development of digital learning and training material; set-up of a Virtual Learning Resource Catalogue and Library.

Selected Reference Projects with UN Organizations

Communication on Progress

The following table lists activities and shows progress made toward achieving positive results with regard to the Ten Principles. To the extent available, performance indicators and quantitative data are provided. Different colors highlight the areas of human rights, labor standards, the environment and anti-corruption, i.e. the core field of actions to which the Ten Principles belong.

Global Compact Principle	Action Taken & Impact Achieved and/or Plans for the upcoming Year
Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights	<p>IMC acts in conformity with human rights legislation and considers its prescriptions especially with regard to the following points:</p> <p>Working Conditions</p> <p>It is one of the main objectives of IMC to create a safe and healthy work environment for its employees according to existent international standards. Appropriate steps are taken to prevent accidents or injury for health arising out of or occurring during work. We are proud that in 2018, we have signed and published our "Health and Safety Policy", which is attached to this COP.</p> <p>IMC's headquarters, the Scheer Tower, provides employees with a state-of-the-art working environment. In addition, all IMC subsidiaries meet highest standards for safe</p>

Global Compact Principle	Action Taken & Impact Achieved and/or Plans for the upcoming Year
	<p>and sane working environments. Regular on-site inspection for workplace safety take place resulting in the definition of measures for improvement. The inspections are often combined with a voluntary offer for ergonomics consulting, addressing the correct setting of the workplace (desk, chair, screen, light) and healthy body posture, preventing back pain and muscle tenseness.</p> <p>In each subsidiary, there is a security officer, who is trained in first aid and can be contacted in any case of injury. The security officer is also responsible for risks of injury or any dangerous situations. Furthermore, there is a fire prevention officer in each subsidiary, responsible for evacuation in case of emergency. IMC currently has 15 fire prevention officers in Germany who are trained once per year.</p> <p>IMC employees have always access to drinkable water. A small kitchen is available in every IMC building, IMC's headquarters also have a snack-bar and canteen.</p> <p>In 2017, IMC introduced, and continued in 2018, a company health program called GET FIT in order to raise awareness among staff regarding nutrition, fitness (including back health) and coping with stress, as well as sharing information for a healthier life. In cooperation with the health insurance Barmer (in Germany) and Vitaliberty, an agency for company health management, the portal MOOVE was introduced for all IMC offices worldwide. MOOVE is a multi-lingual portal that allows tracking of personal health and</p>

Global Compact Principle	Action Taken & Impact Achieved and/or Plans for the upcoming Year
	<p>improving it with personal targets. At IMC's German offices, additional local campaigns are held. In 2018, talks on "Healthy Diet at work and at home", "Live Balance" and "Time Management" were held for all staff, and in the MOOVE portal, an section on "Resilience" was introduced, providing information and practical exercises for the prevention of stress. In 2018, the position of a compliance officer was created and staffed at IMC Germany. Furthermore, IMC Learning Suite was made compliant to the European Law GDPR. Staff development was reinforced by offering digital training in the portal "Empower IMC", while at the same time assuring that staff is compliant with regard to legally required trainings.</p> <p>Wages and Salary</p> <p>IMC ensures "equal pay for equal work" using a transparent remuneration scheme for permanent staff irrespective of any personal circumstances such as gender. A Career Growth/Staff Development System was introduced in 2016, defining the requirements to be met for achieving different career levels in Technical resp. Management Career Paths (see below) for the various departments, which are available to all employees.</p>

Global Compact Principle	Action Taken & Impact Achieved and/or Plans for the upcoming Year																					
	<div><table><tr><th>Career Level</th><th>Technical Career Path</th><th>Management Career Path</th></tr><tr><td>5</td><td></td><td>Q5</td></tr><tr><td>4</td><td>Q4</td><td>Q4</td></tr><tr><td>3</td><td>Q3</td><td>Q3</td></tr><tr><td>2</td><td></td><td>Q2</td></tr><tr><td>1</td><td></td><td>Q1</td></tr><tr><td>E</td><td></td><td>QE</td></tr></table><div>Career Growth</div><div>Development Center</div></div> <p>Labor is being paid in conformity with national legal standards. Wages and salaries paid are enough to meet basic needs of the employees. Also, IMC employees can benefit from special arrangements concerning retirement provisions and other compensations for capital accumulation purposes.</p> <p>All employees are provided with written information about wages and salaries to be paid during their employment time before they enter the employment.</p> <p>Wages and salaries are to be paid in case of force majeure circumstances, such as natural disaster, resulting in interruption of operations or financial crises influencing financial stability of the firm.</p>	Career Level	Technical Career Path	Management Career Path	5		Q5	4	Q4	Q4	3	Q3	Q3	2		Q2	1		Q1	E		QE
Career Level	Technical Career Path	Management Career Path																				
5		Q5																				
4	Q4	Q4																				
3	Q3	Q3																				
2		Q2																				
1		Q1																				
E		QE																				

Global Compact Principle	Action Taken & Impact Achieved and/or Plans for the upcoming Year
	<p>With regard to its international subsidiaries, IMC makes sure to be compliant with national legislation, collective wages and employment conditions of the respective countries, drawing from professional legal support.</p> <p>In 2018, IMC's "Equality and Diversity Policy" was officially published (see attachment), while an Anti-Discrimination Agreement was already part of each employee's working contract for several years.</p> <p>Promoting human rights internationally</p> <p>IMC cooperated with inter-governmental agencies on developing e-learning modules on nutrition and fighting hunger, refugee rights, as well as gender issues, such as prevention from sexual exploitation and abuse, and childrens' rights. The modules are designed for a global audience; in particular, they address professionals in the humanitarian sector and provide guidance and support to their work.</p> <p>Selected performance indicators:</p> <p>The following table shows the current distribution of staff according to gender and age criteria. It also shows IMC's performance in achieving a gender-balanced workforce:</p>

Global Compact Principle	Action Taken & Impact Achieved and/or Plans for the upcoming Year								
			2012	2013	2014	2015	2016	2017	2018
	Gender	Female (in %)	33	35	37	37	33	33,5	34,5
		Male (in %)	67	65	63	63	67	66,5	65,5
	Age groups	< 30 years old	24	26	25	58	82	71	87
		30-50 years old	71	69	70	156	134	145	174
		> 50 years old	5	5	5	6	9	17	29
	<p>Specific plans for 2019:</p> <p>IMC will continue its efforts to ensure favorable working conditions for its entire workforce regardless of the location. IMC will continue to strive for gender-equality and a non-discriminatory working environment for company staff.</p> <p>As IMC expects a further growth of staff both nationally and internationally in 2019, specific aims are further professionalization of Human Resources processes, e.g. a focus on talent management and development, further reinforcement of internal and international communication, improvement of managerial staff development and employee satisfaction in single departments, introduction of a referral program, and</p>								

Global Compact Principle	Action Taken & Impact Achieved and/or Plans for the upcoming Year
	<p>extension of the health management. In addition, IMC will strive to promote further equal working conditions by further advancement of salaries, benefits and working conditions in general.</p> <p>In addition, IMC will continue cooperating with inter-governmental organizations on developing e-learning modules on nutrition and fighting hunger, gender issues, and childrens' rights in order to increase their impact.</p>
<p>Principle 2: Businesses should ensure that they are not complicit in human rights abuses;</p>	<p>IMC respects and acts in conformity with the norms of applicable legislation in the regions it operates.</p> <p>IMC is committed to the concept of fair dealing. Each director, officer and employee should deal fairly with the Company's suppliers, customers, employees and competitors. No one should take their advantage of another by manipulation, concealing information, misrepresentation or other similar practice.</p>
<p>Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;</p>	<p>IMC accepts the right of employees to freedom of association and collective bargaining in accordance to local labor legislation. Employees have the right to join or to form trade unions. Employees' representatives are not discriminated and have an ability to carry out their representative functions in a work place.</p>
<p>Principle 4: Businesses should support the elimination of all forms of</p>	<p>All labor is sourced from the open labor market, employment is freely chosen and there is no forced, bonded or involuntary prison labor. All IMC employees are provided with</p>

Global Compact Principle	Action Taken & Impact Achieved and/or Plans for the upcoming Year
forced and compulsory labor;	<p>labor contracts and may resign at any time they consider appropriate.</p> <p>In addition, IMC offers the following benefits to its staff:</p> <ul style="list-style-type: none"> - Accident insurance - Company pension scheme. <p>Specific plans for 2019:</p> <p>As IMC expects a further growth of staff both nationally and internationally in 2019, specific aims are, among others, further professionalization of Human Resources processes, e.g. a focus on talent management and development, further reinforcement of internal and international communication, improvement of managerial staff development and employee satisfaction in single departments, introduction of a referral program, and extension of the health management. In addition, IMC will strive to promote further good working conditions by further advancement of salaries, benefits and working conditions in general.</p>
Principle 5: the effective abolition of child labor;	<p>IMC doesn't source workforce from child labor. It acts in accordance to the following rules:</p> <p>The course of action taken shall be in the best interests of the child, conform to the provisions of ILO Convention 138 and be consistent with the United Nations Convention</p>

Global Compact Principle	Action Taken & Impact Achieved and/or Plans for the upcoming Year
	<p>on the Rights of the Child.</p> <p>Every employee under 18 should be enabled to attend and remain in quality education until no longer a child.</p> <p>Children and young persons under 18 shall not be employed at night or in dangerous conditions.</p> <p>IMC cooperated with inter-governmental agencies on developing e-learning modules on childrens' rights. The modules are designed for a global audience; in particular, they address professionals in the humanitarian sector and provide guidance and support to their work.</p> <p>Specific plans for 2019:</p> <p>IMC will continue cooperating with inter-governmental organizations on developing e-learning modules on childrens' rights in order to increase their impact.</p>
<p>Principle 6: Businesses should support the elimination of discrimination in respect of employment and occupation.</p>	<p>In 2018, IMC's "Equality and Diversity Policy" was officially published (see attachment), while an Anti-Discrimination Agreement was already part of each employee's working contract for several years.</p> <p>It is the policy of IMC to ensure that no job applicant or employee receives less favorable treatment on the grounds of sex, race, marital status, disability, age, part-time or fixed</p>

Global Compact Principle	Action Taken & Impact Achieved and/or Plans for the upcoming Year
	<p>term contract status, sexual orientation or religion, or is disadvantaged by conditions or requirements that cannot be shown to be justifiable.</p> <p>Abusive, harassing or offensive conduct by an officer and employee is unacceptable, whether verbal, physical or visual. All employees have to sign an anti-discrimination statement.</p> <p>Officers and employees should report any potential incident of harassment to the Human Resources Manager when it occurs. IMC emphasizes that discrimination is unacceptable conduct which may lead to disciplinary action under the organization's Disciplinary Procedure.</p> <p>IMC recognizes the great benefits in having a diverse workforce with different backgrounds, solely employed on ability.</p> <p>IMC supports part-time work and flexible working arrangements that are possible also in management positions.</p> <p>In 2016, IMC implemented the non-profit project "Cost Effective, Quality, Skills Education for South African Youth", aiming to increase access to and capacity of higher and further education and training, and therefore access to the labor market, in South Africa. IMC therefore developed diagnostic tests and bridging courses in "Numeracy" and "English Literacy" to increase the admission rate to Technical Vocational Education and Training</p>

Global Compact Principle	Action Taken & Impact Achieved and/or Plans for the upcoming Year
	<p>colleges in South Africa, as well as providing free and online accessible high quality training material to those who lack the opportunity to visit a college. In addition, IMC supported the colleges in digitizing their learning material and in the development of their own institutional future technology plans. The project was funded by DEG (Deutsche Investitions- und Entwicklungsgesellschaft), a subsidiary of KfW Development Bank.</p> <p>In 2017, IMC started as a partner in the implementation of the non-profit project "InKraFT", which aims to give people with disabilities the right skills to learn and eventually to work as an automobile mechatronic engineer. The project establishes an innovative and virtual learning concept, providing the right tools to get this new work perspective with the help of digital media and technologies. IMC supports the project by providing the Learning Management System IMC Learning Suite and by integrating the modules of the partners into the platform.</p> <p>In 2018, a new non-profit research project of IMC started which supports the political request to invest more in education and the labor market in Africa. Together with research partners, IMC introduces online research laboratories into African schools in the project „Go-Lab Goes Africa“. During the three-year-project, a knowledge portal for schools in Africa is developed, with content available in French and Swahili. The solution will be tested in schools in Nigeria, Kenya and Benin. The schools will be equipped with</p>

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	<p>the necessary technology, teachers will be trained on the use of digital laboratories in their classes and the solution will include offline functionalities for use when internet connectivity is poor.</p> <p>Furthermore, IMC continued to cooperate with inter-governmental agencies on developing e-learning modules on gender issues, such as prevention from sexual exploitation and abuse, and ethics and integrity. The modules are designed for a global audience; in particular, they address professionals in the humanitarian sector and provide guidance and support to their work.</p> <p>Selected performance indicators:</p> <p>IMC is pleased to have reached its highest number of nationality diversity among its staff in 2018, with a total of 39 different nationalities working at IMC:</p> <table><tr><td></td><td>2012</td><td>2013</td><td>2014</td><td>2015</td><td>2016</td><td>2017</td><td>2018</td></tr><tr><td>Nationalities of full-time staff</td><td>24</td><td>29</td><td>31</td><td>31</td><td>30</td><td>29</td><td>39</td></tr><tr><td>Gender equality (% of female full-time staff)</td><td>33</td><td>35</td><td>37</td><td>37</td><td>33</td><td>33,5</td><td>34,5</td></tr></table>		2012	2013	2014	2015	2016	2017	2018	Nationalities of full-time staff	24	29	31	31	30	29	39	Gender equality (% of female full-time staff)	33	35	37	37	33	33,5	34,5
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	<p>Specific plans for 2019:</p> <p>A culturally, ethnically, and linguistically diverse workforce has turned out beneficial for the company's overall business performance in the past. IMC will continue its efforts in this regard making sure that the company's corporate culture welcomes diversity in all respects.</p> <p>In addition, IMC will continue cooperating with inter-governmental organizations on developing e-learning modules on gender issues in order to increase their impact.</p>
<p>Principle 7: Businesses should support a precautionary approach to environmental challenges;</p>	<p>In 2018, IMC published an "Environmental Policy" and an "Environmental Policy Statement (for IMC APAC)" (see attached). IMC promotes perceived attitudes to resource management and resource expenditure in relation to environmental background. All operations have to be completed undue any negative impacts on human beings or environmental pollution.</p> <p>IMC cooperates with inter-governmental agencies on developing e-learning modules on various environmental issues. The modules are designed for a global audience; in particular, they address professionals in the humanitarian sector and provide guidance and support to their work.</p>
<p>Principle 8: Businesses should undertake initiatives to promote</p>	<p>In 2018, IMC published an "Environmental Policy" and an "Environmental Policy Statement (for IMC APAC)" (see attached).</p>

Global Compact Principle	Action Taken & Impact Achieved and/or Plans for the upcoming Year
greater environmental responsibility;	<p>In December 2015, IMC underwent an Energy Efficiency Audit according to DIN EN 16247-1, as required by the new amendment to the German Law on Energy Service Providing (EDL-G) that implements the EU Directives on Energy Efficiency (2012/27/EU) and Energy Service Providing (2006/32/EG). The audit report was made available in 2016, containing recommendation for measures of improvement which are successively implemented during its 5-year validity.</p> <p>IMC continues the use of an additional line in all employees' e-mail signature: <i>"Please consider the environment before printing this e-mail."</i> to avoid waste of paper not only internally, but also outside the house.</p> <p>Travel policy of IMC underlines that employees must respect environmental standards when organizing work-related travels. Travelling by train is the preferred way of transport, besides flights and hiring cars when necessary. Thanks to a more diversified staff distribution in the branch offices (e.g. more New Media and Sales employees in the Munich, Essen, Melbourne or Singapore Offices), travel efforts can be significantly reduced for visiting local clients. The same principles are applied with regard to subcontractors wherever possible. These measures contribute to a reduction in CO2 emissions, travel costs and strain on employees, thus improving their work-life balance.</p> <p>IMC practices waste separation, according to the German law. In 2016, IMC's Munich</p>

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	<p>Office changed from paper towels to washable cloth towel rolls, avoiding waste of paper. In addition, IMC cooperates with inter-governmental agencies on developing e-learning modules on various environmental issues. The modules are designed for a global audience; in particular, they address professionals in the humanitarian sector and provide guidance and support to their work.</p> <p>Specific plans for 2019:</p> <p>IMC will continue taking the measures identified by the Energy Efficiency Audit in order to improve its energy management and enhance its environmental responsibility.</p>
<p>Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies</p>	<p>The "Green IT" concept is widely advocated for IMC. Challenges, which result from complexity of environmental protection, have large influence on IT- development and usage spectrum:</p> <p>New media channels for educational programs are offering chances to promote environmental protection.</p> <ul style="list-style-type: none"> • Learning Solutions become a core competence of Green IT because they can substitute business trips and face-to-face meetings, and hence they reduce CO2 emissions, the travel cost budget and the strain on employees, thus improving their work-life balance.

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	<ul style="list-style-type: none"> • The term "Green IT" marks information technologies which make significant ecologic contribution. Reducing a travel route by 1 km reduces the CO2 emission by an average of approximate 204 gram – in comparison to this, the energy use produced by the IT is negligible. A virtually conducted meeting or an e-learning course with 12 students would reduce the CO2 emission by 244 kg, given an average travel route of 1,200 km. • IMC has increased the use of Web Meetings and Virtual Classroom Sessions for internal communication and cooperation as well as for project coordination meetings with customers. This action reduces the need for travelling and contributes to the reduction of CO2 emissions. IMC intends to further expand its activities in this area in the coming years. • In IMC Learning Suite, the Learning Management System developed by IMC, the options for using one of a variety of virtual classroom tools, among them open source solutions, have been expanded. Thus, IMC impacts and facilitates its customers' practice to hold meetings and trainings virtually instead of face-to-face, reducing CO2 emissions. • IMC supports the DHL GoGreen climate protection projects by combining its shipments with DHL GoGreen services whenever possible. DHL calculates CO2

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	<p>emissions generated by transport using a method based on the ISO 14064 standard. In accordance with the specifications of the Kyoto Protocol, these emissions are offset by climate protection projects.</p> <ul style="list-style-type: none"> • IMC also has increased and intensified its business operations in the area of "cloud computing", providing professional services to its customers via hosted IT environments. This allows for synergies in the use of IT systems via shared IT infrastructures; in 2013, IMC received the "Cloud for Society Award" for its business operations in this area. The award also covers "green IT" aspects of IT operations. IMC's software products, the Learning Management System IMC Learning Suite, the authoring tool IMC Content Studio/"IMC Teach", and the performance support tool IMC Process Guide, are all available as cloud-based solutions (software as a service). • IMC has reduced the number of company cars with high CO2 emissions. With regard to reducing CO2 emissions, SUVs have been banned completely from IMC's car pool. <p>In addition, IMC cooperates with inter-governmental agencies on developing e-learning modules on various environmental issues. The modules are designed for a global</p>

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	audience; in particular, they address professionals in the humanitarian sector and provide guidance and support to their work.
<p>Principle 10: Businesses should work against all forms of corruption, including extortion and bribery.</p>	<p>In 2018, the position of a compliance officer was created and staffed at IMC Germany. All directors, officers and employees shall comply fully with all laws affecting the business of IMC, including, without limitation, all laws prohibiting insider trading, money laundering, bribery, improper payments and anti-competitive activities.</p> <p>The consequences to the company and its directors, officers and employees of any departure from this policy can be very serious. If a criminal violation has occurred, the company will take appropriate steps to stop the criminal conduct and to prevent such conduct from re-occurring.</p> <p>IMC is certified according to ISO / IEC 27001: 2013, proving IMC's Information Security Management System, and holds a recognized DIN EN ISO 9001:2008 Quality Management Certificate, applying a regular schedule for external audits. State-of-the-art data protection and digital processes, combined with staff trainings, contribute to a transparent working environment. The following processes are already being monitored by the ISO standard: Annual People Review (staff appraisal), Induction of new staff, Onboarding of new staff (administratively), Exit of staff, Career Growth/Staff Development, and Internal Change of Department of Staff. Further processes will be</p>

Global Compact Principle	Action Taken & Impact Achieved and/or Plans for the upcoming Year
	<p>integrated in 2019.</p> <p>In order to foster compliance with anti-corruption rules in a broad range of business operations, IMC has developed an interactive training curriculum available for use in organizations of all kinds. In addition, IMC has broadened its product portfolio with an online compliance management system which is used by IMC customers in order to effectively provide compliance relevant training to their workforce.</p> <p>In 2017, IMC has introduced, and continued in 2018, a bi-monthly “Impulse Session” to improve internal transparency and communication between the board and staff. The meeting is held onsite at headquarters and shared by a live webstream with all staff at other offices and subsidiaries.</p> <p>Furthermore, IMC is cooperating with inter-governmental organizations on developing e-learning modules on corruption prevention, internal controls and raising fraud awareness. They are targeted to a global audience of professionals in the humanitarian sector.</p> <p>Specific plans for 2019:</p> <p>IMC will strive to further improve internal communication and transparency. Further processes will be integrated into and monitored by IMC’s ISO-certificated standards.</p>

Global Compact Principle	Action Taken & Impact Achieved and/or Plans for the upcoming Year
	In addition, IMC will continue cooperating with inter-governmental organizations on developing e-learning modules on corruption prevention in order to increase their impact.

Attachments:

- IMC Sustainable Development Policy
- IMC Health and Safety Policy
- IMC Equality and Diversity Policy
- IMC Environmental Policy Statement
- IMC Environmental Management Policy (IMC APAC).

Sustainable Development Policy

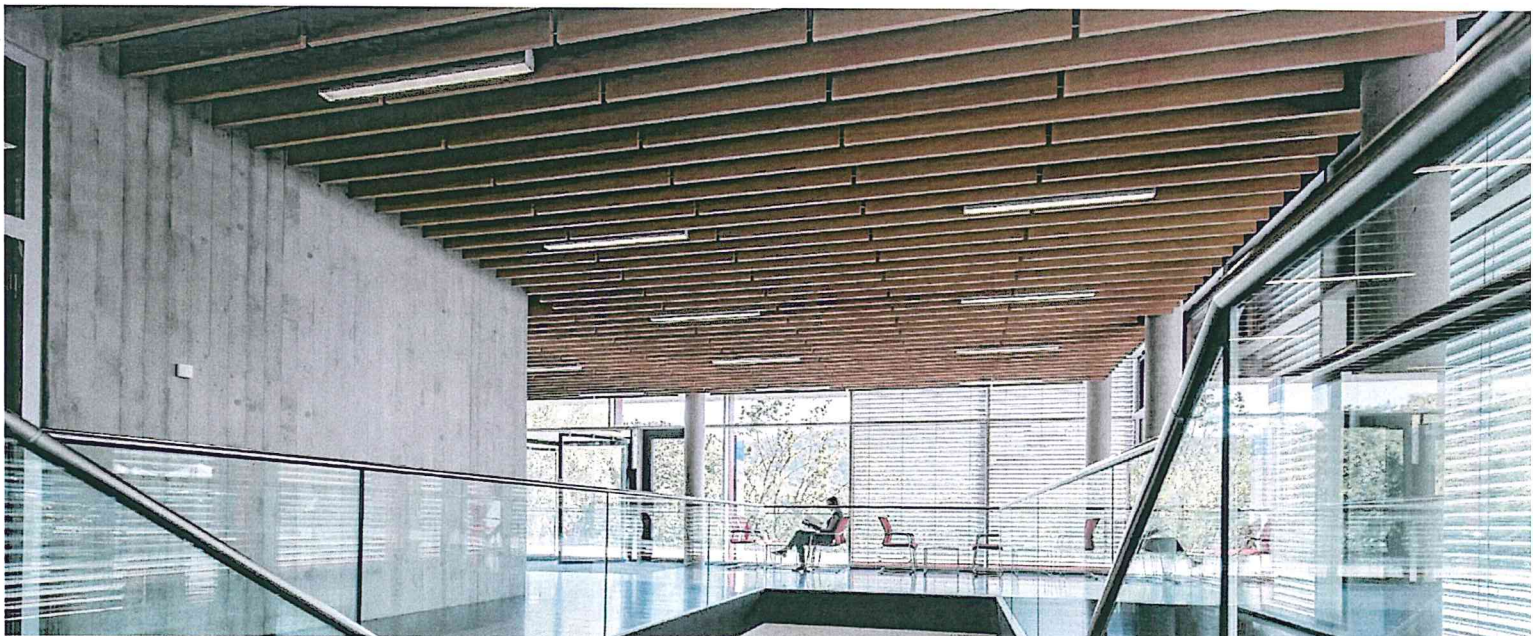


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1 Introduction

Sustainable development is a core element of our corporate and business plans. IMC is committed to the principles of sustainable development and to the progressive integration of these principles into our daily activities. IMC will seek to increase awareness of sustainable development amongst our employees, within our supply chain and to ensure that wherever possible, IMC purchasing and supply activities support the achievement of sustainable development objectives.

1.1 Background

Since our beginnings in the 1990s, engaging with sustainable development principles has required IMC to challenge existing practices, recognise both successes and failures, build upon existing good practices, fully involve internal and external stakeholders, and take a long term view. It includes social as well as environmental impacts.

The Sustainable Development Policy is integrated with IMC's policies and strategies, such as those relating to Research, Knowledge Transfer, Access and Widening Participation, Equal Opportunities, Information, Communication and Technology, Human Resources and Staff and Product Development. Its philosophy permeates many aspects of corporate life.

1.2 Definition of Sustainable Background

IMC recognises the definition of sustainable development as proposed by the Bruntland Report of 1987.

"Development which meets the needs of the present without compromising the ability of future generations to meet their own needs."

Sustainable development is recognised internationally and by IMC as having four main components, namely:

- Social progress which recognises the needs of everyone
- Effective protection of the environment
- Prudent use of natural resources
- Maintenance of high and stable levels of economic growth and employment

2 Principles

IMC's Sustainable Development Policy is integrated with other business processes and makes every effort to be compliant with current legislation and regulations.

The Policy is based upon commitment to the following principles:

- Continual improvement, through setting objectives and targets, continuous monitoring and review
- Complying with, and where appropriate exceeding, applicable legal and other requirements relevant to our operations
- Prudent use of natural resources and the prevention of pollution
- Communicating IMC's commitment to sustainable development across the company and beyond

3 IMC's Sustainable Development Group

Sustainable development issues at IMC are coordinated by the Sustainable Development Group (SDG). The SDG remit includes:

- Establishing working groups to develop individual strategies within the company's Sustainable Development Policy and receiving periodic progress reports from such groups
- Providing a company-wide forum for debate about Corporate Responsibility and environmental issues
- Developing ways in which IMC can demonstrate the effectiveness of its Corporate Responsibility Action Plan which includes its environmental policies
- Ensuring the dissemination of information and promotion of sustainable practice amongst staff through formal processes and by other means
- Encouraging liaison, where appropriate with external bodies, including the local community, on matters of social, economic and environmental significance
- Reviewing priorities for action and recommending a phased programme for the further development of good practice

4 Implementing the Policy

IMC is committed to implementing the Policy through a series of dynamic and specifically focused strategies, currently including:

- Product development
- Procurement
- Transport
- Utilities, including energy
- Waste Management

5 Monitoring and Review

The Sustainable Development Policy and its associated Action Plan will be monitored and reviewed annually by the SDG, which will advise IMC's main board through the annual report of progress and amendments. The report will encompass any potential risks of non-compliance or failure to take positive action in relation to the continuing commitment to and the promotion of sustainable development.

6 Sustainable Development Group Action Plan

IMC has established key targets for 2015 – 20. SDG will:

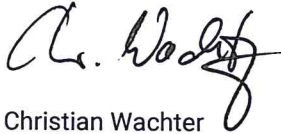
- Maintain an active Environment Management System in view of minimising the impact of our activities on the environment. This encompasses setting, actioning, monitoring, and reviewing targets to achieve continuous improvement. In particular, IMC is committed to:
 - Minimising waste by evaluating operations and ensuring they are as efficient as possible
 - Minimising toxic emissions through the selection and use of its fleet and the source of its power requirement

- Actively promoting recycling both internally and amongst its customers and suppliers.
- Sourcing and promoting a product range to minimise the environmental impact of both production and distribution
- Meeting or exceeding all the environmental legislation that relates to the company
- Use an accredited program to offset the greenhouse gas emissions generated by the company's activities
- Further develop the following strategies and codes of practice:
 - Product development
 - Utilities, including energy
 - Transport
 - Procurement
 - ICT
 - Corporate Responsibility
- Establish ongoing programmes of staff development to ensure updating on legislation and awareness of sustainable development issues.
- (responsibility: Group Human Resources)
- Promote engagement where appropriate with national and regional bodies, associations and networks. An annual report will be presented to the SDG.
- (responsibility SDG)
- Identify and disseminate good practice within IMC by hosting sustainable development seminars.
- (responsibility SDG)

Questions and concerns regarding this Statement should be addressed to the Group Chief Executive or the Group Human Resources Manager:

Group Chief Executive: Christian Wachter

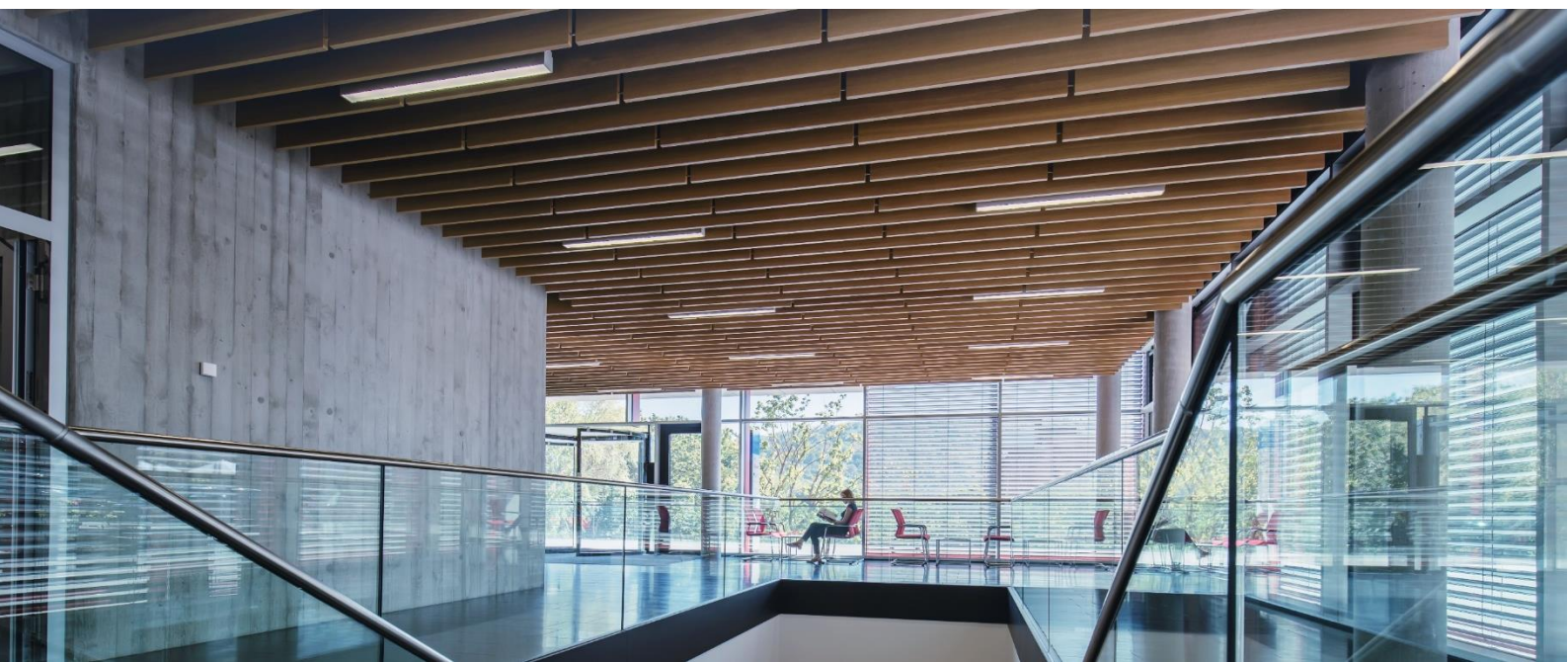
Group Human Resources Manager: Elke Zastrau

A handwritten signature in black ink, appearing to read 'C. Wachter', with a stylized flourish at the end.

Christian Wachter

Date: January 2018

Occupational Health & Safety Policy



1. It is the policy of IMC APAC to take all measures which are reasonably practicable to:

- a) ensure the health, safety and welfare of all persons at work
- b) protect contractors, visitors and the public attending its premises against risks to their health and safety

2. The Director/Management, within the ethos of self-regulation, undertake so far as is reasonably practicable:

- a) to provide the necessary resources and seek the co-operation of all employees with a view to implementing the requirements of the Occupational Health, Safety & Welfare Act 1986 and all supportive and associated legislation concerning Health, Safety and Welfare
- b) to maintain all places of work in a condition that is safe and without risk to health, including the means of access to and egress from such places of work
- c) to provide and ensure that work equipment and systems of work are maintained to be safe and without risks to health
- d) to provide and maintain a working environment for persons at work that is safe and without risks to health, with adequate arrangements for the welfare of such persons
- e) to provide appropriate personal protective equipment where necessary
- f) to ensure safety and the absence of risks to health and the general environment in connection with the use, handling, storage, transport and disposal of articles and substances
- g) to provide such information, instruction, training and supervision as is necessary to ensure the health and safety at work of all employees
- h) to formulate, and where necessary practice, effective emergency procedures as required.
- i) to bring to the attention of all persons including managers, regular and temporary employees, visitors and contractors, at the place of work, their responsibilities with regards to their own safety and the safety of others who may be affected by their acts or omissions at work
- j) to promote the co-operation of employees to ensure safe and healthy conditions and systems of work by discussion and effective consultation.
- k) to assess the risk to the health and safety of employees and others who may be affected and identifying what measures are needed to comply with its health and safety obligations

- l) to keep abreast of legislation by ensuring adequate and appropriate advice through persons competent in health and safety matters
- m) to record and investigate accidents and cases of occupational disease, ill-health and incidents of violence at work
- n) to provide adequate first-aid cover
- o) to monitor health and safety performance on a regular basis with regards to places of work
- p) to bring this policy and relevant health and safety arrangements to the attention of all employees
- q) to review this Health and Safety Policy and the arrangements for its implementation as often as may be necessary. All such revisions will be brought to the attention of employees
- r) to follow the Australian Directive in Working Time Regulations to not exceed 48 hours maximum working per week averaged over a 17 week period, a daily rest period of 11 consecutive hours and a weekly rest period of 24 hours will be rigorously applied. Employees wishing to opt out of the 48 hour maximum rule must sign a detailed agreement to be drawn up by the Personnel Manager

Human Resources will be responsible for reviewing, and where necessary, amending this policy and Statement.

ORGANISATION

The above policy needs the full co-operation of all employees who are expected to give all possible assistance aimed at its successful implementation, to take reasonable care for their own safety and that of others. To achieve this end, every employee must:

- Comply with any safety instructions and directions issued by IMC APAC
- Take reasonable care for their health and safety and the health and safety of other persons (e.g. other employees, contractors, customers, workmen etc.) who may be affected by your acts or omissions at work, be observing safety rules which are applicable to you
- Co-operate with IMC APAC management to ensure that the aims of the Health and Safety Policy Statement are achieved and any duty or requirement imposed on IMC APAC by or under any of the relevant statutory provisions are complied with
- Report and co-operate in the investigation of all accidents or incidents that have led to or may lead to injury
- Report any potential risk or hazard or malfunction of equipment to the appropriate authority

- Not to intentionally or wilfully interfere with or misuse anything provided in the interests of health and safety at work

Any failure by an employee to comply with any aspect of IMC APAC's health and safety procedures, rules or duties specifically assigned to the employee with regard to health and safety will be regarded by IMC APAC as misconduct which will be dealt with under the terms of IMC APAC's disciplinary procedure.

Although the final level of responsibility for ensuring health and safety at work lies with the Director and each individual employee, certain members of management and staff have specific responsibilities to ensure that IMC APAC's health and safety policy is maintained at all times.

The allocation of responsibility within IMC APAC for health and safety matters is as follows:

- The Director has overall and final responsibility for giving effect to this health and safety policy.
- The Personnel Manager is responsible for ensuring there is consultation on health and safety matters with staff.
- The Personnel Manager is responsible for the implementation and monitoring of health and safety policy

Managers are responsible for the implementation of the health and safety policy in areas under their control.

All employees have the responsibility to observe all safety rules and to co-operate with the manager charged with responsibility for the implementation of IMC APAC's health and safety policy to achieve a healthy and safe workplace and to take reasonable care of themselves and others.

ARRANGEMENTS

Accidents and accident reporting:

If you suffer an accident on IMC Australia & New Zealand's premises you (or someone on your behalf) must report that fact to your manager as soon as is practicable after the event. All accidents should be reported however trivial and the accident must be recorded in IMC APAC's Accident book.

First Aid:

The first aid box is located at in the kitchen and is equipped in accordance with official guidance, and does not contain analgesics. Users of the first-aid box must make an entry in the accident book which is kept with the first aid box.

In the event of an accident one of the qualified first aiders will take charge and arrange for medical treatment if required. The list of first aiders appears above the box.

Each member of staff should fill in a personal record so that the Office Manager has a note of next of kin, home telephone number etc.

Electricity:

The Electricity at Work Regulations stipulates that no employee may be involved in work with electricity unless they are competent to do so. There is no requirement for employees to work with electricity i.e. re-cabling, moving sockets etc. as this sort of work must be undertaken by a qualified electrician. The changing of light bulbs, fuses, plugging in computers etc. is acceptable provided the person is competent to do so.

Emergency Evacuation:

All employees must familiarise themselves with routes to escape from the premises, the company fire emergency procedure, also the position of fire alarm call points and fire extinguishers. The purpose of the fire extinguishers is to fight fire only if this can be done without personal risk.

Housekeeping:

Poor standards of housekeeping are a common cause of fires in the workplace. Members of staff are therefore required to maintain the highest standards of housekeeping, in particular by ensuring that waste and redundant material is not allowed to accumulate.

Manual Handling:

It is the duty of all employers to keep manual handling to a minimum, and where it is unavoidable, to try to introduce mechanical aids to eliminate or reduce manual involvement wherever possible. Staff should follow safe lifting procedures e.g. bend from the knees and keep weight evenly distributed – see poster of lifting techniques

Risk Assessment – (on and off site)

Risk Assessments should be carried out by a 'Competent Person'. Anything that can cause harm is noted, evaluated and action taken if necessary. Reviews should be held regularly. In respect of off-site 'Events' a Risk Assessment form should be completed when the initial meeting takes place relating to the booking to assess if the area is suitable to hold the event.

Working from Home

Home workers will be asked to complete a 'Risk Assessment' form before they commence working from home to assess if their working area is suitable.

Smoking

Smoking is not permitted within IMC APAC's headquarters. The designated smoking area where smoking is permitted is the car park and other outdoor areas.

Questions and concerns regarding this Statement should be addressed to the Regional Director or the Group Human Resources Manager:

Regional Director: Russell Donders

Group Human Resources Manager: Elke Zastrau

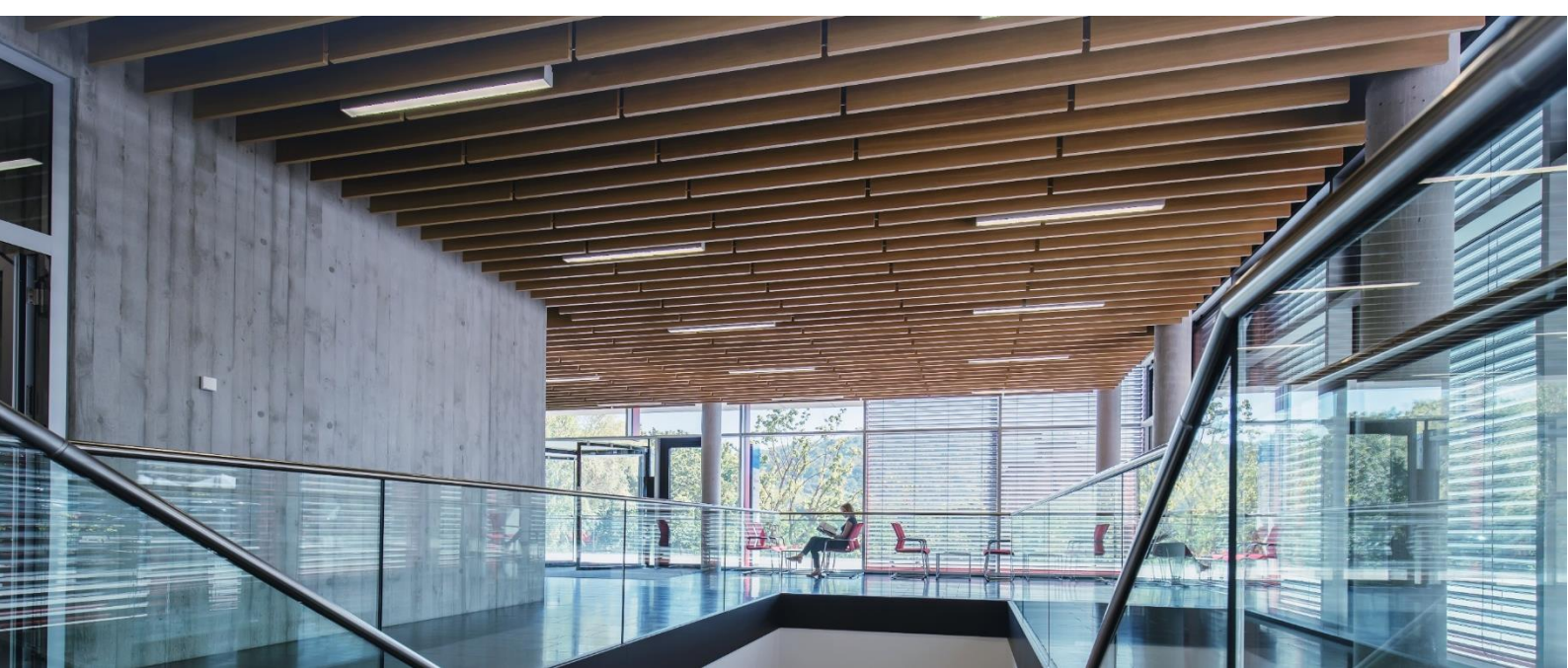


Russell Donders

Date: January 2018

Equality and Diversity Policy

Author: Elke Zastra, Head of Global Human Resources



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Equality and Diversity Policy

1 Our commitment and vision

In all our dealings, including those with clients, suppliers, contractors and recruitment agencies, we will seek to promote the principles of equality and diversity. We will make every effort to reflect our commitment to equality and diversity in our HR, marketing and communication activities.

We are committed to ensuring equality of opportunity and fairness in all areas of employment and to valuing the diversity of our colleagues, clients and people living within our local communities.

Our commitment lies at the heart of our promise to provide outstanding client service by maintaining the highest standards of professional excellence. We are committed to recruiting, training and promoting the best person for the job and encouraging all our colleagues to reach their full potential, regardless of age, gender, marital status, race, nationality, disability, religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities.

We will remain free to decide whether to accept contracts from any particular client, but any refusal to supply goods or services will not be based upon any of the discriminatory grounds referred to above. We will take steps to meet the different needs of particular clients arising from our obligations under anti-discrimination legislation.

We are committed to promoting equality and diversity in those areas in which we have influence. In our dealings with third parties and suppliers, we will seek to promote the principles of equality and diversity. Acts of discrimination or harassment by those acting on our behalf will lead to appropriate steps being taken, including termination of services where appropriate.

2 Local compliance

We are committed to complying with the regulations in force in each country in which we are located. Individual offices may, therefore, implement their own equal opportunities policies. As far as possible, these should be consistent with our overall policy. In the event of conflict, the local policy and the requirements of local regulation will override the provisions of this policy.

We are also determined to creating a working environment which supports our vision and values and which is free of any form of discrimination, harassment or bullying and within which all individuals are treated with respect, fairness and courtesy.

2.1 Shared responsibility

This policy is endorsed by our chairman, chief executive and board. We will support and encourage our colleagues in their responsibility to implement this policy by providing training, written information and guidance in the handbook and expert guidance and advice, where appropriate.

Our progress and successes are regularly monitored and reported to the board and communicated internally and, where appropriate, externally.

2.1.1 Leadership

This policy is endorsed by our chairman, chief executive and board. We will support and encourage our colleagues in their responsibility to implement this policy by providing training, written information and guidance in the handbook and expert guidance and advice, where appropriate.

Our progress and successes are regularly monitored and reported to the board and communicated internally and, where appropriate, externally.

2.1.2 Your responsibility

You are required to comply with the policy in all of your dealings with clients, colleagues and anyone else with whom you come into contact during the course of your employment. The policy and principles underlining our commitment applies not only when you are working on our premises or at those of any client or contact, but also includes work-related social events, hospitality events and travelling or staying away from home whilst on business.

It is everyone's responsibility to ensure the policy is implemented. Any breach of this policy will be treated as a disciplinary offence resulting, if appropriate, in disciplinary action.

2.2 Scope of the policy

This policy applies to everyone working at IMC including employees, temporary or agency workers, trainees, work experience students, secondees, contractors and consultants as well as potential new employees and recruitment candidates. It affects how we work with our clients and our suppliers of goods and services.

This policy covers the following matters:

- recruitment, selection, learning and development and promotion
- terms and conditions of employment/terms of engagement including pay
- disability
- procurement
- discrimination, victimisation and harassment our collective responsibility
- complaints procedure
- monitoring.

2.3 Recruitment, selection, learning and development and promotion

IMC will ensure that information about job opportunities is circulated as widely as possible in the circumstances to ensure that it reaches all sections of the community. All applications are welcomed and are considered for selection on the relative merits of the applicant against the job and/or person specification for the position regardless of age, gender, marital status, race, nationality, disability, religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities.

Job and person specifications will only include criteria which are objectively required for the duties and responsibilities of the vacancy and will be drawn up before the recruitment process begins. However, if there is a genuine and lawful reason for limiting the vacancy to a particular group, this reason and the grounds for it will be clearly stated on any advertisements.

We retain the discretion to invite applications from individuals whose job may be at risk of redundancy or who require redeployment for health or disability reasons before advertising the vacancy more widely.

We aim to provide everyone with the appropriate learning and development opportunities to enable them to improve their performance and achieve the performance targets set for them. Opportunities for learning and development are available to everyone based on role/needs of the job and encouraging personal development. Promotion within IMC is based on merit and the reasonable requirements of the job only.

Sub-contractors and business partners are engaged on the basis of their skills, experience, ability and cost and not on the grounds of age, gender, marital status, race, nationality, disability, religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities. We will work closely with our clients to agree the engagement of a consultant or other sub contractor who is the most appropriate for the service provision required.

2.4 Terms and conditions of employment/engagement

We ensure that terms and conditions of employment/terms of engagement are free from all forms of direct and indirect discrimination and apply equally regardless of age, gender, marital status, race, nationality, disability, religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities. Our grievance and disciplinary procedures will operate without discrimination.

We recognise the need to balance personal and work life and that flexibility with regard to working patterns assists the broadest range of people. Our 'Lifestyle' policy actively encourages and supports this.

2.5 Disability

We value the individual contribution of all colleagues and prospective employees from all sectors of the community. We are committed to facilitating the employment of people with disabilities wherever practicable and in order to achieve this, we apply the following principles. We will:

- Take reasonable steps to ensure that the working environment, working practices, terms and conditions of employment and terms of engagement do not prevent disabled people from taking up positions for which they are suitably qualified and the best person for the job.
- Avoid, remove or alter the barriers to the employment of disabled people, wherever possible when acquiring and fitting out buildings with equipment and devising working practices.
- Make reasonable adjustments to recruitment arrangements, the working environment, working practices role responsibilities and to terms and conditions of employment so as to ensure that no particular disabled person is placed at an unreasonable disadvantage.
- Ensure that any decision not to make an adjustment which might enable or assist a colleague or prospective colleague will not be taken below the level of the departmental manager after consultation with the HR Department. Before making such a decision, we will ensure that all possible adjustments have been fully investigated, including consultation with the individual concerned and any appropriate expert advice.
- Ensure that any colleague who becomes disabled whilst in employment will be given the full support of IMC to continue in their own job (where practicable and having put in place any reasonable adjustments) or is offered a move to an alternative job appropriate to his/her experience and abilities, if available.
- Respond promptly (within 14 days) to requests for reasonable adjustment from our colleagues albeit further discussions and investigations may well be needed.
- Encourage the participation of disabled colleagues to ensure that, wherever possible, our employment practices recognise and meet their needs.
- Consult disabled colleagues on action to make sure they develop and use their abilities at work.
- Continue to provide services and facilities to clients with disabilities.

Further guidance can be obtained on an entirely confidential basis from the HR department. If you know or believe you might be disabled, you are encouraged to discuss this with the HR Department so that we can ensure you achieve your full potential and that we comply with our responsibilities.

2.6 Procurement

We will ensure that the way in which we purchase goods, services and facilities reflects our commitment to equality and diversity. We will put procedures in place to ensure that suppliers from diverse communities have appropriate opportunities in competing for contracts and we will take action to encourage such businesses through our supply chains, to comply with their anti discrimination responsibilities and best practice on diversity issues.

2.7 Discrimination, victimisation and harassment

2.7.1 Discrimination and victimization

A person has been discriminated against if they are treated less favourably than another on the grounds of age, gender, marital status, race, nationality, disability of any kind (including physical, sensory and mental disability), religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities. Discrimination also includes harassment, bullying or victimisation on any of these grounds.

2.7.2 Harassment

Harassment is unjustified, unreasonable or inappropriate treatment of, or behaviour towards another person which causes them distress, discomfort or worry. Harassment may include bullying. Harassment may be discriminatory when it is on the grounds of another's age, gender, marital status, race, nationality, disability, religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities. Harassment will be unlawful discrimination if:

- unwanted conduct takes place
- it is on discriminatory grounds
- with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment.
- where it is reasonable to form the view that this is the impact of the offending behaviour.

The following types of behaviour may amount to harassment:

- physical assault
- physical or verbal abuse including threats
- suggestive comments or gestures
- suggestive or offensive emails
- insulting or abusive behaviour or comments
- isolation or exclusion from work opportunities, corporate, social or sporting events
- persistent criticism or humiliation
- unfair allocation of work or responsibilities.

This list gives examples only and is not exhaustive.

2.7.3 Sexual harassment

The following types of behaviour may amount to sexual harassment:

- physical conduct of a sexual nature.

- unwanted physical contact or conduct even if not obviously sexual including unnecessary touching, brushing against another individual, uncomfortable proximity
- verbal conduct of a sexual nature including unwelcome sexual advances, continued suggestions of social activity outside work after it has been made clear that this is unwelcome, suggestions that sexual favour may further a career (or refusal may hinder it)
- insults, ridicule or teasing of a sexual nature, insults related to gender or sexual orientation, offensive comments about appearance or dress, talk or jokes of a sexual nature which a person present has indicated they dislike
- display of sexually suggestive or pornographic pictures, or sending such items electronically sending sexually harassing messages or images through e-mail
- conduct that denigrates or ridicules, is intimidatory or physically abusive of a colleague because of his/her sex, marital status or sexual orientation.

Again, this list gives examples only and is not exhaustive. Sexual harassment by someone of the same sex as the victim is also covered by this policy.

2.7.4 Consequences of discrimination, victimisation and harassment

Any behaviour involving discrimination, victimisation or harassment of another will not be tolerated. Such behaviour may amount to gross misconduct in which case disciplinary action (including dismissal for serious offences) will be taken against any person breaching this policy.

2.8 Our obligations

IMC believes that we all have the right to work in an environment which promotes equality of opportunity and prohibits discriminatory practices. We do not tolerate any form of discrimination, victimisation or harassment by or against our people.

We should be fully aware of the behaviour that can constitute discrimination, victimisation and harassment. It is the responsibility of each of us to be sensitive towards the impact that we have on others and not to discriminate against, harass or bully colleagues or condone discrimination, harassment or bullying by others. All of us must behave in a way that supports this policy and treat each other with respect, courtesy and dignity in line with our Vision and Values. If you have experienced behaviour which you believe falls short of the standard we require and which is not in line with our vision and values, please see Section 5 (grievance procedure).

2.9 Complaints procedure

2.9.1 Our collective responsibility

All of us must comply with this policy and report any incidents or alleged incidents to our manager or to the HR department. Anyone who believes they are the victim of discrimination, victimisation or harassment should where possible raise the matter with the person against whom they have the complaint and attempt to resolve

the matter without recourse to any formal procedure. You are encouraged to use the complaints procedure which is part of this policy.

2.9.2 Duties of managers

It is the responsibility of all managers to ensure the implementation of this policy and to ensure compliance. Where a manager becomes aware of an allegation of discrimination, victimisation or harassment against a colleague or a member of the public in connection with IMC activities, he/she must discuss it with the complainant. Your HR department can provide further advice and support.

2.9.3 Complaints procedure

Failure to comply with this policy or to co-operate with it operating effectively is a disciplinary offence which may lead to disciplinary action including dismissal.

In the event of a complaint which falls within this procedure, it is our aim to reach a resolution as quickly as possible and as informally as possible. All complaints will be treated seriously and with appropriate confidentiality.

2.9.4 Making a complaint

If you feel you have experienced or are experiencing any form of discrimination, harassment or bullying, please consider in the first instance whether it is appropriate to raise the matter directly with the person concerned. If it is not appropriate to do so, or you feel unable to do so, please discuss the matter with your manager. If you feel unable to do this, the appropriate point of contact is your HR department.

Following initial discussions with your manager or the HR Department, you will be asked to choose one of the following options:

- no further action necessary
- discuss the complaint directly with the individual who is alleged to have caused offence
- ask your manager/HR department to help you resolve the matter through informal approaches
- make a formal written complaint to the HR department (this will initiate a full investigation and if appropriate, recourse to the disciplinary procedure).

If the alleged discrimination, victimisation or harassment involves a client or an employee of a client, or if an employee of a client is alleged to have acted in a discriminatory or harassing manner, appropriate action to deal with the problem will be discussed with the person making the complaint.

2.9.5 Investigation

Once a formal written complaint has been made, the first step is to investigate the allegations as carefully and discreetly as possible. This will involve hearing detailed accounts from both parties - others may also be asked to provide information. Documents, emails and other evidence may be considered. A full record of the progress and outcome of the investigation and any steps taken will be reported to the complainant at the earliest opportunity. Those conducting the investigation will not be parties directly involved in the allegation.

In extreme cases (for example, where it is felt that others could be at risk if no action is taken), we may need to investigate and take disciplinary action even if a formal written complaint is not made.

2.9.6 Disciplinary procedure

If the investigation concludes that there appears to be substance to the complaint, it will normally be appropriate for the disciplinary procedure to be initiated. The disciplinary procedure is set out in full in section 5. Modifications to the procedure may be necessary to reflect the sensitive nature of the allegations.

We would normally seek the agreement of the complainant prior to commencing disciplinary action. However, there may be occasions where despite the views of the complainant, we may need to pursue the matter formally. The matter will be dealt with promptly, fairly and impartially. Care will be taken to ensure that the reputation of each party is not unjustly affected during the course of any investigation.

We will protect individuals who make a complaint or assist in an investigation from harassment and victimisation. Any acts of retaliation or intimidation against the complainant will be treated as a disciplinary matter.

2.9.7 If the complaint is not upheld

If the complaint is not upheld we will advise the individual bringing the allegation and provide an explanation for and the reasoning behind the decision made. Individuals who maliciously make an unfounded complaint will be subject to disciplinary action.

2.10 Victimisation

Any person raising a concern under this policy whether informally or formally will be protected against any adverse treatment from colleagues. It is victimisation to penalise or retaliate against a person who brings complaints of discrimination or harassment in good faith, through any form of less favourable treatment. Any person who does victimise will be subject to disciplinary action, if appropriate and following an investigation. Anyone who considers that they have been victimised should raise this with their manager or the HR department without delay in accordance with the complaints procedure.

Managers who observe harassment, discrimination/victimisation have a duty of care and responsibility to act and should:

- talk to the individual to see if concerns arise
- consider action whether informal or formal in more serious cases
- seek advice from HR.

2.11 Monitoring

We are committed to monitoring the effectiveness of this equality and diversity policy and the associated complaints procedure. We undertake to regularly review all our policies, procedures and practices in relation to

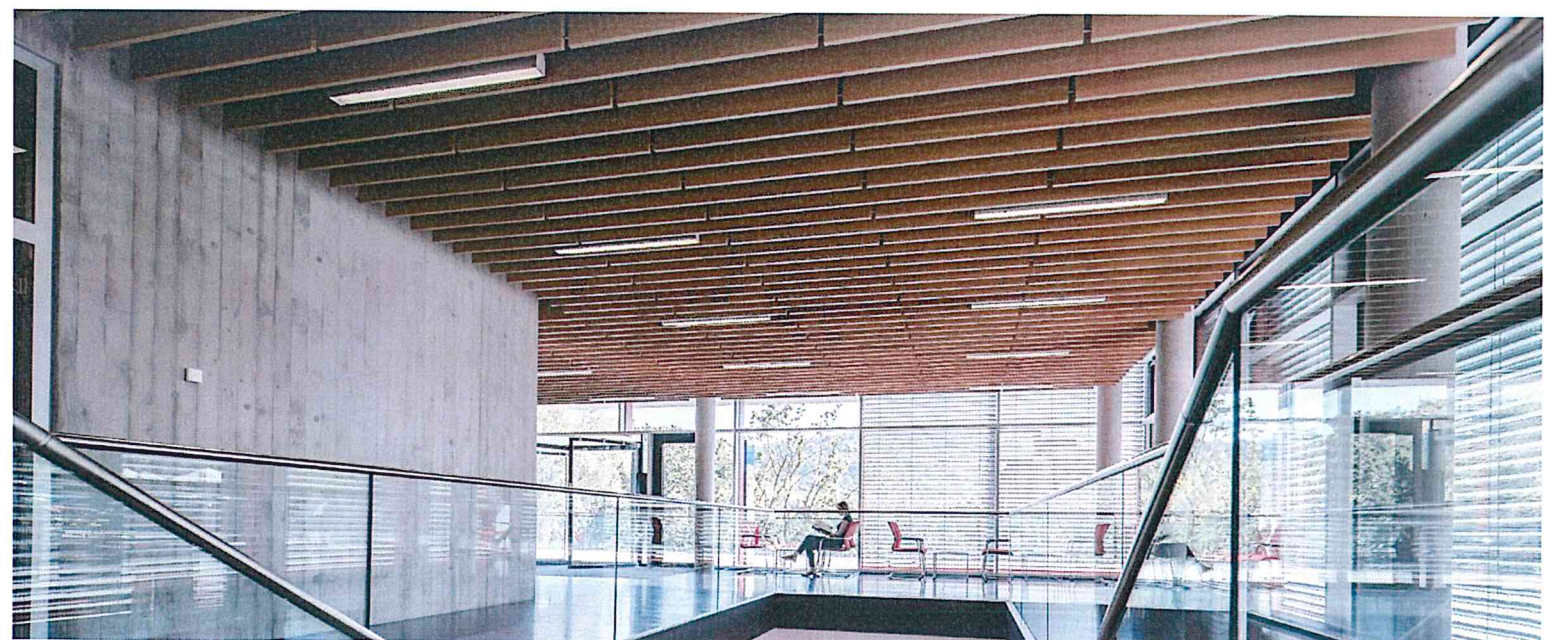
recruitment and selection, terms and conditions of employment, learning and development opportunities, career development, promotion and grievance and discipline to ensure they comply with any legislative changes and good practice. We will endeavour to identify and take all steps necessary to eliminate any unjustified discrimination or victimisation which is revealed by this monitoring process and action which is required to achieve our commitment and vision for equality and diversity.

In addition, we will measure staff and client perceptions of our effectiveness in promoting diversity through qualitative monitoring tools such as:

- Exit interviews
- Staff and client satisfaction surveys.

End of Document

IMC Environmental Policy Statement



IMC Environmental Policy Statement

Date: 18.04.2018

IMC AG as a provider of learning and educational technologies has an high impact on our customer's environmental friendliness since eLearning:

- saves on the paper and ink used to create forms and manuals for non-computer-based training,
- eliminates the negative environmental impact of traveling since employees can access online training anywhere,
- is used to teach workers how to be "green" at work.

IMC AG seeks excellence in every aspect of our business and is committed to minimising the environmental impacts of our business operations. In this context, IMC AG recognises that day-to-day operations can impact both directly and indirectly on the environment. We aim to protect and improve the environment through good management and by adopting best practice wherever possible.

In all our activities we aspire to:

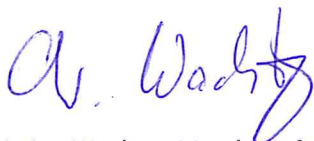
- Comply fully with all relevant legal requirements, codes of practice and regulations.
- Prevent pollution to land, air and water.
- Save energy. Reduce water and energy use.
- Minimise waste and increase recycling within the framework of our waste management procedures.
- Conserve raw materials.
- Identify and manage environmental risks and hazards.
- Involve customers, partners, clients, suppliers and subcontractors in the implementation of our objectives.
- Promote environmentally responsible purchasing.
- Provide suitable training to enable employees to deal with their specific areas of environmental control.
- Improve the environmental efficiency of our transport and travel.

- Establish targets to measure the continuous improvement in our environmental performance.
- Review our environmental policy regularly.

As a company we ensure where possible:

- We use eLearning instead of classroom trainings wherever it is possible.
- Bought-in paper is of a recycled content.
- We operate recycling of all paper waste.
- All emails sent are followed by the advice: "Please consider the environment before printing this e-mail."
- We operate recycling of all card, cans and plastic waste.
- Our office cleaners use green cleaning products.
- All printers and computer settings are pre-set to black print as default.
- All screens are switched off at night.
- All lights are switched off at night.
- All ink cartridges are recycled.

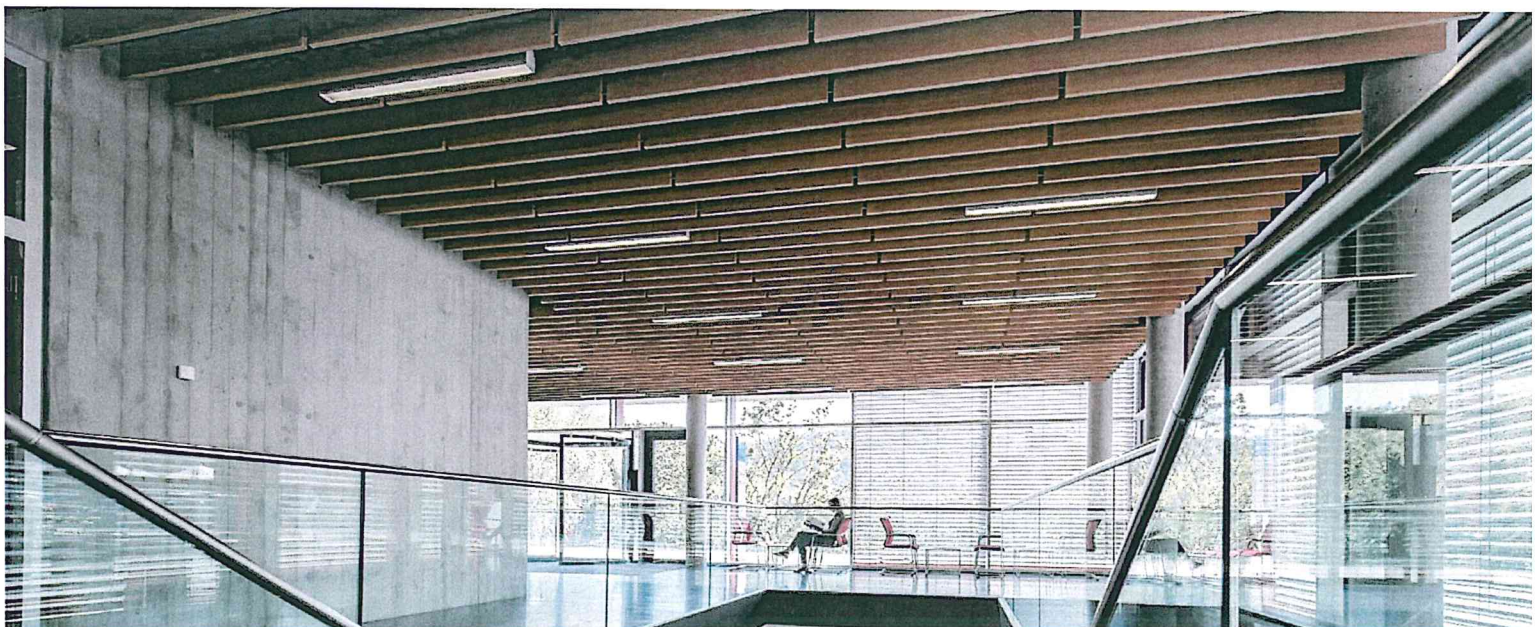
All employees are responsible for working towards the objectives contained within this policy.



Christian Wachter, Member of the Board

Date: April 2018

Environmental Management Policy



IMC as a provider of learning and educational technologies has a high impact on our customer's environmental friendliness since e-learning:

- Saves on the paper and ink used to create forms and manuals for non-computer based training
- Eliminates the negative environmental impact of traveling since employees can access online training anywhere
- Is used to teach workers how to be "green at work"

IMC seeks excellence in every aspect of our business and is committed to minimising the environmental impacts of our business operations. In this context, IMC recognises that day-to-day operations can impact both directly and indirectly on the environment. We aim to protect and improve the environment through good management and by adopting best practice wherever possible.

In all our activities, we aspire to:

- Comply fully with all relevant legal requirements, codes of practice and regulations
- Prevent pollution to land, air and water
- Save energy. Reduce water and energy use
- Minimise waste and increase recycling within the framework of our waste management procedures
- Conserve raw materials
- Identify and manage environmental risks and hazards
- Involve customers, partners, clients, suppliers and subcontractors in the implementation of our objectives
- Promote environmentally responsible purchasing
- Provide suitable training to enable employees to deal with their specific areas of environmental control
- Improve the environmental efficiency of our transport and travel
- Establish targets to measure the continuous improvement in our environmental performance
- Review our environmental policy regularly

As a company, we ensure where possible:

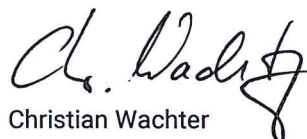
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All employees are responsible for working towards the objectives contained within this policy.

Questions and concerns regarding this Statement should be addressed to the Regional Director or the Group Human Resources Manager:

Regional Director: Russell Donders

Group Human Resources Manager: Elke Zastrau



Christian Wachter

Date: January 2018