

IMC POLICY ON MODERN SLAVERY AND HUMAN TRAFFICKING

IMC Group is a multinational manufacturer of metalworking technology. It is fully owned by Berkshire Hathaway Inc. ("BRK"), a public company whose shares are traded in the New York Stock Exchange. We provide innovative engineering solutions to customers in various key industries (automotive, aerospace, railway, medical devices and more). Our customers use our offerings to manufacture their own products in their own factories. We have a network of over 130 subsidiaries and associates in 60 different locations world-wide, that are engaged in the marketing and sales of IMC products.

As leaders in the global industry, we apply systematic control measures to our supply chains, so that our customers and stakeholders can continue having the fullest confidence in our integrity and credibility. These measures are regarded by us as prerequisites for any commercial interactions in our eco-system. We adopt a zero-tolerance policy to anything that falls short of these standards and expect our stakeholders to operate in the same manner.

We are very proud of IMC's unique, diverse, inclusive and multinational culture. We provide our employees with ethics and compliance training to preserve it.

Modern slavery, servitude, human trafficking, child labor and other forms of forced or compulsory labor are crimes. These are expressly condemned and prohibited by us. For more information about our ethical values and activities, please refer to the [IMC Compass – Code of Ethics](#). Any breach of our Code of Conduct can be reported to IMC's management directly and to our BRK group [hotline](#). The reports are handled immediately. They are professionally assessed and responded to. We expect our business associates to implement the same high standards also within their own respective supply chains, with the goal of increasing employee awareness and promoting social responsibly throughout the industry.

In pursuit of these standards, we have adopted OECD guidelines for supply chains, including with respect to the ethical sourcing of conflict free minerals, according to the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas](#).

In accordance with the UK Modern Slavery Act and other international resources, we are implementing various means, including but not limited to:

- Initiating communications and reasonable enquiry discussions with our immediate suppliers.
- Informing immediate suppliers of this Policy and our strict expectation that they will take similar measures with their respective suppliers to ensure uncompromising compliance throughout the supply chain.
- Incorporating supplier disclosure and audit requirements in Supply Agreements and IMC Group Standard Terms and Conditions of Purchase.
- Publishing this policy and applicable updates on ethical issues online at: www.imc-companies.com