



# IMEC ETHICS CODE OF CONDUCT

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## Related documents

- Doc. 00116: [Export Control Business Process](#)
- Doc. 54037: [Ethics Commission Competences, Procedures and Composition](#)
- Doc. 54018: [Procedure on Research Misconduct](#)
- Doc. 53217: [Conflict of Interest](#)
- Doc. 99004: [Export Control Policy](#)

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# A guideline for behavioral compliance with imec's shared values.

## **I. We guarantee integrity in every aspect of our research**

'Research integrity' is essential for a reliable and professional research institution.

## **II. We strive at all times to create outstanding value for our partners**

Delivering 'outstanding value for our partners' is certainly a central theme, but in no way does it detract from our first commitment.

## **III. We subscribe to commitment to each other and to the organization**

'Involvement with each other' indicates how we deal with one another and with imec resources.

## **IV. We are committed to achieving Societal Responsibility in Sustainable Entrepreneurship**

The contribution that our research makes to 'societal responsibility' is so important that a separate commitment has been linked to it.

# 1. Introduction

## 1.1. What is it?

The imec Ethics Code of Conduct supplements the strategic context of the imec vision, missions and values.

- It is a set of **behavioral standards** that specifies imec's **ethical commitments**.
- It is a set of **rules** providing **guidance** and **direction** for our **daily activities**.
- It is a **behavioral guideline** helping us to **manage ethical dilemmas** and to define the course of action in problem situations.

The imec Ethics Code of Conduct **endorses four specific commitments**:

- I. We guarantee integrity in every aspect of our research.
- II. We strive at all times to create outstanding value for our partners.
- III. We subscribe to commitment to each other and to the organization.
- IV. We are committed to achieving societal responsibility in sustainable entrepreneurship.

## 1.2. Why have we adopted this code?

We have adopted this **Ethics Code of Conduct** to help us maintain the highest standards of professional conduct. We believe that respecting this code is a guarantee for building a **trustworthy, professional and top-quality organization**. By adopting this code, we demonstrate the importance we place on both **personal and organizational integrity and ethical behavior towards all our stakeholders in the way we carry out our mission and work on our vision**.

As we may encounter many situations of ambiguity in our professional life, an Ethics Code of Conduct not only provides us with a guideline, but also provides a **basis for dialogue and discussion to resolve** such situations.

## 1.3. Who is covered by the Ethics Code of Conduct?

**Compliance with the Ethics Code of Conduct is a condition for employment and partnership with imec.** This code must be observed by employees (regardless of their position and location) of the entities of the imec group, and by consultants, industrial residents, students, postgraduates, guests, (sub)contractors, and service-providers, active at any of the entities of the imec group.

## 1.4. How to use the Ethics Code of Conduct

It is our **duty to know, understand and comply with this Ethics Code of Conduct**. In addition to this personal commitment, we all have a **responsibility for appropriately addressing infringements of the Ethics Code of Conduct and to report any unethical issues that may come to our attention**. We can do this in a number of ways: through dialogue, consultation, or reporting.

If we are personally **unable to resolve the issue**, or if we are **uncomfortable discussing the issue with the alleged wrongdoer(s)**, or if we have any **doubts about whether a situation is consistent with our ethical standards**, we have a duty to **seek assistance** from any of the available **reporting channels** and to **imec Ethics Commission**.

Anyone who **reports in good faith on ethics or compliance concerns** will be **protected and will not be subject to any reprisals**. Reporting will be treated with appropriate guarantees of respect for independence, absence of conflict of interest, confidentiality, data protection and privacy, secrecy and diligent follow-up.

## 1.5. Reporting Channels

Imec has established a number of **internal reporting channels competent to assist in resolving ethical questions**. They **can be contacted to intervene depending on who is reporting** an issue, on the **subject** and the **sensitivity** as outlined below. There are also specific reporting channels at every entity of the imec group.

There are different channels available to provide **support and guidance on how to address or solve a problem, such as harassment, violence, sexual harassment, discrimination, or other inappropriate or prohibited conduct**. The respective imec manager or imec HR department can be contacted to provide advice on different problems. If the imec manager or imec HR department are not appropriate or possible, **other different reporting channels per country are also available** and can be found on imec's Employee Center:

- NL: [imec-nl Speak-up Policy](#)
- US: [Unlawful Harassment and Discrimination](#)
- Belgium: [Talking through problems with the right person](#)

**Issues related to research integrity can be addressed to the Commission on Scientific Integrity of imec** (see [Procedure on Scientific Misconduct ID 54018](#)). The [Commission on Scientific Integrity](#) is responsible for overseeing imec's policy on research integrity.

For areas of compliance for which imec has a **compliance department**, the respective departments can bring requests for advice to the Ethical Commission:

- **Dual-use, military use and misuse:** Export Control Office ([export.control@imec.be](mailto:export.control@imec.be))
- Research that involves **processing of personal data:** the Privacy Office ([privacy@imec.be](mailto:privacy@imec.be))

For these areas, the researcher or representative of the research project must present the project of concern to the respective compliance departments in accordance with the procedure described in the Procedure on Ethics Commission Competences ID [54037](#).

**Concerns about a violation of a policy, laws and regulations or about illegal, unethical, fraudulent or corrupt activity**, can be reported via the following **Whistleblower Protection reporting channels**:

- US: [U.S. Whistleblower Policy](#).
- NL: [imec-nl Speak-up Policy](#).
- Belgium: we observe European Union and national rules for the protection of whistleblowers while we adopt an internal policy for this purpose.

## 1.6. Imec Ethics Commission

The Ethics Commission is an independent advisory body reporting to the Executive Board of imec. It is composed by imec employees and external members. It serves as a reflection board and an advisory group on ethics questions that are raising within the organization. For this reason, the **Ethics Commission is entrusted with (i) assisting management and researchers in identifying and addressing ethics issues in research projects, and (ii) supervising and promoting the application of the organization's ethics principles as they are established in this Ethics Code of Conduct** (see Procedure on Ethics Commission Competences ID [54037](#)).

The Ethics Commission can directly be approached in a number of circumstances, such as:

- If you need assistance in discussing and resolving ethics questions and issues regarding **acceptable conduct**;
- If you need help when in doubt about **compliance with or interpretation of the Ethics Code of Conduct**;
- If you believe that **ethics and compliance issues are not being resolved**;
- If you do not feel comfortable reporting through other channels.

## 2. Imec's Ethics Commitments

From the early beginning of imec, it has been our mission to build a bridge between research and industry. We have become a valuable partner to industry and society through our advanced research into semiconductor technology.

In order to increase our economic and societal impact, imec upholds the highest standards of research and business ethics. We support the view that our activities should be guided by ethics considerations in addition to respecting legal obligations. Adhering to the highest ethical standards is the norm at imec.

The imec Ethics Code of Conduct endorses four specific commitments:

### I. We guarantee integrity in every aspect of our research

'Research integrity' is essential for a reliable and professional research institution.

### II. We strive at all times to create outstanding value for our partners

Delivering 'outstanding value for our partners' is certainly a central theme, but in no way does it detract from our first commitment.

### III. We subscribe to commitment to each other and to the organization

'Involvement with each other' indicates how we deal with one another and with imec resources.

### IV. We are committed to achieving Societal Responsibility in Sustainable Entrepreneurship

The contribution that our research makes to 'societal responsibility' is so important that a separate commitment has been linked to it.

## 2.1. Research Integrity

Imec's 'Shared Values' with respect to **Research Integrity** are based on the "[European Code of Conduct for Research Integrity](#)", drawn up by the European Science Foundation (ESF) and All European Academies (ALLEA). Imec also endorses the policy and procedures of the [VCWI \(Vlaamse Commissie Wetenschappelijke Integriteit\)](#), that is part of the KVAB (Royal Flemish Academy for Science and the Arts of Belgium).

Imec's policy on research integrity focuses on **stimulating good research practice** and to **prevent research misconduct**. Research misconduct is the fabrication, falsification or plagiarism in proposing, conducting or reviewing research or in reporting research results. It also includes questionable research practices.

**Research integrity is an integral part of imec's organizational culture** and for that reason we strive to the following ethical principles:

- being precise when conducting research and publishing results.
- being cautious and act with foresight and precaution, not harming anyone.
- being dependable, both in scientific work and in reporting.
- research needs to be verifiable.
- conducting research in an honest and autonomous way.
- being impartial when conducting research.

### 2.1.1 *We are precise and make distinctions when performing research and publishing results.*

We act in a **precise** and **distinctly qualified and quality manner** when carrying out research and publishing results. The obligation to obtain results should not interfere with this principle.

In our research work, we **take into account the latest state of the art in our area of expertise**.

We obtain the necessary skills beforehand in terms of knowledge and mastering the technology, while at the same time developing a critical mind. Assignments for which we are **not qualified** or which can be reasonably considered as **impossible to execute** must be **refused**.

We **check whether the tools we intend to use** (for instance process equipment, measuring material, etc.) **are suited** to the work to be undertaken and that they are ready to be used under optimum technical conditions.

If we are in charge of the research, we **exercise a sufficient level of control over the implementation of the research by our team members**. The responsibilities pertaining to this research must be clearly defined and always complied with.

In media and other public communications or presentations, we **present our research results in a truthful and understandable way**. We avoid arousing unjustified fears or hopes. In our contacts with the media, we are required to **comply with our policies regarding [external communication](#)**.

We assume our responsibilities with regard to the development of our discipline and consequently we **commit ourselves to participating in peer reviews and referring to previous publications wherever necessary**.

### 2.1.2 *We are cautious and act with foresight and precaution, guided by the concern to avoid harming others.*

Although our primary concern is to acquire or increase scientific knowledge, we will **not impose unnecessary or disproportionate risks**. A careful analysis of the benefits, but also of the short, medium and long term risks of a research project must be carried out. In case of doubt, researchers can seek the opinion of imec's Ethics Commission.

**We treat the volunteers of clinical research and experiments with the highest ethical and safety standards**. At imec, we comply with our internal policies about ethical conduct of experiments involving human subjects which define the framework for research performed using human subjects and human body material. We also comply with data protection and privacy laws to protect the confidentiality and privacy of the subjects of studies. Research with human subjects and human body material is only performed upon approval by independent ethics committees or institutional review boards (IRBs) and in observance with laws, regulations and ethical standards.

**Animals used in experiments are treated according to the principles of the 3R's** (Reduction, Replacement and Refinement) as embodied in our internal policies for in-vivo experimentation. Animal research can only start after explicit approval by an authorized ethics committee for animal experiments.

With regard to experiments having a potential **impact on the environment**, we take into account the **principle of precaution**. Such experiments will not be undertaken unless prior assessment by qualified persons has been carried out. The same applies for safety.

**We take responsibility for any errors or omissions we made.**

### 2.1.3 *We are reliable when we act in such a way that third parties can trust us to proceed in a professional manner, both in our scientific work and in our manner of reporting on it.*

We endeavour to **present our expertise, work and results as accurately as possible** and, in all cases, **avoid creating a misleading or overrated idea of our work** amongst our partners and colleagues, the media or any other third parties.

**Data** produced from observations, experiments or existing literature should **not be invented or falsified**. We should not give the impression that empirical data is available if this is not the case. Sampling, analysis techniques and statistical methods should not be chosen or manipulated with a view to obtaining or justifying a result defined in advance.

**Research results must appear correctly in publications, and unwanted results must not be selectively omitted**. Results that do not correspond to the stipulated hypotheses must always be analyzed, reflected upon, aligned to a common vision and, in due course, be reported correctly. Where relevant, the level of uncertainty and the limitations of the results will be provided in publications, presentations and reports in order to reflect a correct impression.

In our reports and communications, we must **establish a clear distinction between research results and conclusions on the one hand, and hypotheses and speculations on the other**.

In general, **principles in terms of intellectual property must be respected**. We may not present fieldwork, data and results obtained by other researchers as our own; we must not plagiarize other people's publications. **People who have collaborated on a research project must be correctly cited**. Colleagues' and researchers' opinions and ideas must be respected; their ideas must not be wrongfully appropriated. This is especially valid in the case of new themes in research, theories or technologies that are still in the early development stage.

### 2.1.4 *Our research work is verifiable so that it allows colleagues to follow the progress of the research and to reproduce it, if required.*

The **information that is generated should be verifiable (meaning, traceable and demonstrable)**. The results of the literature study, hypotheses, organization of the research, research and analysis methods, as well as sources and the results of experiments, are described in detail (in a logbook, laboratory book or report) so that other researchers can verify the accuracy of the process and reproduce it.

The **publication of results is at the base of evaluation by peers**. The results from a research project should be published and/or made accessible to other researchers as soon as possible. Often, agreements are established concerning publication times. These agreements should be respected.

The **primary data of a research project and the protocols must be kept and made accessible for a pre-set and sufficient period of time**. When publications, especially review and summary articles, do not contain all the necessary data for verification, that data should nevertheless be available for perusal. In our publications we try to use as much as possible journals that are offering open access to their publications.



### **2.1.5 *In our scientific activities, we are guided by rules of a scientific nature, which are a condition of our autonomy.***

We carry out our research in an **autonomous manner**:

- (a) by deciding what kind of research we perform,
- (b) by defining our scientific approach and methodology and
- (c) by formulating our scientific conclusions on the basis of scientific arguments only.

This does not prevent us from listening actively to valid suggestions from our R&D partners, but **we retain the ultimate responsibility and accountability for our research.**

By participating in a **peer review or assessment of manuscripts**, we are guided only by considerations of a scientific nature.

Any **disagreements with the scientific views of other researchers** will only be **discussed** on the basis of **scientific arguments.**

In case of third-party funding, the researcher will reflect on the relevance of mentioning the research sponsor. In doing so, the researcher will also take into account any confidentiality requirements that may have been agreed upon.

The possible links between sponsors and researchers, such as their expert or advisory role, will be mentioned. **Any conflicts of interests must be mentioned** in scientific communications and publications.

**Clear contractual agreements must be drawn up** with R&D sponsors or partners with regard, among other things, to the freedom of publication and ownership of the results. If restrictions on the freedom of the researcher have to be imposed, this will be explicitly mentioned.

If a project is carried out by a team composed by representatives of different entities, the **rights and obligations of the various parties involved must be specified**, including the research institution(s) and entities where the research is being carried out, as well as the bodies and entities that are the source of financing. The agreements relating to the ownership of results, their use and dissemination must be clearly established. **Compliance with European Union state aid legislation must be observed.**

### **2.1.6 *We are impartial and we do not allow ourselves to be influenced by our preferences, sympathies, interests, or personal prejudices in the execution of our scientific work.***

We have a right to **our opinions and preferences** (for instance with regard to the economic or societal usefulness of certain activities), although **these should not interfere with our scientific work.** In the publication of research results, especially the conclusions and recommendations for application that could be drawn from them, we make a clear distinction between our scientific judgments and our personal preferences.

If there is a risk that there could be a **conflict or confusion of interests**, we can only accept to carry out the research if our **impartiality will not be jeopardized.** Our **solution to this problem will be explicitly mentioned during the presentation of the research results.**

**2.1.7** *At organization level, we take care for an environment in which integrity is supported and promoted.*

Due to the duties of care, imec supports the standards for good research practices at the many levels of the organization. This organizational responsibility for integrity implies **raising awareness about integrity within the organization** and facilitate training. We will ensure good data management infrastructure. Complaints regarding organizational integrity can be addressed to the Commission on Scientific Integrity.

## 2.2. Commitment to each other and the organization

### 2.2.1 *We contribute in a professional way to delivering outstanding value to all our stakeholders.*

Imec undertakes to deliver high quality research results. In this way, we contribute to the **best possible added value** for imec's (potential) partners while performing our duties in our domain.

Quality at imec means meeting the needs of both internal and external customers. We adopt a customer-focused attitude and contribute in a constructive way to a **customer-friendly culture**. We do this in relation to both internal and external customers, public and private customers, and to industry and academia.

Our research results aim to meet all relevant specifications, including quality and safety requirements, and we provide them efficiently and within the agreed timelines. To achieve this, imec uses a **structured and documented quality management system**.

Our quality management system ensures that our activities correspond with the expectations of external and internal customers and that quality is an intrinsic feature of the various phases of the development process. Imec undertakes to assess, analyze and adjust the effectiveness of this quality management system on a systematic basis in order to achieve ongoing improvements.

### 2.2.2 *We respect the confidentiality of data, information and research outcome from and towards all our stakeholders and the privacy rights of individuals.*

We are **informed about and respect the confidentiality rules and intellectual property rules** applicable to our research and to collaborations with third parties.

We take the necessary **appropriate technical and organizational measures to safeguard confidential information from unauthorized disclosure, modification or destruction** throughout the entire information life cycle. We perform this duty in accordance with our information security policies and guidelines which are based on international standards, such as ISO 27000 series and NIST 800-53.

We are aware that **privacy is a basic right of each individual**. For this reason, we **process personal data with respect and in a correct and transparent manner, to safeguard the privacy right of each individual and to prevent misuse of personal data**. We do this in compliance with applicable Privacy and Data Protection legislation and with highest ethical standards.

### 2.2.3 *We respect imec's independence as a research organization.*

We **refrain from any proposition that may harm imec's independence and good reputation**. We provide a correct picture of the skills and abilities of imec to achieve results.

We **represent properly imec's vision, mission, capabilities, policies and people** as an employee or representative of imec, being an independent research organization.

## 2.2.4 *We engage only in fair and honest relationships with all stakeholders.*

We should assess our suppliers and (sub)contractors, partners and consortium partners only on their merits and using objective criteria. **We should only engage with customers who meet highest standards of integrity.** In order to do so, we gather information in an open, objective, legal and appropriate manner. We conduct the legally required inspections, such as sanction list screening and debarment list checks.

We should **procure only goods and services that satisfy imec's needs and standards of quality and safety.**

Imec has a **zero-tolerance policy** with regard to any and all forms of bribery, corruption, extortion and embezzlement. We should **remain free from influence, the appearance of influence or any conflicting interests.** We should not accept any form of incentives that could, in any way, influence business decisions in favor of suppliers, partners or customers or otherwise gain an improper advantage. We **should not promise, offer, authorize, give or accept any illegal financial or non- financial incentives.** We must identify and declare any instances of apparent or actual conflicts of interest in accordance with imec's policy on Conflict of Interest ([Procedure on Conflict of Interest ID 53217](#)). This includes a conflict between the interests of imec and personal interests or those of close relatives, friends or associates.

**We must refrain from offering or making improper payments** of money or anything of value to government officials, political parties, candidates for public office or other persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action.

**We do not engage in any form of money laundering.** This includes any activity which involves disguising, channeling unlawfully obtained money or transforming such money into legitimate funds.

We do not engage in anticompetitive practices or transactions. We observe competition laws and antitrust laws in the countries where we do business. We do not enter into any type of anti-competitive conduct (such as tying, exclusive dealing requirements, unfair terms, bid rigging), and restrictive agreements (such as illegal price fixing, market or customer allocation, improper exchange of competitive information). We comply with European Union State aid rules. In conducting business, we observe our internal Guidelines on Competition Law Compliance.

We do **not use** material or non-publicly disclosed **information inappropriately or for personal benefit.** We do not use insider information as the basis for trading or for enabling others to trade in the stock or securities.

## 2.2.5 *We observe the laws and regulations of the countries where we do business.*

**Imec is committed to the highest ethical and business standards.** Compliance with legal and regulatory requirements related to our business practices is an integral part of imec's organizational culture.

Each of us is expected to understand and comply with all laws, rules, regulations and standards that apply to our work. In addition, we familiarize ourselves with internal policies which can be found on imec's internal communication channels. Imec actively holds information campaigns and training sessions to promote compliance with internal policies and to encourage ethics behavior in our organization.

## 2.3. Commitment to each other and to the organization

### 2.3.1 *We treat everybody with fairness, dignity and respect.*

We **treat each other in our daily operations with respect, fairness and dignity and in a positive, friendly and polite manner**. We acknowledge our appreciation for each other's contributions in a correct, transparent and fair manner. It is our responsibility to value people for their integrity, talents and commitments. **In the case of conflict** or confrontation, we also deal with it in an **open and constructive way**.

We do not make comments, statements, or make use of images or any type of recording medium containing or implying derogatory, racist, sexual or obscene messages or other types of inappropriate message or content.

### 2.3.2 *We respect all health and safety requirements.*

We **take responsibility for our own health and safety and that of others, including colleagues and anyone present at our premises or places where we perform our activities**.

We are committed to develop and maintain a drug-free, tobacco-free and alcohol-free work environment. We do not tolerate alcohol abuse or the unlawful possession and use of controlled substances (such as misuse of prescription drugs or use of illicit drugs) or smoking in areas other than the areas where smoking is explicitly permitted. **We respect our preventive alcohol and drug policy**.

We **respect all health, safety and environmental laws** and internal health and safety policies and procedures.

We **report timely all health, safety or environmental hazards** to our manager or other available channels.

### 2.3.3 *We are inclusive, supportive and listen actively to others. We are team-players.*

We are all on the same team, **one imec**, with a common vision and mission and with a common set of goals and core values. As such, we create an environment of **mutual trust and respect**.

We promote an environment that encourages **open dialogue** and the **sharing of insights and knowledge** across imec.

We recognize the **important role** that **diversity and inclusion** plays in renewal, creativity, innovation and in our long-term vitality.

We are committed to ensuring that our people can carry out their assignments in an environment free of discrimination on the basis of sex, ethnicity, age, religion, gender (identity), sexual orientation or disability, and free from harassment or any conduct that is likely to cause offence or humiliation. We promote and accept **equal opportunities for all**.

### **2.3.4** *We respect the assets put at our disposal for fulfilling our duties.*

We avoid using imec or partner assets for individual profit or unlawful, unauthorized personal or unethical purposes.

We respect and protect ID badges, passwords and other security codes given to us. We comply with imec's physical security policies and measures.

We safeguard imec's assets against loss, damage, theft or inappropriate access or misuse in all locations where we use such assets.

### **2.3.5** *We support a work environment envisioned to stimulate engagement with the organization.*

Imec offers a **working environment** envisioned to stimulate **employee satisfaction** and **engagement with the organization**. We have a flexible working hours policy and an effective total reward policy. We facilitate homework. **Our policies aim to facilitate the right balance between work and personal life.**

We also support the **freedom to associate freely, bargain collectively and seek representation** and to join workers' councils in accordance with local laws and regulations.

We strictly observe labor and human rights laws. We **condemn the illegal use of child labor and the use of modern slavery.**

**We maintain clean and safe facilities with adequate working areas and space up the highest safety and health standards.**

**We create a working environment where people can help each other and can enjoy working with each other.** We contribute to give the best of us.

## 2.4. Societal responsibility

Sustainable entrepreneurship is of crucial importance in our current society. We aim at **contributing** to this 'sustainable entrepreneurship' in multiple ways.

We will set up our **strategy to enable long-term growth and sustainability**. Sustainability has become a key priority for imec, not just in our core activity - Research and Innovation -, but also in the way we execute and manage our operations. Sustainability has evolved to the corporate mission, as being reflected in the corporate tagline: "Embracing a better life" and in imec's values.

Imec has the strong believe that technology and innovation will contribute to the societal challenges in both ways, offering new solutions to complex problems and reducing bottlenecks, hurdles and emissions. As since the start imec had the ambition to become a world leader in semiconductor technology and applying the power of semiconductor technology to various application domains, so **imec is strongly committed to pave the way towards a sustainable world for the current and next generations** – together with our partners.

Sustainability is important for imec and for society in general and in that sense, it is a global responsibility. No single organization, region or country can tackle the huge challenges that we're facing today, alone. It is necessary that all companies, regions, countries and governments join forces. And that is the reason why **imec subscribed the UN SDG's (United Nations Sustainable Development Goals)**.

### 2.4.1 *We care about the health and safety of people living in our neighborhood.*

We take care in carrying out our research and going about our business not to **put the health and safety of people living in our neighborhood at risk**.

We **report any potential danger to our manager** or other available channels in a timely manner.

### 2.4.2 *We respect the sustainability of the environment in which we operate.*

We conduct **our research and business operations in a manner that respects the entire environment in which we operate**.

**If the research we conduct may have a (serious) negative impact on society or its sustainability**, we will inform imec management immediately and discuss appropriate actions to be taken.

### 2.4.3 *We aim through our research and associated efforts to achieve a long-term perspective leading to a sustainable society for everyone.*

Our research and services will strive to achieve a **long term positive impact on future society**.

We comply with all applicable customs, trade, export control and sanctions regulations.

**We do not carry out any research for military end use, unless the feasibility of such a research project has undergone an ethics review and received a favourable advice by the ethics commission.** Military end-use means: (a) incorporation into military items listed in the Military List, as defined by Common [Military List](#) of EU ; (b) use of production, test or analytical equipment and components therefor, for the development, production or maintenance of military items listed in the abovementioned list; (c) use of any unfinished products in a plant for the production of military items listed in the abovementioned list.

A framework will be provided to guide researchers to perform an initial self-assessment of the intended military research project whereby various factors will be considered and with particular attention to the potential for risk and abuse of the research results. In its review, the Export Control Office and the Ethics Commission, following the [Procedure on Ethics Commission Competences ID 54037](#), will consider in a case by case basis whether there are **required proportional reasons for deviating from the “no, unless policy”**:

Next to research for military end use, we also pay special attention to ethics aspects of research with potential misuse in fields such as:

- Research that could be used to provoke, aggravate or prolong armed conflicts or in breach of international humanitarian law;
- Research that could engage to adversely affect regional peace, security and stability (excluding use for the legitimate defense and national security interests, including involvement in UN or other peace-keeping activity);
- Research that can be used to facilitate terrorism and international organized crime;
- Research involving technologies that could be used in internal repressions;
- Research that involves developing surveillance technologies that could curtail human rights and civil liberties.
- Research that involves minority or vulnerable groups or develops social, behavioural or genetic profiling technologies that could be misused to stigmatise, discriminate against or intimidate people;
- Research that could harm the national security interest of the EU member States and, for this purpose, the risk of reverse engineering or unintended technology transfer should be taken into consideration;

In its review, the Export Control Office and the Ethics Commission, following the [Procedure on Ethics Commission Competences ID 54037](#), will consider in a case by case basis whether imec should participate in such projects with potential risk for misuse.

We attribute special concern to research with dual use or misuse and request special licenses for such research. We observe imec [policy](#) and [process](#) on Export Control and Sanctions.

Imec's internal focus on social responsibility is driven by its values that define imec's way of working. **Imec strives for integrity, passion, connectedness, and excellence.** Imec cares for the well-being and education of its people. Imec does not leave anyone behind. Imec values diversity in the workplace and endeavours solidarity around the globe. Imec respects the planet through an environmentally friendly way of working.

We **promote education and training** through internships of students from all relevant fields in line with the research or with the daily operation of imec. We stimulate applications from students of all nationalities. We made use of legitimate, properly managed apprenticeship programs which comply with applicable laws and regulations.

We **promote science and technology education for children and citizens** through our own initiatives and in cooperation with various public, non-profit and private organizations.

We aim at **increasing the impact of our research operations both on the region in which we work and at global level.** Such impact is also expressed in the further enhancement of knowledge-intensive job creation through our successful research or through entrepreneurship or through other valuable efforts within imec's mission.



