

## 1. IMI Supply Chain - Code of Conduct Overview

The IMI ESG agenda forms an integral part of the way we do business, and is fully aligned with our purpose, Breakthrough Engineering for a better world. IMI is committed to doing things the right way. This means being true to our values, working with integrity and supporting each other along the way right across the supply chain.

## 2. Impact on the Supply Chain

IMI sources components, materials and services for its manufacturing and sales operations from many countries around the world. We recognise that there are local and national differences in standards in relation to many aspects of the manufacturing and wider business environment.

However, we also recognise that there are a number of minimum standards that must be achieved by all. IMI has a code of responsible business available at [www.imiplc.com](http://www.imiplc.com) and such code forms part of this Supply Chain Code of Conduct (together the "IMI Code") (each as may be updated by IMI from time to time). The Board of IMI plc has endorsed the IMI Code, and expects all IMI businesses and employees to comply with it.

IMI expects suppliers to have equivalent values and policies to the IMI Code embedded in their businesses. The supplier acknowledges that it shall, at all times conduct, and procure that its officers, directors and employees and/or representatives conduct, business ethically and in accordance with the relevant parts of the IMI Code.

## 3. Policy Commitments – IMI's Requirement of Suppliers

It is IMI's policy only to work with suppliers that meet or exceed the following requirements:

- Suppliers will comply with all appropriate local legislation.
- No forced, bonded or involuntary prison labour will be used.
- No children are to be employed by IMI's suppliers. We support the long-term objective to eliminate child labour consistent with the United Nations Convention on the Rights of the Child.
- Employees of our suppliers shall be paid wages and benefits for a standard working week that meet or exceed minimum national requirements.
- Employees of our suppliers shall work hours that comply with national laws.
- All our suppliers must respect the rights of minorities and indigenous peoples. Suppliers must not discriminate in the workplace based on ethnic origin, social origin, health status, disability, sexual orientation, age, gender or political opinion.
- For suppliers that provide us with goods containing tin, tantalum, tungsten, gold, cobalt or mica, must be able to demonstrate a reasonable country of origin investigation, leading to the identification of the smelter. This is in support of the Organisation for Economic Co-operation and Development (OECD), due diligence guidelines, for responsible supply chains of minerals from conflict regions.
- All suppliers to provide, on request, product compliance information; including (but not limited to); EU Reach and Rohs compliance declarations. This includes requests from third-party providers. All chemicals at supplier location must be managed responsibly. Suppliers are prohibited from using Mercury and EU Persistent Organic Pollutants in the supply chain to IMI (as detailed in the Minamata and Stockholm Conventions).
- All our suppliers shall take responsibility to protect the health and safety of their employees. Suppliers must control hazards and take the best precautions against accidents and occupational diseases. Maintain accident / injury records and have a defined improvement plan.
- All our suppliers shall protect the environment to minimise environmental pollution and make continuous improvements in environmental protection. Suppliers are required to take action to minimise waste generation and manage resources sustainably, promoting reuse and recycling. Suppliers must adhere to the Basel Convention on the import and export of hazardous wastes.

- Suppliers shall support IMI's efforts to reduce our carbon footprint. IMI wishes to work with suppliers that proactively want to strive for a better world, of low carbon products and facilities. Suppliers are expected to share their efforts to minimise their carbon footprint and increase energy efficiency.
- Ensure compliance with customs laws regarding valuation & classification. Ensure documentation is available on request.
- Ensure data confidentiality and compliance with local laws.
- Suppliers shall cascade these values to their suppliers.

Failure to comply with any agreed improvement plan would result in review and possible termination of the contract. IMI Companies must have appropriate checks in place to ensure that suppliers meet or exceed these requirements.

## 4. Policy Commitments – IMI's Commitment to Suppliers

IMI commits to the following in relation to supply chain and purchasing activities, and expect our suppliers to have similar policies in place to ensure trade is fair and free from bribery & corruption:

### Suppliers Business Practices

- IMI will ensure that agents or any other representatives acting on the company's behalf know about applicable company policies when working for IMI. IMI will not use another party to perform a task that IMI company employees are not permitted to perform.

### Purchasing Business Practices

- IMI companies will use a procurement process that is fair and seeks the best value for the cost of purchases. Procurement processes will rely on factual, objective information, based on materials that are provided to all relevant suppliers. This process will not discriminate against a potential supplier based on improper considerations, such as its management's gender, race, nationality or age. In addition, IMI will support our customers' diversity agenda by providing information on minorities as requested.

### Fair Competition

- IMI will ensure fair competition in its supply chain at all times, avoiding fixing prices or rigging purchasing bids. IMI does not offer, or accept, gifts or hospitality which could influence a bid.

### Business Partner Reviews

- IMI companies will conduct appropriate reviews of potential business partners to ensure that the level of risk is appropriate for the business. Reviews should consider assessment of information relevant to the anticipated relationship with the potential partner, which may include financial soundness, legal matters, employment practices and ethics and compliance.
- IMI conducts risk analysis on all suppliers and reserves the right to audit the supplier's facilities.

### Fair & Ethical dealings

- IMI employees will conduct business fairly, and never misrepresent themselves, the company or its products or services. IMI employees will not try to obtain advantage through dishonest, corrupt or other fraudulent or unlawful activities.

## 5. Reporting of breaches and accountability

Anyone who becomes aware of any existing or potential breach of this policy is required to notify the IMI Group Procurement Director promptly. If preferred, concerns may be reported in accordance with IMI's Whistleblowing Policy via [www.imihotline.com](http://www.imihotline.com)

## 6. Enquiries

All enquiries in relation to this policy or its applicability to particular situations should be addressed to the IMI Group Supply Chain Director.

IMI plc  
March 2024

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We, the supplier, agree to conduct our business in accordance with this code of conduct:

Supplier Name: \_\_\_\_\_

Signed by: \_\_\_\_\_ Name: \_\_\_\_\_

Position in Company: \_\_\_\_\_

Date: \_\_\_\_\_