

Ethical conduct forms the basis of IMI's business decisions and dealings with our stakeholders. We commit to acting responsibly, sustainably and with integrity, and expect our extended supply chain to do the same. We actively choose suppliers that respect the environment, their employees and adhere to our strict IMI Supply Chain Code of Conduct. We encourage our suppliers to adopt similar working practices, as our supply chains are often long and complex, and we wish to positively influence ethical and sustainable trading throughout the supply chain.

IMI acknowledges the issues concerning human rights abuses at the base of the supply chain, specifically in the mining sector for metals such as tin, tantalum, tungsten and gold. In particular, we are concerned about the situation in the east of the Democratic Republic of Congo (DRC) and other Conflict-Affected and High-Risk Areas (CAHRAs), where proceeds from mining are sometimes used to finance rebel conflicts and are associated with serious human rights abuses. IMI is committed to address this issue, even though we do not directly source minerals from the DRC or other CAHRAs. Indeed, as mines are typically seven or more tiers removed from our direct suppliers, we address the issue through leveraging our influence on our supply chain.

Our priority is to work with our direct suppliers to gather information on material sources of origin, highlight any risks to relevant suppliers and customers. IMI is committed to following the OECD guidance for Responsible Minerals sourcing. We have a process to identify the origins of conflict minerals in our supplies, and are committed to ensuring they originate from legal, audited mines. We encourage our suppliers to use the OECD guidance, publicised by the Responsible Minerals Initiative (RMI), on minerals sourcing and accept the industry-standard Conflict Minerals Reporting Template (CMRT) to carry out our investigations.

We are asking all of our suppliers of products containing conflict minerals (specifically tin, tantalum, tungsten and gold, otherwise known as 3TG) to take immediate action to identify the origins of 3TG in the products they supply to us. Failure to comply may result in loss of business with IMI. Any employee who knows of a breach of this policy is required to notify their line manager or Divisional Supply Chain Director promptly.

In order to comply with this policy, all IMI businesses must follow the relevant internal procedures, and conduct supply chain investigations to determine the smelters of 3TG in all the products we sell. Please address any queries to conflictfree@imiplc.com.

December 2020