

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 documented its own internal standards on ethical business and procurement practice in the IMI Code of Conduct; available in the Governance section on the corporate website www.imiplc.com

The Board of IMI plc has endorsed this supply chain policy, and expects all IMI businesses and employees to comply with it.

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.
- For suppliers that provide us with goods containing tin, tantalum, tungsten, gold or cobalt, they 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.
- 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 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.
- Ensure compliance with customs laws regarding valuation & classification. Ensure documentation is available on request.
- Ensure data confidentiality and compliance with local laws.
- Suppliers will 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:

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.

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.

Fair & Ethical dealings

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

5. Reporting of breaches and accountability

Any employee or business partner who becomes aware of any existing or potential breach of this policy is required to notify the Group Procurement Director promptly. If preferred, concerns may be reported in accordance with the Company’s Whistleblowing Policy via www.imihotline.com

6. Enquiries

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

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