

2018 statement from IMI plc (“IMI”) in relation to the steps taken to prevent slavery and human trafficking pursuant to the Modern Slavery Act 2015 (“the Act”)¹

IMI continues to believe all companies must take their role seriously in preventing modern day slavery and human trafficking. IMI utilises a combination of general corporate responsibility policies and specific supply chain compliance actions to combat modern slavery in its supply chain. These include; the IMI Way and the IMI Code of Conduct, IMI Supplier Code of Conduct and Audit Process, IMI New Supplier Approval and Self-Declaration Process, IMI Standard Procurement Contracts and relevant staff training.

1. The IMI Way and Code of Conduct

The IMI Way sets out our values – excellence, innovation, integrity and collaboration – and embraces all our activities.

Our Code of Conduct embodies the IMI Way and covers all aspects of the way we conduct business. It covers everything from anti-bribery and corruption to our environmental responsibilities.

These two policies are designed to ensure that we do not involve forced labour or human trafficking in the manufacture of our own products or in any of our operations.

You can find out more about the IMI Way and Code of Conduct on this website by following this link: <http://www.imiplc.com/corporate-responsibility/our-approach.aspx>

2. IMI Supplier Code of Conduct and Audit Process

Our Supplier Code of Conduct process provides a structured approach to ensuring our suppliers are managing their businesses responsibly and are not engaged in human slavery or trafficking.

The Supplier Code of Conduct risks cover a range of issues from bribery and corruption, providing safe and healthy work places, safeguarding the environment *and* labour standards.

Each of our three divisions (Critical Engineering, Precision Engineering and Hydronic Engineering) assesses the specific Supplier Code of Conduct risks in their supply chains and audit any high-risk suppliers. This current practice results in audits taking place in what we consider “high risk” areas for all aspects of supply chain risk including any forced labour risk.

3. IMI New Supplier Approval and Declaration Process

The New Supplier Approval procedure has been established and embedded across the divisions. This requires an ethical declaration from suppliers to confirm that they do not engage in any forced labour and that they abide by all applicable local labour laws.

¹ This statement has been published in accordance with the Act and sets out the steps IMI has taken during the financial year ending 31 December 2018 to ensure that slavery and human trafficking is not taking place in its own operations or in its supply chains. It is made on behalf of IMI plc and its subsidiaries Norgren Limited, IMI Precision Engineering Limited and IMI Kynoch Limited.

Modern Slavery Act Statement



4. IMI Standard Procurement Contracts and Staff Training

IMI has standard procurement contracts which contain provisions that oblige suppliers that no forced, bonded or involuntary prison labour will be used and that no children under 16 years old are to be employed.

IMI updates and trains its procurement professionals to monitor, detect and take steps to prevent forced or trafficked labour on visits to suppliers. This is carried out by an online training module specifically developed by IMI for our people and available to all staff via IMI Learn, our learning management platform. This module is compulsory for all procurement professionals within the organisation.

This statement was approved by the Board of IMI plc.

Mark Selway
Chief Executive Officer

26th February 2019


Engineering
GREAT the IMI Way