

## **IMC Worldwide Modern Slavery and Human Trafficking Statement**

For financial year end date December 31, 2018.

### **Introduction**

IMC Worldwide Ltd (including IMCW Holdings Ltd) is committed to the Modern Slavery Act of 2015. As a business and as individuals, we are committed to our core values. As such, we ensure we demonstrate trust, integrity and excellence in our work and the projects we deliver. We have always had a zero-tolerance stance on corruption, bribery, forced work, and other unethical actions. IMC takes tackling modern slavery worldwide seriously, and we are committed to working towards the Sustainable Development Goals, particularly Goal 8 – Decent Work and Economic Growth.

In the past 12 months, IMC has taken several measures to demonstrate our commitment to the Modern Slavery Act 2015 and working towards eradicating the risk of modern slavery in our supply chains. In November, we submitted our first Sustainability Report in accordance with our obligations as a member of the UN Global Compact. This highlights our commitment, as well as our progress, towards these goals, including not being complicit in human rights abuses, the elimination of all forms of forced and compulsory labour and the effective abolition of child labour. We will continue to improve our processes and procedures to continuously combat such acts. Our Sustainability Report also demonstrates how we are working towards the principles of the Ethical Trading Initiative (ETI) and the International Labour Organisation (ILO).

### **Our Business and Organisational Structure**

IMC Worldwide is a UK-based leading, independent consulting company with over 50 years of experience implementing, monitoring and successfully delivering development programmes in over 120 countries across Sub-Saharan Africa, South and South-East Asia, Middle East, the Pacific, the Caribbean, Eastern Europe, and Central Asia.

IMC has offices in Nepal, Pakistan and Bangladesh, from which our largest projects in Asia are delivered, and also an office in the United States. IMC is committed to ensuring the international labour standards we work towards in the UK are embedded as normal practice in the regional teams and offices. We have strong relationships with our country teams and are working with them on the best way to ensure we can monitor and report on modern slavery in our supply chains.

### **Supply Chain**

Our supply chains consist of partner organisations, located all over the world, and independent consultants. All partners and independent consultants are expected to carry

out their work ethically and must sign up and adhere to the IMC Business Ethics Policy. The Business Ethics Policy covers acts of corruption, modern slavery, human trafficking, and fairness in procurement, as well as a code of conduct.

During 2018, IMC made progress to ensuring modern slavery is eradicated in our supply chain in Nepal. In 2017, the team hired a Supply Chain Manager to look specifically into issues such as modern slavery, who was working to develop a toolkit and training to help those working in the country office. This year, this toolkit developed into a Briefing Note specifically designed for tackling modern slavery in our supply chains. This briefing paper was not restricted to our operations in Nepal, but was distributed company-wide, ensuring that this best practice knowledge was shared across the business.

This year we also hired a new resource in our head office in the UK to look specifically into the issue of modern slavery on our projects and in our supply chains, designing training around these issues to raise knowledge and awareness for both internal staff and independent consultants contracted with us.

The nature of the work IMC carries out overseas sometimes means that our supply chains are wide and disparate. As such, a great deal of work is being carried out to identify where we, as a management consultancy, have the greatest leverage to influence change and set a standard for best practice.

## **Our Policies**

IMC's Anti-Slavery and Human Trafficking Policy outlines our commitment to preventing modern slavery risks, how we intend to act as a business and how we expect all our staff, independent consultants and partner organisations to act. The policy also outlines our reporting guidelines, and we encourage anyone who suspects a modern slavery incident to come forward and report it. Additionally, IMC's whistleblowing service details are available to all our staff, independent consultants, partner organisations and the public.

IMC operates several other policies designed to safeguard all individuals. These include our Environmental Policy, Security Policy, Redundancy Policy, Health and Wellbeing Policy, Safeguarding Policy and Ethics and Anti-Corruption Policy, amongst others. All policies are reviewed periodically to ensure they remain up-to-date and fit for purpose. IMC does not support or knowingly deal with any business or individual involved in slavery or human trafficking. We will not work with any party that we suspect is connected in any way with slavery or trafficking.

## **Due Diligence, Risk and Mitigation**

IMC is committed to undertaking due diligence on all our partner organisations, suppliers and individual consultants. We want to ensure that everyone we work with holds the same high standards and policies that we do. We are keen to collaborate with our partners to tackle complex issues surrounding modern slavery and human trafficking, and if one of our partner organisations does not have a specific policy in place, we require them to agree to

ours. We aim to stand as an example of best practice and choose to partner with organisations and individuals who wish to do the same.

We have updated our independent whistleblowing systems and processes and include details on our website, intranet and in all our contractual agreements to ensure our employees, suppliers and the public can raise concerns confidentially and anonymously should they witness any wrongdoing.

## Looking Forward

Going forward, we will continue to uphold our zero-tolerance standards and work with our supply chains to do the same, so that together we can help combat modern slavery.

IMC understands that modern slavery is not only a risk in the countries in which we work overseas, but also in the UK. As such, we are committed to encouraging our staff, independent consultants and partner organisations to read IMC's Anti-Slavery and Human Trafficking Policy and understand their rights and the rights of those we work with. To build on this further, throughout 2018 we have been developing our own modern slavery training which in the next year we will roll out to all internal staff and independent consultants in our supply chain. This training will cover what the signs of modern slavery are, how to mitigate the risks of modern slavery, and how to report any modern slavery concerns on our overseas projects and in the UK. We also plan to give continued guidance to our bid teams on what to design into the delivery of our client's programmes to mitigate against the risks related to modern slavery.

As a company, we are committed to continuous improvement and our target for 2019 will be to continue to map where we have the greatest leverage to influence change in our supply chains.

## Approval of this statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes IMC's modern slavery and human trafficking statement for the financial year 1 January to 31 December 2018.



Signed Gavin English

Managing Director

Date: 15/03/2019