



# The IMI Way

Our Code of Responsible Business



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# The IMI Way

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# The IMI Way

## Message from the Chief Executive



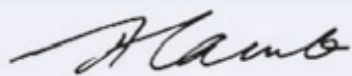
The most consistent factor in IMI's longstanding business success has been our commitment to *The IMI Way* – we pursue excellence and deliver results, innovate and provide value to our customers, and act with integrity. Though we have not formalised these values before, they do represent the unifying types of conduct that have underpinned IMI in the past and that will be evermore critical to our future growth. For that reason we have now decided to explicitly draw out these common values that unify IMI and best capture *The IMI Way*. We believe it will become vital for our business performance that we spell out and, as a group of businesses, engage around the behaviours that set IMI apart. I trust that you will recognise that these are, and must always be, more than words written on a page – they emanate from the actions that IMI employees around the world demonstrate daily, and they are something for which we must all take individual responsibility.

While we can all be proud of the achievements of IMI, we can never feel complacent. Our competitors challenge us, customers want better products and services, shareholders expect strong and sustainable financial results and other stakeholders will continue to scrutinise all aspects of our business. The road ahead may be bumpy on occasion, but we welcome the challenges as they provide opportunities to consistently differentiate ourselves from the competition – through the quality and innovation in our products and services, the consistency and professionalism of our people and the strong ethical leadership we all must exemplify. Customers, employees, suppliers, shareholders and everyone who works with IMI should appreciate what it means to do things *The IMI Way*.

The leadership team is committed to supporting every employee across our worldwide operations in making responsible decisions, and we recognise that challenging situations will arise. Please take the time to carefully read this Code of Responsible Business as it will provide important guidance on the business conduct to which we must all adhere. It also provides information on where to go for support and guidance when you have questions or concerns. If you are ever faced with a dilemma about the right course of action, I urge you to stop, look at this Code and, if still in any doubt, consult with your manager or any member of the compliance, legal, responsible business or HR functions at local or IMI Group level.

In the end, the efforts that each of us individually makes on behalf of the company leads to the success that we create together.

Thank you for taking the time to read this Code and for embracing its spirit.



Martin Lamb  
Chief Executive, IMI plc

# The IMI Way

## Contents

➤ <b>Message from the Chief Executive</b> .....	<b>2</b>
➤ <b><i>The IMI Way: The Values that Unite &amp; Guide Us</i></b> .....	<b>6</b>
➤ <b>Our Roadmap: An Introduction to Our Code of Responsible Business</b> .....	<b>10</b>
➤ <b>Seeking Help &amp; Guidance</b> .....	<b>13</b>
Seeking Assistance .....	13
Reporting Concerns .....	13
The IMI Hotline .....	14
Ensuring Non-Retaliation .....	14
Operating Unit Legal Matters .....	15
Addressing Waivers of the Code.....	15
➤ <b>Summary of Our Responsible Business Policies</b> .....	<b>16</b>
➤ <b>Customers</b> .....	<b>22</b>
Fair & Ethical Dealings .....	22
Marketing with Integrity .....	22
Customer Information .....	23
Product Quality & Safety.....	23
Gifts, Entertainment & Other Courtesies .....	23
Improper Payments .....	24
Public Sector Customers.....	24

**Colleagues ..... 26**

Health, Safety & Environmental Protection .....26

Workplace Relationships .....28

Fair Employment .....28

People Development.....29

Respectful Workplace Conduct .....29

Employee Information .....29

**Shareholders ..... 30**

Communications & Investor Relations .....30

Use of Company Resources .....31

Internal Controls .....31

Corporate Governance.....32

Conflicts of Interest .....33

Inside Information & Securities Trading.....34

Limits of Authority.....35

**Business Partners ..... 36**

Purchasing Practices.....36

Fair Competition .....36

Import & Export Controls.....38

Suppliers’ Business Practices.....39

Business Partner Reviews .....40

Fair & Ethical Dealings .....40

**Communities ..... 41**

Human Rights .....41

Community Support.....42

Political Donations.....42

Communications with Outside Parties .....42

# The IMI Way

## The IMI Way: The Values that Unite & Guide Us

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Our goal is to become the most admired and the most innovative engineering solutions company of our size, anywhere.

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We will fulfil this objective through the effective execution of our strategy, which centres on industry or sector leading customers in niche markets that are themselves growing. Adding value to such customers and improving their sustainable performance is the route to our own sustainable business and profit growth. Our four key strategic imperatives are:

- Accelerating our key account focus.
- Increasing our innovative abilities.
- Seizing market opportunities to grow in developing regions.
- Acquiring companies with complementary technology and market positions.

Our ability to turn insight regarding our customers' needs into new products and services that bring real value to the customer differentiates us. Applying the best engineering, innovation and technical know-how to generate value for our customers is known at IMI as *Engineering Advantage*.

Central to *Engineering Advantage* is the intellect, energy and commitment of everyone that works at IMI. It always will be the people that make the difference, and *The IMI Way* embodies how we bring all our talent and dedication to our work.

To achieve these goals at IMI, we have guiding values that exemplify how we behave. Wherever you work in IMI and whenever you encounter an IMI employee, you can expect to see these values at work. These values are not new; we demonstrate them daily in what we say and how we act. What is new is that now we have articulated our values to remind all of us about what makes us successful, to introduce the values to new employees and to communicate them to our many stakeholders.

## **Our Values: IMI People Pursue Excellence and Deliver Results**

- We honour the promises and commitments we make to all our stakeholders.
- We are passionate about delivery, taking pride in our work.
- We are disciplined in the way we execute our plans.
- We are accountable for results.
- We strive for the highest professional standards.
- We provide the highest quality products and services.
- We continuously improve the way we do business.
- We invest in the development of our people to enhance their performance and capability.



# The IMI Way

## **Our Values: IMI People Innovate and Provide Value to Our Customers**

- We build close and strong relationships with our customers.
- We listen and respond to our customers' needs.
- We manage our resources and drive our actions to satisfy our customers.
- We work together and take pride in creating value for our customers.
- We capitalise on our technical know-how to create Engineering Advantage.
- We are innovative in solving customer problems.
- We create solutions, products and services that meet our customers' needs, now and in the future.
- We solve problems with imagination and creativity; we bring value to our customers and partners.

## **Our Values: IMI People Act with Integrity**

- We demand the highest ethical standards from ourselves, our partners and our suppliers.
- We are honest and have the courage to “do the right thing”
- We create a culture where our employees consistently make the right choices.
- We will not compromise on the health and safety of our people and those to whom we have a duty of care.
- We respect all our stakeholders and the environment and communities in which we operate.

# The IMI Way

## Our Roadmap: An Introduction to Our Code of Responsible Business

Our Code of Responsible Business (the “Code”) is a guide to help all of us consistently demonstrate our commitment to *The IMI Way* throughout our worldwide operations. It can help us determine the right course of action, for instance, in a feedback conversation with a colleague, in negotiations with a major new customer or supplier, in an assessment of our health and safety performance or in a review of product innovations.

The Code has two sections. The first deals with the Code’s purpose, how our values underpin it, and how you can seek further guidance for any matters connected with the Code. The second section sets out our principal corporate policies for how we interact with customers, colleagues, shareholders, business partners and the communities we are part of. The Code supersedes and replaces all IMI corporate policies under the banner of the responsible business policy. The Code is the principal guide for the conduct expected from all IMI colleagues.



### The Fundamentals

1. Read this Code. Understand what others should expect from you and what you should expect from others.
2. Talk about ethics and compliance issues that arise in your business activities with your colleagues and manager, and seek appropriate advice to help you handle challenging situations.
3. Raise your concerns. Do not allow the company’s reputation or any individuals or stakeholders to be put at risk. You can refer to your manager or any

member of the compliance, legal, responsible business or HR functions at local or IMI Group level. If you wish, use the IMI Hotline.

4. Use this Code for guidance to help you better evaluate choices and make decisions that reinforce IMI's values and our commitment to responsible business.

The Code is not an exhaustive set of rules, or a prescriptive set of dos and don'ts. Rather, it is a living document that helps us engage in honest transactions with colleagues and other stakeholders. It is your responsibility to ensure you are fully familiar with the Code. Separate and more detailed procedures and processes support the Code and are available on IMI's Passport intranet and through your line manager. It is also your responsibility to come forward with any questions or concerns you have. By embracing the spirit of the Code and taking a proactive responsibility for it, we can bring *The IMI Way* to life for all stakeholders and further differentiate the value of IMI across all of our markets.

Always remember, whenever in doubt about a course of action, stop, think, consult the Code and never hesitate to ask for help.

**Application of the Code:** This Code applies to all directors, officers and employees of the IMI Group. Throughout this Code, "IMI", "the IMI Group" and "the company" refer to the IMI Group and all of its activities, subsidiaries and majority-owned and controlled businesses.

**Senior Leadership:** At each IMI company, senior leadership is responsible for ensuring adherence with the principles, standards and spirit of this Code and address violations of it. In particular, all operating company policies should be consistent with and no less stringent than this Code. Since each unit's needs are unique, its leadership is responsible for developing any additional policies and procedures needed to ensure legal and ethical compliance. Senior leaders can consult the compliance, legal, human resources or responsible business functions locally or at IMI Group level for assistance. Senior leaders are also responsible for serving as positive role models and advocates for the Code and *The IMI Way*. Finally, senior leaders must ensure that any transgressions or violations of the Code are appropriately addressed, including taking disciplinary action when necessary, and must ensure that lessons learnt are shared within their organisation and, as appropriate, across the IMI Group.

## The Right Direction



All of us at IMI must strive for the highest professional standards to best serve our customers, colleagues, shareholders and other stakeholders. Take your responsibilities seriously, just as you should expect your colleagues to do.



# The IMI Way

**Local Company Policies:** This Code sets out the minimum policies across the IMI Group. In certain instances, IMI or an operating company will develop supplementary policies for certain business activities or countries with more stringent local regulations or business practices. Employees are responsible for making sure they also understand any additional policies and procedures that apply to their business. If in doubt about these policies and procedures, contact your line manager.

**Managers:** Managers and supervisors have a duty to ensure that their employees are aware of and understand this Code and adhere to its policies. Managers also are responsible for providing guidance to employees with questions and for addressing any legitimate concerns that employees raise.

## The IMI Responsible Business Initiatives

As a reflection of the values that underpin *The IMI Way*, we take our responsibilities to the environment and the communities in which we operate very seriously. We put particular emphasis on ensuring that our management of people, social, environmental and economic issues is aligned and integrated with the overall management of the business. To support this commitment, IMI is a signatory to the UN Global Compact, which establishes standards for human rights, labour practices, the environment and anti-corruption. We strongly believe that high standards of responsibility are compatible with growth and business efficiency.

We have identified four key priorities within our overall approach to responsible business:

- Continually improving our working practices to minimise health and safety risks.
- Understanding and meeting our customers' responsible business priorities.
- Managing the particular challenges relating to the supply chain in low-cost countries.
- Maximising energy efficiency in both our processes and products.

These priorities will be reviewed at least annually to ensure that they remain relevant and appropriate. Up-to-date information on these and related matters are available through the Responsibility section of the IMI website.

# The IMI Way

## Seeking Help & Guidance

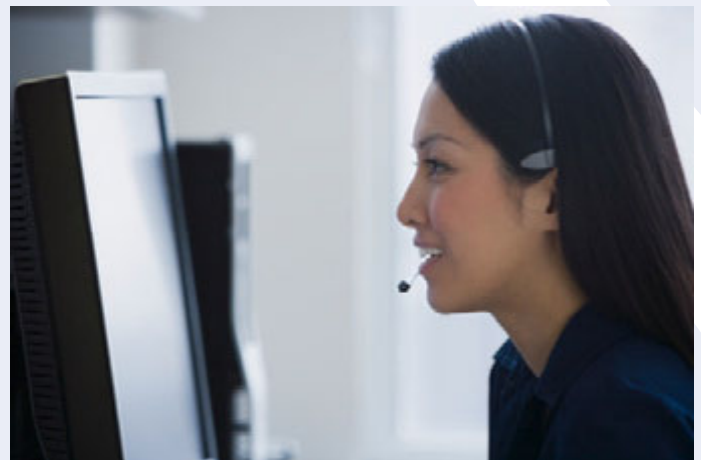
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As we move forward as a global company, IMI is committed to ensuring that all employees have the knowledge, resources and support to act according to the Code. Individually, we cannot consistently pursue excellence, deliver results, innovate, provide value for our customers and act with integrity unless we are willing to ask for guidance when needed. Seeking support when faced with new or difficult situations is a strength.

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### Seeking Assistance

If you have questions about this Code, or the proper action in a given situation, first consult your immediate manager. If your manager is unavailable, or if you are uncomfortable discussing the matter with your manager, you can also contact a senior manager or any member of the compliance, legal, responsible business or human resources functions at IMI Group or local level. If you prefer, you can use the IMI Hotline (see details on page 14).



### Reporting Concerns

As a duty of your employment, you are required to raise concerns about possible violations of the law, a regulation or the Code. Your exercising this responsibility helps the company identify possible problems, correct them and support all employees in performing their day-to-day responsibilities. Report your concerns to your manager or, if necessary, a senior manager, or any member of the compliance, legal, responsible business or human resources functions at IMI Group or local level. Additionally, you may report your concerns to an Executive or Non-Executive Director of IMI plc.



# The IMI Way

## The IMI Hotline

When you encounter a particularly sensitive situation and you are not comfortable using the regular reporting channels, you can report a concern via the IMI Hotline. You can use the IMI Hotline to report anything that is contrary to the spirit or letter of the Code, such as workplace harassment, corruption or expense abuse. In certain countries there are legal constraints governing the use of the IMI Hotline. Where these exist you will be given appropriate guidance when making a report. For more detail, contact the local or IMI Group legal or compliance functions.

If you raise a concern via the Hotline, on the Internet or by telephone, you can be assured of anonymity if you request it. The Hotline is managed by a third-party provider and is strictly regulated, which means your identity will not be known to the company without your consent. All non-anonymous calls will be treated confidentially, if requested, so far as legally possible and consistent with appropriate investigative and follow-up action.

You can contact the IMI Hotline as follows:

-  Through the Internet: [www.imihotline.com](http://www.imihotline.com)
-  By telephone (all calls are free of charge from a fixed line): See telephone numbers listed on the inside back cover.

The company will promptly investigate your report and, if you request, inform you when it has resolved the matter. The company will discipline any Code violators as appropriate, with action up to and including dismissal from employment and reporting to the authorities. Please understand that confidentiality considerations may not permit the company to inform you of the final outcome of an investigation.

## The Right Direction



Have the courage to “do the right thing” when you see something that looks wrong. Seek guidance and raise concerns with your manager or another appropriate person. Use the IMI Hotline if you feel the need to raise your concern through an alternative channel.

## Ensuring Non-Retaliation

The company will protect any employee who reports concerns in good faith from penalty or retaliation. You are expected to report possible instances of retaliation to a senior manager or any member of the compliance, legal, responsible business or human resources functions at IMI Group or local level. You can use the Hotline if you or another employee has been retaliated against for raising a legitimate concern.

## **Operating Unit Legal Matters**

Operating units must notify IMI corporate legal staff immediately of any potentially significant legal matters. Significant matters can include proposed corporate transactions, major regulatory or litigation proceedings, significant product integrity or environmental concerns or anything with strategic or reputation implications for the IMI Group.

Operating unit management should handle routine legal matters locally. As needed, operating unit senior managers should procure local legal advice to identify and manage legal risk. IMI corporate legal staff can guide operations in using external counsel and, where appropriate, approaching routine matters.

## **Addressing Waivers of the Code**

The Chief Executive or IMI Group Finance Director must approve any waivers to this Code. Waivers for Executive Directors of IMI require full IMI Board approval unless otherwise provided in this Code or in another referenced document.

# The IMI Way

## Summary of Our Responsible Business Policies

This section provides an overview of IMI's responsible business policies that apply across the enterprise, including all platforms and operating companies. Use this as a guide to what you will find in this Code, and check each corresponding topic for more detailed information regarding the company's expectations for all Board members, officers and employees. IMI also provides additional guidance and materials that address enterprise or corporate-level activities and activities among platforms and operating companies.



In all situations, follow applicable laws, regulations, this Code and any additional local company policies. Be sensitive to local business practices and customs, but do not allow these to be an excuse for conduct that violates the law. If you believe a conflict exists between this Code or the spirit of this Code, a local company policy and/or local laws and regulations, you should raise the matter immediately with your manager. Always follow the highest standard whether it is this Code, local company policy or law or regulation.

Responsible conduct is about our interactions with colleagues and external stakeholders, and so we have organised our policies by the principal stakeholders that we work with everyday at IMI: customers, colleagues, shareholders, business partners and communities.

### Customers

- **Fair & Ethical Dealings** – Always deal fairly with our customers and never try to obtain advantage through dishonest, corrupt or other fraudulent or unlawful activities.

- **Marketing with Integrity** – Ensure that the company’s product/service claims are accurate, are truthful and can be substantiated. Follow all laws, regulations and professional standards regarding advertising, promotional and other marketing activities.
- **Customer Information** – Safeguard customer information, store it securely and do not share it with others outside of the company without the customer’s knowledge, especially customer confidential or proprietary information.
- **Product Quality & Safety** – Always follow appropriate quality assurance procedures for your business, and ensure you are familiar with and can comply with all relevant safety requirements in all potential end markets. Immediately report any unsafe product issues to management.
- **Gifts, Entertainment & Other Courtesies** – Follow laws, regulations and company policies in exchanging gifts and entertainment, especially those involving government or public sector customers.
- **Improper Payments** – Never provide anything of value, such as a bribe or “kickback”, to influence a business decision. A bribe or kickback can include cash, gifts, services and favours.
- **Public Sector Customers** – Know and follow all rules related to doing business with government and other public sector customers. These rules may concern procurement activities, provision of any data or reporting to the customer, handling its confidential information and intellectual property or the use of agents or other representatives in working with a public sector customer.

## Colleagues

- **Health, Safety & Environmental Protection** – We are committed to safeguarding our employees in the workplace and to acting in an environmentally responsible manner. Know your facility’s specific practices regarding health and safety and environmental protection. Ensure that visitors and other non-employees know about and adhere to these expectations. Immediately report potential unsafe or environmentally harmful situations. Help ensure that company products and services are safe to use.
- **Workplace Relationships** – Avoid personal relationships at work that may conflict with your duty to the company. Discuss any potential conflicts with your manager or a local human resources manager.



# The IMI Way

- **Fair Employment** – Make decisions regarding hiring, pay and benefits, promotion or other employment matters based on objective criteria and never on age, gender, race, religion, sexual orientation or other personal characteristics that are improper to consider.
- **People Development** – Talent and skills development are critical to our success. Encourage colleagues to develop and improve their performance so that IMI people can achieve their potential. Take responsibility for your personal development as well.
- **Respectful Workplace Conduct** – Always treat others with respect. Never act toward others in a way that could be considered as harassing, humiliating, bullying or pestering.
- **Employee Information** – Access or share other employees' personal information only if you are authorised. Comply with applicable laws and policies for transferring this data across country borders.

## Shareholders

- **Communications & Investor Relations** – Only designated individuals should speak on behalf of the company. Information released to outside parties is expected to be accurate, timely, clear, understandable and relevant.
- **Use of Company Resources** – Use all company resources carefully, including property, funds, information, technologies and intellectual property, and safeguard them from improper use or loss. Dispose of them according to approved procedures.
- **Internal Controls** – Follow all internal control procedures, such as those related to book keeping, financial management and reporting and records management.
- **Corporate Governance** – Support good governance practices in company operations, such as the use of processes that demonstrate sound business controls.
- **Conflicts of Interest** – Ensure that personal interests remain separate from work responsibilities, including outside activities, financial interests, relations with close relatives or others, political activities or interests and use of company resources for personal interests.
- **Inside Information & Securities Trading** – Never use sensitive company information for personal trading or provide this information to others without a legitimate business need for it, especially if others are likely to use it for their own securities trading.

- **Limits of Authority** – Ensure your and others' actions on behalf of the company are properly authorised.

## Business Partners

- **Purchasing Practices** – Follow procurement practices that are fair, and seek good value for company funds. Do not unfairly discriminate against suppliers in purchasing.
- **Fair Competition** – Ensure that the company competes fairly and does not enter into agreements or understandings that unfairly restrict competition. Do not disparage competitors or discuss or exchange pricing or other sensitive business information with them.
- **Import & Export Controls** – Know and adhere to applicable requirements regarding export or import of products and services and economic sanctions or boycotts.
- **Suppliers' Business Practices** – Help the company ensure that suppliers meet IMI expectations regarding their own facility working conditions, or agree to and make progress toward achieving these standards. Ensure that any agents or other representatives acting on the company's behalf know about applicable company policies when working for us. Never use one of these parties to perform a task that company employees are not permitted to perform.
- **Business Partner Reviews** – Review potential business partners to manage the level of risk in working with them.
- **Fair & Ethical Dealings** – Always deal fairly with our business partners and never try to obtain advantage through dishonest, corrupt or other fraudulent or unlawful activities.

## Communities

- **Human Rights** – Follow company practices that demonstrate IMI's commitment to human rights. Topics include use of child or forced labour, a safe and healthy workplace for colleagues and local communities, safe products and services, environmental protection, payment of a fair wage, lawful working hours and freedom of association or collective bargaining. Ensure that we apply these standards across the whole supply chain.



# The IMI Way

- **Community Support** – Follow this Code’s guidance when supporting charities or causes. Keep separate any personal, community and charitable activities and contributions from company activities.
- **Political Donations** – Do not use company funds or resources for political activities or interests without first consulting the IMI Group legal function and obtaining approval from the IMI Group Finance Director. As a general rule, the company will not approve political donations and the Group does not make donations to political parties.
- **Communications with Outside Parties** – Communicate with outside stakeholders about company activities only if you are authorised to do so. Ensure communications are accurate, fair, timely, clear, understandable and relevant.

**Additional Guidance:  
Our Responsible Business Policies**



# The IMI Way

## Customers

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Our continued success lies in creating superior long-term value for our customers and inspiring their trust. Our actions must demonstrate our commitment to serving our customers: by working closely with and listening to them, finding innovative solutions to their challenges, effectively managing our resources to serve them and delivering on our commitments to them. How we communicate and interact with prospective and current customers must establish and strengthen their confidence that IMI companies understand and are committed to meeting their needs.

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## Fair & Ethical Dealings

Always deal fairly with our customers and never try to obtain advantage through dishonest, corrupt or other fraudulent or unlawful activities. For instance, be truthful when presenting the company's capabilities and the quality of our products and services.

## Marketing with Integrity

We establish trust with prospective and current customers in our marketing and other communications that inform them about IMI companies, our products and services and the benefits they provide. To maintain this trust, we need to follow the laws and regulations and professional and industry standards regarding advertising, promotional and other marketing practices and materials. Remember that these rules are likely to be different in each country where we market. Take responsibility to ensure that IMI claims are accurate, truthful and can be substantiated. Be cautious when discussing competitors or their products and services, and do not disparage them.

*See Also: [Fair Competition](#), page 36, for information on competitor disparagement.*

## Customer Information

Our customers trust us to use the information that they provide to us for legitimate business purposes, safeguard it, store it in a secure location and not share it with others outside of the company without the customer's knowledge. This includes any customer non-public information, including confidential and proprietary data. Be especially vigilant in protecting customer personal information, and only share it with the customer's permission or send it across country borders in compliance with regulations.

## Product Quality & Safety

We commit to providing our customers with the highest quality products and services and ones that they can rely on. Among our customers' chief expectations are that these products and services will be safe and meet or exceed the quality levels that we promise them. Follow legal requirements and your company's policies and procedures regarding product and service safety and quality. Understand the contractual or other requirements that IMI must achieve to meet the customer's requirements – including those that may exist in the range of potential end markets. If you believe that an integrity, quality or safety issue exists regarding a product or service, report this matter to your manager or another operating or functional manager as soon as possible.

## Gifts, Entertainment & Other Courtesies

Gifts, entertainment, meals, travel and other business courtesies sometimes are appropriate ways to promote business relationships and strengthen connections with our business partners. At other times, they can be inappropriate. Many countries have laws that restrict what can be exchanged in business relationships. Also understand that when conducting business with any country's government officials, rules often are stricter. Always understand and follow the respective government entity's rules.

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### The Right Direction



Ensure that how you serve our customers demonstrates IMI's passion for delivery, pride in our work and commitment to providing them with products and services that they can count on.

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# The IMI Way

At the minimum, ensure that any gift or entertainment that you offer or accept:

- Will not be perceived as an inducement to a specific business action or as a bribe or kickback.
- Is legal.
- Is not likely to breach the policies or standards of the recipient's organisation.
- Is modest and infrequent.
- Relates to a business purpose. For instance, any gift should be related to a specific event or activity; any entertainment should be in a venue where business will be discussed.
- Is consistent with IMI and any local policies or guidelines on gifts, entertainment, travel and gratuities.

## The Right Direction



We strive to demonstrate the highest professional standards of ethics. Never offer or provide to, or accept from, someone anything of value that could be considered an improper payment or a bribe to influence a business decision. Bribes, kickbacks or other improper payments are never authorised by IMI leadership and can lead to significant penalties to both the individual who provides or receives it as well as the company.

## Improper Payments

Never provide something of value to an individual that is intended or could be perceived as intended to influence a business decision. For instance, do not provide cash or something equivalent to cash, gifts, entertainment, travel, services or favours in hopes that the recipient will make a business decision that benefits you or the company. Expensive gifts or other courtesies, even if not intended to encourage benefits, can be perceived as a bribe.

You are expected to know and comply with these guidelines and your specific company's policies, which may set higher standards due to local legislation or regulatory requirements.

## Public Sector Customers

The national and local governments that IMI companies supply allow us to directly serve countries and their citizens. These opportunities require that we understand and follow specific rules and other expectations in conducting government business. For instance, if you work with government customers, you are expected to:

- Clearly understand and follow the government entity's purchasing or procurement requirements.
- Always report accurately any information that IMI provides to a government entity, such as product testing data or financial information.

- Use care in handling government non-public information and in using its intellectual property.
- Follow the government's rules on exchanging gifts and entertainment, and never provide anything of value that could be considered improper, such as a bribe or kickback.
- In conducting business with the government, only use agents or other representatives who are properly vetted and who you strongly believe to be reliable and honest.
- Obtain legal or compliance advice before discussing employment with any current or former government official.



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### Check the Guidepost

- *Do I know how materials that describe or promote my company's products will be used? If these are to be used with customers, have these materials been properly reviewed or approved?*
  - *Do I understand how I can use the specific information that the company has obtained from a customer?*
  - *Am I aware of proper practices for exchanging gifts or entertainment specific to my country or region? If so, do I know whether these practices are consistent with the IMI Code of Responsible Business or my company's policies?*
  - *Am I confident that I understand how the ways of working in another country or jurisdiction match the Code? Have I sought advice to manage appropriately in these situations?*
  - *In serving a government customer, do I know whether it has rules that govern my actions? If so, have I reviewed these rules?*
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# The IMI Way

## Colleagues

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We want to build and maintain great working environments in which every individual's contribution is valued and recognised. We accomplish more for our customers when we work together and show pride in how we serve them. Our company structure is built on great trust that



each employee will hold himself or herself accountable for helping us to realise the company's goals. Central to this objective is providing a workplace where each of us feels healthy, safe and free from impediments such as discrimination or other improper conduct, where our personal information is safeguarded, and

where each of us respects our colleagues and receives respect in return.

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## Health, Safety & Environmental Protection

IMI's activities, including manufacturing, warehousing, office work, onsite servicing, sales and product development make health, safety and environmental responsibility critical issues to us. Two of our principal commitments are to safeguard the health, safety and welfare of all employees and minimise our impact on the local and wider environment. IMI will not compromise on these important matters. Paying attention to these issues makes for a better workplace and shows our concern for one another, our business partners and the environment. A safe and healthy workplace also can increase our productivity, help us to focus our energies on meeting customer needs, provide engineering advantage and move the company forward.

The IMI Board has specifically endorsed this policy as part of the Code and requires all businesses and employees to comply with it. The IMI Executive Committee is responsible for the oversight of the policy's operation and reports to the Board when appropriate matters arise and with an annual review. The IMI Group Finance Director is the Board member with corporate responsibility for health, safety and environmental matters, and the platform business presidents are responsible for ensuring that the policy is implemented in their operations.

To support these commitments, IMI businesses are required to manage their activities, and employees are expected to act, as far as reasonably practicable, to ensure that we will:

- At a minimum meet or exceed all health, safety and environmental laws and regulations in the countries where we operate, and the specific health, safety and environmental rules, requirements and procedures of IMI and each of our companies.
- As appropriate, communicate with relevant regulatory officials, trade associations and industry groups regarding IMI's commitment to these issues.
- Ensure that all employees understand their responsibilities for and ways to improve performance related to health, safety and environmental protection.
- Align company operations with good practices in workplace health, safety and environmental protection.
- Identify and address risks in our industrial operations and associated hazards to provide safe working conditions and to prevent pollution.
- Support risk management by monitoring work-related near misses, investigating root causes of any accident or near miss, minimising related hazards and finding better ways to reduce the number and severity of personal accidents and environmental incidents.
- Ensure that the health, safety and environmental impacts of our products and processes are reduced to a minimum, and work with our customers and suppliers to achieve improved performance on shared objectives.
- Use opportunities from health, safety and environmental improvements in products and processes for wider business benefits, such as optimising energy and other resource-use efficiency, particularly with regard to CO<sub>2</sub> emissions.

## The Right Direction



IMI's human rights policy addresses many issues related to workplace health and safety and employment and working conditions. These expectations apply to all IMI plc platforms and operating companies and set the principles for our supply chain partners.

*See Also: [Human Rights, page 41](#), and [Suppliers' Business Practices, page 39](#).*



# The IMI Way

- Continually improve our management and performance in these areas by setting objectives, targets and plans and investing in techniques and technology, as appropriate.
- Facilitate communication, co-operation, education and training to maximise the contribution of all employees to the achievement of high standards in health, safety and environmental matters.
- Conduct due diligence regarding health, safety and environmental issues during corporate transactions.
- Require contractors and other visitors to comply with all relevant health, safety and environmental requirements when on IMI business.
- Report appropriate performance information publicly on a regular basis.
- Implement and follow company policies and procedures regarding use of alcohol or medications during business hours, and never allow these substances to affect the safety of any employee or other person.

## The Right Direction



The company may monitor the workplace, including facilities, telephones and computer systems and equipment, to ensure that no unauthorised access occurs and to verify compliance with its policies. Employees should not expect a right to privacy in the workplace. However, all employees should be respectful of colleagues' privacy.

If you are in any doubt about the policies and procedures that apply to you, your colleagues and your business unit, please contact your local health and safety manager, your line manager or IMI Group Risk Management.

## Workplace Relationships

Sometimes personal relationships in the workplace can conflict with our duty to the company. Individuals should not be in a romantic or similar relationship if one reports directly to the other. Even non-reporting personal relationships can lead to conflicts. Family relationships or close friendships at work may cause problems, such as when relatives or friends who are colleagues have influence over an individual's employment conditions or share sensitive company information, such as confidential or inside information. Discuss these situations with your manager or local human resources manager to ensure that no conflict exists or that it can be managed effectively.

## Fair Employment

The IMI Group's success comes from providing employees with a fair opportunity to demonstrate their abilities and from recognising and rewarding them for their achievements. We make employment decisions, such as those related to hiring, pay and benefits, promotion, training and termination, based on merit and business need, not on

race, colour, national origin, gender, sexual orientation, religion, disability, marital status or other personal characteristics that are improper to consider. Review your company's fair employment or non-discrimination policy to understand specific expectations in your business.

## People Development

Talent and skills development are critical to our success. Encourage colleagues to develop professionally to improve both their competencies and the company's overall abilities. IMI wants its people to have the best opportunity to achieve their potential. If you supervise others, actively foster your staff's professional development through constructive feedback and coaching, and ensure the effective management of their performance. Take responsibility for your personal development, as well. Participate in programmes across business "boundaries" to broaden your capabilities and ensure the best result for you and the company.

## Respectful Workplace Conduct

We benefit from the collaborative opportunities that our unique organisation presents when each of us acts respectfully and responsibly toward one another, and when we work together. Always treat colleagues and others with whom you interact with respect. Never engage in any conduct that could be considered harassing, humiliating, bullying or pestering, including sexual harassment. If you are unsure whether certain conduct is appropriate, ask your manager, local human resources manager or local compliance or legal officer. Also, be willing to politely discuss with others what you consider to be disrespectful conduct so that all of us can sustain a culture of trust and respect.

## Employee Information

Each of us needs to provide personal information to the company to facilitate employment benefits and other company operations. In the current climate where information can be easily transferred, shared or lost, it is important that we respect one another's privacy by carefully handling any employee personal information we work with or receive. Do not access or share this information with anyone, including colleagues, if you are not authorised to do so. Certain countries and regions restrict how this information can be transferred across country borders.



### Check the Guidepost

- *Can I distinguish legitimate requirements for a job from discriminatory or other unfair conditions? For instance, can a job that involves heavy lifting be restricted only to men?*
- *Do I know what questions I should not ask when interviewing a job candidate?*
- *Do I know what type of conduct is appropriate or inappropriate when working with colleagues? For instance, what sorts of humour or teasing would be improper?*
- *How should I handle information belonging to my colleagues? What about their personal information that they shared with me?*

# The IMI Way

## Shareholders

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Our way forward relies on the capital that our shareholders invest in the resources for our success. We must use these resources with respect and care. Further, we demonstrate commitment to the company by not allowing personal interests to conflict with our job responsibilities and duty to the company.

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## Communications & Investor Relations

Shareholders, regulators, local communities and others rely on what we communicate to them about the IMI Group's operations. It is imperative that we preserve their trust in us by creating a climate of consistent, coherent, clear and open communications with them. All our communications to these parties must be accurate, fair, timely, clear, understandable and relevant. Only designated employees should communicate with our outside stakeholders, and they should follow specific

procedures in doing so; this ensures that these communications have been properly reviewed. Special caution is required when communicating information that might be sensitive or affect the value of IMI shares.

IMI cares about our stakeholders' views of our operations, and so we provide various ways to encourage this feedback. These methods include face-to-face meetings, the company's and its subsidiaries' websites and contact information in our annual reports, press releases and third-party directories. Address any questions regarding this matter to your company's president or finance director.

All employees are responsible for safeguarding information that should not be made public or communicated outside of IMI.

## Use of Company Resources

Many types of resources are required to serve our customers and run our businesses. We need to use all of these assets with care, ensure we get the best value for them and safeguard them from improper use or loss.

- **Property and Funds** – Including facilities, equipment, supplies and raw materials. Acquire these resources with the intent to get the best value for their cost. Protect them from improper use, loss or disposal. Ensure that company funds, including cash, cheques, or other financial resources, are held securely when not being used, and that accurate records support financial transactions.

- **Technology** – Including computers and computer systems, telephones, e-mail and Internet or intranet access. Use these resources according to company directions, ensure that company technology is safe from malicious attacks, such as computer viruses, and only dispose of them according to company procedures.

These resources are intended for business use, though minor personal use is permitted, provided that this use is approved by your manager, has negligible cost to the company, does not interfere with company operations or your duties, is respectful of others and never involves discriminatory, harassing or other inappropriate content or use.

- **Company Information** – Including confidential, non-public and other proprietary information belonging to the company. Safeguard this information, only share it with others with a need to know it, and label it appropriately. Only dispose of it according to record retention procedures. Also, use others' information that they share with us respectfully and according to their use requirements. An employee's duty to protect confidential information generally continues after company employment ends.
- **Intellectual Property** – Including copyrights, trademarks, service marks and patents. Ensure that these resources contain protective notices and that others we provide them to understand restrictions on their use. Another form of intellectual property includes trade secrets that every employee must protect from unauthorised disclosure to non-employees.

## Internal Controls

IMI maintains internal control procedures to ensure that the business is operating effectively and to address any potential risks that could jeopardise our success. IMI depends on all employees to properly record and maintain the results of financial and

# The IMI Way

other business transactions; each of us is accountable for this important task. Therefore, it is critical that all employees follow internal control procedures and support others charged with managing and evaluating these controls.

- **Financial Management** – Adhere to the IMI Group Accounting Manual and regulations and professional rules regarding recognising and recording revenue and expenses. Ensure that the company properly records all financial transactions and approves the establishment of all accounts that hold financial assets. Raise questions or concerns regarding questionable financial or accounting practices, such as requests to inaccurately report earnings or other financials, with the IMI Group Finance Director.
- **Expenses** – Do not approve expense claims if you are involved in the event or if it is apparent that the expenses incurred violate the Code or relevant IMI or customer entertainment guidelines.
- **Records Management** – Always provide full, fair, accurate, timely and understandable information in internal documents and disclosures to management, especially if this information may be provided to outside parties. Follow records management and retention policies and procedures applicable to the IMI Group and your business.

## Corporate Governance

To ensure continuing good governance practices throughout the IMI Group, IMI maintains a governance programme. Governance at the top is defined in the role, powers and practices of the Board of Directors, its chairperson and committees and the Chief Executive. Corporate governance also is managed by internally approved business plans, budgets and the materials listed below.

### The Right Direction



IMI and your colleagues trust you to be accountable for the results that you produce and report. Take responsible actions that demonstrate this trust. Help manage our resources effectively to deliver products and services that meet our customers' needs.

Operating unit and corporate leadership and all employees should be familiar with and follow internal materials relevant to their work duties, which include:

- IMI Group Accounting and Internal Control Manual
- Insurance Manual
- Treasury Manual
- Taxation Manual
- Model Code for Share Dealing
- Entertainment Guidelines
- Operational Limitations of Authority

If you have concerns about corporate governance, discuss the matter with your manager or the Company Secretary. All of the above policies and procedures are available via the Passport intranet or through your local finance function.

## Conflicts of Interest

As employees of an IMI company, we have a duty to ensure that our job responsibilities and personal interests remain separate. To ensure that a personal interest does not improperly affect your job duties, disclose potential conflicts to your manager, your senior manager or an appropriate compliance officer. With this person, you can determine whether the matter presents an actual conflict and, if so, how it can be addressed. Potential conflicts can include:

- **Financial Interest** – Holding an ownership interest in any supplier, competitor or customer. (Ownership through a fund for which you do not control the holdings, such as a mutual fund, typically is not a conflict. If in doubt, please ask for guidance from the Company Secretary.)
- **Outside Activities** – Having an agency, consulting or employment relationship with any supplier, competitor or customer; having any outside business interest or activity that detracts from an individual's ability to devote appropriate time and attention to his or her responsibilities to the company.
- **Family Employment** – Employing, supervising, reviewing or having any influence on the job evaluation, pay or benefits of any close relative or close friend, or making decisions about dealings with them as a business associate.
- **Gifts or Payments** – Giving or receiving any improper personal gifts or payments in return for business, such as an excessive or inappropriate business courtesy. Cash gifts are not acceptable.
- **Company Resources** – Using expenses or any of the company's assets (or allowing others to use them) other than for business purposes. *See Also: Use of Company Resources* on page 31.
- **Use of Agents or other Representatives** – Allowing or using any agent or intermediary to do anything that would be improper for a company employee to do (for example, any bribery or other unlawful act).
- **Corporate Opportunities** – Taking business opportunities without proper approval that ought to be offered to the company, or competing with the company.

*See Also: Workplace Relationships, page 28.*

# The IMI Way

## Inside Information & Securities Trading



### Check the Guidepost

- Do I understand what information belonging to the company, its customers, suppliers or other business partners is considered to be confidential or otherwise should not be disclosed to others?
- Do I work with information that could be damaging to the company if it were disclosed to others?
- Am I careful in discussions with business associates or friends about not disclosing any information that is confidential to the company or its customers, suppliers or other business partners?
- Do I know the company's rules about dealing in IMI shares by employees with access to price-sensitive confidential information?

Our customers and the company trust each of us to responsibly handle confidential and other non-public information entrusted to us in our jobs. IMI plc is obliged by legal and regulatory requirements to announce any development that is likely to significantly impact the price of IMI shares. Information about these potentially price-sensitive developments is known as “inside information”. Examples can include trading results, important corporate transactions, major changes in trading prospects, Board changes and significant regulatory issues.

IMI takes seriously the responsible handling of inside information and will discipline individuals who do not adhere to relevant guidance and regulations. IMI will not authorise any employee dealings in IMI shares while inside information is awaiting announcement to the market.

### Your Responsibilities and IMI's Internal Controls

IMI managers must learn to recognise and protect potentially significant inside information and help safeguard it as follows:

- **Corporate disclosure of inside information:** Inside information must be announced to the public only through IMI's corporate HQ.
- **Sharing with non-IMI individuals:** Before providing inside information to someone outside IMI, obtain approval from an appropriate Executive Director, and ensure the outside individual signs a confidentiality agreement in advance.
- **Sharing with IMI colleagues:** Before providing inside information to a colleague, first ensure that the disclosure is a business necessity and that the individual is an authorised insider. For instance, do not routinely copy colleagues on e-mails that include inside information or invite colleagues to confidential briefings unless a business need exists.
- **Responding to media or other enquiries:** If you receive media or other enquiries concerning matters related to inside information, do not make any comment and refer the requesting party to the Chief Executive, IMI Group Finance Director or Investor Relations Director.

### *Further Guidance*

Refer any enquiries or requests for guidance in this connection to an Executive Director or the Company Secretary.

## **Limits of Authority**

To ensure that company activities and transactions are appropriately authorised, the company has established authority limits for certain senior managers in conducting company business, and expects limits of authority to be cascaded throughout the IMI Group. Notify an appropriate senior manager if you are not clear about your authority or suspect others are acting without proper authorisation.

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## **The Right Direction**



Help IMI earn others' trust by taking accountability for results. Ensure that you use any authority granted to you as an IMI employee wisely and with care. Examples of the use of authority may include, among other activities, the following:

- Selecting agents to represent the company.
  - Signing contracts or agreements on behalf of the company.
  - Establishing prices or other terms of product or service sale.
-

# The IMI Way

## Business Partners

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Our relations with suppliers, agents and representatives, regulators – even competitors – also reflect our commitment to acting responsibly. These relations always must be built on principled conduct, respect, sound business decisions and our commitment to our customers, investors and employees. IMI's continued success is tied with that of other business partners and the respect of our competitors.



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ment to acting responsibly. These relations always must be built on principled conduct, respect, sound business decisions and our commitment to our customers, investors and employees. IMI's continued success is tied with that of other business partners and the respect of our competitors.

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## Purchasing Practices

How we acquire and use the raw materials, equipment and other supplies and services that we purchase affects our performance and, in turn, that of our customers and shareholders. We want to ensure that how we acquire these goods and services enhances the company's success and demonstrates respect for our many potential and current suppliers. Each IMI Group company is expected to use a procurement process that is fair and seeks the best value for the cost of purchases. In general, procurement processes should rely on factual, objective information, based on materials that are provided to all relevant suppliers. This process should never discriminate against a potential supplier based on improper considerations, such as its management's gender, race, nationality or age.

## Fair Competition

At IMI, fair competition means acting honestly and responsibly while we compete vigorously to serve our customers and deliver returns to our shareholders. We adhere to fair competition and antitrust laws and regulations in the countries where we operate, as well as IMI and local company guidance. Relevant areas to consider include:

- Agreements with customers, suppliers or competitors that may unfairly limit competition. Numerous activities can contravene these policies, and sometimes employees can find themselves inadvertently breaching the regulations. Some examples may include discussing and fixing prices with competitors, rigging purchasing bids, bundling unrelated products or requiring customers to set specific resale prices.
- Unilateral actions that unfairly restrict competition. Some examples include setting prices with the intent to drive competitors out of the market or refusing to deal with a customer or supplier unless they also deal with the company on an unrelated matter.
- Disparagement of a competitor or its products and services, such as through discussions with potential or current customers, suppliers or other competitors.
- Unacceptable ways to gather market information, such as through exchange with competitors, misrepresentation, espionage, or improper use of marketing consultants or other third parties.

These rules can be quite complex and may vary by region or country. If you work in a sales or marketing role, have regular contact with customers, suppliers or competitors, or deal with business agreements or contracts, it is especially important that you understand related laws and regulations and IMI and local company fair competition policies and procedures. If in any doubt about these complex matters you must always take advice.

Be especially aware of the following:

**Relations with Competitors:** Relationships with competitors present the most sensitive territory in competition law. Avoid any arrangements or understandings with competitors to constrain competitive activity. For example:

- Avoid agreements with competitors:
  - On prices, discount levels or rebate levels, or the exchange of information on these matters with competitors.
  - On the timing of price movements, or to “follow the leader” in pricing changes.
  - Not to compete with them (or not to compete aggressively) in certain product or geographical areas.



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### Check the Guidepost

- *Am I aware of any company guidance regarding purchasing products or supplies in a fair and proper way?*
  - *Do I know what I can discuss with competitors if I am in a conversation with them?*
  - *Does my job involve preparing any documentation or other information related to exporting or importing products or services? If so, do I know the requirements for this information?*
-



# The IMI Way

- To boycott certain customers or not to bid for certain projects.
- About who is going to supply which customers or who is going to submit the most competitive bid for any contract or tender.
- Do not provide competitors with details or copies of your price lists when they are revised, and do not ask competitors for their price lists.
- Do not attend trade association meetings or other industry gatherings at which you know your competitors will be discussing prices, marketing plans or any of the above; do not remain at these gatherings where this information is being discussed. (If you leave this type of meeting to avoid such discussions, ask that your departure be entered into the minutes.)

*Relations with Customers:* Avoid any arrangements with customers to constrain competitive activity. For example:

- Do not dictate the price at which customers (including distributors) resell your products (but recommending a resale price may be legitimate provided nothing requires your customer to follow that recommendation).
- Do not dictate where or to whom distributor customers may resell your products.
- Do not have an “export price” and a “home market price” for products sold to customers in the same country, dependent upon the location of the end user.

If your business has a significant share of the relevant market (around 40% or above), you should seek advice before refusing to supply, launching any rebate or loyalty schemes, pricing in a predatory fashion or entering into any exclusive supply arrangements with customers or distributors.

If you are in any doubt about these matters, contact IMI corporate legal staff or local lawyers for advice.

## **Import & Export Controls**

As a global enterprise, IMI and its companies conduct business across national borders, each of which has its own controls regarding exports, imports, embargoes and boycotts. We must be respectful of each country’s regulations and address any conflicts that may arise in these areas. Doing so ensures that our products, services or raw materials move smoothly, which strengthens IMI’s and our customers’ operations.

- **Imports** – Often, importation of products requires certain licenses, certification, fees and documentation.
- **Exports** – Regulations often address the types of raw materials, products or services that can be exported from one country to another. In some cases, a country may restrict certain information (like national security data) or technology (such as software programs) from being exported. In some instances, a country may restrict intellectual property (such as technical information) from being communicated to a non-national of that country, even inside the country’s borders. Export licenses, certification and documentation requirements may need to be checked and attended to.
- **Embargoes/boycotts** – A country may restrict certain trading relationships between itself and another country, and also restrict efforts to hide a shipment’s final destination by exporting through a third country.

## The Right Direction



Show how we demand the highest ethical standards from ourselves, our partners and our suppliers. Monitor our partners’ and suppliers’ activities in their work with us to ensure that they follow the standards to which they agree.

*See Also: [Human Rights](#), page 41.*

If you work with moving raw materials, products or services across national borders, or exchanging company intellectual property or non-public information with others from another country, ensure that you understand each applicable country’s requirements.

## Suppliers’ Business Practices

At IMI, we want to work with business partners that operate responsibly. Also, we appreciate the role we can have in promoting a responsible supply chain. In tailoring operations to local conditions, we require suppliers and other business partners to meet at least minimum standards or show progress toward achieving these standards over an agreed upon and suitable timescale.

Minimum standards include:

- Compliance with all appropriate local legislative requirements.
- No use of child, forced, bonded or involuntary prison labour.
- Payment of wages and benefits for a standard working week that meet or exceed minimum national requirements.
- Use of work hours that comply with national laws.
- Protection of the health and safety of employees by compliance with standards in keeping with local expectations of good practice.

# The IMI Way

- Protection of the environment by compliance with standards in keeping with local expectations of good practice.

A supplier's failure to comply with any agreed upon improvement plan may result in a contract review and possible termination. Each IMI company is expected to adopt appropriate procedures to ensure that suppliers address these issues.

Agents or other representatives, when representing or working for IMI or its companies, should follow applicable policies in this Code. An IMI company should never use an agent or other representative to conduct actions that it is not permitted to do itself. Employees who supervise these relationships are responsible for communicating IMI standards to these partners. Each IMI company is expected to use controls to promote partner adherence to these expectations.

## Business Partner Reviews

IMI companies are expected to 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

Every employee is expected to conduct company business fairly, and to never misrepresent themselves, the company or its products or services. Never try to obtain advantage through dishonest, corrupt or other fraudulent or unlawful activities.



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### Check the Guidepost

- *Have I ensured that any agents or other representatives serving IMI that I work with are aware of the company's standards of conduct?*
  - *How can I ensure that I am honest and upfront with the prospective and current business partners I work with?*
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# The IMI Way

## Communities

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IMI has benefitted greatly from the communities in which we operate, and we must continue to remain respectful of them. We have a duty to be a responsible business citizen and to meet our commitments to our communities. We want to show appreciation to these neighbours for their support. To this end, IMI continues to demonstrate support for economic, social and environmental standards, remain respectful of human rights, assist our local communities through charitable activities and community volunteering and communicate appropriately with all of our stakeholders.

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## Human Rights

As part of our corporate responsibility, IMI believes in respect for essential human rights. IMI continues to ensure that employees work in a safe, respectful environment that recognises human dignity. The company's practice is to respect internationally recognised human rights standards, such as the United Nations Universal Declaration of Human Rights and other relevant international conventions and guidelines. IMI also will promote these standards amongst our suppliers.

Operating company senior management is responsible for ensuring that local operations comply with this policy. All employees should help ensure that the company:

- Does not employ child labour or forced, bonded or involuntary prison labour.
- Provides a safe and hygienic working environment based on applicable standards, the prevailing knowledge of the industry and any specific hazards.
- Does not jeopardise the health or safety of those living near our operations or those using our products.
- Minimises the impact of operations and products on the environment.

## The Right Direction



Demonstrate how we respect the communities in which we operate. Support IMI's commitment to help eliminate child labour consistent with the United Nations Convention of the Rights of the Child and the United Nations Global Compact. Notify your manager of any suspected violations of human rights standards by either an IMI company supplier or other business partner.

*See Also:* [Health, Safety and Environmental Protection, page 26](#), and [Suppliers' Business Practices, page 39](#).

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# The IMI Way

- Pays employee wages and benefits for a standard working week that meet or exceed minimum national requirements.
- Ensures that employees' working hours comply with applicable laws.
- Complies with national laws concerning an individual's freedom of association and collective bargaining.

## Community Support

We recognise the value of supporting our communities. One way that IMI supports our local communities is through sponsoring certain charities or causes. We do this responsibly by supporting recognised national and local charities and causes, generally with auditable accounts, that are most aligned with IMI or its companies regarding location, supported cause or relevance.

## Political Donations

Do not use company funds or resources for political activities or interests without first consulting the IMI Group legal function and obtaining approval from the IMI Group Finance Director. As a general rule, the company does not approve political donations.



### Check the Guidepost

- *Are potential human rights violations a risk in the country or region where I work? If so, how do I ensure that company operations do not run afoul of these important standards?*
- *Do I participate in any outside activities in relation to which I use my position with the company?*
- *Do I communicate with anyone outside of the company where I need to be aware of company guidelines regarding the protection of company information?*

## Communications with Outside Parties

Our communities and other outside stakeholders rely on what we communicate to them about company operations. It is imperative that we preserve their trust in us by communicating consistently, clearly and openly with them. Ensure that all company communications to these parties are accurate, fair, timely, understandable and relevant. Only designated employees should communicate with our outside stakeholders; this ensures that we have properly reviewed these communications.

**See Also: Communications & Investor Relations, page 30.**

# The IMI Way

## Further Resources

Below are further sources of support and guidance if you have any concerns or questions about the Code and how it relates to you, your role and your business:

- Your manager
- Your local legal or compliance officer
- Your local HR advisor
- Your local finance manager or the IMI Group Finance Director
- Your local health, safety and environmental manager
- A more senior manager in your business
- The Company Secretary or any other IMI corporate lawyer
- The IMI Chief Compliance Officer
- The Head of Group Risk Management
- The IMI Group Human Resources Director
- The company intranet site (Passport), or local intranet for your business
- The IMI plc website ([www.imiplc.com](http://www.imiplc.com))
- A member of the Executive or IMI plc Board
- The confidential and anonymous IMI Hotline ([www.imihotline.com](http://www.imihotline.com))

# The IMI Way

## IMI Hotline Telephone Numbers

Country	Number
United Kingdom	0800-032-8483
Australia	1-800-339276
Austria	0800-291870
Belgium	0800-77004
Brazil	0800-8911667
Canada	888-271-4619
Czech Republic	800-142-550
China (Northern)	10-800-712-1239
China (Southern)	10-800-120-1239
Denmark	80-882809
Finland	0800-1-14945
France	0800-902500
Germany	0800-1016582
India	000-800-100-1071
Italy	800-786907
Japan	J5 0044-22-11-2505 JP 00531-121520
Korea	K2 00308-110-480 KO 00798-1-1-009-8084 00798-14-800-6599
Malaysia	1-800-80-8641
Mexico	M1-M5 001-866-737-6850 (New) 001-800-840-7907
Netherlands	0800-0226174
Norway	800-15654
Poland	0-0-800-1211571
Spain	900-991498
Sweden	020-79-8729
Switzerland	0800-562907
Taiwan	00-801-102-880
Thailand	001-800-12-0665204
United States, Guam, Puerto Rico	888-271-4619

For employees in other countries, access the [www.imihotline.com](http://www.imihotline.com) website and select your country to find the number to call. Should you have any difficulty with the telephone numbers above, please access the above website to obtain the most current telephone number, or call IMI HQ to request a contact number (anonymously if you wish) (+44 (0) 121 717 3700).

## **The IMI Way**

IMI plc Our Code of Responsible Business

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