

IMC WORLDWIDE GROUP

BUSINESS ETHICS POLICY

Business integrity is the oral and ethical standards earns the respect of its peers and the trust of its clients. Reinforced by a robust code of ethics, business integrity can be achieved in the application and enforcement of a set of guiding principles governing the actions of the firm, its staff and business partners.

The IMC Worldwide Group (IMC), has a policy that outlines its approach to business integrity in two parts: a **Code of Ethics** and a **Code of Conduct**. Our **Code of Ethics** outlines the ethical principles of the IMC Worldwide Group, its staff and our business partners, representing the aspirations of the firm at the business level. Our **Code of Conduct** translates these principles into practical guidance that empowers the IMC Worldwide Group, its staff, its business partners and their employees to realise these aspirations.

Our **Business Ethics Policy** – the combination of these two codes – has been developed to reinforce our commitment to honesty and truthfulness and for the practical purpose of protecting the IMC Worldwide Group, its staff and business partners from **acts of corruption, modern slavery (including but not limited to slavery, servitude, forced or compulsory labour, bonded labour and child labour) or human trafficking, human rights abuses, causing harm**, and the potential criminal liabilities. Specifically, it recognises the responsibilities of IMC Worldwide Ltd as a UK-registered firm under the UK Bribery Act 2010, and the UK Modern Slavery Act 2015 and its responsibilities in accordance with the relevant laws, statutes and codes applicable in the countries in which we operate. The IMC Worldwide Group will amend this code as and when necessary to reflect changes in national legislation, international agreements etc.

As part of our commitment to achieving the principles laid down in our Business Ethics Policy, the IMC Worldwide Group has assigned a Board Director responsible for compliance with our Business Ethics Policy on all projects undertaken by the firm. The IMC Worldwide Group's Managing Director and Board Director responsible for Business Compliance and Ethics, Mr Gavin English, is charged specifically with ensuring the firm maintains its commitment to combat corruption, modern slavery and human trafficking, and continues to enforce a zero-tolerance approach to non-compliance. This Policy provides a framework for setting, reviewing and achieving the IMC Worldwide Group's anti-bribery objectives.

A special note on **terrorist financing** / excluded entities – the IMC Worldwide Group takes every step to ensure that we are not inadvertently used by either an individual terrorist or terrorist organisation. In the past, government authorities have been concerned about suspicious persons working for charities in various countries who used their positions for terrorist aims. Another concern is that an employee may use the company's funds to support a terrorist aim rather than for the purpose that was originally intended.

The IMC Worldwide Group reserve the right to perform background checks on its employees and team members. Additionally, the IMC Worldwide Group performs due diligence to ensure that vendors and partners are not affiliated with any individual terrorist or terrorist organisation/entity sanctioned or restricted by UK Government or the United Nations.

CODE OF ETHICS

In our conduct on any project, from procurement through to project completion, the IMC Worldwide Group, its staff, its business partners and all independent consultants pledge that:

Accept the responsibilities of our Profession...

- At all times uphold the dignity, standing and reputation of our Profession, 'leading by example' as advocates of good governance and strong moral/ethical codes of practice;
- Act with impartiality, and in the legitimate interests of our client(s) at all times when providing professional advice, judgement or decision;
- Apply due skill, care and technical diligence in services rendered to our client(s), imparting knowledge at levels consistent with technological progress, changes to legislation, multilateral agreements on aid and sustainable development etc.;
- Disclose any conflict of interest, potential conflict of interest or future involvement that may potentially create a conflict of interest;
- Recognise that many of the countries and communities we work in are in need of our help, seeking solutions that are compatible with the Sustainable Development Goals (SDGs and the principles of economic, social and environmental sustainability);
- Advocate and adhere to core labour standards as outlined in the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work (1998), and the UN Guiding Principles on Business and Human Rights (2011) seeking to eliminate forced, compulsory and child labour, and protect the rights of the individual;
- Advocate and adhere to the core standards as outlined in the UK Modern Slavery Act 2015 seeking to prevent slavery and human trafficking within our supply chains and our own business; and
- Perform all services with integrity and conduct ourselves with the professionalism expected of a firm with our international standing, reputation and experience.

Promote transparency and fairness in Procurement...

- Advocate the concept of "selection by ability" for individuals, seeking to eliminate discrimination based on gender, age, race, political, social or cultural backgrounds;
- Advocate the concept of "selection by ability" for firms and organisations, adhering to the principles of fair and transparent procurement throughout the tendering process;
- Refrain from bidding for and/or performing any service unless judged competent to do so;
- Neither willfully attempt, nor otherwise sanction attempts to influence the decision of any tendering body through deliberate misrepresentation of ability, or other acts of corruption;
- Neither carelessly nor intentionally do anything to injure the reputation of a third-party, nor attempt to prejudice the appointment of rival individual/firm through negative campaigning; and
- Engender a sense of trust and respect with all consultants and firms associated with the IMC Worldwide Group in mutual appreciation of our professionalism, and of our duty to the client.

Adopt a rigorous stance on corruption...

- Promote a 'zero tolerance' approach to all forms of corruption;
- Ensure continuing compliance with the UK Anti-Bribery Act (2010) and any relevant national legislation governing the operations and actions of firms/individuals where we work;

- Perform appropriate due diligence on all potential partners, and refuse to associate with any firm, or employ any individual suspected of corrupt behaviour/practice;
- Ensure all employees, contractors and business partners are (i) regularly reminded of our strict policy on corruption, and (ii) agree, by contract, to adhere to our 'Code of Conduct' when working on opportunities and projects with the IMC Worldwide Group;
- Provide context-appropriate anti-corruption training to all employees (including the IMC Worldwide Group employees, independent consultants, and consultants' and contractors' employees where appropriate) to reinforce the responsibilities incumbent upon them as representatives of the IMC Worldwide Group;
- Maintain and review 'whistle-blowing' procedures for the reporting of observed acts of corruption/bribery/fraud/extortion, and communicate these procedures to all IMC Worldwide Group employees, independent consultants, and consultants' and contractors' employees;
- Immediately report to the relevant authority any known act of corruption, fraud or bribery committed by its employees, contractors, partnering firms or any third-party agent in the course of their commission on any lead, bid or project;
- Suspend any employee suspected of committing a corrupt offence, subsequently terminating their contract should any later investigation find they have acted in direct contravention of our 'Code of Conduct';
- Cooperate fully with any legitimately constituted investigative body which may conduct any inquiry into the administration of our business; and
- Ensure that all confidentiality of rates and contract documents, financial details and account payments are not disclosed or discussed with any parties except parties that are specifically authorised to do so.
- Continuously review our work in achieving our Anti-Bribery Objectives as set out here, and use the results of this review to improve our systems.
- Ensure that our Anti-Bribery Management system is followed throughout the company with continued training and using the received feedback.

Adopt a rigorous stance on all human rights abuse, including sexual exploitation and abuse, modern slavery, and human trafficking ...

- Promote a 'zero tolerance' approach to all forms of human rights infringements including sexual exploitation and abuse, sexual harassment, modern slavery and, human trafficking;
- Ensure continuing compliance with the UK Modern Slavery Act (2015) and any relevant national legislation governing the operations and actions of firms/individuals in the countries where we work;
- Perform appropriate due diligence on all potential partners or suppliers, and refuse to associate with any firm, or employ any individual suspected of partaking in the abuse of human rights including modern slavery, and/or human trafficking;
- Ensure all employees, contractors and business partners are (i) regularly reminded of our strict policy on safeguarding and modern slavery and human trafficking, and (ii) agree, by contract, to adhere to our 'Code of Conduct' when working on opportunities and projects with the IMC Worldwide Group;
- Maintain and review 'whistle-blowing' procedures for the reporting of observed acts of human rights abuse, including modern slavery and human trafficking, and communicate these procedures to all IMC Worldwide Group employees, independent consultants, and consultants' and contractors' employees;
- Immediately report to the relevant authority any known act of human rights abuse, including sexual exploitation and abuse, modern slavery, or human trafficking committed by its

employees, contractors, partnering firms or any third-party agent in the course of their commission on any lead, bid or project;

- Suspend any employee or supplier suspected of partaking/aiding/abetting/failing to recognise or notify the IMC Worldwide Group of any forms of human rights abuse, including sexual exploitation and abuse, modern slavery and/or human trafficking, and subsequently terminating their contract should any later investigation find they have acted in direct contravention of our 'Code of Conduct'; and
- Cooperate fully with any legitimately constituted investigative body which may conduct any inquiry into the administration of our business.

CODE OF CONDUCT

In our conduct on any project, from procurement through to project completion, the IMC Worldwide Group, its staff, its business partners and all independent consultants pledge that:

We will:

- adopt a 'zero tolerance' approach to all forms of corruption, sexual exploitation and abuse, modern slavery and human trafficking;
- ensure compliance with all UK, international and national anti-bribery legislation governing the operations and actions of firms/individuals;
- commit to undertaking continuous improvement activities relating to this policy and its application across the IMC Worldwide Group;
- engender a sense of trust and respect with all partner firms;
- perform all services with integrity and adhere to the principles of fair and transparent procurement;
- apply due skill, care and technical diligence in services rendered to our client(s);
- apply rigorous ethical principles in our research and evaluation work and seek to ensure no harm to beneficiaries;
- undertake appropriate due diligence on suppliers;
- ensure all employees and suppliers are (i) regularly reminded of our strict policy on corruption, sexual exploitation and abuse, human rights, modern slavery and human trafficking and (ii) agree, to adhere to the principles laid down in the IMC Worldwide Group's 'Business Ethics Policy';
- disclose any conflict of interest, potential conflict of interest or future involvement that may potentially create a conflict of interest;
- ensure all employees and suppliers involved in project delivery complete the context-appropriate anti-corruption training and are provided with Gift registers and appropriate guidance;
- ensure employees and suppliers are aware of and understand the 'whistle-blowing' procedures for the reporting of observed acts of corruption/bribery/fraud/extortion/human rights abuse/modern slavery/human trafficking;
- ensure employees and suppliers are aware of and understand the procedures for reporting any known act of corruption, fraud, bribery, human rights abuse, modern slavery or human trafficking;
- immediately suspend any employee suspected of committing a corrupt offence, or partaking/aiding and abetting in acts of human rights abuse, modern slavery and/or human trafficking pending further investigation; and
- cooperate fully with any legitimately constituted investigative body which make inquiry into the administration and management of the bid or project.

And we will not:

- wilfully attempt, or otherwise sanction attempts, to influence the decision of any tendering body through deliberate misrepresentation of ability, or other acts of corruption including bribery and extortion;
- carelessly or intentionally do anything to injure the reputation of a third-party, nor attempt to prejudice the appointment of rival individual/firm through negative campaigning;
- become involved in any activity which will, or might, involve dishonesty nor comply with any direct instruction to act dishonestly;
- become involved in any activity which will, or might result in human rights abuse, modern slavery or human trafficking;
- instruct any other person to act dishonestly or to knowingly commit any act of corruption, bribery, extortion, fraud, modern slavery or human trafficking;
- give or accept gifts, payments or other benefits – including exchange of favours – if the intention is to improperly influence actions or decisions;
- attempt to have claims/payments approved in any way other than the legitimate and recorded means; or
- dishonestly provide, conceal, or approve work, materials, equipment or services which are not of the quality and quantity required under contract.



Gavin English, Managing Director, the IMC Worldwide Group

April 2020

Related Policies

- Anti-Bullying and Harassment Policy
- Anti-Slavery and Human Trafficking Policy
- Gifts & Hospitality Policy
- Safeguarding Policy
- Whistleblowing Policy