

IMC WORLDWIDE GROUP

ANTI-SLAVERY AND HUMAN TRAFFICKING

POLICY

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1 POLICY STATEMENT

- 1.1 The IMC Worldwide Group (IMC) has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We set out below some examples of how we are committed to behaving in an ethical manner:
- our employees and consultants are free to terminate their employment or engagement at any time subject to them complying with any lawful contractual obligations which they are required to observe;
 - we provide clear and transparent information to our employees and consultants about hours to be worked, rates of pay and the calculation of legal deductions;
 - wage payments must be paid directly to individuals and at regular intervals in accordance with their contract of employment and national law;
 - we do not place any restrictions on the freedom of movement of any of our staff;
 - we prohibit the confiscating or withholding of identity documents or other valuable items, including work permits and travel documentation (e.g. passports, ID cards), bankcards and similar documents;
 - we prohibit the use of violence, harassment, intimidation, coercion or bullying, whether physical or psychological and any threat of any such activities in any circumstances;
 - we prohibit the use of debt bondage or bonded labour;
 - we prohibit the use of disciplinary measures that include an obligation to work;
 - we prohibit the practice of compulsory overtime for any reason; and
 - we prohibit the practice of workers being charged fees or costs associated with their recruitment – including travel, visa or administrative costs – irrespective of whether the charges are raised by an employer, recruitment agent or broker.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- 1.3 We expect the same high standards and commitment to ethical practices from all of our contractors, suppliers and other business partners and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone

held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

- 1.4 This Policy applies to all employees and suppliers (including contractors, consultants, agents, business partners and sub-contractors) of the IMC Worldwide Group regardless of where in the world they are working at the time.
- 1.5 This Policy does not form part of any employee's contract of employment and we may amend it at any time.

2 RESPONSIBILITY FOR THE POLICY

- 2.1 The IMC Worldwide Group Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 The Business Improvement Leader (BIL) has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the BIL.

3 COMPLIANCE WITH THE POLICY

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

4 COMMUNICATION AND AWARENESS OF THIS POLICY

- 4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5 REMEDY AND REDRESS

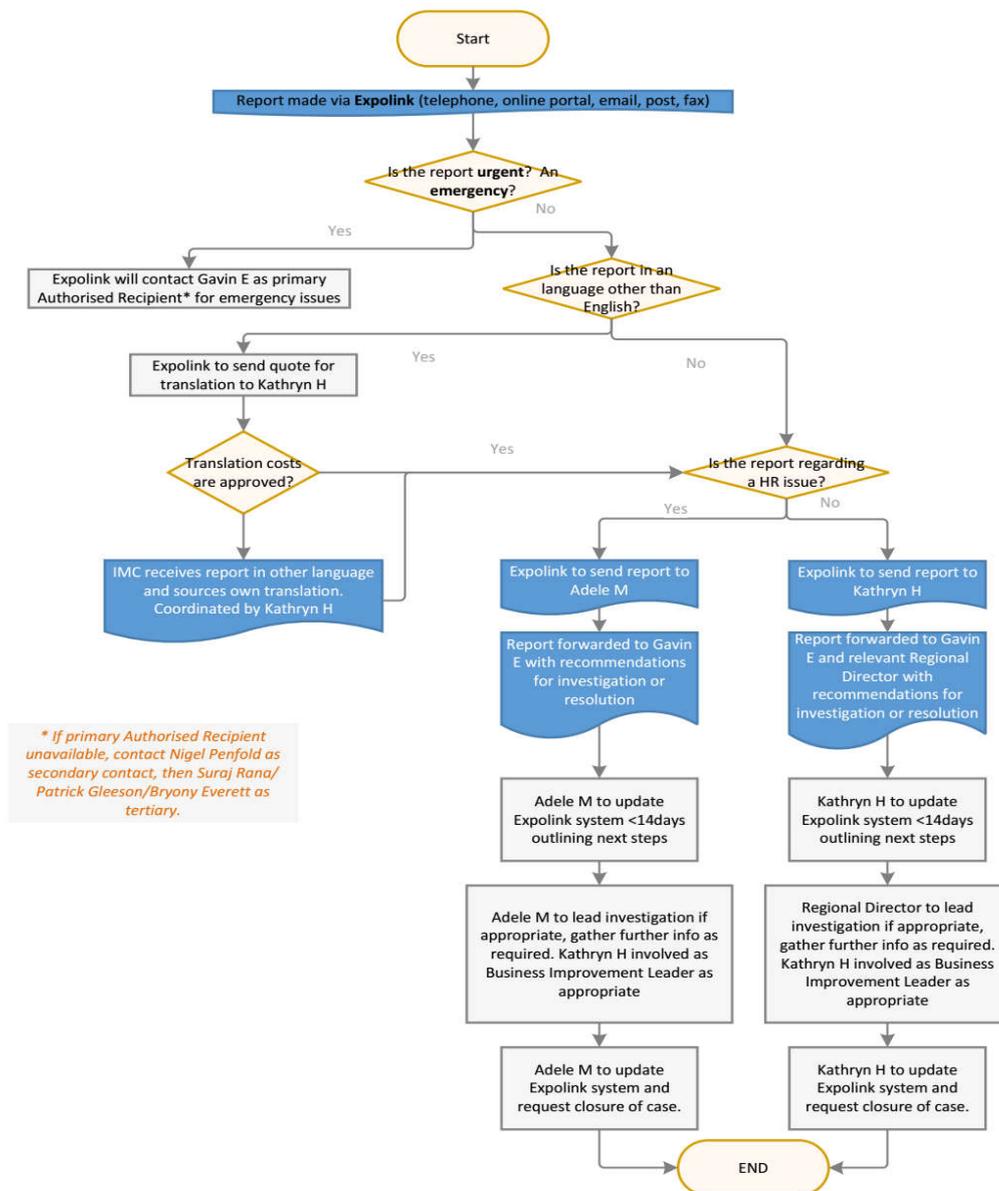
- 5.1 You must notify your manager or team leader as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

- 5.2 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 5.3 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or team leader.
- 5.4 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the BIL immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the IMC Intranet > Home> Employee hub> Policies> Grievance procedure. For independent consultants raise this with the appropriate IMC Regional Director or the Managing Director where it is not appropriate to refer the issue to the Regional Director.
- 5.5 If we suspect that any IMC consultant, contractor or business partner has engaged in modern slavery or other human rights abuses, we may immediately suspend their contract while we investigate. If an investigation finds the accused party guilty of modern slavery or human rights abuses, we may terminate their contract immediately. Any suppliers that are implicated in modern slavery or human rights abuses will not be eligible to partner with IMC until they are able to sufficiently demonstrate improved systems and controls for reducing the potential for modern slavery or other human rights abuses in their supply chains.
- 5.6 IMC's independent confidential 24/7 Whistle Blowing hotline (below) can also be used to raise any issues, including those concerning modern slavery.

Via the online portal : www.imcworldwide.ethicspoint.com

Telephone number for the UK is 0800 069 8413

6 INTERNAL COMMUNICATION PROCEDURE FOR INVESTIGATING ISSUES RAISED.



7 BREACHES OF THIS POLICY

- 7.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 7.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



Gavin English, Managing Director, IMC Worldwide Limited