

IMC Worldwide Group - Modern Slavery and Human Trafficking Statement

For financial year end date December 31, 2021.

Introduction

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

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

Our Business and Organisational Structure

IMC Worldwide is a UK-based leading, independent consulting company with over 60 years of experience implementing, monitoring and successfully delivering development programmes in over 120 countries across Sub-Saharan Africa, South and South-East Asia, Middle East, the Pacific, the Caribbean, Eastern Europe, and Central Asia.

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

Supply Chain

Our supply chains consist of partner organisations, located all over the world, and independent consultants. All partners and independent consultants are expected to carry out their work ethically and must sign up and adhere to the IMC Business Ethics Policy. The Business Ethics Policy covers acts of corruption, modern slavery, human trafficking, and

fairness in procurement, as well as a code of conduct. All partners sign up to this policy during our business development stages but sign up to our full suite of policies including our Anti-slavery and human trafficking policy when we win a new contract.

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

Our Policies

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

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

Progress in 2021

IMC is committed to our zero-tolerance standards and learning from experiences on projects and our supply partners.

IMC has faced various organisational and operational challenges which have presented obstacles to IMC's progress in advancing our modern slavery prevention measures.

In 2020, we launched our Modern Slavery training modules for all staff and independent consultants and we continue to ensure that all parties complete the training and have refresher training every 2 years. All new independent consultants are now subject to a process that means that they are issued with our standard training and need to complete this within 7 days of contract start. This training covers what the signs of modern slavery are, how to mitigate the risks of modern slavery, and how to report any modern slavery concerns on our overseas projects and in the UK.

Due Diligence, Risk and Mitigation

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

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

Risks of Modern Slavery are included in IMC's Master Risk Register and as a key word prompt in IMC's standard risk assessment template for all projects.

Looking Forward

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

As a company, we are committed to continuous improvement and our target for 2022 will be to continue to map where we have the greatest leverage to influence change in our supply chains.

We have developed a Modern Slavery Standard Operating Procedure (SOP) that is soon to be launched. The purpose of the Modern Slavery SOP is to:

- To build awareness of modern slavery and key modern slavery identifiers among IMC project staff, IMC suppliers and partners.
- To direct the design and implementation of best-fit modern slavery risk management procedures for projects.
- To improve the protection of human rights in our operations and in doing so ensure IMC's compliance to the Modern Slavery Act.

The Modern Slavery SOP instructs teams to take a risk-based approach and to design Modern Slavery monitoring activities, reporting protocols, communications plans and training plans according to the risks prevalent on the particular project.

We will also explore what KPIs can assist us in our modern slavery prevention measures. Such KPIs will include:

- Number of staff trained.
- Number of contracted independent consultants trained.
- Roll out and application of our Modern Slavery Standard Operating Procedure.
- Risk assessments on projects – highlighting modern slavery risks.
- Internal audits carried out – focusing on modern slavery measures at project level.

Approval of this statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes IMC's modern slavery and human trafficking statement for the financial year 1 January to 31 December 2021.



Signed Gavin English, Managing Director

Date: 07/03/2022