

Secretary-General
United Nations
New York
NY 10017
USA

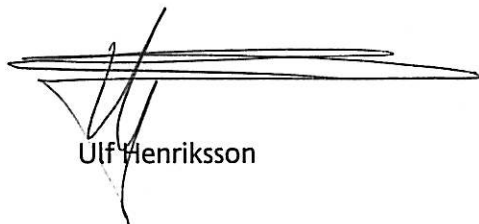
13 September 2007

Dear Secretary-General

I am pleased to confirm that Invensys plc supports the ten principles of the Global Compact in respect to human rights, labour rights, the protection of the environment and anti-corruption. With this communication, we express our intent to support and advance those principles within our sphere of influence. We commit to making the Global Compact and its principles part of the strategy, culture and day-to-day operations of our company and undertake to make a clear statement of this commitment - both to our employees, partners, customers and to the public. We support public accountability and transparency and will report on progress made in a public manner.

Please find attached some general information regarding our company as well as the contact person responsible for contacts with the office of the Global Compact.

Yours sincerely



Ulf Henriksson

Enclosure: Invensys plc Information Sheet

Cc: Angel Alcalá, Invensys plc
Steve Sacco, Invensys Process Systems

Company Information to the Global Compact

Please type or use print capitals

Type of organisation Company Labour
 Business Association NGO
 CSR Organisation City
 Other (please specify) _____

Name of the organisation: Invensys plc

Address: Portland House, Bressenden Place City: London

State/province: N/A Zip/postal code: SW1E 5BF Country: United Kingdom

Telephone: +44(0)20 7834 3848 Fax: +44(0)20 7834 3879 Website:
www.invensys.com

Number of employees: 27,313 (direct)

Type of activities: Industrial automation, transportation and controls

Name and title of highest executive

Mr. Ulf Henriksson, Chief Executive

Name and title of contact person

Mr. Angel Alcala, Vice President Environment Health and Safety

Telephone: +44(0)20 7821 3710 Fax: +44(0)20 7834 3879 Email:
Angel.Alcala@invensys.com

Check if applicable: Subsidiary of _____

Sector (please highlight only one):

Aerospace & Aviation Automobiles & Auto Components

Company Information to the Global Compact
Please type or use print capitals

- | | | | |
|--------------------------|---------------------------------|-------------------------------------|--|
| <input type="checkbox"/> | Agriculture | <input type="checkbox"/> | Metals & Mining |
| <input type="checkbox"/> | Chemical | <input type="checkbox"/> | Oil and Gas |
| <input type="checkbox"/> | Commercial Services & Supplies | <input type="checkbox"/> | Professional, Scientific and
Technical Services |
| <input type="checkbox"/> | Commerce & Distribution | <input type="checkbox"/> | Pharmaceutical & Biotechnology |
| <input type="checkbox"/> | Construction & Engineering | <input type="checkbox"/> | Paper & Forest Product |
| <input type="checkbox"/> | Containers & Packaging | <input type="checkbox"/> | Personal Care & Household
Products |
| <input type="checkbox"/> | Construction Materials | <input type="checkbox"/> | Real Estate |
| <input type="checkbox"/> | Education | <input type="checkbox"/> | Technology Hardware & Electrical
Equipment |
| <input type="checkbox"/> | Finance & Insurance | <input type="checkbox"/> | Textile, Apparel & Luxury Good |
| <input type="checkbox"/> | Health Care Services & Supplies | <input type="checkbox"/> | Transportation & Storage |
| <input type="checkbox"/> | Food & Drink | <input type="checkbox"/> | Telecommunication |
| <input type="checkbox"/> | Industrial Conglomerates | <input type="checkbox"/> | Tourism and Leisure |
| <input type="checkbox"/> | Internet & E-commerce | <input type="checkbox"/> | Utilities |
| <input type="checkbox"/> | IT Consulting & Software | <input checked="" type="checkbox"/> | Other |
| <input type="checkbox"/> | Leisure Equipment & Products | | |
| <input type="checkbox"/> | Machinery | | |
| <input type="checkbox"/> | Media & Communications | | |

If 'Other' please specify _____Engineering &
Technology_____

Communication on Progress

Year: 2007

STATEMENT

Being a good corporate citizen is an integral part of our business strategy and corporate culture. The values of sustainable development and corporate responsibility are embraced at all levels within our company. As a member of the Global Compact, we believe that our business policies and practices support and embody the ten principles. Our Chief Executive, Leadership Team, and Board of Directors fully support all aspects of our business operations as we work towards our sustainability goals.

By supporting the United Nations Global Compact, we intend to take a proactive stance on human rights, labour rights, the environment and the fight against bribery and corruption. In our 2007 annual report, we highlight the ongoing progress we have made against these principles. We will continue to report on our progress in future annual reports and corporate communications. Here we provide an index to our performance with cross-references to the related Global Compact principles. More information and data are available throughout our annual report (www.invensys.com) and in our Code of Conduct.



Angel Alcala

VP Environment, Health and Safety

Contact: Angel Alcala

Email: angel.alcala@invensys.com **Phone:** +44 (0) 207 821 3710

Fax: +44(0) 207 834 3879

	<p align="center">Summary of Action Taken & Impact Achieved</p>	<p align="center">Pages in 2007 Annual Report</p>
<p>Global Compact Principle</p> <p>1: Businesses should support and respect the protection of internationally proclaimed human rights;</p> <p align="right"><input type="checkbox"/></p>	<p>Respect for human rights is embedded in the core values and culture of the organization. We subscribe to the United Nations Universal Declaration of Human Rights (UDHR) through the Invensys Code of Conduct where we have pledged to support certain overarching principles, including:</p> <ul style="list-style-type: none"> • Support and respect for the protection of international human rights • Avoidance of any complicity in human rights abuses <p>The Company's commitment to human rights means we all have a duty to respect human dignity, safety, health and security. We are making progress to improve working conditions in consultation with the workers and their representatives, and we are developing robust health and safety management systems. We also respect existing national laws in the countries where we operate, and evaluate our compliance against such laws.</p> <p>The Invensys Code of Conduct reflects our pledge to support and respect the protection of internationally proclaimed human rights. More than 95% of Invensys employees globally have completed Code of Conduct training. The Invensys Helpline also provides a mechanism for employees to raise a concern or report a violation of the Code. The Code of Conduct is available for review on Invensys web site at: http://www.invensys.com/cg/default.asp?top_nav_id=14&nav_id=14</p>	<p>Page 37, 40</p>
<p>2: and make sure that they are not complicit in human rights abuses.</p> <p align="right"><input type="checkbox"/></p>	<p>The Invensys Code of Conduct and Corporate Compliance Program supports our efforts to communicate our commitment that our employees and suppliers are not engaged in human rights abuses. Through the Code and associated training program, we endeavor to avoid complicity in human rights. Our actions seek to avoid 1) knowingly assisting a state in violating human rights 2) any benefits from human rights abuses committed by someone else and 3) failing to raise the question of systematic or continuous human rights violations in our interactions with the appropriate authorities.</p>	<p>Page 37, 40</p>

<input type="checkbox"/>	<p>3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;</p>	<p>Invensys respects the right of workers to join associations of their own choice and does not interfere in an employee's decision to associate, or discriminate against the employee or a representative of the employee. We work in good faith with employees and their organizations within a voluntary process to determine terms and conditions of work and the regulation.</p> <p>The Invensys Code of Conduct and Corporate Compliance Program supports using mutual dialogue and negotiation to achieve our business objectives.</p>	<p>Page 37, 40</p>
<input type="checkbox"/>	<p>4: the elimination of all forms of forced and compulsory labor;</p>	<p>The Invensys Code of Conduct prohibits all forms of forced and compulsory labor within Invensys and among its contractors and suppliers. Contract laborers who work in our facilities also meet these standards. Forced and compulsory labor is not a concern within our business sector.</p>	<p>Page 37</p>
<input type="checkbox"/>	<p>5: the effective abolition of child labor;</p>	<p>The Invensys Code of Conduct prohibits the employment of children or persons below the statutory minimum age in the workplace. The company is committed to work proactively with others – including suppliers – to eliminate these abuses in the labor markets related to our business supply chain. Contract laborers who work in our facilities also meet these standards.</p>	<p>Page 37</p>
<input type="checkbox"/>	<p>6: and the elimination of discrimination in respect of employment and occupation.</p>	<p>Fairness and equal opportunity are embedded within our company culture. The Invensys Code of Conduct states that is contrary to company policy to engage in employment discrimination and harassment. We provide equal opportunity to all employees on the basis of their skills and suitability for the work to be performed. We have formalized programs in place for fair recruitment, performance review and advancement for all employees.</p>	<p>Page 37, 40</p>
<input type="checkbox"/>	<p>7: Businesses should support a precautionary approach to environmental challenges;</p>	<p>Invensys strives to conduct its business in an environmentally sustainable manner and continues to mitigate our ecological footprint. The Invensys EHS policy states that we will employ techniques to minimize environmental impacts of operations. The Invensys Code of Conduct promotes our shared commitment to reducing the environmental impact of our activities and promoting the sustainability of the natural resources. In all aspects of our operations, we strive to take early action to ensure that irreversible environmental damage does not occur. We have established formal internal programs such as the Environmental Health and Safety (EHS) Compliance Assurance Verification Program to identify potential EHS impacts and implement advanced corrective actions. We have formally established a goal of eliminating all chlorinated solvent use from our operations by the end of 2007. For those areas where environmental impacts have occurred historically, we have a committed process of restoring the soil and water back to beneficial use. We also review the potential environmental and community impacts for all new or relocated operations.</p>	<p>Page 37-39</p>

<p>8: undertake initiatives to promote greater environmental responsibility;</p>	<p>We measure, track, and report progress in incorporating sustainability principles into business practices, including reporting against globally recognized environmental key performance indicators. Through our internal Environmental Performance Questionnaire program, we collect data such as CO2 emissions, water consumption, hazardous waste and non-hazardous waste generation from our primary operating locations. Although we have not set targets as our manufacturing base continues to change due to restructuring activities, we intend to do so in the near future. At a local level we continuously seek to identify opportunities for improving energy efficiency, reducing emissions and obtaining energy from renewable sources.</p> <p>We promote and communicate our environmental performance by participating in recognized surveys such as the Carbon Disclosure Project (CDP5) Greenhouse Gas Emissions Questionnaire and Ethical Investment Research Services (EIRIS) Survey.</p> <p>The Invensys Code of Conduct establishes the expectation that all employees are responsible for ensuring that our actions are protective of the environment, and provides mechanisms for notification and resolution on environmental concerns.</p> <p>We have established 2 environmental metrics (environmental releases and environmental citations) that are reported and reviewed at each board meeting (10 times per year). Our EHS Compliance Assurance Verification Program and Management Representation Questionnaire provide both visibility and communication avenues for environmental issues with senior management. In 2007, we launched EHS Induction training for all employees to promote and establish expectations associated with safe and healthy work practices as well as environmental responsibility.</p>	<p>Page 37-39</p>
<p>9: and encourage the development and diffusion of environmentally friendly technologies.</p>	<p>At Invensys, sustainable development lies at the core of many of our businesses. We seek to help our customers improve the reliability, consistency and efficiency of both their businesses and products. We provide highly engineered control solutions for major manufacturers of appliances such as ovens, washing machines and refrigerators that increase operating efficiency and reduce energy consumption. As the result of our efforts, we have been awarded the prestigious Energy Star Label by the United States Environmental Protection Agency (EPA). We also work with customers to improve the efficiencies of their operations while at the same time reducing harmful greenhouse gas emissions. For example, we engineer control and software systems that help major public utilities optimize their operations and reduce</p>	<p>Page 37-39</p>

	<p>nitrogen oxide (NOx) and sulfur dioxide (SO2) emissions.</p> <p>Within our own operations, we have formalized programs such as lean manufacturing, 6 sigma, and 5s to minimize waste and increase efficiency. In 2006, we made progress in reducing our CO2 emissions and our hazardous waste generation, and we have increased our energy consumption from renewable resources.</p> <p>The Invensys Code of Conduct also supports environmental sustainability by requiring that employees notify management of potential environmental issues and offer ideas for continuous performance improvement</p>	
<p><input type="checkbox"/> 10: Businesses should work against all forms of corruption, including extortion and bribery.</p>	<p>The Invensys Code of Conduct strictly prohibits direct and 3rd party bribes and kickbacks for the purpose of obtaining or retaining business or to gain an improper advantage. Invensys does not make or condone the making of corporate donations to political parties or candidates, and does not allow the use company time, property or equipment for personal political activities.</p> <p>Invensys has a distributed policy on the appointment of agents and distributors, and procedures which are being rolled out across the enterprise. In 2006, we made significant progress in this area through a formalized program to review and re-establish all agent agreements in compliance with this policy.</p>	<p>Page 37</p>