



Invensys plc
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28 August 2009

Secretary-General
United Nations
New York, NY 10017
USA

Dear Mr. 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.

Sincerely yours,

A handwritten signature in black ink, appearing to be "Ulf Henriksson", written over a horizontal line.

Ulf Henriksson
Chief Executive

Enclosure: Invensys plc Information Sheet

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



Communication on Progress

Year: 2009

STATEMENT OF CONTINUED SUPPORT

Being a good corporate citizen is an integral part of our business strategy and corporate culture. As we continue our journey to create a high performing, sustainable and cohesive business, we have recognized the need to look at how we manage social and environmental performance to ensure that we address economic success whilst balancing profitability and meeting customer and market expectations. We believe that sustainability is part of our core business offering because we apply our technologies to help our customers increase productivity, reduce waste, improve efficiencies and reduce the impact on the environment and communities. In doing so, we enable our customers to improve the economic success of their business. We also believe that the values of sustainability and corporate responsibility are embraced at all levels within our company. Our Chief Executive, the Executive Leadership Team, and Board of Directors fully support all aspects of our business operations as we work towards our sustainability goals.

In 2008, we strengthened our commitment to support the well-being of our employees, our communities and our environment by formally integrating sustainability into the Environmental, Health, Safety & Sustainability (EHS&S) function. We convened several sustainability workshops, deployed further training on sustainability and Code of Conduct, and established a Sustainability Policy. We continue to take a proactive stance on human rights, labor rights, the environment and the fight against bribery and corruption. We believe that our commitment, business policies and practices support and embody the ten principles of the United Nations Global Compact.

In our 2008 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 external 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, our Code of Conduct, and our corporate website (www.invensys.com).



Angel Alcala

Senior Vice President, Environmental
Health Safety & Sustainability

28 August 2009

Contact: Angel Alcala

Email: angel.alcala@invensys.com **Phone:** +1 (469) 365-6773

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: 20,529 (direct)

Type of activities: Global technology, 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, Senior Vice President Environment, Health, Safety and Sustainability

Telephone: +1 (469) 365-6773 Email: Angel.Alcala@invensys.com

Check if applicable: Subsidiary of _____

Sector (please highlight only one):

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

If 'Other' please specify _____ Technology _____

Global Compact Principle	Summary of Action Taken & Impact Achieved	Pages in 2009 Annual Report (AR) and/or Sustainability Report (SR)
1: Businesses should support and respect the protection of internationally proclaimed human rights;		Pages 22-24 (AR) Pages 29, 30 (SR)
<input type="checkbox"/>	<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>We continue to respect and support the principles of the European Convention on Human Rights and other equivalent legislation by ensuring we comply with the labor laws of the countries in which we operate and by creating an inclusive culture for our employees, including men and women from different nations, cultures, ethnic groups, generations and backgrounds. We also respect existing national laws in the countries where we operate, and evaluate our compliance against such laws.</p> <p>As part of a review process of our Compliance Programme and in line with our new Invensys brand and positioning, the Code of Conduct was reviewed and redesigned in 2009 and is available on our web site (http://www.invensys.com/Sustainability/CodeofConduct.asp). A new and expanded training to accompany the new Code of Conduct is available to all employees, accompanied by dedicated training for selected employee groups in areas of legal compliance. The training programme will help our employees to understand their rights and obligations as employees of Invensys, and to be aware of situations where caution needs to be exercised in their work.</p> <p>The Company's commitment to human rights means we all have a duty to respect human dignity, safety, health and security. We continue to make progress to improve working conditions for all Invensys employees in consultation with the workers and their representatives, and we continue to develop robust health and safety management systems. Our Environmental, Health and Safety (EHS) Policy outlines our commitment to doing business without harming people or the environment. Our Environmental Health Safety and Sustainability (EHS&S) Induction Training has been completed by all Invensys employees, temporary workers and contractors in order to stress the importance of safety to our organization and raise awareness. We also make a variety of EHS&S training modules ranging from travel safety and security to office ergonomics available to all employees. Our EHS&S management system includes 10 EHS&S standards which outline the requirements for our major operating locations to manage and continuously improve its EHS&S</p>	

	<p>programs, processes, and functions.</p> <p>We continued to promote wellness programmes in an effort to improve the overall health and well-being of our employees. Approximately 97% of our major locations offer wellness programmes with an average of four programmes per site. The most common wellness programmes offered include, medical tests, local gym access, and healthy lifestyle information. Where appropriate, we also provide onsite health support, vaccinations and family planning support.</p>
	<p>2: and make sure that they are not complicit in human rights abuses</p> <p style="text-align: right;">Pages 22-24 (AR)</p> <p style="text-align: right;">Pages 29, 30 (SR)</p>
<p><input type="checkbox"/></p>	<p>The Invensys Code of Conduct and Corporate Compliance Programme supports our efforts to communicate our commitment that our employees and suppliers are not engaged in human rights abuses. Through the new Code (available on our web site http://www.invensys.com/Sustainability/CodeofConduct.asp) and associated training program, we endeavor to avoid complicity in human rights abuses. 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. All Invensys employees are required to complete the Code of Conduct training and we audit our training records to ensure compliance with this policy.</p> <p>Each of the constituent businesses of Invensys has a Compliance Officer, identified by the Code of Conduct training as a point of contact for compliance issues where it is inappropriate or unwelcome to report directly to one's line manager or HR function.</p> <p>The Invensys Helpline is operated by an independent company and is publicized to employees via the Invensys Code of Conduct. As part of the new Global Compliance Programme the helpline is being more heavily promoted across the Group and made more accessible for employees. Any investigations are undertaken by the VP Global Compliance and any material investigations are brought to the immediate attention of the Audit Committee which determines appropriate follow-up actions. Statistics on the volume and general nature of calls are reported annually to the Audit Committee and the Board. In addition, staff can raise concerns through other means such as electronic or postal mail sent to the Board or management, which correspondence is investigated in the same manner as concerns raised through the helpline Invensys has a firm policy against retaliation for raising a good-faith concern under the Code.</p> <p>Additionally all Invensys business leaders are required to certify annually through a Management Representation Letter (MRL) that their business units are in compliance with the Code of Conduct, including an explicit certification on compliance with laws and regulations related to human rights, child labor and forced labor.</p>

	<p>3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;</p>	<p>Pages 24, 25 (AR)</p>
<p><input type="checkbox"/></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. The Invensys Code of Conduct and Corporate Compliance Programme supports using mutual dialogue and negotiation to achieve our business objectives.</p> <p>The Invensys European Employees Forum, with elected employee representatives, promotes dialogue with management. We communicate with our employees globally through local communications networks, town hall meetings, 'skip level' meetings and employee newsletters, webchats and blogs.</p> <p>In 2008, we launched our Invensys Employee Engagement Survey globally, increasing our cross-Invensys communication opportunities, so we can hear ideas, suggestions and feedback from as many employees as possible. Business and functional teams have been working to implement action plans they created in response to Survey feedback.</p> <p>In 2009, leaders are reporting on their progress against action plan commitments during Invensys deep dive reviews with the Chief Executive, sharing success stories and lessons learnt. The goal is to increase employee engagement and spread best practices across businesses and geographies.</p> <p>Our supplier qualification programme includes a Supplier Profile and Self Assessment Questionnaire which must be completed by our largest suppliers. Suppliers are ranked and evaluated on a variety of criteria including Worker Association.</p>	
	<p>4: the elimination of all forms of forced and compulsory labor;</p>	<p>Pages 22-24 (AR) Pages 9, 10, 29, 30 (SR)</p>
<p><input type="checkbox"/></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 primary concern within our business sector.</p> <p>All Invensys business leaders are required to certify annually through a Management Representation Letter (MRL) that their business units are in compliance with the Code of Conduct, including an explicit certification on compliance with laws and regulations related to human rights, child labor and forced labor.</p>	

	<p>Our supplier qualification programme includes a Supplier Profile and Self Assessment Questionnaire which must be completed by our largest suppliers. Suppliers are ranked and evaluated on a variety of criteria including Forced Labor and Hours & Wages.</p>
	<p>5: the effective abolition of child labor;</p> <p style="text-align: right;">Pages 22-24 (AR) Pages 9, 10, 29, 30 (SR)</p>
<p><input type="checkbox"/></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>All Invensys business leaders are required to certify annually through a Management Representation Letter (MRL) that their business units are in compliance with the Code of Conduct, including an explicit certification on compliance with laws and regulations related to human rights, child labor and forced labor.</p> <p>Our supplier qualification programme includes a Supplier Profile and Self Assessment Questionnaire which must be completed by our largest suppliers. Suppliers are ranked and evaluated on a variety of criteria including Employee Minimum Age.</p>
	<p>6: and the elimination of discrimination in respect of employment and occupation.</p> <p style="text-align: right;">Pages 22-24 (AR) Pages 9, 10, 29, 30 (SR)</p>
<p><input type="checkbox"/></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>The Invensys Values (innovation, agility, integrity, meritocracy and courage) have been deployed globally through workshops, communications, contests and employee training. At Invensys, meritocracy means that we develop, evaluate and recognize high performing ability and achievement. We judge each other based on what we have done and our commitment to what we will do.</p> <p>Each of the constituent businesses of Invensys has a Compliance Officer, identified by the Code of Conduct training as a point of contact for compliance issues where it is inappropriate or unwelcome to report directly to one's line manager or HR function. Our corporate VP, Global Compliance has the responsibility for implementing programs to ensure compliance with the various laws, policies and standards governing the Group's business. The Invensys Helpline is operated by an independent company, and is publicized to employees via the</p>

Invensys Code of Conduct. As part of the new Global Compliance Programme the helpline is being more heavily promoted across the Group and made more accessible for employees. Any investigations are undertaken by the VP Global Compliance and any material investigations are brought to the immediate attention of the Audit Committee which determines appropriate follow-up actions. Statistics on the volume and general nature of calls are reported annually to the Audit Committee and the Board. In addition, staff can raise concerns through other means such as electronic or postal mail sent to the Board or management, which correspondence is investigated in the same manner as concerns raised through the helpline. Invensys has a firm policy against retaliation for raising a good-faith concern under the Code.

We respect and support the principles of the European Convention on Human Rights and other equivalent legislation by ensuring we comply with the labor laws of the countries in which we operate and by creating an inclusive culture for our employees, including men and women from different nations, cultures, ethnic groups, generations and backgrounds. We also respect existing national laws in the countries where we operate, and evaluate our compliance against such laws. We have in place local policies and procedures which set out our commitment to create an environment where our employees can work without concerns that they will not be treated appropriately as a result of their gender, marital status, sexual orientation, color, religion, race, nationality, ethnic origin, age or disability.

All Invensys business leaders are required to certify annually through a Management Representation Letter (MRL) that their business units are in compliance with the Code of Conduct, including an explicit certification on compliance with laws and regulations related to fairness, equal opportunity and harassment.

Our supplier qualification programme includes a Supplier Profile and Self Assessment Questionnaire which must be completed by our largest suppliers. Suppliers are ranked and evaluated on a variety of criteria including indication of discriminatory practices.

	<p>7: Businesses should support a precautionary approach to environmental challenges</p>	<p>Pages 22-24 (AR) Sustainability Report (All)</p>
<p><input type="checkbox"/></p>	<p>Invensys strives to conduct its business in an environmentally sustainable manner and continues to mitigate our environmental 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. The Invensys Sustainability Policy states that we will reduce our environmental footprint by managing and minimizing waste, and efficiently using energy, water and other resources. We promote recycling and minimization of hazardous substances in our processes/products. We also mitigate and repair environmental impacts from past handling and disposal practices through a formal remediation process to restore the soil and water back to beneficial use. We review the potential environmental and community impacts for all new or relocated operations. In all aspects of our operations, we strive to take early action to ensure that irreversible environmental damage does not occur.</p> <p>We have formal internal programs such as the Environmental Health Safety and Sustainability (EHS&S) Compliance Assurance Verification Programme to identify potential EHS impacts and implement advanced corrective actions. An independent and external organization performs an average of 20 EHS compliance audits annually to evaluate our performance against legal requirements. Senior managers provide a commitment letter that outlines the corrective actions and timeframes for closing out the findings and all compliance findings and corrective actions are tracked until closure is achieved. The goal of the EHS Compliance Assurance Verification Programme is to ensure compliance with laws and regulations, and also to address any potential challenges before they impact the environment.</p> <p>Our EHS&S management system includes 10 EHS standards which outline the requirements for our major operating locations to manage and continuously improve its EHS&S programs, processes, and functions. Two EHS&S standards, Environmental Management and Waste Minimization, explicitly address the precautionary approach to environmental challenges. We continue to eliminate the use of hazardous materials and successfully eliminated the use of all chlorinated solvents in our operations in 2008 and we continue to remove lead from our products.</p>	

	8: undertake initiatives to promote greater environmental responsibility	Pages 22-24 (AR) Sustainability Report (All)
<input type="checkbox"/>	<p>Sustainability is at the heart of our business in a way that it connects with our employees, our products and services, our operations, our customers, our communities and the environment. Environmental responsibility is a major component of our sustainability strategy.</p> <p>Our Sustainability Policy outlines our commitment in the following areas:</p> <ul style="list-style-type: none"> • Reducing our environmental footprint – We manage and reduce waste, and efficiently use energy, water and other resources. We promote recycling and minimization of hazardous substances in our processes/products • Designing our products and services in a sustainable fashion – We minimize environmental impacts and resource consumption for new and existing products and services. • Delivering offerings that improve the efficiencies of our customers - We offer a diverse portfolio of products, services and solutions that help our customers increase productivity, operate efficiently, reduce waste and operate in a sustainable manner. We invest in technology and engineering capabilities in order to address the resource improvement needs of our customers. • Supporting the well being of our employees and communities – We promote awareness of sustainability issues among all employees. We commit to creating a safe and environmentally responsible workplace. We invest time and resources in our local communities. We encourage and support employees to contribute individual skills for community benefit. • Mitigating and repairing environmental impact – We take all possible steps to prevent environmental damage from existing operations and address the impact from past handling and disposal practices. • Enhancing the sustainability performance of our suppliers – We measure and evaluate supplier sustainability performance and ensure that they adhere to common social and environmental standards. • Measuring and communicating our sustainable performance – We publicly and transparently share our goals, achievements and opportunities for further improvement with employees, customers, investors and government bodies; we measure our progress, establish goals and drive for continuous improvement. <p>These elements are integrated into the business strategies in order to make a positive impact on Invensys, our communities and the world.</p> <p>We measure, track, and report progress in incorporating sustainability principles into business practices, including reporting against globally recognized environmental key performance indicators (KPIs). We extended our Environmental Performance Questionnaire (EPQ) for a seventh consecutive year and collected environmental data from 42 major locations. In 2009, we exceeded a 5% reduction target that was set in 2008 for the following environmental KPIs for our major locations and set a goal to achieve another 5% reduction in 2010:</p> <ul style="list-style-type: none"> • total energy use (KWh); • total CO2 emissions (kg); • total water consumption (m3); 	

- total non-hazardous wastes (kg); and
- total hazardous wastes (kg).

Progress on these KPIs are required to be reported each month and integrated into each business' overall performance metrics. At an operational level, we continuously seek to identify opportunities for improving energy efficiency, reducing emissions and obtaining energy from renewable sources. Over the last year, we measured our CO2 contributions associated with business-related travel and our major office locations.

We also have environmental metrics, number of environmental releases and number of environmental citations, that are reported and reviewed at each board meeting (10 times per year). Our EHS&S Compliance Assurance Verification Program, Management Representation Letter and monthly operations reviews provide both visibility and communication avenues for environmental issues with senior management.

We have also focused on employee training to promote environmental responsibility. Our Code of Conduct addresses environmental responsibility and a specific EHS&S compliance training module for the Code was released in 2008 and updated in 2009. Our EHS&S Induction training promotes and establishes expectations associated with safe and healthy work practices as well as environmental responsibility.

Our Sustainability Awareness Training programme ensures that all employees are aware of the importance of incorporating sustainable practices and values such as waste reduction, resource conservation and health and safety principles into daily work habits. Last year 20,043 employees (98%) participated in sustainability awareness training.

We have a dedicated EHS&S intranet site where employees can obtain information on supporting environmental responsibility and share best practices for natural resource usage and reduction.

We promote and communicate our environmental performance in a transparent manner by publishing a Sustainability Report and participating in recognized surveys such as the Carbon Disclosure Project (CDP) Questionnaire, Ethical Investment Research Services (EIRIS) Survey/FTSE4Good and Dow Jones Sustainability Index (DJSI)/SAM Survey.

Our supplier qualification programme includes a Supplier Profile and Self Assessment Questionnaire which must be completed by our largest suppliers. Suppliers are ranked and evaluated on a variety of environmental criteria including Eco-Efficiency Benchmarking, Life Cycle Analysis with respect to Eco-Efficiency, Energy Efficiency, Eco-Costs, Waste (Hazardous & non-Hazardous) Management & Minimization, and Water use & conservation.

In 2009, we launched our first Sustainability Survey to gauge employee understanding of sustainability concepts and commitment to sustainability actions. Approximately 8,100 Invensys employees responded and there was proportionate representation from each Business Group and each global region. Of employees responding, 74% agreed that Invensys conducts business in a responsible manner

	<p>with respect to social, environmental and ethical issues (20% remained neutral on the statement). At our annual Invensys Annual Leadership Meeting, several awards were granted to teams within the various businesses, including an Innovation Award to the IPS team for work done as part of the ExxonMobil project which included automation and efficiency improvements and emissions reductions.</p>	
	<p>9: and encourage the development and diffusion of environmentally friendly technologies</p>	<p>Page 4, 22 (AR) Pages 9-11 (SR)</p>
<p><input type="checkbox"/></p>	<p>Our EHS&S philosophy with regard to our responsibility to provide products, services and ongoing support in a sustainable manner. In a world increasingly focused on the efficient use of resources driven social, economic and environmental concerns, our offerings allow customers to improve productivity and reduce waste. We seek to help our customers improve the reliability, consistency and efficiency of both their businesses and products.</p> <p>Invensys has 3 divisions, all of which provide products and solutions to carbon intensive industries and support the reduction of GHG emissions for our customers. Invensys Operations Management (consisting of Process Systems, Wonderware and Eurotherm) serves the oil & gas, petrochemical, nuclear, energy and manufacturing industries where it designs, manufactures, installs, tests and commissions software and computer-based hardware for the automation and regulation of operations, the management of certain administrative functions of manufacturing businesses, and the simulation of manufacturing process operations. The Energy Management group targets energy (and GHG) improvement projects for large industrial customers. Products such as Eurotherm's EPower assist national energy utilities with predictive load management which reduces energy consumption and greenhouse gas generation. Wonderware's Facility Management System helps regulate energy consumption at some of the world's largest complexes. Invensys Rail is a multinational leader in delivering state-of-the-art railway control and communication solutions for the Rail industry. Rail transportation is more carbon efficient than road or air travel, and Invensys Rail offers a variety of solutions to improve this carbon efficiency. Invensys Rail provides energy efficient driving profiles that can be calculated based on track features, and the speed and acceleration of a train. Driving recommendations can then be sent wirelessly to the train, helping the driver to conserve energy. Energy savings (and hence carbon dioxide reduction) of 7% are estimated from energy efficient driving. Invensys Controls provides quality products and services to HVAC, refrigeration, safety, water heating, food equipment and transportation industries across residential and commercial markets. They manufacture a vast array of products encompassing smoke and carbon monoxide alarms, thermostats, valves, zone controls, timers, electronic components, commercial control systems.</p> <p>We are working to improve the environmental impact of our products life cycles by developing baseline of environmental/sustainability footprint of our largest products of each business.</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>10: Businesses should work against all forms of corruption, including extortion and bribery.</p>	<p>Pages 22-24 (AR)</p> <p>Pages 9, 10, 29, 30 (SR)</p> <p>Web Site: http://www.invensys.com/aboutus/default.asp?top_nav_id=1&nav_id=129&prev_id=1</p>
<p><input type="checkbox"/></p>	<p>Invensys is committed to achieving our business goals legitimately and we require employees to obey all relevant laws. 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. The prohibition applies to bribes made directly or through third parties, including attorneys, agents, consultants, advisors, suppliers, and customers. To educate our employees on this important issue, training on avoiding bribery and corruption has been delivered to all Invensys employees through our ongoing Corporate Compliance Programme.</p> <p>The Corporate Compliance Officer and the Audit Committee monitor our programs for countering bribery. We also have an affiliation with Trace International which helps keep us up to date on new requirements/issues and assist in the due diligence process so as to help avoid doing business with bribe payers. We have a procedure and due diligence reporting programme for working with agents in order to ensure that the proper compliance mechanisms are in place, and we review all agreements in accordance with the Delegation of Authority. Additionally, the Management Representation Letter, which includes a section on conduct and anti-bribery, is completed by all senior managers on a semi-annual basis in order to certify compliance with our process and procedures. The results of the Management Representation Letter are reviewed by both the Board and the Audit Committee as part of our ongoing governance and assurance processes</p> <p>Invensys has a policy of dismissal for any proven violations of anti-bribery policy. Failure to comply with the policy and procedure for appointing agents may result in disciplinary action up to including termination of employment.</p>	