





Sustainability Report

IMC Worldwide Ltd

November 2018

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Communicating this procedure document:

- IMC Intranet
- IMC Quality Management System overview
- IMC new starter Induction

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Abbreviations, Acronyms and Initialisms

Table 1- Abbreviations, Acronyms and Initialisms

CSR	Corporate Social Responsibility
EMS	Environmental Management System
ETI	Ethical Trading Initiative
ILO	International Labour Organisation
IMS	Integration Management System
ISO	International Standard Organisation
PSEA	Protection from sexual Exploitation and Abuse
RAID	Risk, Assumptions, Issues, Decisions
SDGs	Sustainable Development Goals
UNGC	United Nations Global Compact
YCDC	Yangon City Development Committee

A message from our Managing Director



I am pleased to present IMC Worldwide's first Sustainability Report for the year November 2017 to November 2018.

This report communicates our progress as members of the United Nations Global Compact (UNCG) and also sets out targets for the year ahead.

I am pleased to confirm that IMC Worldwide supports the Ten Principles of the UNCG on human rights, labour, environment and anti-corruption. We are committed to making the UNCG and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals. IMC Worldwide will make a clear statement of this commitment to our stakeholders and the general public.

We recognise that a key requirement for participation in the UNCG is the annual submission of a Communication on Progress (COP) that describes our company's efforts to implement the Ten Principles. This Sustainability Report stands as our COP and will be uploaded to the UNCG website as per the requirements.

In line with our company values, we support public accountability and transparency, and therefore commit to report on progress annually according to the UNCG COP policy.



Gavin English

Managing Director

26th November 2018

Introduction

OUR APPROACH

IMC is a member of the UNGC. Since joining in 2018, IMC has been looking at how we can use the UNGC as a framework for our sustainability efforts and reporting. IMC has taken the UNGC Principles¹ as a structure for this report. The Principles are:

1 Human Rights

[Principle 1](#): Businesses should support and respect the protection of internationally proclaimed human rights; and

[Principle 2](#): make sure that they are not complicit in human rights abuses.

2 Labour

[Principle 3](#): Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

[Principle 4](#): the elimination of all forms of forced and compulsory labour;

[Principle 5](#): the effective abolition of child labour; and

[Principle 6](#): the elimination of discrimination in respect of employment and occupation.

3 Environment

[Principle 7](#): Businesses should support a precautionary approach to environmental challenges;

[Principle 8](#): undertake initiatives to promote greater environmental responsibility; and

[Principle 9](#): encourage the development and diffusion of environmentally friendly technologies.

4 Anti-Corruption

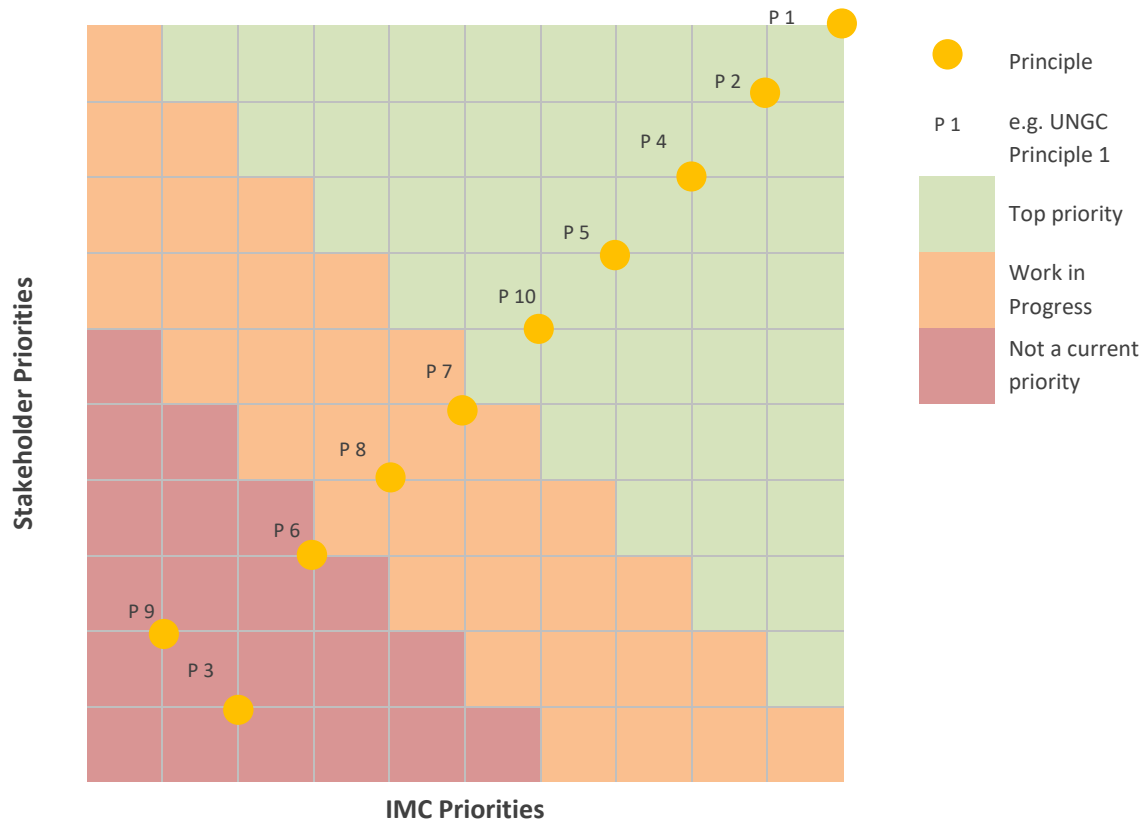
[Principle 10](#): Businesses should work against corruption in all its forms, including extortion and bribery.

Using the four pillars (Human Rights, Labour, Environment, Anti-Corruption) this report summarises the issues or relevance to IMC's work then discusses IMC's achievements and targets for next year.

¹ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

MATERIALITY

Earlier in the year we undertook a materiality exercise to prioritise the UNGC Principles for IMC. We plotted IMC's priorities against our stakeholders' priorities. We then categorised the priorities as follows:



Top priorities for IMC and Stakeholders:

- Businesses should support and respect the protection of internationally proclaimed human rights
- Make sure that they are not complicit in human rights abuses
- The elimination of all forms of forced and compulsory labour
- The effective abolition of child labour
- Businesses should work against corruption in all its forms, including extortion and bribery

What IMC can report on and is Work in Progress:

- Businesses should support a precautionary approach to environmental challenges
- The elimination of discrimination in respect of employment and occupation
- Undertake initiatives to promote greater environmental responsibility

What is currently not an IMC priority and will be looked at in the future:

- Encourage the development and diffusion of environmentally friendly technologies
- Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

Human Rights



Figure 1 - Human Rights Pillar progress (percentage)

United Nations Global Compact Principles

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
Principle 2: make sure that they are not complicit in human rights abuses.

SDG's related to material issues covered in this section



IMC Worldwide is committed to protecting, securing and promoting human rights across our work. Our values are integral to the business and guides all the work we do. One of our values is 'Integrity'. We have a steadfast adherence to a strict moral and ethical code. We bring honesty and sincerity to our work, which includes championing for human rights, and not accepting anything less. We do this both through the dedication to the Modern Slavery act, and through zero tolerance on in-country projects.

ANTI-SLAVERY AND HUMAN TRAFFICKING

We have 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. IMC Worldwide established a "Anti-Slavery and Human Trafficking Policy" in November 2017. The policy establishes the company's commitment to ethical behaviour in the following ways;

- 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.

DUE DILIGENCE

At IMC, we undertake due diligence on all potential collaborators. Due diligence is a process of checks including technical competency, ethical approach and attitude that is carried out to help us make an informed decision about partners, suppliers and Consultants that we work with. The process requires completion of a questionnaire filled by the potential partner, which is checked by IMC before further checks are undertaken. These checks include internet searches and World-Check. The World-Check database is part of the Thomson Reuters Risk Management Solutions suite, and contains a list of Politically Exposed Persons (PEPs) and heightened risk individuals and organisations. The database is used around the world to help to identify and manage financial, regulatory and reputational risk.

Undertaking these due diligence checks is our first level of assurance that we only engage with ethical and morally responsible partners and individuals.

WHISTLEBLOWING

IMC believes strongly in accountability, transparency and respect for individuals. All employees, and programme personnel, company Directors, and third parties are encouraged to raise genuine concerns about possible misconduct in our operations, whether in matters of financial reporting or in any other matter not specifically addressed in our other policies. This is particularly important when the possible misconduct may negatively impact the beneficiaries of IMC Worldwide.

Our Whistleblowing policy is designed to:

- Support the values and mission of IMC Worldwide.
- Ensure that employees, programme personnel, company Directors, and third parties can feel comfortable raising concerns without fear of retribution.
- Provide a transparent and confidential process for dealing with concerns including, but not limited to: financial transactions, financial reporting, fraud/corruption, bribery, blackmail, criminal offenses, failure to comply with legal or regulatory obligations; abuse, exploitation, endangering the health and safety of other individuals; endangering the environment; concealment of any of the foregoing concerns.

This policy extends to all IMC Worldwide activities and extends to programme personnel, company Directors and other partner and beneficiary organisations with which we work.

IMC Worldwide Modern Slavery and Human Trafficking Statement

For financial year end date December 31, 2017.

Introduction

IMC Worldwide Ltd (IMC) 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 worked towards eradicating the risk of modern slavery in our supply chains. We have become a member of the UN Global Compact and will be implementing processes to measure our own progress towards these goals, which include not being complicit in human rights abuses, the elimination of all forms of forced and compulsory labour and the effective abolition of child labour. To do this, we are working towards the guidance and principles of the Ethical Trading Initiative (ETI) and the International Labour Organisation (ILO).

We will continue to improve our processes and procedures to continuously combat such acts.

Our Business and Organisational Structure

IMC Worldwide is a UK-based leading, independent consulting company with over 50 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 Nepal, Pakistan and Bangladesh from which our largest projects in Asia are delivered. 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.

During 2017, IMC made progress to ensuring modern slavery can be eradicated in our supply chain in Nepal. The team has hired a Supply Chain Manager to look specifically into issues such as modern slavery. The specialist has created a series of tools to assist the project teams in identifying instances of modern slavery and developed a project checklist that can be used on project audits specifically related to modern slavery. Part of these tools and training is identifying the relevant bodies that incidents can be reported to, ensuring effective and efficient responses.

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 risk, 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 forwards 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, 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.

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.

In 2017, IMC has updated the project risk register tool which is to be completed at proposal stage, again during the start of a project, and updated continually throughout the lifespan of a project. The risk register provides scope for modern slavery to be added as a risk at several levels, including bonded labour, child labour, human trafficking and forced labour. The risk register requires mitigation measures to be included. A copy of the risk register is to be shared with the wider team, and all members are encouraged to input their concerns.

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 help combat modern slavery.

As outlined previously, IMC's Supply Chain Manager in Nepal is working to develop a toolkit and training to help those working in the country office to feel comfortable and confident in reporting instances of modern slavery. IMC hopes to trial this approach in Nepal, and from the feedback from the project team, develop a similar training for our other country offices.

IMC understands that modern slavery is not only a risk in the countries in which we work overseas, but also in the UK. As such, we are committed to encouraging our staff, independent consultants and partner organisations to read IMC's anti-slavery and human trafficking policy and understand their rights and the rights of those we work with.

As a company we are committed to continuous improvement and our target for 2018 will be to map where we have the greatest leverage to influence change in our supply chains, trial a training toolkit in Nepal, and develop this to be implemented elsewhere in the coming years.

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 2017.



Signed Gavin English

Managing Director

Date: 16/03/2018

Human Rights Targets

Achievements 2018	Targets 2019
Delivered our second Modern Slavery Act Statement.	Deliver our third Modern Slavery Act Statement, and continue to work to improve in all areas
Hired a Nepal based Supply Chain expert to ensure compliance in our Nepali project offices.	Complete the design of our Modern Slavery 'essentials' training.
Continued to work on our Modern Slavery Commitments.	Deliver Modern Slavery 'essentials' training to all permanent staff.
Anti-slavery and Human trafficking Policy now in standard Partner Contracts.	Institutionalise the training of all new starters moving forward.
Anti-slavery and Human trafficking Policy now in standard in Independent Consultant contracts.	Design and deliver specialist training for those designing and managing projects.
RAID Matrix for projects now includes prompts to consider modern-slavery risks.	

Labour

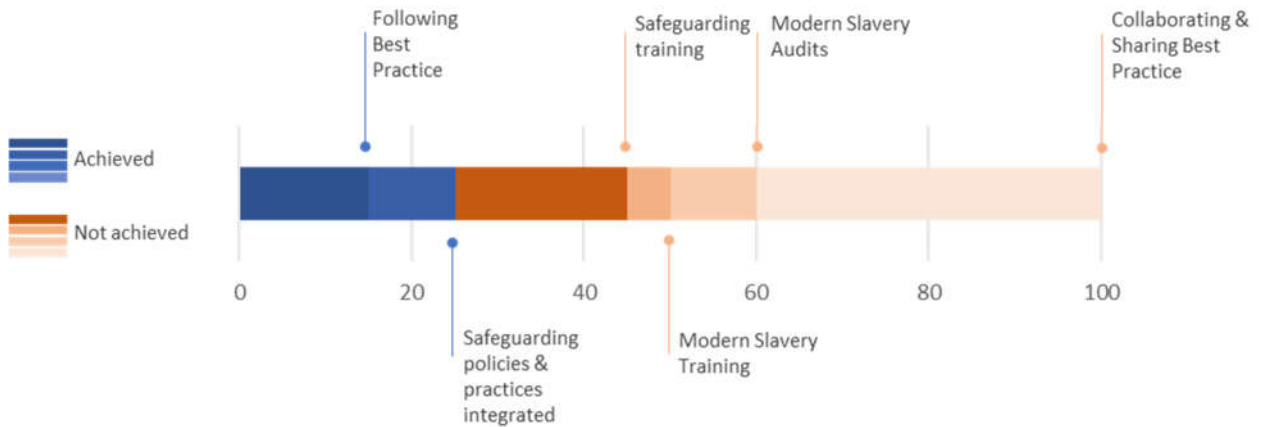


Figure 2 - Labour Pillar progress (percentage)

United Nations Global Compact Principles	<p>Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;</p> <p>Principle 4: the elimination of all forms of forced and compulsory labour;</p> <p>Principle 5: the effective abolition of child labour; and</p> <p>Principle 6: the elimination of discrimination in respect of employment and occupation.</p>
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SDG's related to material issues covered in this section

3 GOOD HEALTH AND WELL-BEING

8 DECENT WORK AND ECONOMIC GROWTH

10 REDUCED INEQUALITIES

IMC is committed to following best practice when upholding the rights of its workers; recognising that its people are its greatest asset. One of our core values is 'trust', and our endeavour to promote this in our working environment is evident in our agile and flexible working policy, which emphasises the importance of a work/life balance and allows considerations for those with younger children. Between April and May 2018, the North Wing in the UK head office in Redhill

underwent refurbishments with an aim of improving working conditions for members of staff. IMC also has a number of initiatives in its Redhill office to promote good health and wellbeing including, Sports and Social committee, walking group and mental health awareness week.

ETHICAL TRADING INITIATIVE

Although IMC are not currently members of the Ethical Trading Initiative (ETI), we are still committed to the principles and practices as set out in its base code. As a global business, we are particularly concerned with our actions towards better labour practices in our supply chains, and IMC's Business Ethics Policy highlights our duty to advocate and adhere to the core labour standards as defined in the ILO Declaration on Fundamental Principles and Rights at Work (1998), with our main aim being to eliminate forced, compulsorily and child labour; one of the key principles of the ETI base code.

IMC follows a zero-tolerance policy towards Modern Slavery and is committed to ensuring there is transparency throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015. We expect high standards in ethical practices from all of our contractors, suppliers and other business partners, and they must adhere to the IMC Business Ethics Policy. IMC has made progress to ensuring modern slavery is eradicated in our supply chains in Nepal, with a Supply Chain manager looking specifically into the issue of modern slavery. **To reinforce this, our next aim will be to implement modern slavery and child labour audits on all of our high-risk projects. We are also in the process of developing modern slavery training which will form part of the induction process for all individuals, contractors and suppliers and partners who work for any given project.**

IMC is dedicated to ensuring that no unlawful discrimination occurs against any persons and, as an Equal Opportunity Employer, follows an established policy of anti-discrimination. IMC recognises the benefit and is proud of its diverse workforce, and as a UK Visa Sponsor can provide two visa licences per year. We are currently working towards obtaining the Investors in People Standard, whereby our values and integrity will form a key part of the assessment process; we recently met the standards through an external assessment process for the Living the Organisations Values and Behaviours.

ETI Base Code:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practice
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

SAFEGUARDING AT IMC

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur. IMC adopts a zero-tolerance stance on exploitative and abusive relationships, with Protection from sexual Exploitation and Abuse (PSEA) and child protection coming under this umbrella term. Safeguarding applies consistently and without exception throughout all of our partners, projects and programmes.

Recently IMC produced its first Safeguarding Policy, which highlights our governing principles for both our employees, and partner and supplier employees, as well as independent consultants. The purpose of this policy is to protect those who come into contact with IMC employees or programme personnel, with a particular focus on children or at-risk adults. This Safeguarding policy complements our Business Ethics and Anti-Harassment and Bullying policies and has been put in place to ensure that IMC, as a business, is taking reasonable steps to prevent harm and to respond appropriately when that harm occurs. Whilst IMC is committed to promoting preventative measures against abuse and exploitation, it recognises that in some circumstances these instances may still occur and that any member of IMC programme personnel might receive a safeguarding report. We are currently in the process of developing essentials safeguarding training for all our employees and working with our programme teams to develop context specific training.

MANAGING RISK

IMC's RAID matrix is used to identify, analyse and prioritise risks and establish mitigation responses. It now includes mandatory identification of environmental and safeguarding risks.

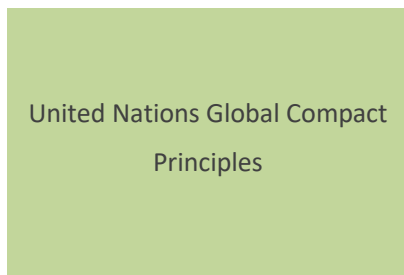
Labour Targets

Achievements 2018	Targets 2019
Office Refurbishments in the North Wing.	Obtain Investors in people Standard.
New Agile and Flexible Working Policy.	Modern Slavery and Child Labour audits on all high-risk projects.
Diversity and Equalities training for all new starters.	Modern Slavery training developed.
Strengthened contracts for Independent Consultants.	Safeguarding Investigation Procedures.
Published Safeguarding Policy and guidance document.	Safeguarding animation video.
RAID matrix now improved.	Implementation of safeguarding training.

Environment



Figure 3 - Environment Pillar progress (percentage)



Principle 7: Businesses should support a precautionary approach to environmental challenges;
 Principle 8: undertake initiatives to promote greater environmental responsibility; and
 Principle 9: encourage the development and diffusion of environmentally friendly technologies.



At IMC, we understand the importance of the environment, our environmental responsibilities and the need to meet, and proactively approach, the environmental challenges.

It is our vision to be an environmentally conscious and sustainable organization which can be trusted by our clients. It is our objective to carry out all measures reasonably practicable to continually improve performance to reduce environmental impacts. We continually update and improve our environmental performance and benchmark against the best-in-class to try to ensure we demonstrate leadership in this area.

We have identified seven objectives and targets that will help reduce our environmental impacts. These are:

UK Head Office EMS Principal Targets

1. Increase use of sustainable transport

2. Improve waste management by reducing waste to landfill
3. Reduce use of electricity and wastage of water

Procurement Targets

4. All major purchases (fridges, IT equipment, etc) purchased to have high environmental rating and are well maintained.
5. Purchase of services and products from environmentally aware suppliers (including paper, stationary/office equipment, catering).

Staff Awareness and Training Targets

6. Good awareness and compliance of EMS objectives within the company (UK) through delivery of regular internal training events.

Overseas Impact Targets

7. Monitoring annual level of flight carbon emissions, raising awareness of impacts and setting targets and encouraging ways to reduce project-related and non-project related flights.



We improve and manage our environment through our Environmental Management System (EMS) which is accredited to ISO14001:2015 and part of our wider Integrated Management System (IMS). Our commitment is set out in our [Environmental Policy](#); this demonstrates our environmental responsibility and sets out our vision in regard to managing the environmental challenges. Additionally, we are also beginning to integrate environment into our project management through our project risk assessments last year.



We are part of the [Paris Pledge for Action](#); committing ourselves to managing our climate and environmental footprint and recognising our responsibility to support the objectives of the Paris Agreement. As part of this we are undertaking monitoring and reduction of the carbon emissions associated with our flights.

What we are doing: We are promoting sustainable practices through encouraging walking, cycling or public transport to/from work and for business travel, sustainable procurement and use of resources, good recycling behaviours and more. This is undertaken through training, intranet, emails and signs.

We are also managing our carbon from our office, office equipment and flights. To do this we have started monitoring our flights and introducing better video conferencing facilities. We are also moving towards sustainable procurement such as purchasing energy efficient equipment

One key success this year included integrating environmental aspects into general project management through our RAID matrixes. This further allows environmental and social risks and opportunities to be identified before the project starts. We also have plans to integrate basic sustainable business practices further into the business development and project processes.

We are also improving our monitoring and reporting; below highlights our environmental performance.

Highlights of Head Office Environmental Performance




IMC Staff believe that we are good or average in our environmental management based on an 2017 IMC survey undertaken before EMS training.



We are moving towards energy efficient electronics



Rainwater is harvested for use in the toilets.



We used 38,035kWh of electricity between July 2017 and July 2018². This is around 11.8 tonnes CO₂/year.



IMC Staff and contractors travelled 3.6 million miles between August 2016 and August 2017. These are mostly long haul. This equates to 627 tonnes of CO₂ per year.

Better Video Conferencing Facilities to reduce the need for travel



We purchase an average of 4,558 sheets of paper per week. Almost all paper is reused or recycled

We produce 1.7 tonnes of general waste each year excluding paper recycling.



Electronics, toners, batteries and glasses, bottle caps are recycled. Plastic bags and books are reused.



Our metal and plastic recycling makes up 8% of our total waste.



16% people cycle or walk to work each week. This is the equivalent of over 400 miles per week.

42% of staff use public transport to travel to work (1473 miles per week).



² Excluding heating and cooling- only available for the whole building which is occupied by multiple companies.

Environment Targets

Achievements 2018	Targets 2019
Improved our monitoring and reporting.	Reduce residual waste by reduce personal bins and increasing recycling.
RAID Matrix for projects now includes prompts to consider environmental risks and opportunities.	Improve recycling rates of metal, glass and plastics to 10% total waste and reduce overall volume of residual waste.
Improved Video conferencing facilities introduced – which reduces the need to fly.	Improve decision making to minimise amount of overseas flights bases on 2018 baseline.
Continual work to improve sustainable behaviours e.g. new signs and recycling facilities in the new open plan office.	Replacing all old monitors (once broken) to more energy efficient computer monitors.
	Improving staff awareness and opinions of our environmental management through training and the staff Intranet.

Anti-Corruption

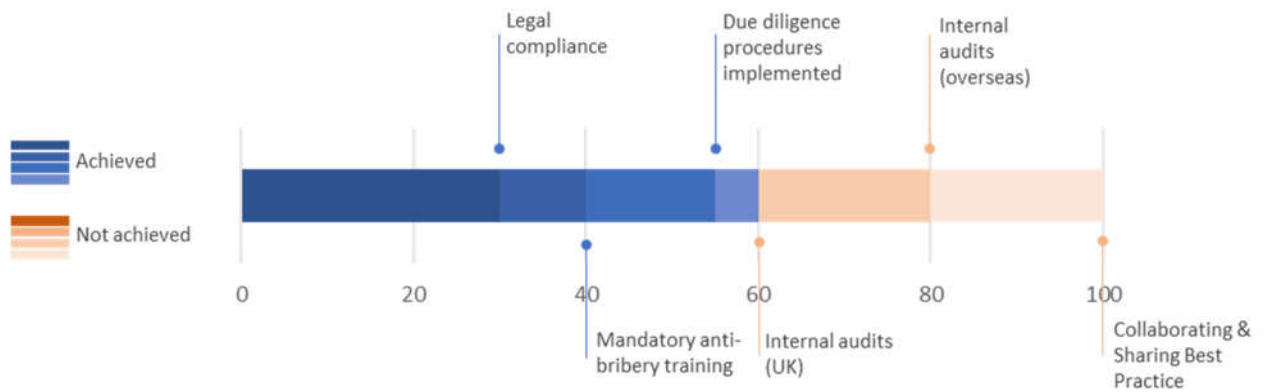


Figure 4 - Anti-Corruption Pillar progress (percentage)

United Nations Global Compact Principles

Principle 10: Businesses should work against all forms of corruption, including extortion and bribery

SDG's related to material issues covered in this section



Business integrity is the quality of being honest and having strong moral principles. A business that holds itself to consistent moral 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.

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 IMC Worldwide Ltd, 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 IMC Worldwide Ltd, its staff, its business partners and their employees to realise these aspirations.

Other related policies include:

- Gifts and hospitality policy
- Whistleblowing policy

ACCREDITATION

IMC has been accredited by the ISO 37001 standard for Anti Bribery Management Systems. Our compliance to this standard covers all our operations – both in the UK and abroad.

LEADERSHIP

Gavin English our Managing Director is the Director responsible for Ethical Compliance at IMC. The management system is supported by our Anti-Bribery Compliance Manager and our Business Improvement Team.

COMMUNICATION

Communication around anti-corruption and bribery is very important to the way we work. Our policies are shared on our website, they appear in our Job Descriptions and our contracts. During recruitment we ask questions around ethics and we make sure we have references for anyone who works with us, even if it is for a short or medium-term project.

MANDATORY TRAINING

IMC has invested in online training for all our people. Our CRM system helps us manage this process as we work with lots of different individuals each year.

DUE DILIGENCE

IMC undertakes due diligence on all our partner organisations, independent consultants and new starters. This involves a standard questionnaire that is completed by the prospective external party. Internal checks are then carried out to complete a background search. We use the Thompson Reuter's Risk Intelligence Software to run our checks – this is an efficient way to look at a great volume of publicly available information.

RISK MANAGEMENT

Our programmes take place in complex environments where corruption risks are high. IMC assesses risk at various stages of our Business Development and Project Implementation cycles.

Mitigation measures are reviewed at the corporate level answering the question – are our procedures still adequate? Each programme then has its own risk matrix which is monitored by the project manager on the job.

Our head office operations including finance and recruitment are also assessed, mitigation measures are then put in place and monitored.

AUDIT AND CONTINUOUS IMPROVEMENT

IMC is subject to an external audit against our ISO Standards each year. We also carry out our own reviews throughout the year.

Our projects are subject to Project Health Checks, here a project is reviewed against applicable procedures. Where necessary the findings of the Health Checks result in Corrective Actions that are taken forward by the Project Manager.

Anti - Corruption Targets

Achievements 2018	Targets 2019
Developed our due diligence procedure to include Thompson Reuters WorldCheck.	Repeated Due Diligence training for new starters.
Trained head office staff involved in proposals and project management in the new due diligence procedure.	Complete our first full external audit under ISO 37001.
Updated all training and procedure documentation to reflect the new changes to due diligence.	Bespoke support to high-risk projects
Commissioned and implemented new training programme for all staff and independent consultants.	Senior management training on requirements under ISO 37001.
Expanded the compliance function at IMC.	
Improved and rolled-out Project Health Checks.	

IMC's Charity Fund

BACKGROUND

SDG's related to material issues covered in this section



Launched in 2015, the IMC Charity Fund is an integral part of our CSR initiatives. Each year, we allocate £10,000 to the fund that are used to help charitable and sustainable initiatives aimed at alleviating poverty in the regions where IMC operates.

The mission of the IMC Charity Fund is:

“To go even further in our goal to eradicate poverty and complement what the international community is already doing.”

The Charity Fund and mission was formulated with three key objectives in mind; (1) Support the beneficiaries of IMC programmes, aiming to increase the overall value of our work, (2) Help the most vulnerable become more resilient, (3) Contribute to tackling a range of key issues across the developing world.

For proposals to be eligible, they must be located in an IMC project country, and be linked to an ongoing IMC project, while expanding the reach and impact on the poor. All IMC employees are invited to submit ideas.

The application process was redesigned for 2018 to be a more collaborative process, to ensure maximum impact and not place undue stress on any individuals. The new process contained a series of steps

Once a member of staff had an idea of a project where the IMC charity Fund could add extra value and impact, a meeting was scheduled with the Charity Committee team to discuss the potential intervention, including strengths, potential weaknesses and sustainability. Depending on how well formed the idea already was, this could either be a one-off meeting, or one in a series. After a joint effort of ideation and scoping, the applicant staff produced a one-page document for submission and discussion, including impact expected and budget. The one pager was then discussed with independent evaluation volunteers, who had not been previously involved, as a level of quality assurance. Finally, the applications were passed to the IMC Board for voting.

2018 PROJECTS

In 2018, we received a total of 4 applications for funding, requesting a total budget of £17,600. Ultimately, two were approved by the Board;

Sierra Leone Plastic Recycling

Disposal of solid waste in Freetown has become a major problem in the city resulting in a diversity of environmental health hazards. Of particular concern are the occupational health risks associated with the urban poor who pick out recyclable waste from the waste at the waste dump sites in the city. While a non-profit initiative called LePlastics was originally identified, some issues surfaced afterwards. Suitable solutions are currently being investigated.



Yangon Alley Gardens

The Alley Garden Project is an urban regeneration initiative aimed at collective stewardship of “wasteland”, enhancing social capital and contributing to community space and city greening. The project focuses on Yangon’s many unhygienic back alleys and intends to demonstrate the possibility of utilising these wastelands for recreation, food production, art and social cohesion purposes, while also raising awareness of better waste management methods. The project will be delivered in collaboration with Yangon City Development Committee (YCDC), who are responsible for the initial clean up, fixing of the sewerage, and repaving of the alleyway; after which Doh Eain completes further upgrades for the space.



Example Before



Example After

For IMC, Doh Eain research indicates that 27th-28th Middle block is ready for a project to begin. The space has recently been repaired by YCDC and we have had interest from local representatives of the area. Work is expected to begin in late 2018 or early 2019.

Charity Fund Targets

Achievements 2018	Targets 2019
<p>Relaunch of the Charity Fund – after originally being launched in 2015 and a period of stagnation, the charity fund was relaunched in May 2018 to inform new colleagues of the initiative and breathe new life into it</p>	<p>Successfully implement all approved applications</p>
<p>Received 4 applications for funding – requesting a total of £17,600 against a budget of £10,000</p>	<p>Continue to draw interest from the staff and receive good quality proposals that help maximise impact</p>
	<p>Approve new projects to continue to improve the lives of the world’s poor</p>

Indexes/Appendices

SDG cross reference chart

Section	Material Issue	Related SDG
Human Rights	Anti-slavery and human trafficking Policy and Statement.	8 Decent work and economic growth
Labour	2018 UK head office refurbishments, Sport and Social committee, Agile and Flexible working Policy. Supply chain Manager hired in Nepal specifically to look into modern slavery. Equal opportunities employer with two visa licenses.	3 Good health 8 Decent work and economic growth 10 Unlawful Discrimination
Environment	16% of people cycle or walk to work each week. Almost all paper is re-used or recycled. Rain water is harvested and used in the toilets. Part of the Paris pledge for action-committed to managing our climate and environmental footprint.	11 Sustainable Cities and Communities 12 Responsible Consumption 13 Climate Action
Anti-corruption	Business Ethics Policy, Code of Conduct, ISO Accreditation to ISO 37001:2016.	16 Peace, justice and strong institutions
Charity Fund	£10,000 is donated into a fund that is used to help charitable and sustainable initiatives aimed at alleviating poverty in the regions where IMC operates.	1 No Poverty

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