





SUSTAINABILITY REPORT

IMC Worldwide

November 2019



DOCUMENT CONTROL

Issue / revisions	First issue	Version 2		
Date	26 th November 2018	28 th November 2019		
Prepared by	f. Gording; K. Brady; G. Basset; K. Hancock	G. Basset; K. Brady; K. Hancock		
Signature				
File reference	IMC Sustainability report 2018	IMC Sustainability Report 2019		
Authorised by	G. English	G. English		
Signature				

CONTENTS

Introduction	2
1.1 Our Approach	2
Human Rights	2
Labour	2
Environment	2
Anti-Corruption	2
1.2 Materiality	3
2 Human Rights	4
2.1 Anti-Slavery and Human Trafficking	4
2.2 Due Diligence	5
2.3 Whistleblowing	5
3 Labour	11
3.1 Ethical Trading Initiative	11
3.2 Safeguarding at IMC	12
3.3 Managing risk	13
4 Environment	15
5 Anti-corruption	19
5.1 Accreditation	19
5.2 Leadership	20
5.3 Communication	20
5.4 Mandatory Training	20
5.5 Due diligence	20
5.6 Risk management	20
5.7 Audit and Continuous Improvement	20
6 Charity Fund	23
6.1 Background	23
6.2 2018 Projects	23
7 Indexes/Appendices	26

TABLE OF FIGURES

Figure 1 - Human Rights Pillar progress (percentage)..... 4
Figure 2 - Labour Pillar progress (percentage) 11
Figure 3 - Environment Pillar progress (percentage) 15
Figure 4 - Anti-Corruption Pillar progress (percentage) 19

ACRONYMS & ABBREVIATIONS

CSR	Corporate Social Responsibility
EMS	Environment Management System
ETI	Ethical Trading Initiative
ILO	International Labour Organisation
IMS	Integration Management System
ISO	International Standard Organisation
KPI	Key Performance Indicator
PSEA	Protection from Sexual Exploitation and Abuse
RAID	Risk, Assumptions, Issues, Decisions
SDG's	Sustainable Development Goals
SLN	Safeguarding Leads Network
UNGC	United Nations Global Compact
YCDC	Implementing Partners

A MESSAGE FROM OUR MANAGING DIRECTOR



I am pleased to present IMC Worldwide’s Sustainability Report for the year November 2018 to November 2019.

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 UNGC 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.

This year, IMC has undergone an internal re-structuring after the temporary suspension of one of our key projects. This led to the need for IMC to announce a proposed restructure involving a collective consultation process. Following closure of the collective consultation, the final restructure was announced in October. This has had a knock-on effect to some of the initiatives being implemented in relation to our commitment to the UNCG and the Sustainable Development Goals.

Gavin English
Managing Director
28th November 2019

INTRODUCTION

1.1 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:

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.

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.

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.

ANTI-CORRUPTION

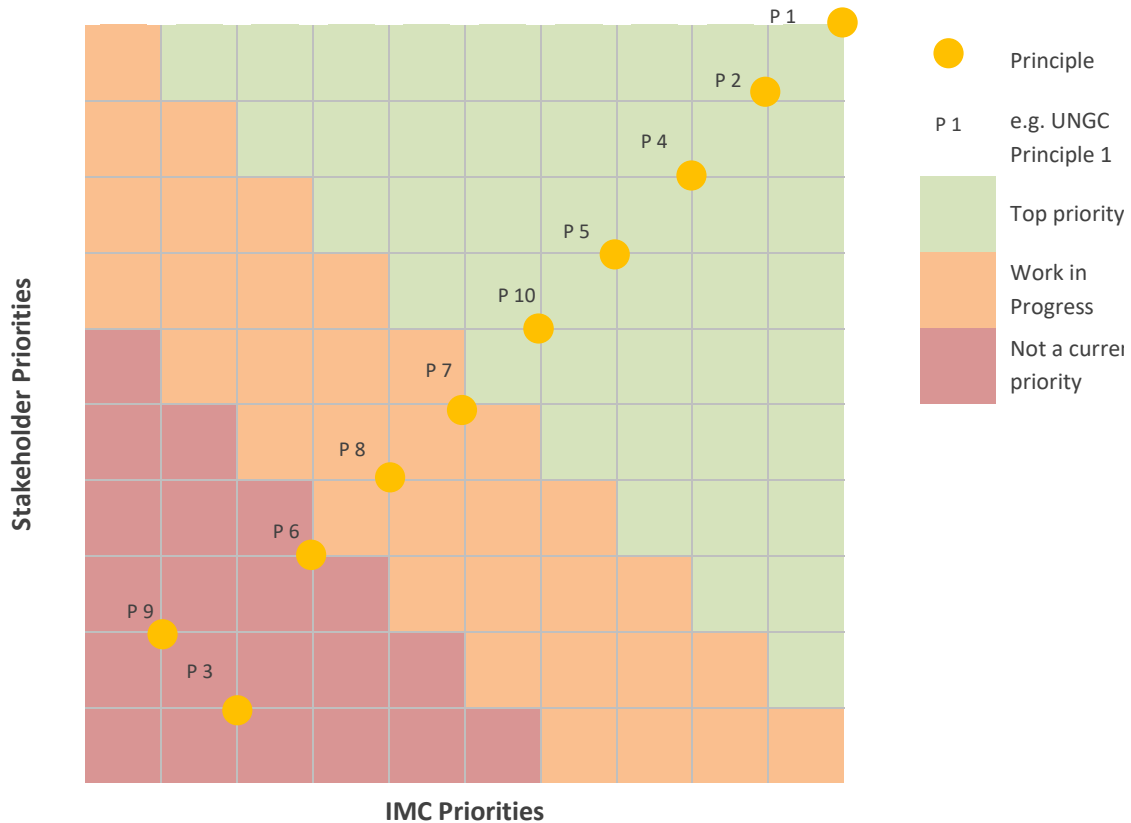
Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

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>

1.2 MATERIALITY

Last year we undertook a materiality exercise to prioritise the UNGC Principles for IMC. We plotted IMC's priorities against our stakeholder's 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

2 HUMAN RIGHTS

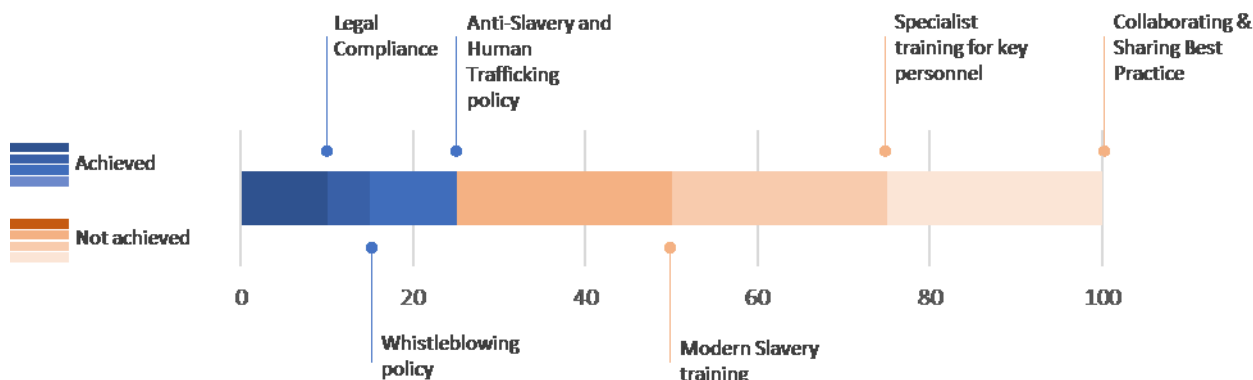


Figure 1 - Human Rights Pillar progress (percentage)

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.

2.1 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 an "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 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 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 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.

2.2 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.

This year, IMC developed a new renewal process for when due diligence expires after a two-year period. Email tracking was also introduced, which allows better central record keeping on our CRM system, Dynamics.

2.3 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, 2018.

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 first 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 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, and also an office in 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.

During 2018, IMC made progress to ensuring modern slavery is eradicated in our supply chain in Nepal. In 2017, the team hired a Supply Chain Manager to look specifically into issues such as modern slavery, who was working to develop a toolkit and training to help those working in the country office. This year, this toolkit developed into a Briefing Note specifically designed for tackling modern slavery in our supply chains. This briefing paper was not restricted to our operations in Nepal, but was distributed company-wide, ensuring that this best practice knowledge was shared across the business.

This year we also hired a new resource in our head office in the UK to look specifically into the issue of modern slavery on our projects and in our supply chains, designing training around these issues to raise knowledge and awareness for both internal staff and independent consultants contracted with us.

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.

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.

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.

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. To build on this further, throughout 2018 we have been developing our own modern slavery training which in the next year we will roll out to all internal staff and independent consultants in our supply chain. This training will cover 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. We also plan to give continued guidance to our bid teams on what to design into the delivery of our client's programmes to mitigate against the risks related to modern slavery.

As a company, we are committed to continuous improvement and our target for 2019 will be to continue to map where we have the greatest leverage to influence change in our supply chains.

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 2018.



Signed Gavin English

Managing Director

Date: 15/03/2019

HUMAN RIGHTS TARGETS

Achievements 2019	Targets 2020
Assessed our modern slavery achievements and objectives and devised a plan to work on any identified improvements	Design context specific KPI's
Delivered project specific training which included a section on modern slavery	Deliver Modern Slavery Essentials training
	Institutionalise the training of all new starters moving forward
	Design and deliver specialist training for those designing and managing projects

3 LABOUR

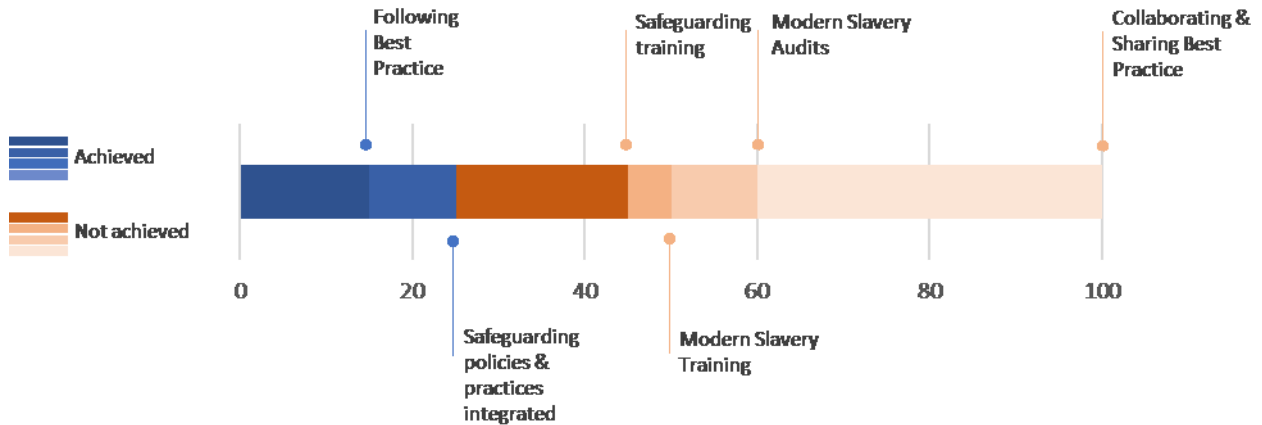


Figure 2 - Labour Pillar progress (percentage)

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>
--	--

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. 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.

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

3.1 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 with IMC.**

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.

3.2 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.

- 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

IMC's Safeguarding Policy 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.

IMC is one of the founding members of the Safeguarding Leads Network (SLN). The SLN is a group of committed private sector suppliers that want to work together to share best practice on safeguarding and improve the way the development sector works together to drive up standards.

IMC has recently developed our Investigation template and supporting approach for responding to safeguarding cases. This helps to ensure that all cases are handled in a consistent manner and adequate records are kept.

IMC often partners with other organisations to deliver our projects. As such we are not always in control of all project operations. Working with our partner organisations to ensure that their safeguarding measures are developed and in place on our projects has been a focus for IMC this year. We have developed a Safeguarding Briefing Note for our partner organisations to assist with this capacity building.

3.3 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 2019	Targets 2020
Tightened up our safeguarding reporting and investigation procedures	Finalise and launch Safeguarding Investigation Procedures and implement this as best practice across all of our programmes
Conducted a deep dive safeguarding audit on a partner organisation and worked with them to improve their systems and processes	Roll-out modern slavery essentials training to all staff and integrate this training on a rolling schedule
Modern slavery “essentials” training developed and ready to be rolled out next year	Implement modern slavery training to all independent consultant’s who work with us
	Deliver safeguarding training to all staff
	Design and deliver specialised safeguarding training to bid and project teams

4 ENVIRONMENT



Figure 3 - Environment Pillar progress (percentage)

United Nation Global Compact Principles

- 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.

SDG's related to material issues covered in this section

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

It is our vision to be an environmentally conscious and sustainable organisation which can be trusted by our clients. It is our objective to carry out all measures reasonably practicable to continually improve our

performance to reduce environmental impacts.

We have identified seven objectives that will improve our environmental performance and benchmark IMC against the best-in-class to try to ensure we demonstrate leadership in this area. These are:

UK Head Office Environmental Management Principal Objectives

1. Increase the use of sustainable transport
2. Improve waste management by reducing waste to landfill
3. Reduce the use of electricity and waste of water
4. All major purchases (fridges, IT equipment, etc) purchased to have high environmental rating and be well maintained.

Procurement Objectives

5. Proactively promote environmentally and socially conscious procurement practices.

Staff Awareness and Training Objectives

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

Overseas Impact Objectives

7. Monitoring annual level of flight carbon emissions, raising awareness of impacts, setting targets and encouraging the reduction of 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 integrating environmental issues into our project management processes through continuous project risk assessments.



We are part of the [Paris Pledge for Action](#); committing to managing our climate and environmental footprint and recognising our responsibility to support the objectives of the Paris Agreement. As part of this we monitor and endeavour to reduce 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. We are also promoting sustainable procurement and use of resources, good recycling behaviours and more. This is undertaken through raising awareness, training, regular reminders to staff and signage.

We are managing the carbon footprint from our office, office equipment and flights. We have also introduced a range of incentives aimed at reducing our emissions including monitoring flights taken, introducing better video conferencing facilities and energy efficient office equipment. This has led to a drop in energy usage and the number of flights booked per person.

One key success has been introducing food waste. We have also seen reductions of about 10% per year in our paper usage per employee due to the improvement of online tools.

We are also moving towards sustainable procurement practices such as purchasing energy efficient equipment and more environmental or social alternatives. We will continue to work on this element into 2020 along with other improvements including training, further work on our flight management and improving the sustainability of our procurement practices.

Below highlights our environmental performance for the past year.

Highlights of Head Office Environmental Performance



Rainwater is harvested for use in the toilets.



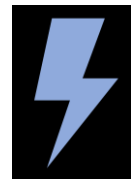
Better Video Conferencing Facilities to reduce the need for travel



IMC Staff and contractors travelled 4.5 million miles in 2018; with a 4% decrease in the number of flights.

This equates to 1128 tonnes of CO₂ equivalent per year².

We used 32,777 kWh of electricity between July 2018 and July 2019³. This is around 9.1 tonnes CO₂/year.



We purchase an average of 4,696 sheets of paper per week.

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



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



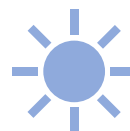
Our metal and plastic recycling makes up 8% of our total waste.



Electrical vehicles recharge points are available



Motion sensor lights reduce lights being left on unnecessarily.



Solar energy provides part of our overall electricity supply



13% of staff cycle or walk to work each week. This is the equivalent of over 400 miles per week.

43% of staff use public transport to travel to work



² This includes the Radiative Forcing

³ 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 overall volume of residual waste through improved waste practices
Continual work to improve sustainable behaviours e.g. new signs and recycling facilities in the new open plan office	Improve decision making and other measures to minimise the booking of overseas flights
Introduced energy emissions saving measures including electrical cars recharge points and motion sensor lights	Improve procurement practices- this includes choosing environmental and social conscious suppliers and buying more sustainable products
Separate Food Waste Collection – Reducing waste to landfill	Phase out all single use plastics
Committed to phasing out single use plastics within the head office	Improve staff awareness of, and compliance with, our environmental management system and processes through training and the staff Intranet
A proportion of our energy is now from renewable sources	

5 ANTI-CORRUPTION

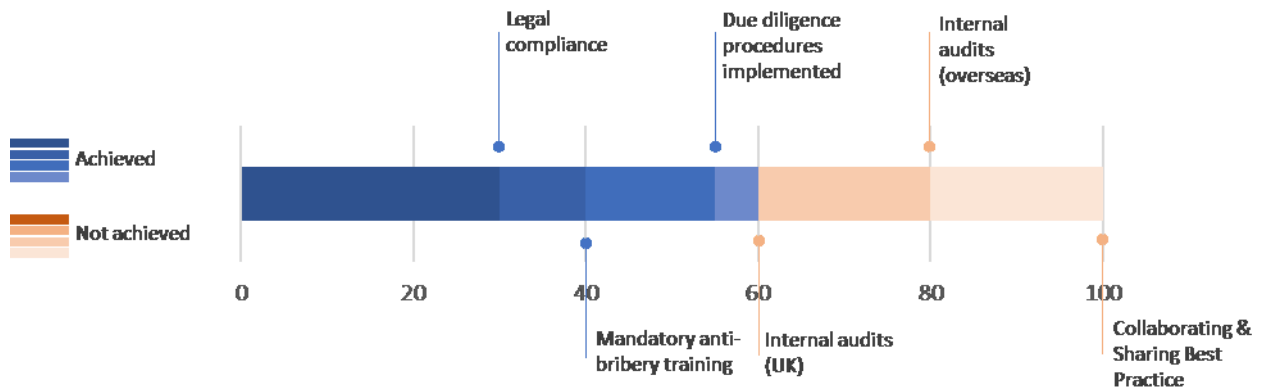


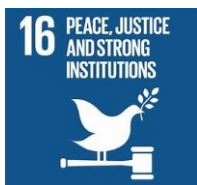
Figure 4 - Anti-Corruption Pillar progress (percentage)

United Nations Global Compact Principles

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

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.

SDG's related to material issues covered in this section



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

5.1 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.

5.2 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.

5.3 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.

5.4 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.

5.5 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.

This year, IMC developed a renewal process for after due diligence has expired after the two-year approval period. Email tracking was also introduced, which allows better central record keeping on our CRM system Dynamics.

5.6 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.

5.7 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.

Business Development audits are also being carried out. These determine whether a bid has been completed and submitted following IMC's standard procedure. This audit involves the use of a RAG rating system which outlines any key trends in non-conformances. These findings are shared with the Board and circulated to the wider company in a monthly bulletin.

ANTI - CORRUPTION TARGETS

Achievements 2019	Targets 2020
<p>Completed and passed our first ISO 37001 audit with no non-conformances</p>	<p>Senior Management training on requirements under ISO 37001</p>
<p>New quantifiable scoring criteria added to our Master Risk Register that aligns with project risk analysis</p>	<p>Re-launch due diligence training and Institutionalise this as part of training for all new staff moving forward</p>
<p>Undertook regular Business Development audits and Project Health Checks which looked at due diligence and other processes that fall under our Anti-bribery Management Systems</p>	<p>Launch new due diligence procedures for local (in country) staff</p>
<p>A Whistleblowing investigation template was developed and put into action on a live case</p>	<p>Launch newly developed two-tier due diligence process</p>

6 CHARITY FUND

6.1 BACKGROUND

Due to an internal re-structure at IMC and a shift in priorities across the business, the IMC Charity Fund has been put on hold for 2019. The section below provides an outline of the purpose, process and aims of the fund, and also outlines the success of the projects funded in 2018.

Launched in 2015, the IMC Charity Fund is an integral part of our CSR initiatives. We will aim to allocate £10,000 to the fund which is used to help charitable and sustainable initiatives aimed at alleviating poverty in the regions where IMC operates.

SDG's related to material issues covered in this section



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 Charity Fund process contains a series of steps. Firstly, once a member of staff had an idea of a project where the IMC charity Fund could add extra value and impact, a meeting will be 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 will produce a one-page document for submission and discussion, including impact expected and budget. The one pager will then be discussed with independent evaluation volunteers, who had not been previously involved, as a level of quality assurance. Finally, the applications are passed to the IMC Board for voting.

6.2 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 2019	Targets 2020
Not applicable for 2019	Relaunch of the Charity Fund after the pause in 2019 due to the company's internal re-structuring
	Approve new projects to continue to improve the lives of the world's poor

7 INDEXES/APPENDICES

Table 1: 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

Acknowledgements / Contact information

Kathryn Hancock: Kathryn.Hancock@imcworldwide.com

