









SUSTAINABILITY REPORT

IMC Worldwide

November 2021



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Prepared by	f. Gording; K. Brady; G. Basset; K. Hancock	G. Basset; K. Brady; K. Hancock	K Hancock	N Sayer, K Hancock, J Essex
Signature				
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Authorised by	G. English	G. English	G. English	G English
Signature				

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ACRONYMS & ABBREVIATIONS

CMT	Crisis Management Team
CRP	Carbon Reduction Plan
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
RAG	Red, Amber, Green
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 2020 to November 2021.

This report communicates our progress as members of the United Nations Global Compact (UNGC) and also sets out targets for the year ahead. Performance against our Carbon Reduction Plan is covered separately but summarised here.

In supporting the Ten Principles of the UNGC on human rights, labour, environment and anti-corruption IMC Worldwide are committed to ensuring the UNGC is reflected in the culture and day-to-day operations of our company, and to engaging in collaborative projects which align with the Sustainable Development Goals. This Sustainability Report stands as our Communication on Progress against the UNGC and will be uploaded to the UNGC website as per the requirements.



In September this year, IMC launched our Carbon Reduction Plan that presents our corporate targets to reduce our carbon emissions by 46% by 2025 and 67% by 2030 and achieve net zero by 2050. This will play a central role in our sustainability commitments going forward.

We recognise the urgency to respond to the climate crisis and are committed to reducing our greenhouse gas emissions across our business operations. As an organisation dedicated to supporting people around the world to achieve sustainable development, helping to lift communities out of poverty and promoting equality, we have a role in both limiting our own impact on climate change and supporting others in developing in a way that enables them to limit their impact.

In 2021 we also launched our Strategic Plan for 2021 to 2023 “One IMC – A local global interconnected approach to build better futures together”. This set out five new

objectives to grow the business differently going forward The strategy and the objectives of this plan support our Carbon Reduction Plan and wider commitment to the UNGC and the Sustainable Development Goals.

Gavin English -Managing Director

16th November 2021

1 INTRODUCTION

1.1 OUR APPROACH

IMC is a member of the UNGC and has committed a pathway to zero carbon, as set out in our Carbon Reduction Plan (CRP, September 2021). The focused targets in the CRP combine with the wider UNGC which guides our approach to sustainability. IMC has taken the UNGC Principles¹ as an overall structure for this report. These 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 PRIORITY PRINCIPLES

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
- Businesses should support a precautionary approach to environmental challenges
- Undertake initiatives to promote greater environmental responsibility

What IMC can report on and is Work in Progress:

- The elimination of discrimination in respect of employment and occupation

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

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. Our Due Diligence procedure helps us evaluate who we work with and their organisational capacity to manage ethical risks in their organisation. Our Whistleblowing policy helps us protect whistleblowers and encourages reports so that we can protect human rights in our operations.

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 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
- 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.

documentation (e.g. passports, ID cards),
bankcards and similar documents;

Each year IMC publishes our Modern Slavery Statement on our website. It can be found [here](#).

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 Refinitiv 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.

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

This year we also introduced mandatory financial due diligence for potential partner contracts of £100,000 or equivalent and for all design and engineering works, irrespective of value. Such financial due diligence is undertaken at the earliest opportunity to assess the proposed partner's economic and financial standing and their ability to undertake the proposed contract.

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.

HUMAN RIGHTS TARGETS

Achievements 2021	Targets 2022
Delivered project specific training which included a section on modern slavery	Design context specific KPI's
Delivered Modern Slavery Essentials training online to staff and independent consultant.	Design and deliver specialist training for those designing and managing projects
Institutionalised the training of all new starters moving forward	Launch Modern Slavery Standard Operating Procedure

3 LABOUR

United Nations Global Compact Principles

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.

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.

As we begin to return to the office, IMC has agreed hybrid working practices.

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 it is a mandatory requirement that they must adhere to the IMC Business Ethics Policy. IMC has **implemented modern slavery training for all staff and newly contracted, independent consultants.**

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 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.

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.

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. Safeguarding basic training is in place for all staff and newly contracted, independent consultants.

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.

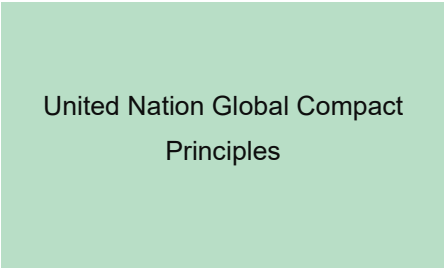
IMC has developed our investigation template and supporting approach for responding to safeguarding cases. This helps to ensure that all cases are handled in a consistent manner and adequate records are kept.

IMC often partners with other organisations to deliver our projects. As such we are not always in control of all project operations. We continue to work with our partner organisations to ensure that their safeguarding measures are developed and in place on our projects. As part of our due diligence checks we will determine if a partner has a safeguarding policy in place and if they do not we will work with them to either develop their own policy or ensure they understand our policy.

LABOUR TARGETS

Achievements 2021	Targets 2022
<p>Finalised and launched Safeguarding Investigation Procedures and implemented this as best practice across all of our programmes.</p>	<p>Launch Safeguarding Standard Operating Procedure</p>
<p>Designed and delivered specialised safeguarding training to bid and project teams</p>	<p>Developed safeguarding country plans for key priority countries.</p>

4 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.



At IMC, we understand the importance of realigning our business practices and project impacts to the SDGs, including those that relate to climate change and the environment. This especially relates to SDGs 11-15 (see below). Taking these responsibilities seriously requires us to change our company systems, financial budgets and culture such that we proactively approach and meet these climate and environmental challenges.

It is our vision to shift to being an environmentally conscious and sustainable organisation, including reducing our direct and indirect carbon 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:

4.1 UK HEAD OFFICE ENVIRONMENTAL MANAGEMENT PRINCIPAL OBJECTIVES

1. **Reducing our carbon footprint which requires us to significantly reduce the annual level of carbon emissions from our flights.** This will be delivered by realigning our business with Covid-19 hybrid working (eliminating short and frequent trips overseas and those that are not directly related to project delivery). This in turn will require changes to our project processes for bidding for work, tracking expenses through projects and procuring flights – as well as carbon awareness training being rolled-out to all permanent and project staff (as part of project mobilisation).
2. **Reducing our use of unsustainable travel.** This means substantially reducing flights and reducing car-based transport for commuting to work and in-country travel. This will include reducing the need to travel, and shifting to public transport and walking and cycling (the latter requires the distances travelled to be shorter).
3. **Sustainable procurement.** We have now committed to only buy recycled office paper from 2021. We also eliminating our use of Single Use Plastic in line with our projects in this area. Double-sided printing is the standard setting for all of our printers and in the future this will be tracked per employee. All major purchases (fridges, IT equipment, etc) purchased to have high environmental rating and be well maintained.
4. **Reduce and Reuse, Recycling and Food Composting.** This primarily applies to office-wide purchases (e.g. computers, renewal of furniture) as well as direct consumption in the

office and through home working. The primary aim is to minimise to virtually zero the amount of residual waste (that which is not reused, composted or recycled)..

5. **Electricity, heating and water use.** Reduce the use of electricity (including for heating) and waste of water. The IMC Worldwide office has good water saving measures installed due to our landlord, SES Water. We will minimise electricity use by ensuring IT equipment is not left on standby. We will monitor and reduce our on site energy use by minimising the need for heating and cooling the office.

We will deliver these by changing how we work going forward:

1. Change our project lifecycle and financial procedures, including for booking flights and tracking expenses (including project expenses)
2. Raise the profile of our climate and wider environmental (EMS) objectives within the company (UK, US and Europe head offices – and all project offices overseas) to develop a common culture and ways of doing things across the company.
3. Raise profile and participation of our staff commuter survey, project carbon budgets and corporate impacts through establishing a network of climate and environmental champions across the company.
4. Include climate and wider sustainability training as part our induction process for new staff (including for projects) and annually for existing staff.

4.2 OVERSEAS IMPACT OBJECTIVES



Whilst our audited commitment to improve and manage our environmental performance is through our Environmental Management System (EMS) which is accredited to ISO14001:2015 and part of our wider Integrated Management System (IMS) in the UK – and Carbon Reduction Plan (CRP) in response to UK government requirements - both our EMS and CRP commitments and processes are being expanded from head office only to encompass our global operations from 2022.

Our commitment is set out in our [Environmental Policy](#): this demonstrates our climate and environmental responsibility and sets out our vision in regard to responding to the climate emergency and managing the environmental challenges. Additionally, we are also integrating climate and environmental impacts into our project management processes, including decision making, budgets and through continuous project risk assessments.

Carbon Reduction Plan commitments



As part of Carbon Reduction Plan IMC Worldwide has signed up to the [UNFCCC Race to Zero campaign](#). Through this we will promote our commitment to reduce carbon emissions to zero, as well as monitor

and report it to the UK government, as required.

4.3 WHAT WE ARE DOING

The IMC Carbon Reduction Plan set out 2019 as a new baseline for our carbon emissions baseline, which covers the majority of our environmental impacts. It showed that international flights comprise the majority of the climate impact of IMC Worldwide's UK operations. This is summarised for 2019 and 2020 in the table below:

	2019	2020
Flights	91.2%	92.8%
Electricity/Gas	0.6%	1.1%
Paper	0.1%	0.2%
Commuting	8.1%	5.9%

The higher percentage of electricity/gas and paper in 2020 are due to the much lower overall impact of flights and commuting as highlighted in the table below.

	UK	US	Europe
Flights	41.4%	22.3%	11.1%
Commuting	29.6%	27.4%	26.4%

The total footprint of commuting in 2020 was mainly reduced because of more home working. This is highlighted below.

	2019		2020	
	Ave. distance	Ave/employee	Ave. distance	Ave/employee
Mode	Km	tCO2e/year	Km	tCO2e/year
walking/cycling	9.7	0.00	8.1	0.00
public transport	52.3	0.65	57.8	0.22
car	30.3	1.53	39.1	0.63
air	684.5	9.43	684.5	2.46
Overall average		1.02		0.40

We are also promoting sustainable procurement and use of resources, good recycling behaviours and more. However, in the past year no significant change in procurement has taken place. An analysis of the environmental benefits of shifting to recycled paper was undertaken in 2017 but this has not lead to any change. There has not been any composting of food waste in the office since the outbreak of Covid. This has not yet been reinstated.

The main reduction of the carbon footprint from our office and, flights has come from Covid-19 as opposed to management changes. We are now in a position to improve management systems to institutionalise the reduction in flights that occurred during 2020, and the reduction of commuting footprint through hybrid working.

Further work is therefore needed to start to reflect sustainable procurement practices in our policies and to establish budgets, procedures and decision making processes that lead to proactive decisions to reduce our carbon footprint and wider environmental impacts of operations.

CLIMATE AND ENVIRONMENT TARGETS

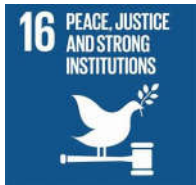
Achievements (reported for 2020)	Targets 2021-2022
<p>Significant reduction in carbon footprint and environmental impact in 2020 due to Covid-19.</p>	<p>Establish baseline footprint of in-country operations overseas.</p>
<p>Baseline carbon footprint for IMC UK, US and Europe operations established, including international flights, commuting and principle other environmental impacts</p>	<p>Establish changes to project and organisational processes and decision making, including linkage to overall IMC carbon budgets.</p> <p>Specific change to procedures for approval and booking of flights.</p>
<p>Board level commitment to reduce IMC Worldwide carbon footprint by 46% on 2019 levels by 2025.</p>	<p>Make decisions to change to sustainable procurement practices – including for paper, to eliminate single use plastics, and regarding replacement rates and specification of IT equipment.</p>
<p>Committed to phase out single use plastics.</p>	<p>Reinstate staff training and awareness of environmental management system post-Covid and extend this to include Carbon Reduction Commitments.</p>
<p>Hybrid working min 6 days a month regularised Covid working from home going forward. Reduced travel, paper, shift to sharepoint default work space</p>	

5 ANTI-CORRUPTION

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

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 and intranet, 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 revised our mandatory training in line with our in-house safeguarding and modern slavery training.

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 Refinitiv Risk Intelligence Software to run our checks – this is an efficient way to look at a great volume of publicly available information.

IMC has a renewal process for when due diligence has expired after the two-year approval period. Email tracking is also in place which allows better central record keeping on our CRM system Dynamics.

This year we introduced financial due diligence to check on a partner's economic and financial standing and ability to undertake a proposed contract.

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.

During the pandemic the Crisis Management Team (CMT) have undertaken regular COVID-19 office risk assessments.

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 Red, Amber, Green (RAG) rating system which outlines any key trends in non-conformances. These findings are agreed with the bid manager or project manager and shared with the Board of Directors and included in the six monthly Quality Management System Management Review Report.

ANTI - CORRUPTION TARGETS

Achievements 2021	Targets 2022
Continued to undertake regular Business Development audits and Project Health Checks which looked at due diligence and other processes that fall under our Anti-bribery Management Systems	Senior Management training on requirements under ISO 37001
Used Microsoft Teams to manage an investigation with the project team involved.	Launch new due diligence procedures for local (in country) staff
Launched financial due diligence process.	Launch newly developed two-tier due diligence process
Moving to a granular tracking of ethical compliance using KPIs in our internal audits.	Embed the KPIs in our management reports and improve how we use them once we have sufficient data.

6 INDEXES/APPENDICES

6.1 SDG CROSS REFERENCES

Table 1: SDG cross reference chart

Section	Material Issue	Related SDG
Human Rights	Anti-slavery and human trafficking Policy and Statement.	- Decent work and economic growth ●
Labour	2018 & 2019 UK head office refurbishments, Sport and Social committee, Agile and Flexible working Policy. Hybrid working. 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	Overall carbon footprint of commuting reduced to 41% of 2019 levels in 2020. No change with respect to paper. Almost all paper is re-used or recycled but still not using recycled paper. Overall carbon footprint of flights for IMC UK operations reduced to 30% of 2019 levels in 2020.	● 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

6.2 IMC POLICIES AND STATEMENTS

[IMC Business Ethics Policy](#)

[IMC's Whistleblowing Policy and Statement](#)

[IMC's Safeguarding Statement](#)

Acknowledgements / Contact information

Kathryn Hancock: Kathryn.Hancock@imcworldwide.com

