

# **Imperial Logistics Limited**

United Nations Global Compact: Annual Communication  
on Progress (COP)

Covering the period 1 July 2019 to 30 June 2020

**Imperial™**  
beyond possibility

## Statement of continued support by the Chief Executive Officer

26 July 2021

Dear Imperial stakeholders

Everyone who works for Imperial is united by one clearly defined common purpose – connecting Africa and the world and improving people’s lives with access to quality products and services. This means that – as a business and as individuals – we make a meaningful difference in people’s lives and play a key role in the development of Africa. Imperial enables access to quality products and services for millions of people in our 25 countries of operation, including food, medicine, fuel and countless other products that make everyday life better.

We understand that being a purpose-led organisation with Environmental, Social and Governance imperatives embedded in our business strategy means that we must create sustainable, long-term value for our key stakeholders and that we must prioritise people, planet and profit.

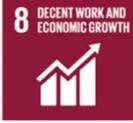
I am pleased to publish this report demonstrating Imperial’s support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

Our Communication on Progress details our actions in integrating the Ten Principles into our business strategy, culture and daily operations. This report will also be published on our website for accessibility by all stakeholders.

Regards



**MOHAMMED AKOOJEE**  
**GROUP CHIEF EXECUTIVE OFFICER**

Human Rights		
<p><b>UN Global Compact Principles:</b></p> <p><b>Principle 1:</b> Businesses should support and respect the protection of internationally proclaimed human rights;</p> <p><b>Principle 2:</b> Businesses should make sure that they are not complicit in human rights abuses</p>		
<p><b>Our commitment:</b></p> <p>Imperial has a responsible, ethical, inclusive and sustainable approach to doing business which is central to our strategy and our purpose. We believe in the importance of doing business in ways that value and respect human rights– of our colleagues, customers, business partners and everyone that is affected by our business– and have a set of policies and procedures, endorsed at the highest levels of leadership within the organisation and across operations, to translate this belief into action.</p> <p>We adhere to the Universal Declaration of Human Rights as well as the rules and regulations of each country in which we operate. We are guided by the International Bill of Human Rights as well as the International Labour Organisation’s (ILO) Core Labour Standards and its Tripartite Declaration of Principles. We recognise the Organisation for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises and the UN’s Guiding Principles on Business and Human Rights.</p>		
Disclosure on actions and measurement	Where to find more information	GRI indicators and SDG alignment
<p><b>ACTIONS</b></p> <p>Imperial’s purpose is connecting Africa and the world and improving people’s lives with access to quality products and services. This purpose is intrinsic to our strategy as we seek to contribute to society, build confidence and trust, uphold integrity and support the communities in which we operate –we believe society is better off because Imperial exists. Imperial recognises that it has a responsibility to respect human rights and avoid complicity in human rights abuses both in the workplace and more broadly within its sphere of influence. Imperial has formally outlined the business principles we believe in and the commitments Imperial has made through our <b>Code of Conduct</b> which serves to align decision-making and activities across Imperial and addresses a number of areas including human rights. The Code of Conduct sets standards that all Imperial employees, the CEO and members of the Board must follow, as well as the expectations of business partners, contractors and their employees, whom we encourage to act in a way that is consistent with the Code.</p> <p>Respect for human rights is included in:</p> <ul style="list-style-type: none"> <li>• Imperial Code of Conduct</li> <li>• Imperial Code of Conduct – Corporate and Social Responsibility Guidelines</li> <li>• Various Human Resources policies, such as those governing disciplinary processes, grievances, right to associate, etc</li> <li>• Climate Change and Environmental Sustainability Framework &amp; Strategy</li> </ul>	<p><a href="#">Imperial Code of Conduct</a></p> <p><a href="#">Imperial Code of Conduct – Corporate and Social Responsibility Procurement Guidelines</a></p> <p><a href="#">Imperial climate change and environmental sustainability framework and strategy</a></p> <p><a href="#">Imperial ESG Report FY20</a></p> <p><a href="#">COVID-19 response</a></p> <p><a href="#">CSI fact sheet</a></p>	<p>GRI: 103-2, 404-1, 405-1 412-2, 413-1</p>  <p>Ensure healthy lives and promote well – being for all at all ages</p>  <p>Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all</p>

These policies set out our commitments to respect the rights and dignity of all people, and the governance and delivery mechanisms to support these commitments. These policies apply to every Imperial employee and person within our Imperial wholly-owned entities, and in joint ventures to the extent possible and reasonable given Imperial’s level of participation.

Oversight on human rights is provided through the Imperial’s Social Ethics and Sustainability (SES) Board Committee meeting as stipulated in Imperial’s SES Board Committee Terms of Reference and Annual Work Plan for 2021.

**Harassment and unfair discrimination**

In Imperial workplaces, human rights typically take the form of non-discrimination and diversity in personnel practices, privacy, professional development, and work-life balance. Refer to Labour Practices content below for further information.

As reflected in our company values, we foster a culture and working environment where our employees treat each other with respect, courtesy, and fairness, promoting equal opportunity for all. In this regard, we do not tolerate harassment or unfair discrimination in our working environments. Imperial’s People and Culture function has developed and rolled out an anti-discrimination and anti-harassment policy (including sexual and racial harassment) and training minimum expectations.

We encourage our employees to express their concerns in an open and direct manner, and to point out any circumstances that might indicate an infringement of internal directives, including allegations of harassment and discrimination. An independent whistle-blowing hotline, managed by Deloitte, services most of our operating countries, enabling stakeholders to report concerns anonymously, with the option to report concerns in a language local to their country.

**Health and safety**

Care for our people, customers and stakeholders, are amongst the primary reasons for having effective Health & Safety principles and values throughout all levels of our organisation. Our approach to safety covers safe road transportation services, product quality and employee wellness. Our quality and safety management frameworks and systems align to relevant legislation in each country of operation and are designed to ensure we consistently meet client and principal Safety, Health, Environmental and Quality (SHEQ) requirements.

A network of skilled health and safety professionals across the group ensure that safety standards are continually monitored for compliance and opportunities for improvement identified. Our established safety committees at operational sites, oversee the alignment and implementation of health and safety objectives.



Reduce inequality within and among countries

Our customised SHE management system framework ensures accountability across all levels towards the safety of people, the sustainability of our environment, the protection of our assets, as well as adopting a responsible way of work which will enable us to be recognised within the marketplace as leaders in our industries.

Our in-house training and development function ensures that only the best drivers are sourced, trained and approved for driving our commercial vehicles.

Recently, we have embarked on a focused programme of digitalisation to improve multiple outcomes, including safety, which we refer to as Project Blue Fleet. This has begun shifting our focus from reacting to accidents to proactively avoiding them and is supported by driving organisational discipline and standardising best practices and processes, initially across our South African operations. Initiatives include acquiring trucks and trailers with the latest safety technology (e.g. lane control, brake assist and fatigue monitors), telematics to manage hours, speed and harsh braking, onboard cameras to support fatigue management, training and accident investigations. The effort is underpinned by operations excellence, focusing on the human elements of road safety. This includes briefings and debriefings, driver management, driver training, toolbox talks, safety meetings and a workshop management system.

**COVID-19**

Our primary duty and responsibility during Covid-19 has been and remains to lead and act in the best interest of all our stakeholders. Our focus is on protecting our people, operations, clients and suppliers from infection, and fulfilling the critical role we play in ensuring the continued supply of the essential products and services needed to respond to this threat.

Business continuity plans and pandemic protocols and guidelines set the stringent safety and strict access controls needed to prevent the spread of the virus within our buildings and warehouses and keep our employees and their families healthy. Over the course of the three waves experienced, many employees worked primarily from home, while essential employees work on different shift systems and in separate offices to allow for increased social distancing and to ensure continuity when a member of a team tests positive for the virus. Virtual meetings are encouraged.

Our protective measures include daily temperature and health screening, hand sanitisation dispensers, PPE and rigorous hygiene, cleaning and disinfectant programmes for high-risk areas, including trucks used across shifts. Workplaces are continuously monitored using risk assessments and, in South Africa, weekly documented compliance inspections.

<p>Our Market Access and Logistics Africa businesses have a dedicated Covid-19 champion who promotes awareness, ensures that communication reaches all operational levels, monitors compliance by means of documented compliance inspections and manages suspected Covid-19 cases in line with the National Institute for Communicable Diseases protocols. Measures have also been implemented to support contact tracing. In Logistics International, similar duties are managed by a crisis team, which co-ordinates with the company doctor to adapt preventative measures, when required. A dedicated Covid-19 champion manages all suspected cases and emergencies on a 24/7 basis.</p> <p><b>Responsible Supply Chain</b> While we do not have control over human rights in the supply chain, we take precautions to minimise the risk of doing business with parties that violate human rights. Imperial requires its suppliers to act in accordance with good business ethics, with human rights and labour rights being part of the due diligence and certification criteria included in our selection process of new acquisitions and suppliers.</p> <p>In addition to compliance with the applicable laws and regulations in the country/countries of operation(s), Imperial expects suppliers to:</p> <ul style="list-style-type: none"> <li>• Support sustainable development and commit to continuous improvement of Health, Safety, Health, Environment and Quality (SHEQ) issues in their operations, and actively work towards employees' safety, and</li> <li>• Respect human rights, comply with relevant ILO labour standards and relevant international human rights conventions</li> </ul> <p><b>Privacy and Confidentiality</b> We respect the privacy and the confidentiality of personal data of all our stakeholders.</p> <p>We give due consideration to the legal issues that apply to the use of information and communication technology (ICT), as well as the collection, processing, sharing, retention and destruction of information in all forms. Data protection standards have been formulated and internal and external data transfer agreements put in place to ensure we comply with the Protection of Personal Information (POPI) Act and other relevant ICT legislation in South Africa, privacy legislation across Africa and the General Data Protection Regulation (GDPR) in the EU.</p> <p>As new policies are published, they are supported by employee awareness campaigns, and training if required. The information security representatives and privacy custodians in individual businesses receive monthly internal training on policies, and</p>		
---	--	--

they are required to report on the progress of policy implementation.

**Corporate Social Investment**

Imperial also works to address human rights issues in our communities, through our Corporate Social Investment (CSI) programme. Through this, we support development in areas where society’s resources are not sufficient to guarantee wellbeing and fundamental rights of the local communities, including the right to education, healthcare and public safety.

Details regarding our priorities and activities for advancing human rights-related matters during FY20 can be found on page 33-63 of the **ESG Report**. More recently, in light of the impacts of COVID-19 lockdowns and compounded by the geographies in which we operate, a CSI initiative and internal employee awareness campaigns around gender-based violence have commenced.

**MEASUREMENT**

Various safety indicators and CSI spend undergo external limited assurance (refer to pg 78-79 of the **ESG Report FY20** for details).

For health and safety, operating companies within our businesses are certified to various standards dependent on the industry they operate within and client requirements. Examples of such certifications include:

RTMS (SANS 1395:2019) – South Africa

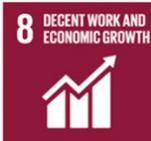
ISO 22000:2019

Safety & Quality Assessment for Sustainability (SQAS)

International Cyanide Management Code (ICMI).

Assessments such as the EcoVadis supply chain assessment and the FTSE4Good rating, also review social performance, including human rights topics. Regulatory authorities conduct periodic inspections to confirm our compliance with applicable regulations.

Our performance on human rights indicators (safety, transformation - including racial and gender representation on the board and at management levels as well as preferential procurement and enterprise development, CSI spend) is recorded in our **ESG Report FY20** (pg 62-63). In addition, indicators regarding the impacts of our CSI programme are contained within our **CSI fact sheet**.

Labour		
<p><b>UN Global Compact Principles:</b></p> <p><b>Principle 3:</b> Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;</p> <p><b>Principle 4:</b> the elimination of all forms of forced and compulsory labour;</p> <p><b>Principle 5:</b> the effective abolition of child labour;</p> <p><b>Principle 6:</b> the elimination of discrimination in respect of employment and occupation.</p>		
<p><b>Our commitment:</b></p> <p>At Imperial, our efforts to be a responsible business requires building a culture on integrity, respect and inclusiveness. We do not tolerate any form of discrimination, slavery, trafficking or forced labour in any part of our business or supply chain. Our commitment to respecting labour rights is guided by the International Bill of Human Rights as well as the ILO’s Core Labour Standards and its Tripartite Declaration of Principles.</p>		
Disclosure on actions and measurement	Where to find more information	GRI indicators and SDG alignment
<p><b>ACTIONS</b></p> <p>Respect for human rights and our employees is included in several of our policies:</p> <ul style="list-style-type: none"> <li>• Imperial’s Code of Conduct</li> <li>• Imperial’s Code of Conduct – Corporate and Social Responsibility Procurement Guidelines</li> <li>• Various Human Resources policies such as those governing disciplinary processes, grievances, right to associate, etc</li> <li>• Climate Change and Environmental Sustainability Framework &amp; Strategy</li> </ul> <p>The importance of equality and diversity is entrenched in Imperial’s values and in the Group’s recruitment and remuneration guiding principles. Imperial has formally outlined commitments on labour standards in our <b>Code of Conduct</b> and human resources policies through a number of provisions including the following:</p> <p><b>Respect and fair treatment</b></p> <ul style="list-style-type: none"> <li>• We foster a culture and working environment where our people treat each other with respect, integrity, courtesy, and fairness, promoting equal opportunity for all regardless of their gender, ethnic origin, age, creed, sexual orientation, political convictions, or other corresponding matters. We value all employees as individuals.</li> <li>• We do not tolerate harassment or unfair discrimination in our working environments. We are committed to respecting human rights and workers’ rights, and we demand the same from all our suppliers.</li> <li>• We take an unambiguous stand on harassment, discrimination, child labour, forced labour or any exploitation: it is neither compliant with our values nor acceptable. Assessments indicate that there are no instances of material risk</li> </ul>	<p><a href="#">Imperial Code of Conduct</a></p> <p><a href="#">Imperial Code of Conduct – Corporate and Social Responsibility Procurement Guidelines</a></p> <p><a href="#">Imperial climate change and environmental sustainability framework and strategy</a></p> <p><a href="#">Imperial ESG Report FY20</a></p> <p><a href="#">Careers at Imperial</a></p> <p><a href="#">Women at Imperial</a></p>	<p>GRI: 102-8, 102-41, 401-1, 403-9, 404-3, 405-1, 406-1</p> <div style="text-align: center;">  <p>Achieve gender equality and empower all women and girls</p> </div> <div style="text-align: center;">  <p>Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all</p> </div> <div style="text-align: center;">  <p>Reduce inequality within and among countries</p> </div>

<p>relating to freedom of association or collective bargaining, child labour, or forced or compulsory labour within Imperial.</p> <ul style="list-style-type: none"> <li>• We act in compliance with laws and regulations, which we see as our minimum standards, and we expect our business partners to act in accordance with our minimum standards.</li> <li>• We apply and comply with the local labour legislation in all our countries of operations, as well as any collective bargaining agreements.</li> <li>• In accordance with ILO conventions and standards, all of Imperial personnel have the right to organise themselves and to belong to union associations. However, not all employees in all countries are covered by collective bargaining agreements.</li> </ul> <p><b>Professional development and support</b></p> <ul style="list-style-type: none"> <li>• We invest in our people to develop the professional knowledge and skills necessary for them to effectively perform their roles.</li> <li>• We help our people reach their potential through investments in personal and professional development and support programs.</li> <li>• We provide a safe work environment for our people and expect our clients and suppliers to do the same.</li> </ul> <p><b>Diversity and inclusion power the workforce of the future</b></p> <p>To succeed Imperial believes that its workforce must reflect the world around it.</p> <ul style="list-style-type: none"> <li>• We encourage and value a diverse mix of people, view-points, talents and experiences. We believe that workforce diversity is a competitive advantage both in business operations and in competing for the best talent.</li> <li>• We create inclusive working environments that not only address individual needs, but allow our people to utilise their unique strengths.</li> <li>• We ensure a fair working environment and every employee at Imperial is entitled to fair treatment and equal opportunities regardless of their gender, ethnic origin, age, creed, sexual orientation, political convictions or other corresponding matters. We are committed to respecting human rights and value all employees as individuals.</li> </ul>		
--	--	--

**Gender diversity**

During FY2019, Imperial launched a Global Women’s Forum initiative as part of its long-standing commitment to talent development and building a workforce with the skills to solve the business and societal challenges of the Fourth Industrial Revolution. As part of the new initiative, Imperial seeks to attract, retain and increase the representation of women at all levels.

We are making conscious efforts to take steps to increase the number of women and underrepresented minorities in our leadership ranks throughout the organisation, while recognising that gender and inclusion efforts are most successful when supported by the right environment, culture and policies. Our strategy includes modifying talent processes, setting global standards, providing our people with more development, sponsorship and leadership opportunities to inform our actions.

**Responsible supply chain**

Our **Code of Conduct** reflects commitments to respect the rights of our workforce and people working at our sites, including those people working through our contractors and suppliers. Our expectation is that workers in our operations, joint ventures and supply chains are not subject to abusive or inhumane practices, such as child labour, forced labour, trafficking, slavery or servitude, discrimination or harassment.

**Mergers and acquisitions due diligence**

A comprehensive due diligence process is conducted on all potential new acquisitions. M&A targets’ practices related to human and labour rights are reviewed in the audits.

Details regarding our priorities and activities for advancing labour practices during FY20 can be found on page 17-31 of the **ESG Report**.

**MEASUREMENT**

A subset of our key performance indicators for labour standards undergo external limited assurance (refer to pg 78-79 of the **ESG Report FY20** for details).

Furthermore, Imperial undergoes recognised international ESG assessments and ratings. These include the EcoVadis supply chain assessment and the FTSE4Good rating, amongst others. Regulatory authorities conduct periodic inspections to confirm our compliance with applicable regulations.

<p>Our performance on labour standards indicators (employment equity including racial and gender diversity, participation in collective bargaining agreements, training hours and spend) is recorded in our <b>ESG Report FY20</b> (pg 30-31).</p>		
--	--	--

Environment		
<p><b>UN Global Compact Principles:</b>  <b>Principle 7:</b> Businesses should support a precautionary approach to environmental challenges;  <b>Principle 8:</b> undertake initiatives to promote greater environmental responsibility;  <b>Principle 9:</b> encourage the development and diffusion of environmentally friendly technologies</p>		
<p><b>Our commitment:</b>            As a multi-national operator in logistics and market access, Imperial strives for zero harm to people and the environment. Being a prominent global top 40 logistics firm means that the successful transition to a more sustainable, low-carbon economy is of strategic importance to us. We are committed to integrating sustainable environmental practices into our everyday operations, being innovative to reduce our environmental footprint and helping our clients minimise their climate change-related supply chain risks. We support the aims of the 2015 Paris Agreement, and the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).</p>		
Disclosure on actions and measurement	Where to find more information	GRI indicators and SDG alignment
<p><b>ACTIONS</b></p> <p>As highlighted in our <b>Environmental Sustainability Policy Statement</b>, Imperial is committed to responsible environmental stewardship and sustainable business practices. As a leading logistics company, we recognise that our business activities have an impact on the environment. In the interest of our stakeholders, including our employees, customers, shareholders, suppliers and communities, we are committed to minimising this impact and to developing, promoting and implementing innovative solutions and services that are environmentally friendly, by creating an inspirational brand that makes a positive difference to our customers, our planet and each other.</p> <p>We believe we have a responsibility to care for and protect the environment in which we operate and are committed to improving environmental performance across all our business activities. We also encourage our business partners to support us in this effort.</p> <p>Imperial recognises its key environmental impacts to be in the areas of:</p> <ul style="list-style-type: none"> <li>• Energy use</li> <li>• Materials use</li> <li>• Waste generation</li> <li>• Emissions to air/water</li> <li>• Water use</li> <li>• Transport</li> <li>• Procurement</li> </ul> <p>We continually strive to reduce our ecological footprint by:</p>	<p><a href="#">Imperial environmental sustainability policy statement</a></p> <p><a href="#">Imperial ESG report FY20</a></p> <p><a href="#">Imperial CDP submission 2020</a></p> <p><a href="#">Imperial climate change and environmental sustainability framework and strategy</a></p>	<p>GRI: 301-1, 302-1, 302-4, 302-5, 303-1, 305-1, 305-2, 305-3, 305-4, 305-5, 306-2, 306-3, 307-1, 308-1</p> <div style="text-align: center;">  <p>7 AFFORDABLE AND CLEAN ENERGY</p> </div> <p>Ensure access to affordable, reliable, sustainable and modern energy for all</p> <div style="text-align: center;">  <p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> </div> <p>Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation</p>

- Adopting an ESG strategy during the course of FY21, and linking ESG KPIs to executive remuneration.
- Adopting the highest environmental standards in all areas of our operations, by meeting and exceeding all relevant legislative requirements.
- Assessing our organisational activities and identifying areas where we can minimise our impacts.
- Minimising waste through careful and efficient use of all materials and energy.
- Purchasing sustainable products wherever feasible [e.g. recycled, low environmental impact products and energy from renewable resources], with waste avoidance and reduction of environmental impacts in mind.
- Striving towards zero waste to landfill through waste reduction, reuse and recycling.
- Minimising the use of water.
- Improving the efficiency of buildings through environmentally sustainable design with new and refurbished projects.
- Training employees in good environmental practices and encouraging employee involvement in environmental actions.
- Reducing risks from environmental, health or safety hazards for employees and others in the vicinity of our operations.
- Adopting a green transport strategy.
- Aiming to include environmental and ethical considerations in investment decisions where appropriate.
- Assisting in developing solutions to environmental problems in our own business and in our sector.
- Continuously assessing the environmental impact of all our operations and set meaningful and realistic targets to improve our performance.

Details regarding our actions to continually improve our environmental impacts for Financial Year 2020, covering the bullet points above, can be found on page 65-79 of our **ESG Report**. The write-up demonstrates our precautionary approach and our adoption of latest technology regarding environmentally friendly trucks.

### Climate change

In-depth disclosure of Imperial’s carbon footprint, as well as our risks and opportunities related to climate change, can be found in the Imperial **ESG Report FY20** and the **2020 Imperial CDP** (formerly Carbon Disclosure Project) Climate Change response. Please see question 4 of our CDP response for information on Imperial’s initiatives to manage



Make cities and human settlements inclusive, safe, resilient and sustainable



Ensure sustainable consumption and production patterns



Take urgent action to combat climate change and its impacts

and reduce our carbon footprint as well as pg 65 – 77 of the **ESG Report FY20**.

**MEASUREMENT**

Ensuring the accuracy of our data is a high priority to enhance credibility amongst our stakeholders. Our key performance indicators for environmental impacts undergo external limited assurance (refer to pg 78-79 of the **ESG Report FY20** for details).

Furthermore, Imperial undergoes recognised international ESG assessments and ratings, and obtains relevant certifications on environmental, health and safety standards, where applicable, to ascertain the quality of our management systems and practices. These include the EcoVadis supply chain assessment, ISO 50001 and 14001 certifications and the FTSE4Good rating, amongst others.

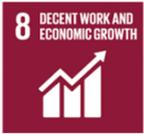
Regulatory authorities conduct periodic inspections to confirm our compliance with applicable regulations.

**Environmental stewardship**

Our performance on key environmental focus areas (fuel, electricity and water consumption, waste generation, environmental incidents and compliance performance) can be found in our **ESG Report FY20** (pg 77).

**Climate change**

Details regarding our performance on key greenhouse gas metrics can be found in our **ESG Report FY20** (pg 77 – fuel and electricity consumption and Scope 1, 2 and 3 greenhouse gas emissions) and in further detail in questions 6, 8 and 9 of our **CDP response**.

Anti-Corruption		
<p><b>UN Global Compact Principles:</b> Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.</p>		
<p><b>Our commitment:</b> We have a moral and ethical duty to always act with the highest standards of integrity and honesty in delivering our strategy. We do not tolerate acts of bribery or corruption committed by any of our employees, including the Board of Directors, or any third parties who act on our behalf. Our commitment to anti-bribery and corruption builds on our corporate responsibility to our customers, shareholders and colleagues to deter, prevent, detect and respond to those who would seek to use the Group to facilitate any form of financial crime.</p>		
Disclosure on actions and measurement	Where to find more information	GRI indicators and SDG alignment
<p><b>ACTIONS</b></p> <p>Imperial actively supports multiple efforts to eradicate corruption throughout the globe. As a signatory to the UNGC we conform to the Organisation for Economic Co-operation and Development (OECD) Principles.</p> <p>Imperial operates in parts of the world where bribery and corruption present a high risk, so it is important that Imperial makes its position regarding both absolutely clear to our employees, contractors, suppliers and others in any way connected to its business.</p> <p>Imperial does not engage in bribery or corruption in any form, and we expect our suppliers, customers and other business partners to behave in the same way. This is stated in Imperial’s <b>Code of Conduct</b> which categorically prohibits any forms of bribery and corruption, as does our <b>Code of Conduct – Corporate and Social Responsibility Procurement Guidelines</b>.</p> <p>Imperial has formally outlined the business principles it believes in and its commitments in the <b>Anti- Bribery and Corruption Policy</b>. The policy serves to align decision-making and activities across Imperial and addresses a number of areas, including anti-bribery and corruption.</p> <p>The Group Risk and Ethics teams work closely with senior Imperial management to build and enhance a globally consistent anti-corruption program across the Imperial group, which includes the following elements:</p> <ul style="list-style-type: none"> <li>• An Imperial anti-bribery and corruption policy that includes requirements for all group divisions own anti-corruption programs and addresses matters such as bribery, facilitation payments, political and charitable contributions, and gifts and entertainment;</li> <li>• Anti-corruption training that includes applicable policies, corruption red flags and case scenarios;</li> <li>• Annual confirmation that all Imperial top and senior management employees have read, understood and</li> </ul>	<p><a href="#">Imperial Code of Conduct</a></p> <p><a href="#">Imperial Code of Conduct – Corporate and Social Responsibility Procurement Guidelines</a></p> <p><a href="#">Imperial Anti-bribery and corruption policy</a></p> <p><a href="#">Imperial Corporate Governance Report FY20</a></p> <p><a href="#">Imperial ESG Report FY20</a></p>	<p>GRI: 102-16, 205-1, 205-2, 205-3</p> <div style="display: flex; flex-direction: column; align-items: center;"> <div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p>Promotes sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all</p> </div> </div> <div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p>Reduce inequality within and among countries</p> </div> </div> <div style="display: flex; align-items: center;">  <div style="margin-left: 10px;"> <p>Promote peaceful and inclusive societies for sustainable development,</p> </div> </div> </div>

<p>agree to comply with the local anti-corruption policy and are not in violation of this policy; and</p> <ul style="list-style-type: none"> <li>• A review program to assess compliance with Imperial’s anti-bribery and corruption policies and drive continuous improvement in anti-corruption programs.</li> </ul> <p><u>Whistle-blowing hotline</u> We encourage our employees to express their concerns in an open and direct manner, and they are required to point out any circumstances that might indicate an infringement of laws and internal directives, including suspected occurrences of bribery and corruption. An independent whistle-blowing hotline, managed by Deloitte, services all our operating countries, enabling stakeholders to report concerns anonymously, with the option to report concerns in a language local to their country.</p> <p><u>Training</u> Training on our anti-bribery and corruption policy has been rolled out to staff through an eLearning tool. This includes training on the Foreign Corrupt Practices Act, as many of our international clients are subject to the Act or similar legislation. For our employees in the healthcare businesses, refresher training is undertaken annually.</p> <p><b>MEASUREMENT</b></p> <p>The outcomes of regular internal audits, as well as client audits, confirm that we are implementing acceptable anti-bribery and corruption practices.</p> <p>Refer to pg 14-15 of the <b>ESG Report FY20</b> for commentary on performance against key performance indicators for the year, including whistleblower reports, actions taken against bribery and corruption, number of employees trained on bribery and corruption, litigation and compliance.</p>		<p>provide access to justice for all and build effective, accountable and inclusive institutions at all levels</p>
--	--	--