



## **Modern Slavery and Human Trafficking Statement**

One of our most basic beliefs is that everyone should have the opportunity to work. IMS Building Solutions Limited complies with the applicable employment laws and our obligation is to ensure fairness in the hiring and advancement of all employees, both permanent and temporary without discrimination. All of our staff have a personal responsibility for maintaining a respectful work atmosphere, free of abusive or unprofessional conduct. Every employee is expected to respect other people and treat them with dignity.

Our commitment to respect in the workplace includes our full support for international efforts to promote ethical principles and practices related to the prevention of the exploitation and abuse associated with modern slavery and human trafficking. We also expect commitment to these principles from all organisations with which we do business and will not support or do business knowingly involved in slavery or human trafficking.

IMS is committed to social and environmental responsibility and has zero tolerance for slavery and human trafficking. As part of this commitment we prohibit the use of forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery, or trafficking of persons. IMS considers each supplier's conduct vis-à-vis the IMS Supplier Code of Conduct when awarding and/or renewing business with the supplier.

IMS has taken a variety of actions to verify the absence of forced labour, slavery, and human trafficking in our supply chain, including the following:

1. **VERIFICATION AND RISK ASSESSMENT:** Internal assessment of supply chain risk based on international indices, supplier performance (e.g., audit and spot check results), and other indicators of supplier-specific risks. This risk assessment is conducted annually, and incorporates data on human trafficking incidence, as well as other risk factors including human rights risk and country governance and accountability. Supplier-specific risk incorporates data regarding labour management systems, the demographics of the workforce, and the use of labour agents.
2. **AUDITS:** On-site verification of EICC Code conformance through independent, third-party audits that are announced, as well as through spot checks conducted by IMS employees in-region. The third-party audits includes an assessment of the suppliers' policies and practices with regards to human trafficking risks and controls as well as their management and oversight of their own suppliers, with particular emphasis on any labour brokers. Spot checks assess a set of key social and environmental indicators, including indicators related to forced labour. We select supplier sites to audit and to spot check based on the verification and risk assessment described above. Additional detail and statistics on both audits and spot checks, as well as a discussion of findings and associated corrective actions, are available in "Monitoring and Assessment" in the Supply Chain Social and Environmental Responsibility section of IMS's Sustainability Report.

3. SUPPLIER CERTIFICATION:
  - Certification from suppliers of compliance with all applicable laws, including those related to freely chosen employment, showing high risk on the SAQ are audited, and supplier sites demonstrating known risk factors for human trafficking are investigated with regard to those issues specifically and, depending on the outcome, may be audited as well.
  - Acknowledgements of the IMS Supplier Code of Conduct from 100% of IMS's Tier 1 and strategic Tier 2 direct suppliers. This industry-standard Code includes a substantive section on human trafficking. Compliance with the Code is also part of our standard contract language for all IMS vendors, and evaluated through the SAQs and audits referenced above.
4. INTERNAL ACCOUNTABILITY: Internal accountability standards and procedures to help confirm that employees and suppliers meet IMS standards. This program is intended to ensure that IMS employees and suppliers are aware of and adhere to established standards and processes. Supplier accountability occurs through mechanisms ranging from audit corrective actions (see "AUDITS," above) to supplier scorecards and quarterly business reviews. IMS also maintains corporate-wide accountability and grievance mechanisms (e.g., the IMS Ethics Hotline), which are available to both employees and external parties. For additional information, see the Governance section of IMS's Sustainability Report.
5. TRAINING: Training all IMS supply chain management professionals on the IMS Supplier Code of Conduct. This includes employees at all levels of the commercial and engineering supply chain organizations, and is conducted regularly through a variety of training approaches, from in-person, all-day workshops to online modules. Human trafficking is consistently covered as part of the training provided.

IMS's Global Supply Chain Management organization has responsibility for implementing and monitoring compliance to all of the supply chain activities described above.

Our focus on slavery and human trafficking is part of a larger effort to encourage supply chain transparency and accountability. We will not tolerate forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery, or trafficking of persons by any IMS supplier or for any other purpose.