

Functional Group: Legal and Compliance

SOP

GRP-LC6-024

Procedure Name: Charitable Donations and Sponsorships

Revision No:

Rev 003

Effective date: November 2016

Applicable Regions: Global

Giving Charitable Donations and Providing Sponsorships

1.1 Policy Statement

IMI only provides charitable donations or sponsorships which have been appropriately approved.

1.2 Document Purpose

This document sets out IMI's policy and approval requirements for charitable donations and sponsorships. It applies to donations made by IMI businesses (and IMI employees) when there is a connection between the recipient of those donations and IMI's commercial activities (for example, charities established by customers of IMI). Any charitable donations or sponsorships to organisations that have no link to IMI's commercial activities are not subject to this policy.

To the extent that this Standard Operating Procedure conflicts with local legal requirements, you should contact your Divisional Legal and Compliance team for guidance. Divisions and business units may, with the approval of your Divisional Legal and Compliance team, adopt their own policies and procedures relating to charitable donations, but the policy must contain requirements that are equivalent to, or stricter than, the requirements set out in this Standard Operating Procedure (i.e. they cannot be less restrictive). Please contact your Divisional Legal and Compliance team to check whether another, more restrictive, policy applies to your division or business unit.

1.3 Approval Requirements

If you wish to make a charitable donation or sponsorship on behalf of IMI, you will need to seek the appropriate approval for the donation using the form attached.

Approvals are only given when:

- *The donation or sponsorship is made on an arm's length basis. That is, there is no actual link, or no link could be perceived, between the making of the donation and the receipt of any commercial benefit by IMI;*
- *It is sufficiently clear that the donation or sponsorship will be paid to an organisation that is expected to use it for a charitable or community purpose and not to an individual or for a non-charitable purpose;*
- *That the charity or sponsored organisation is registered in the jurisdiction in which the payment will be made and operates for the purpose that the donation or sponsorship is being made; and*
- *If anything is to be offered to IMI in return for the donation or sponsorship, it is proportionate to the amount given and not intended to give IMI any benefit (commercial or otherwise) outside of the relationship with the charity or organisation sponsored.*

If the donation meets these requirements and is under £1,000 (or relevant currency equivalent) the local Business Unit Managing Director and Business Unit Finance Director may approve the donation or sponsorship using the form attached.

If the donation is worth £1,000 or more (or equivalent) the donation must be approved by the Divisional Managing Director and Divisional Finance Director using the form attached.

No donation or sponsorship should be committed to or made until approval has been received in writing. You should retain a copy of the approval for your records for six years.

You should let the person who requests a charitable donation or sponsorship know that IMI has an approval process for them and that you will need to submit the request for approval.

Any charitable donations must be paid directly into a bank account in the full name of the charity (not individuals connected to it) located in the same country as the charity. Charitable donations should never be paid in cash.

1.4 Limited Exception to Approval Requirements

This policy does not apply to donations made through the IMI plc Charitable Donations Committee whose budget is approved by the IMI Board.

Charitable Donation and Sponsorship Approval Request Form

This form should be used to request approval to make a charitable donation or to enter into a sponsorship arrangement.

About the IMI person requesting approval:	
1.	Your name:
2.	Your IMI business name:
3.	Your telephone number:
4.	Your email address:
About the charity or organisation to be sponsored (the Organisation):	
5.	What is the name of the Organisation?
6.	What is the legal or regulatory registration number of the organisation and where is it based? (enter "not applicable" if there is no registration process in the jurisdiction in which they are based)
7.	What does the Organisation do (what is its charitable purpose)?
8.	Has the donation been requested by an external party? (if so, please provide details of the person and who they work for)
9.	Is the Organisation linked to any commercial or political body? (if so, please provide details)
10.	<p>What checks have you conducted to ensure potential links between any external person requesting the donation and the Organisation have been identified?</p> <p>(For example, have you checked who the registered officers of the Organisation are?)</p>
About the donation or sponsorship amount:	
11.	How much money or what benefit in kind is being requested?

12.	<p>Is anything to be offered to IMI in return for the donation?</p> <p>If yes, what is to be offered and how does this relate to the proposed donation?</p>
13.	<p>What percentage of the charity's total revenue does the donation represent?</p>
14.	<p>Has a specific purpose been assigned to the charitable contribution and is it consistent with the purpose of the Organisation described above?</p>
15.	<p>What are the bank details for the Organisation to which any donation or sponsorship can be paid?</p> <p>The account should not be in the name of an individual and should name the Organisation.</p>
16.	<p>In what country is the bank account?</p> <p>If the account is in another country than where the Organisation is registered, what, if any, reason has been provided for this?</p>

For approval purposes only

Signature of IMI person requesting approval

Print Name:

Date:

Approval decision (delete as applicable)

Approved/ Rejected/ Referred for further information

Signature of Business Finance Director (or Divisional Finance Director for donations of £1,000 or more)

Print Name:

Date:

Signature of Managing Director (or Divisional Managing Director for donations of £1,000 or more)

Print Name:

Date: