

Functional Group: Legal and Compliance  
 Procedure Name: Anti-Bribery Policy  
 Effective date: November 2016

SOP GRP-LC6-21  
 Revision No: Rev 003  
 Applicable Regions: Global

## Anti-Bribery Policy

### 1.1 Policy Statement

We do not engage in Bribery or Corruption of any kind and do not allow any external parties to do so on our behalf.

### 1.2 Document Purpose

This document provides a clear statement that IMI and its employees do not participate in any form of Bribery or Corruption.

### 1.3 Document Definitions

Term	Definition
<b>Bribery</b>	<p>Bribery is offering, promising, giving, requesting or accepting anything of value (for example, money, gifts, hospitality, favours, information, job opportunities, or any other benefit or advantage) with the purpose of improperly obtaining an advantage, such as:</p> <ul style="list-style-type: none"> <li>➤ <i>Gaining new business (for example, to secure a new contract);</i></li> <li>➤ <i>Retaining business (for example, to secure a repeat order or the renewal of a contract from an existing customer); or</i></li> <li>➤ <i>Obtaining other advantages in relation to IMI's business or influencing any decision or outcome for the benefit of IMI or IMI personnel (for example, a change to a bidding process to IMI's advantage or obtaining relevant permits/approvals for the business or IMI personnel).</i></li> </ul>
<b>Corruption</b>	<p>Corruption is the misuse of powers gained through employment (most often in the public or government sector) for the personal or private gain of the person who acts corruptly or a third party they are associated with.</p> <p>Bribery is a form of Corruption. It is though only one potential form of Corruption. Other forms of Corruption include:</p> <ul style="list-style-type: none"> <li>➤ <i>Nepotism: favouritism shown to relatives or friends;</i></li> <li>➤ <i>Fraud: cheating an employer, customer or other person through deceit;</i></li> <li>➤ <i>Embezzlement: stealing of money or property; and</i></li> <li>➤ <i>Bid rigging: agreeing to tender or not to tender in an inappropriate fashion.</i></li> </ul>

## 1.4 Procedures

Compliance with this policy against Bribery and Corruption will be achieved through following the Standard Operating Procedures listed below:

- GRP-LC6-22 Facilitation payments (small bribes to secure prompt completion of routine administrative tasks);
- GRP-LC6-23 Political Activities and Donations to Political Organisations;
- GRP-LC6-24 Giving Charitable Donations and Providing Sponsorships;
- GRP-LC6-25 Hospitality, Entertainment and Gifts (Giving and Receiving);
- GRP-LC6-26 Conflicts of Interest (between an employee's interest and those of IMI);
- GRP-LC6-27 Know your Customer; and
- GRP-LC6-28 Dealing with Business Partners (Third Parties)

To the extent that any of these Standard Operating Procedures conflict with local legal requirements, you should contact your Divisional Legal and Compliance team for guidance. The divisions and individual business units may, with the approval of the relevant Divisional General Counsel, adopt their own policies and procedures relating to Anti-Bribery and Corruption, but such policies must contain requirements that are equivalent to, or stricter than, the requirements set out in these Standard Operating Procedures (i.e. they cannot be less restrictive). Please contact your Divisional Legal and Compliance team to check whether any, more restrictive, policies apply to your division or business unit.