

Functional Group: Legal and Compliance

SOP

GRP-LC6-023

Procedure Name: Political Activities and Donations

Revision No:

Rev 002

Effective date: November 2015

Applicable Regions: Global

Political Activities and Donations to Political Organisations

1.1 Policy Statement

We do not participate in political activities and do not make donations or provide resources for any political purpose.

1.2 Document Purpose

This document explains when our prohibition on making donations to or providing resources for political purposes applies and what to do if you are approached to give an IMI view on political issues.

1.3 When does the Prohibition on Making Political Donations Apply?

You should not make political contributions or donations of any kind (whether for lobbying or in support of political parties or candidates or otherwise) for or on behalf of IMI, or use IMI's resources to support political activities. Neither should you represent the views of IMI, or be perceived to be doing so, on any political issue.

In a personal capacity, you can make political donations from your own money, or participate in political activity in your own time. You should make it clear that such activities are carried out in a personal capacity and not for or on behalf of IMI and you should not use IMI resources.

1.4 What Should I do if I am Asked to Express IMI's View on a Political Issue?

If you are approached by anyone to obtain IMI's views on any political issues, you should refer that request to IMI Headquarters; either the Investor Relations Director, the Chief Compliance Officer or the Group Legal Director and Company Secretary (contact details are available on the intranet).