

# Modern Slavery and Human Trafficking Statement

## IMI plc financial year ending 31 December 2025



This Modern Slavery and Human Trafficking Statement (the **Statement**) is made pursuant to section 54 of the Modern Slavery Act 2015 on behalf of IMI plc and its relevant group companies listed at the end of this Statement (together, **IMI**). It sets out the steps taken during the financial year ending 31 December 2025 to prevent modern slavery and human trafficking in our operations and supply chain.

### Message from the Chief Executive Officer (CEO)

*At IMI, we operate ethically, source materials responsibly, and work to prevent modern slavery and human trafficking in our business and supply chain. As a United Nations Global Compact signatory, our strategy and practices reflect its principles, and we prioritise human rights through established procedures.*

*Compliance with laws and respect for communities is essential. We require our partners to meet our standards, as detailed in our [Supply Chain Code of Conduct](#), helping us address risks and uphold integrity across operations.*

*If you notice conduct that conflicts with our values or are uncertain about any action, please speak up and report it at [www.imihotline.com](http://www.imihotline.com) or refer to our Global Speaking Up Policy for more information. We foster an open environment where concerns can be raised without fear of retaliation.*

*By upholding these standards, we protect people and ensure IMI's continued success and ethical future.*

*Thank you.*

**Roy Twite**

Chief Executive Officer

### Governance and accountability

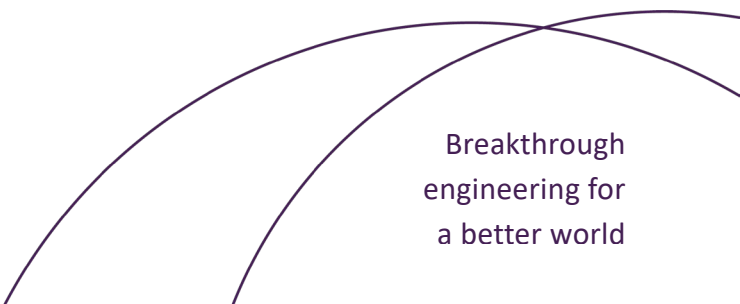
IMI's CEO is accountable for IMI's performance and overall compliance. The Chief Operating Officer is accountable for implementation, monitoring, and effectiveness of strategies designed to uphold IMI's commitments, including those related to human rights and modern slavery as outlined in this Statement, across all IMI Sectors.

This responsibility is flowed down to each Sector President, who in turn, is accountable for their respective Sector's performance and compliance with IMI's human rights principles and values. IMI's Supply Chain function understand IMI's approach, working to advance efforts and strategies to eliminate the risks of slavery and human trafficking prioritising those that provide goods or services directly contributing to the production of IMI's final products and services "direct suppliers". For the purposes of this Statement, "direct suppliers" means "suppliers". In each Sector, responsible Supply Chain and Procurement leads have implemented effective compliance policies and procedures to mitigate these risks.

### Our business and structure

IMI plc, headquartered in Birmingham, England, serves as the ultimate parent company of the companies within the IMI group. The company is listed on the London Stock Exchange and is a constituent of the FTSE4Good Index.

IMI is a global leader in fluid and motion control. We engineer bespoke valves, actuators and systems in close partnership with customers to enhance safety, productivity and sustainability. From automation and energy to healthcare and transport, our customised solutions are often a small part of a system – but they deliver outsized impact on performance in the world's most critical applications.



Breakthrough  
engineering for  
a better world

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IMI operates across two business platforms (Automation and Life Technology) and five customer-focused sectors: Process Automation, Industrial Automation, Climate Control, Life Science & Fluid Control and Transport (**Sectors**).

- Process Automation engineers advanced automation solutions that improve efficiency, sustainability and safety in severe service applications, using smart technologies and full lifecycle support to maximise long-term performance.
- Industrial Automation's pneumatic and electric motion systems help machine builders and end users around the world automate and optimise manufacturing and warehousing processes.
- Climate Control creates innovative solutions to help our customers optimise heating and cooling systems, reduce energy use and improve building comfort.
- Life Science & Fluid Control solve complex fluid and detection challenges to advance research, diagnose disease earlier and support patient-focused critical care.
- Transport solutions help our customers to improve fuel economy, reduce emissions and enhance safety and driver comfort.

## Direct Operations

We employ more than 10,000 people across manufacturing facilities in 19 countries. Further details on IMI's organisational structure can be found on the IMI website [www.imiplc.com](http://www.imiplc.com).

## Downstream value chain

Our downstream value chain includes distributors, OEM customers and end users who integrate and use IMI's solutions within their equipment, systems and processes.

IMI's structure is designed to maximise collaboration, efficiency, and adherence to its values and principles. IMI's Supply Chain and Procurement team is responsible for supplier onboarding, monitoring, and risk management across all each of the five Sectors. IMI implements measures to ensure these activities align with IMI's overall culture, values, principles, and global commitment to protecting human rights.

## Our People

At IMI, the health, safety and wellbeing of our employees is our top priority. We are committed to:

- Complying with national wage and working condition laws in all regions where we operate, paying at least the legal minimum wage and considering living wage indices to align pay with cost-of-living standards. We have historically allocated budgets to pay higher than average pay awards to employees most affected by rising living costs.
- Training our Supply Chain and Procurement teams to monitor, detect and prevent child, forced, or trafficked labour in our supply chain.

All IMI UK employees must complete a 'Right to Work Check' to verify their legal eligibility to work in the UK. During payroll setup, we verify that each employee's identity matches their work documents and that bank accounts are registered in their names before payroll payments are processed. For international recruitment travel, such as for our graduate program, we reimburse travel and visa expenses. If an employee doesn't have automatic right to work, we consider sponsoring a permit or visa.

Our 2025 Annual Report, available on our website [www.imiplc.com](http://www.imiplc.com) provides details about our workforce policies and procedures. Additionally, you can find our UK Gender Pay Report on the same website. Our disclosures in accordance

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with the Global Reporting Index provide further insights into both our management of our supply chain and our workforce, also accessible on our website.

### Our supply chain

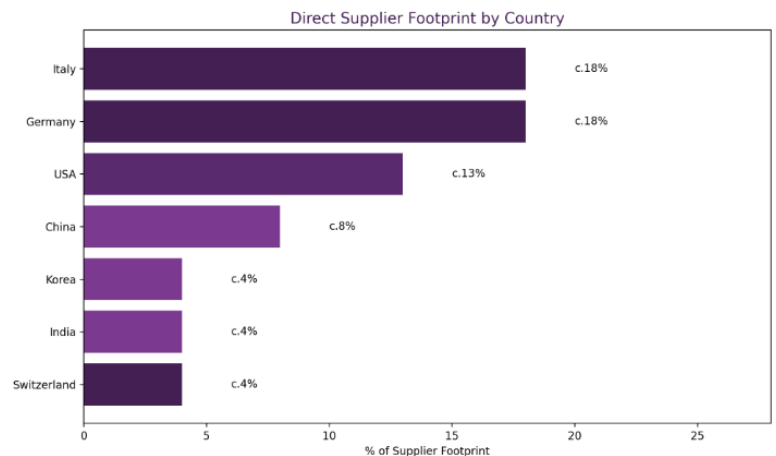
IMI's approach to human rights extends across our global, multi-tier supply chain. We rely on and source a diverse range of raw materials, components and services from over 7,000 suppliers worldwide, including metal castings, elastomers and electronics, as well as other goods and services required to deliver high-quality products in all our Sectors.

Given the specialised technical nature of the products we procure, our tier 1 suppliers have been evaluated as presenting low risk for modern slavery. This is because the majority of components we purchase are highly engineered to detailed specifications, necessitating a skilled workforce for production. Additionally, we have more leverage over these suppliers due to our established relationships, particularly in cases where we own the designs and issue them to the market, giving us greater oversight and control.

In contrast, we have minimal leverage with global electronic component manufacturers from whom we typically purchase standard products in small quantities, often through distributors. This places us further removed from the original producer. As is common within the industry, limited purchasing volume prevents us from dealing directly with manufacturers, reducing our leverage over upstream suppliers.

Our supplier footprint is primarily concentrated in Europe, the USA and Asia-Pacific. The table shows an approximate country breakdown of our direct suppliers. We continue to improve our understanding of our supply chain through monitoring and supplier engagement.

Effective monitoring is central to our programme. We design and continuously enhance procedures to monitor, test and audit suppliers against our human rights expectations, including modern slavery, child labour and human trafficking. We focus on prevention and early identification of risk.



### Key modern slavery risk areas

IMI has identified a small proportion of its supplier population (approximately 1%) as high-risk based on critical potential risk indicators. This assessment did not reflect any definitive violations of human rights principles but was based solely on characteristics and specific factors that are identified as risk indicators.

We believe our most salient modern slavery risks relate to:

- **Suppliers operating in high-risk countries**

Modern slavery risk is significantly higher in countries that have weak labour protections or enforcement, high corruption levels, large migrant worker populations, political instability or conflict and high poverty rates or informal labour markets.

Many of IMI's high-risk suppliers are based in countries or regions that are recognised internationally as high-risk areas such as China, India and Taiwan. A majority of IMI's high-risk suppliers operate in China. IMI is

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working to decrease the number of its high-risk suppliers, including suppliers operating in high-risk countries. In 2025, IMI terminated 11 high-risk suppliers located in China (10) and Qatar (1).

- **Conflict minerals linked to high-risk mining with a greater exposure to human rights concerns**

Some of IMI's high-risk suppliers operate in the electronics, machinery and casting industries. IMI recognises that these areas and industries which may be tied to conflict zones and are associated with higher risks of modern slavery, including forced labour and human trafficking. IMI is aware that minerals and mining industries may rely on "smelters" (e.g. tin, tantalum, tungsten and gold) to process raw materials from mining operations which could potentially link to conflict zones and raise ethical concerns as to sourcing activities. While IMI does not interact directly with such smelters, IMI is vigilant in identifying those suppliers which themselves may rely on smelters in their respective supply chains.

In response to this potential risk, IMI strictly applies its Responsible Minerals Sourcing Policy, and conducts periodic investigations, audits and site visits of relevant suppliers, as needed, to identify and eliminate high-risk operations that may involve human rights issues. IMI's specific policy and procedures is aligned with OECD guidance from the Responsible Minerals Initiative and is available on the IMI website at <https://www.imiplc.com/sites/imi-corp-rev2/files/2024-08/imi-responsible-minerals-sourcing-policy-august-2024.pdf>.

IMI is proud of its record in addressing this risk. IMI increased the number of relevant suppliers investigated for potential conflict minerals issues from over 200 in 2024 to over 300 in 2025 and this has identified a modest number of suppliers that report the existence of high-risk smelters in their supply chain. This allows IMI to tackle possible high-risk smelters and minimise human rights risks.

- **Solar panel sourcing**

IMI has identified a potential high risk supply chain risk relating to the sourcing of solar panels for IMI's factories, since a significant portion of the world's polysilicon is produced in the Uyghur region of China (XUAR). IMI recognises that this region has an increased risk of forced labour and human rights abuses. To mitigate this risk, where we own the property, IMI employs a comprehensive strategy that includes enhanced due diligence requirements, investigation of supply chain risks in specific areas, and the certifications and contractual assurances. These measures continue to be applied in line with IMI's Solar Panel Sourcing Policy. By leveraging its position as a significant buyer of certain raw materials and goods, IMI takes steps to have suppliers themselves commit to conducting their own enhanced due diligence on their own suppliers who may be operating in the XUAR region and posing real forced labour risks. IMI's sites remain committed to following these processes in their sourcing decisions.

## Policies and standards

We have designed and implemented a comprehensive set of robust policies to ensure that we do not involve forced labour or human trafficking in the manufacture of our own products, in any of our operations or in our supply chains.

<a href="#">Our Code</a>	Outlines our commitment to a broad range of issues, including human rights, and sets our expectations for our employees, and our third-party business partners, including suppliers and suppliers, with whom we conduct business. Our Code states: <ul style="list-style-type: none"><li>- We expect our suppliers to commit to ethical business practices, minimise their environmental impact and operate in accordance with the Supply Chain Code</li></ul>
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	<ul style="list-style-type: none"> <li>- We establish and enforce policies and procedures (including the Supply Chain Code) to ensure responsible sourcing.</li> <li>- We ensure fair competition in our supply chain by treating suppliers equitably, avoiding price fixing or bid rigging.</li> <li>- Anyone who suspects unethical behaviour should 'speak up' and report it.</li> </ul> <p>Our Code is approved by the Board and is publicly available in 13 languages on our website.</p>
<a href="#">Supply Chain Code of Conduct (Supply Chain Code)</a>	<p>We expect our business partners, suppliers, contractors, and those in our supply chains to align with our commitment to human rights, particularly regarding violations such as forced or involuntary labour and modern slavery. Specifically, the Supply Chain Code states:</p> <ul style="list-style-type: none"> <li>- Suppliers must comply with all relevant local legislation.</li> <li>- No forced, bonded, child, or involuntary prison labour will be used.</li> <li>- Suppliers' employees must be paid wages and benefits for a standard working week that meet national requirements and have work hours that comply with national laws.</li> <li>- All suppliers must take responsibility for protecting the health and safety of their employees.</li> <li>- Suppliers shall cascade these values to their suppliers.</li> </ul> <p>We commit to fair, ethical and transparent supply chain and purchasing practices.</p> <p>Our Supply Chain Code is available on our website.</p>
Supplier Onboarding Policy	<p>Outlines our mandatory process for onboarding new direct material suppliers. Our goal is to gradually extend its application to service suppliers over time.</p>
<a href="#">Responsible Minerals Sourcing Policy</a>	<p>Confirms our commitment to sourcing minerals ethically and sustainably, ensuring that tin, tungsten, tantalum, gold, and cobalt are obtained with respect for human rights. We require all our suppliers of products containing conflict minerals to promptly identify the origins of these minerals in the products they supply to us.</p> <p>Our Responsible Minerals Sourcing Policy is available on our website.</p>
Global Speaking Up Policy	<p>Outlines the procedure for reporting legitimate concerns about suspected misconduct at IMI without fear of punishment or retaliation. We operate an independently managed IMI Hotline, available 24/7 for everyone. By increasing transparency, we hope to increase trust in our processes. Anyone with an ethical, human rights, or environmental concern about IMI or its supply chain can contact the helpline by visiting <a href="http://www.imihotline.com">www.imihotline.com</a>.</p>
Sustainability Policy	<p>Outlines our commitment to responsible and sustainable business. This was reviewed by the Sustainability Committee and approved by the Board.</p> <p>Our Sustainability Policy is available on our website.</p>
Global Human Rights Policy	<p>We have formalised our human rights activities into a Global Human Rights Policy which was launched in Q1 2026.</p> <p>Our Global Human Rights Policy is available on our website.</p>

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We review and update our policies on a regular basis with input from in-house experts, suppliers, and external stakeholders. Employees' violation(s) of our policies may result in disciplinary action, up to and including termination.

Each Sector is responsible for implementing controls and ensuring compliance with IMI policies and related standard operating procedures and guidelines.

### Our processes – to find, fix and prevent issues

IMI manages supply chain risks throughout the entire lifecycle of its suppliers, from onboarding through to ongoing monitoring to testing and auditing. We have implemented a supply chain solution that enables us to identify, measure, monitor, and mitigate individualised risk assessments of our suppliers and remediate in those situations where suppliers engage in high-risk activity or violate our Code.

### Supplier due diligence and risk management

To prioritise our compliance and mitigation strategies, we apply carefully designed risk-based due diligence measures, tests, and strategies to manage our suppliers. Our onboarding and monitoring strategies are based on risk assessments that consider critical indicators of potential risk, such as:

- (i) location of operation;
- (ii) types of goods and services supplied;
- (iii) size of organisation;
- (iv) familiarity with the supplier, including its owners, managers, and key staff; and
- (v) other relevant risk factors specific to the supplier and its operations.

We use this process to categorise suppliers on a low, medium and high-risk basis.

IMI continuously reviews and monitors suppliers based on their risk level and tracks their activities, with assessments being revisited annually, or more frequently where any potential changes are identified in their risk profiles. This allows us to analyse potential risks based on unique characteristics of each supplier and then prioritise compliance operations to focus more efforts on higher risk suppliers.

### High-risk supplier self-assessment audits

If a high-risk supplier is identified, they must complete a self-assessment audit covering forced and bonded labour, human rights, environmental, and health and safety standards. If the self-assessment audit identifies concerns, then IMI will either (i) implement corrective actions and/or termination of the supplier relationship, or (ii) complete a full on-site audit of the supplier.

To date, IMI has not uncovered any human rights or environmental violations in its tier 1 supply chain.

### Automated monitoring and screening

We use an automated platform, to track, monitor and investigate suppliers (c. 3,600) of products sold in the last 12 months covering 14 different topics, including product compliance, conflict minerals and trafficking and labour rights.

We have identified key strategic suppliers to investigate ESG factors, including climate impact, human trafficking (using the industry-standard STRT - Slavery and Trafficking Reporting Template), and organisational commitment (governance). Our compliance partner also screens our suppliers for adverse media notifications that may reflect a

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change in the status of a particular supplier. In 2025, our compliance partner supported us with the investigation of c.76,000 components in c.66,000 active products.

### Supply Chain Code requirements

All direct suppliers, and indirect suppliers for our German sites (taking a risk-based approach to prioritise efforts) that we consider to be medium or high risk, must sign and comply with our Supply Chain Code before supplying to IMI, or demonstrate that they have equivalent standards in place. To date, more than 2,200 suppliers have formally committed to our Supply Chain Code.

### Corrective actions and ethical terminations

Non-compliance with IMI's Supply Chain Code or policies may lead to appropriate corrective actions, such as stop work notices, warning letters, additional training, and, if necessary, termination of the supplier relationship.

When exiting a supplier relationship, IMI is committed to doing so responsibly and ethically, whilst maintaining respect and fairness throughout the process. We will ensure that the decision is communicated clearly and transparently to the supplier, providing adequate notice and reasons for the termination. We will work collaboratively with suppliers to mitigate any negative impacts on their business and employees, offering support where possible to help them transition smoothly.

### Site/Sector Reporting

Since implementing a site/Sector reporting system in 2024, reports have continued to be prepared throughout 2025 by the Sector Supply Chain Director for their sites/Sectors on a quarterly basis which show progress on identifying and managing supply risk and supplier response rates to ESG surveys, conflict mineral investigations and product compliance.

These reports are reviewed, approved and are now signed by the Sector President to ensure focus on delivering improvement actions and to declare compliance with our global onboarding process. Supplier terminations are also tracked through these reports.

### What we did in 2025

IMI recognises the importance of proactive monitoring and intervention to prevent the possibility that slavery, forced labour or human trafficking exists in our operations and supply chain. We assess, design and tailor our policies and procedures to address country and region-specific risks and Sector-specific guidance, as needed, so our programme operates effectively and our monitoring and reporting functions identify potential risks before problems occur.

In 2025, we implemented additional measures to enhance our modern slavery compliance programme by:

- Commissioning an external review to enhance our human rights-related policies and procedures.
- Establishing a Sustainability Committee of the Board with oversight of our modern slavery commitment, its implementation and monitoring.
- Operating our Global Supplier Onboarding Policy, requiring risk-based due diligence, review and assessment of suppliers for human-rights risks, and ongoing monitoring for risk profile changes.
- Expanding the use of our supply-chain compliance platform to monitor adverse media on suppliers, store signed Supply Chain Codes and assess conflict-minerals and human-rights risks in our supply chain.

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- Operating site/Sector reporting systems to track and tailor proactive monitoring for higher-risk suppliers and their activities.
- Delivering online training to Supply Chain and Procurement leads and employees on onboarding and monitoring processes, risk assessments, site reporting, compliance measurement and legal requirements, supplemented by regional face-to-face workshops (including ESG topics and a modern slavery video) for all key supply chain personnel.
- Offering comprehensive supplier training (via our compliance partner) on product compliance, conflict minerals and ESG standards.
- Updating our Global Speaking Up Policy to encourage open communication and prohibit retaliation for raising concerns, including those related to human rights.

## Additional measures in our organisation

### Training for employees

Training on modern slavery and human trafficking is available to all employees and is mandatory for those who directly interact with our supply chain. These issues are addressed in our Code training, which is delivered to all employees - online for desk-based employees and in person for site-based employees. The Code training undergoes regular reviews. It includes a section on responsible sourcing and human rights. At the end of the training, employees must pass a quiz to demonstrate their understanding. After successfully completing the training and passing the quiz, employees are required to sign a declaration confirming that they have read, understood, and will follow the Code. The Code was updated in 2024, and a renewed mandatory Code training was completed in 2025, achieving a 97% completion rate as of 9 January 2026.

IMI updates and trains its supply chain and procurement professionals to monitor, detect and take steps to prevent forced or trafficked labour on visits to suppliers. This is carried out by an online training module "*IMI Modern Slavery: Implications for IMI and our Supply Chains*" which has been specifically developed by IMI for our people and is available via IMI's learning management platform. The module covers:

- The evolving legal framework.
- Products and locations which are more susceptible to slave labour.
- Indicators to look out for which may indicate modern slavery (deception, excessive overtime, withholding of wages, violence, living on-site, debt bondage).
- IMI's expectations and the policies and procedures in place to prevent the use of modern slavery in our supply chain.

The training is compulsory for all IMI supply chain / procurement professionals, including new employees in these functions. To date, we have trained over 950 employees.

We also have an additional ESG training programme for our procurement teams which included product compliance and human rights in the supply chain. To date, over 300 of our procurement people have completed this training and 92 of these have completed an additional training module covering conflict minerals.

### Training for suppliers

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We offered comprehensive training to all our direct suppliers on product compliance, conflict minerals and Environmental, Social, and Governance (ESG) standards through our compliance partner in 2025. In 2025, 254 suppliers attended the training offered.

### Contracting

In addition, we utilise standard procurement contracts which contain provisions that prohibit suppliers from using forced, bonded or involuntary prison labour and children under 16 years old.

### Speaking up and effectiveness

IMI encourages anyone with an ethical, human rights, or environmental concern about IMI or its supply chain to speak up and report it. Visit [www.imihotline.com](http://www.imihotline.com) for more information. We do not tolerate improper business conduct and are dedicated to fostering a culture where everyone can voice their concerns without fear of retaliation.

In 2025, 51 concerns were raised via the IMI Hotline, of which 3 were duplicates. This compares with 34 concerns in 2024 of which 1 was a duplicate. Following careful investigation, 5 concerns were substantiated in full whilst 6 were substantiated in part.

We received no concerns through the IMI Hotline in 2025 in relation to potential modern slavery, labour or human rights abuses in our supply chain.

### Actions taken from 1 January 2026 to the date of this Statement

Following our external human rights review completed in 2025 to enhance our human rights-related policies and procedures, IMI implemented the following high priority actions between 1 January 2026 and the date of this Statement:

- **Sustainability Policy:** We rolled out our Global Sustainability Policy in Q1 2026. This policy was approved by the Board in 2025.
- **Human Rights Policy:** We have formalised our human rights activities into a Global Human Rights Policy setting out our zero-tolerance approach to modern slavery and human trafficking. This policy expressly states that IMI supports the UN Guiding Principles on Business Human Rights and recognises its duty to respect human rights and provide access to remedies.

These actions build on the controls in place during the 2025 reporting period and provide a stronger policy and governance foundation for the enhancements planned during 2026.

### Looking ahead – our continued commitment to protect human rights

We remain dedicated to promoting human rights and addressing modern slavery and human trafficking. Although we have not identified any violations within our supply chain, we recognise the potential risks deep within it and continue to enhance our procedures to mitigate any human rights violations. Our goal is to improve our supplier response rates by fostering stronger communication and collaboration with our suppliers. We are committed to investing in supplier engagement to ensure that our suppliers fully align with our values and compliance requirements.

In 2026, we will:

- Enhance engagement with suppliers including through visits, audits and training.
- Continue to enhance our risk assessment processes in our operations and supply chains.

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- Embed our Global Human Rights Policy.
- Implement outstanding recommendations from the 2025 external review.

We believe that through these focused actions, we can create a more transparent, responsible and ethical supply chain.

### **Approval**

This Statement has been reviewed and approved by IMI plc's Board of Directors on 4 March 2026 and signed by our Chief Executive Officer (CEO). It applies to IMI plc and the following group companies: IMI Kynoch Limited, IMI Precision Engineering Limited, Norgren Limited, Thompson Valves Limited and Truflo Marine Limited. A full list of our subsidiaries is available in our IMI plc Annual Report 2025.

A handwritten signature in black ink that reads 'R. Twite'.

**Roy Twite**

**Chief Executive Officer**

**IMI plc**

DATE: 4 March 2026