



Third Party Code of Conduct

At **I&M Group**, we are committed to conducting business responsibly, ethically and transparently. We work with third parties who share our values and uphold the highest standards of integrity, professionalism and accountability.

This Third-Party Code of Conduct sets out the minimum standards of conduct expected of all third parties engaged by I&M Group Plc and its subsidiaries.

Scope

The Code applies to suppliers, contractors, consultants, service providers and their personnel who provide goods or services to, or act on behalf of, I&M Group.

Ethical and Responsible Business Conduct

Third parties are expected to:

- Act with integrity, professionalism and transparency
- Comply with all applicable local and international laws and regulations
- Deliver services competently, efficiently and in line with contractual obligations
- Cooperate with due diligence and monitoring processes

I&M Group maintains a **zero-tolerance approach** to bribery, corruption, fraud and unethical conduct in any form.

Data Protection and Confidentiality

Third parties must safeguard confidential information, personal data and intellectual property accessed in the course of engagement with the Group. Appropriate controls must be in place to ensure information security, data privacy and the resilience of technology systems.

Financial Crime and Conflicts of Interest

Third parties are required to comply with applicable **anti-money laundering and counter-terrorism financing laws**, and to promptly identify, disclose and manage any actual or potential conflicts of interest that may arise.

People, Environment and Society

I&M Group expects its third parties to:

- Uphold fair labor practices, human rights and occupational health and safety standards
- Avoid discrimination, forced labor and child labor



- Act responsibly towards the environment by managing resources efficiently and minimizing environmental impact
- Support ethical and sustainable supply chains aligned to recognized international standards

Speaking Up

Third parties are encouraged to report, in good faith, any actual or suspected breaches of this Code, applicable laws or ethical standards through I&M Group’s designated reporting and whistleblowing channels. All reports are treated confidentially, and retaliation against individuals who raise concerns in good faith is not tolerated.

Our Expectation

Compliance with this Third-Party Code of Conduct is a **mandatory condition for engagement** with I&M Group and its subsidiaries. All third parties are expected to acknowledge and adhere to these standards throughout their contractual relationship with the Group.

POLICY APPROVAL:			
	Name	Signature	Date
CHAIRPERSON BOARD AUDIT & RISK MANAGEMENT COMMITTEE	MS. ROSE KINUTHIA	SIGNED	19 TH JUNE 2025
CHAIRPERSON BOARD OF DIRECTORS	MR. OLIVER FOWLER	SIGNED	19 TH JUNE 2025

****The original duly signed policy document remains available at our offices for reference.***