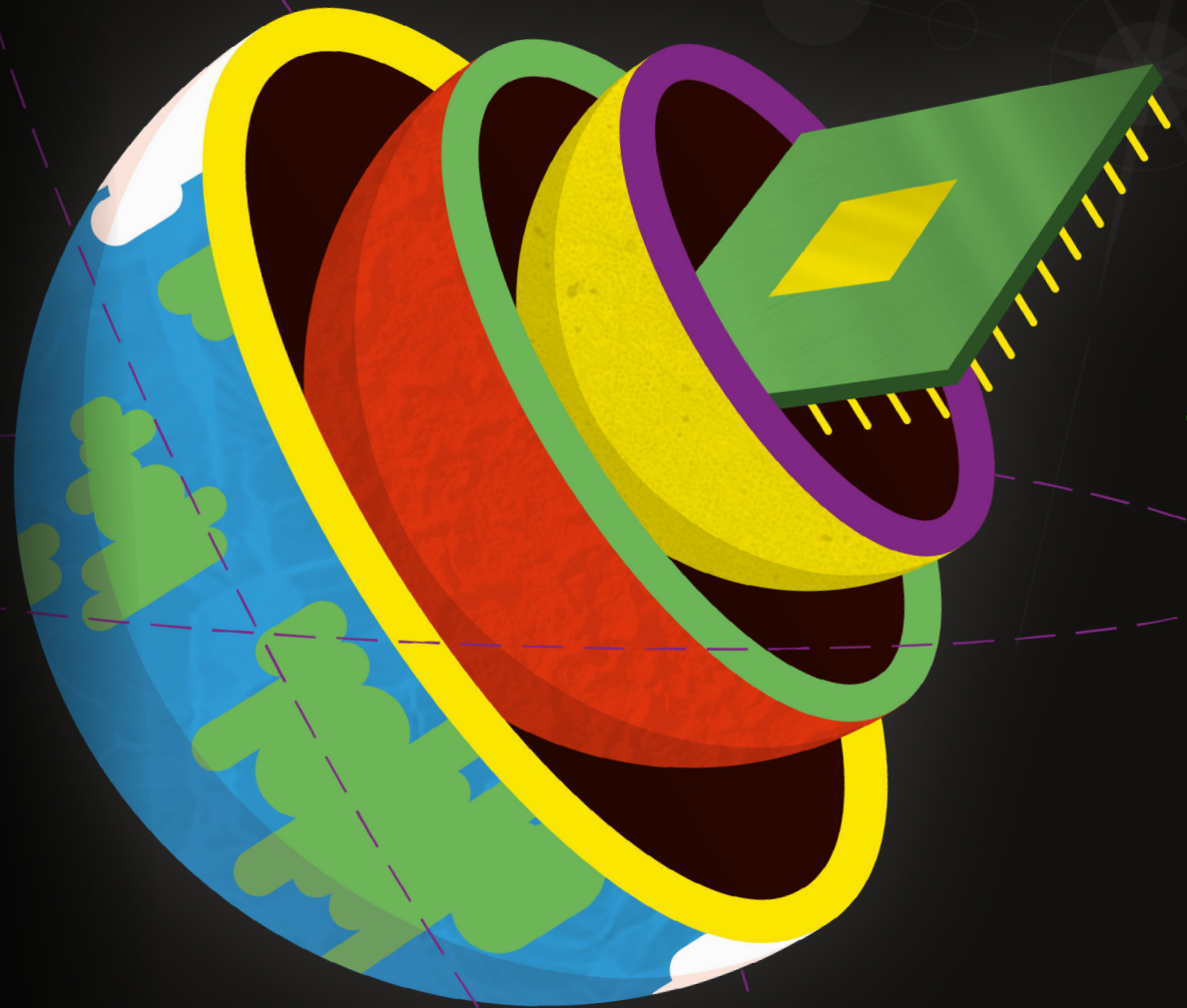


 Imagination

# SUSTAINABILITY REPORT

2022



# Contents

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# Overview

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## Board sponsor introduction

As we enter into our second environmental, social, and governance (ESG) reporting cycle, good governance, social responsibility and environmental sustainability remain key topics for Imagination's board. 2022 has been a challenging period for many of us, with the war in Ukraine, increasing tensions between the US and China and economic and market turmoil. Against this background, ESG and sustainability seem to have taken more of a back seat in the minds of companies, governments and individuals compared to the prominence they had in 2021. At Imagination, we believe this challenging environment does not mean that we should ease off our efforts around ESG, but rather that it emphasises the importance of working together towards a sustainable future. This is something to which the company, and its management, remain committed.

I was delighted that Imagination was included in Glassdoor's UK top 20 places to work in 2023, based in part on the steps the company has taken to ensure Imagination is a progressive, inclusive and supportive employer. Our support of local and global charities was also stepped up in 2022, strengthening our work with our charity partners around our Hertfordshire headquarters, Akshaya Patra and DENS, and supporting international causes such as the Pakistan Flood Appeal and providing support for Ukrainian refugees in Romania.

During 2022 we also moved forward with our work around sustainability and we remain on track with our strategy. Working with a climate strategist, we now understand the levers we possess to reduce our footprint and we have a clearer view of our net-zero pathways. We have also partnered with a carbon accounting firm, allowing us to develop a deeper, more accurate understanding than ever before of our emissions across Scope 1, 2 and 3. We intend for this to be a lasting engagement that provides us with reliable, comprehensive and consistent data over the coming years. We're in the process of doing an in-depth analysis of our Scope 3 emissions and I'm keen to be among the first companies in our industry to transparently report these.

We are early on in our sustainability journey, but Imagination and its Board of Directors remain committed to making Imagination a key player in a sustainable future.



**John Kao,**

Board Member and ESG Board Sponsor



# About Us

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## Our business

Imagination is a UK-headquartered company that designs and licenses semiconductor intellectual property (IP) to customers operating in multiple industries. The IP we license has been used in billions of chips worldwide. Our product portfolio comprises our graphics processing unit (GPU), AI neural network accelerators (NNA), and RISC-V-based central processing units (CPU). This portfolio provides the building blocks for heterogeneous compute solutions which assign workloads to different specialist processors to be dealt with in the most efficient way, both for better performance and lower energy use.

Being “ingredients” (IP) of “ingredients” (chip) Imagination’s products sit at the start of the complex semiconductor value chain. The products we develop are purely digital, with no manufacturing or physical shipping by ourselves. Our customers integrate our IP into their chip designs, manufacture a chip and either use this in their own products or sell the chips to equipment manufacturers.

The IP business model is one with a relatively small footprint, but with the potential for enormous impact through a multiplier effect across many licensed customers in multiple industries. The more widely adopted our IP is, the stronger this multiplier effect becomes as this obviates the customers’ need to develop their own IP. When taken with our leading position in the key metrics of power, performance and area (PPA) this IP business model has the potential to have an enormously positive impact in the battle against climate change as we enable more customers to design smaller, more power-efficient products.

## Our markets

### Automotive and Industrial

Mobile devices have been transformative across the globe, allowing people to connect to one another regardless of location and access services and opportunities that previously would have been impossible. While each device uses relatively little in terms of energy, the number of devices across the globe is staggering. With our power-efficient mobile solutions, small reductions in power use over many devices add up to a significant energy saving.

### Mobile

The automotive industry is changing for the better, and Imagination is an enabler of this. The move to smarter and more autonomous vehicles, with enhanced safety requirements, can be powered by Imagination-provided IP. With the most performant, energy-efficient GPU and CPU compute solutions and unique neural network accelerators, we are empowering automotive manufacturers to create lighter, more efficient vehicles. Our processors are less power-consuming than alternatives and the thermal efficiency and robustness of our technology enable cars that are less likely to fail, requiring costly repair.

### Data centre and Desktop:

Massive data centres have become a cornerstone of modern living, but their environmental impact has become an area of concern and a move towards greener solutions is essential. With GPUs providing a more efficient alternative to traditional CPU-powered data centres Imagination’s embedded GPU and heterogeneous compute solutions can be at the heart of the efficient data centres of tomorrow, reducing both heat output and energy usage on a like-for-like basis.

# Our vision, mission, and values

At Imagination, we strive for it to be a great place to work for our employees and to have a positive impact on the wider world, driving our customers and our end users' satisfaction and creating shareholder value in a meaningful, sustainable manner. Clarity of direction, aligned values, healthy culture

and good governance are all fundamental hallmarks of high-performance companies. They are a must when it comes to building a "great place to work". A high-performance company is an impossible dream unless our place of work is indeed truly great.

## VISION

Our vision is to be the undisputed leader for semiconductor IP solutions that transform billions of lives.

## MISSION

We share our partners' challenges, giving them the edge in a global technology market where differentiation, quality and velocity are the keys to success.

By keeping to our core values and unleashing the creativity of our people we aim to be the trusted partner for all technology companies who are looking to solve complex challenges and build the world's best products.

## VALUES

### COLLABORATIVE

We are a family. We are respectful to our colleagues and customers. We work with and listen to them to achieve the best outcome.



### CUSTOMER FIRST

We are committed to making our colleagues and customers successful and highly satisfied.

### COMMITTED

We deliver what we say, when we say, to the highest standard



### INNOVATIVE

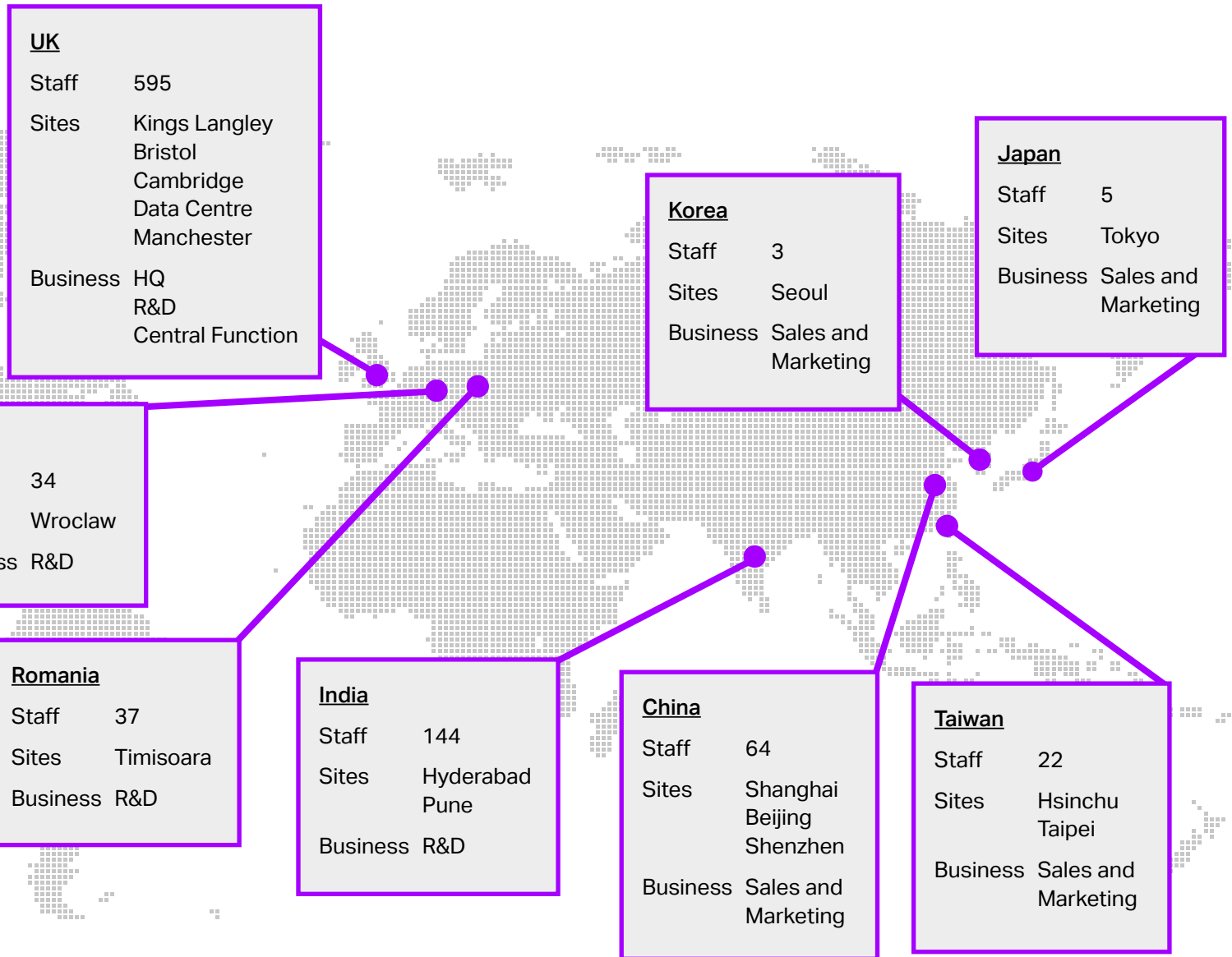
We strive to innovate with new and forward-thinking solutions



### STRAIGHTFORWARD

We are always humble, ethical, open and constructive with colleagues and customers

# Global footprint



\*23 Additional homeworkers across Europe, US, and Australia



# Overview of our approach to sustainability reporting

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## Imagining a sustainable future

As sustainability reporting, net-zero goals and other environmental pledges become increasingly commonplace, there remains confusion around the validity of claims and actions that companies are taking. Imagination is committed to regular, transparent, and honest reporting that highlights our work within this space. We aim to publish our annual sustainability report in Q1 each year. This report outlines the progress made over the previous year and the steps and actions planned for the current financial year (January to December). Where our efforts fall short of our targets, we'll take accountability for this and outline plans for remedial actions.

This report follows the Global Reporting Initiative (GRI) framework and includes Climate Related Risk and Strategy considerations consistent with Taskforce for Climate-Related Financial Disclosures (TCFD) requirements. We have committed to the Science Based Target initiative net-zero standard and during 2023 we will be submitting our net-zero goal to this body for validation.



# Stakeholders

## Shareholders

Our shareholders are the custodians of the business, through their careful stewardship and direct support, they look to grow the company profitably and sustainably, providing returns over the medium to long term.

### How we engage / What role they play

Through regular updates to the board of directors and shareholder representation on the ESG steering committee, shareholder input is a regular element of our ESG activities.

## Employees

Our employees are at the heart of Imagination. They set and represent our culture and are key in defining and realising the future vision for the company.

### How we engage / What role they play

Employees are core to Imagination's business. We will engage with our employee body through structured consultation, working groups and methods for gathering ad-hoc feedback.

## External bodies

External bodies, validation and certification have a key role to play in ensuring companies are taking responsible, legitimate steps to achieve their ESG goals. With adherence to frameworks (GRI, TCFD), participation in wider groups (UN Global Compact) and validation through external bodies (SBTi) companies can legitimise their ESG efforts.

### How we engage / What role they play

We will engage with external bodies by making public commitments and aligning with best practices and reporting frameworks.

## Government

The government sets the tone for the environment we operate in and through regulation and taxation, has a direct influence on the companies that operate within its jurisdiction. Companies too can play a role in influencing government policy, guiding it towards creating a sustainable and fairer market environment.

### How we engage / What role they play

We will ensure we remain aligned with regulatory requirements set out by the government. We will also look to influence the government through lobbying and outreach to encourage attention to ESG issues.

## Local community

The local communities that surround us are directly impacted by our operations; be it with stimulation of the local economy, social outreach or preservation of the local area, the views of our local communities should be considered in our ESG activities.

### How we engage / What role they play

We will engage with the local community both through our charitable activities, and also through consultation, to identify the key, material issues in the communities we exist within.

## Industry participants

Through collaboration with other participants in the semiconductor supply chain, we can exert a stronger influence on the wider supply chain and encourage a unified front on the journey to decarbonise the semiconductor IP industry.

### How we engage / What role they play

We aim to work along with other participants to align on methods to reduce the carbon footprint of our industry.

## Customers

Our customers (and their customers) are a significant stakeholder group of Imagination. As they also progress on their ESG journey, collaboration between Imagination and our customers to decarbonise the entire industry will become increasingly prevalent. We aim to exert soft influence and sit at the table with our customers to help accelerate this pathway to a sustainable future.

### How we engage / What role they play

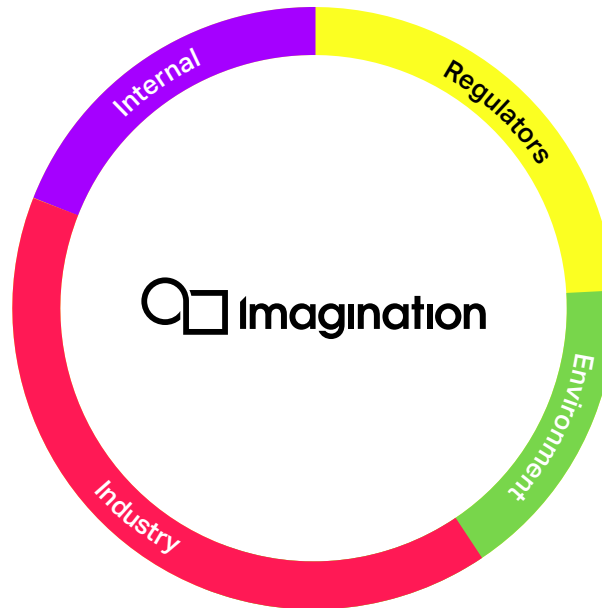
We will engage with customers to support their efforts to reduce their emissions. We will do this by continuing to develop efficient IP, supporting more efficient end products. We also plan direct engagement with our customers to discuss a combined approach to reducing overall emissions in the supply chain.

## Suppliers

With little inbound material required to carry out our operations, our suppliers represent a relatively small, but important group. As with our customers, we will look to work with our suppliers to encourage and accelerate their pathway to a sustainable future.

### How we engage / What role they play

We will work with our suppliers to reduce the emissions associated with our inbound supply chain. We will look to do this by introducing green procurement practices and by direct engagement with our suppliers to discuss a combined approach to reducing overall emissions in the supply chain.



## End users

The end users of our products drive the behaviours of our customers, and therefore indirectly influence us. With greater consumer demand for socially and environmentally conscious companies, this has a knock-on effect on the entire supply chain.

### How we engage / What role they play

While we have little direct engagement with our end users, their input is reflected through our customers and wider market trends.

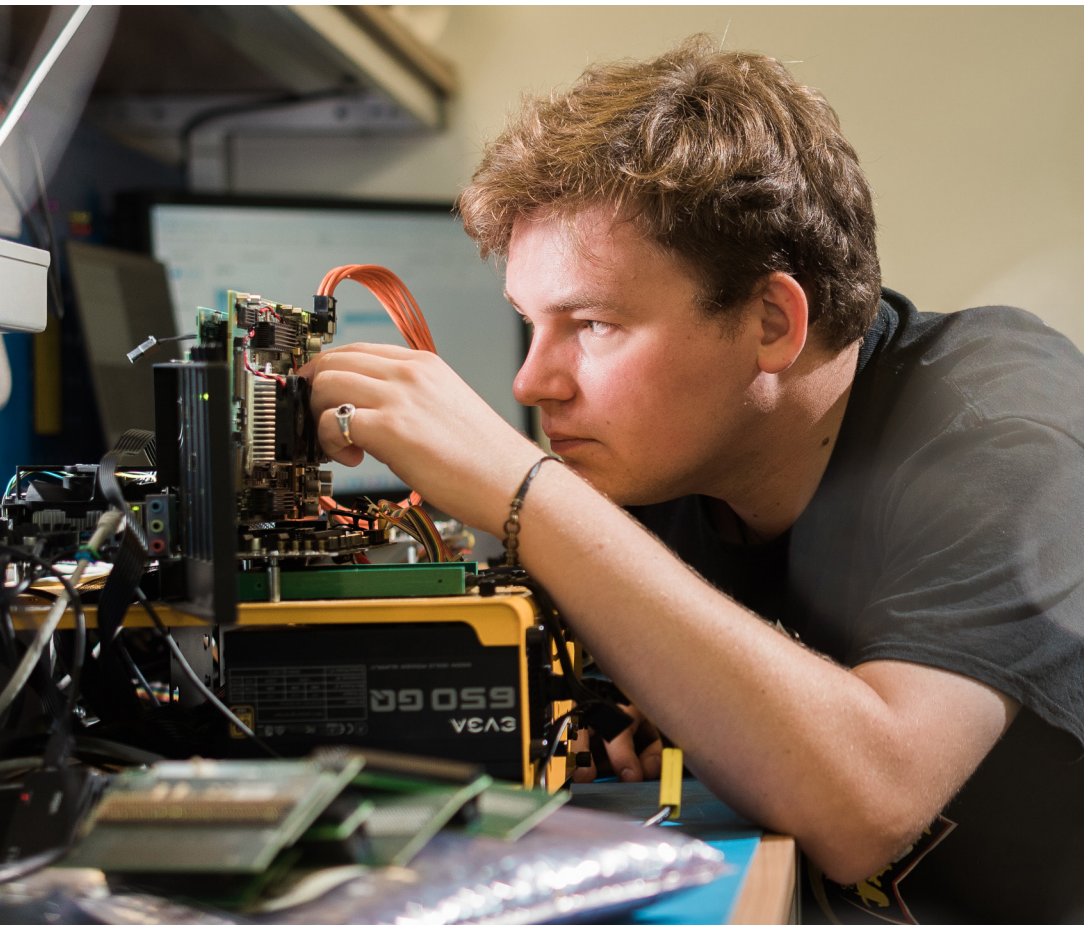


# Material Topics

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## Ethos & Approach

We have chosen to focus on a small group of key material topics that are specific to Imagination. With this prioritisation, we can deliver the biggest impact in the most important areas for Imagination and our stakeholders. The identification, assessment and validation of these topics are carried out in conjunction with a cross-section of Imagination's stakeholders in a rolling materiality assessment cycle.



## Methodology

For a topic to be included in the list of key material topics, it must meet three criteria.

1. The area is of high importance to our stakeholders and the wider ecosystem in which we operate.
2. There is significant scope for Imagination to have a meaningful impact in this area.
3. Imagination's impact in this area must be measurable.

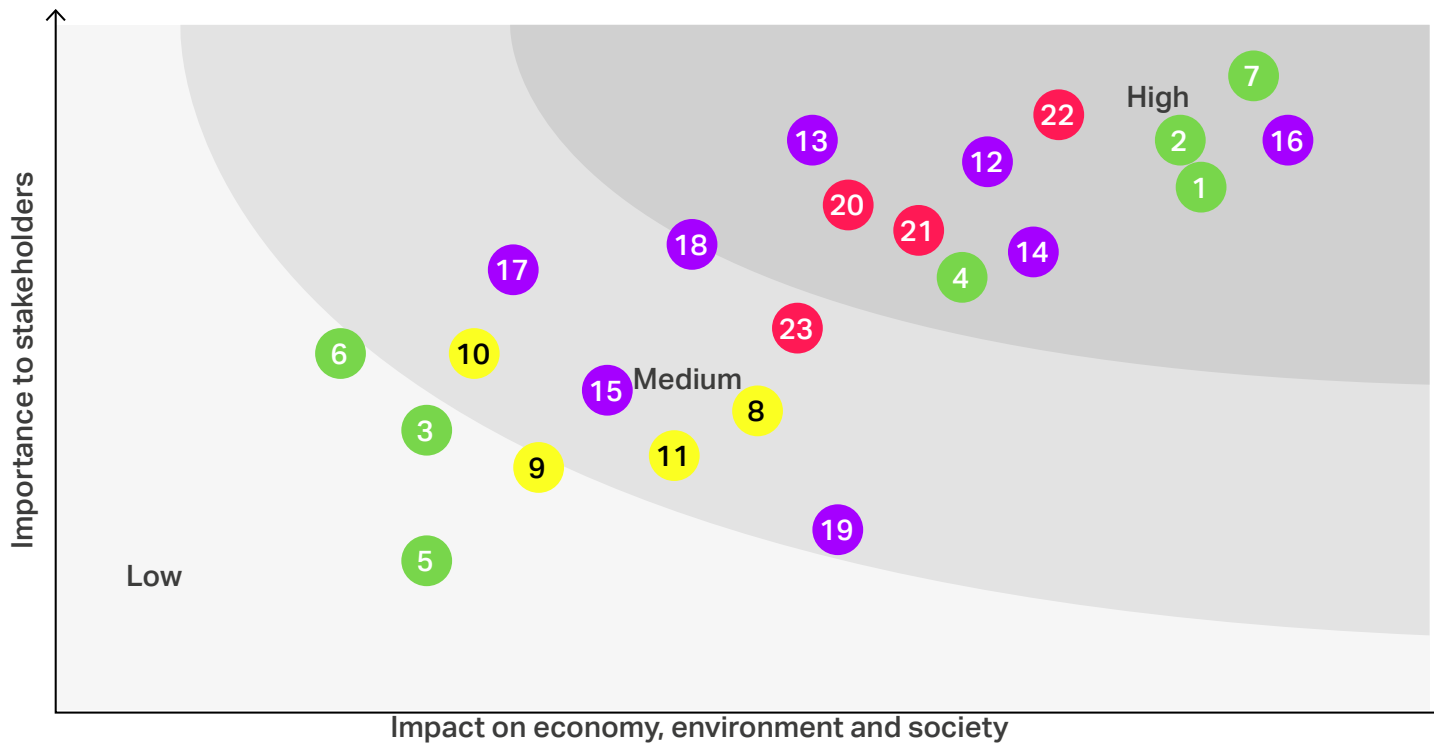
Where a topic is not included in the list of key material topics, this should not be taken as an indication that this topic is unimportant. Topics not included within the key material topics remain a focus for management but are outside of the scope of this sustainability report.

The list of material topics outlined below has been identified through a survey of Imagination's employees in all sites globally carried out in Q4 2022.

# Material Topics

## Material topics

The output of the materiality assessment is shown on the chart above, with nine topics being categorised as high impact and high importance. These topics are:



<b>Environmental</b>	<b>Social</b>
1. Greenhouse Gas Emissions	12. Employee experience
2. Energy sources	13. Diversity & inclusion
3. Water management	14. Gender pay gap
4. Waste management	15. Future talent
5. Green-Coding	16. Human rights
6. Biodiversity	17. Data Privacy
7. Climate crisis	18. Responsible technology
	19. Community Engagement
<b>Economic</b>	<b>Governance</b>
8. Financial performance	20. Anti-corruption
9. Indirect economic impacts	21. Competitive Behaviour
10. Responsible procurement	22. Ethics and integrity
11. Tax	23. Risk & resilience

# Material Topics

#	Topic	Description	Explanation of inclusion	GRI Disclosures
<b>Environmental topics</b>				
1	Greenhouse gas emissions	The direct emissions from Imagination's activities that contribute to climate change.	Climate change is a major concern for many of our stakeholders. Directly generated greenhouse gas emissions and those generated through purchased electricity make up the largest proportion of Imagination's overall environmental impact.	GRI-305
2	Energy sources	The source of purchased energy used at Imagination sites and related emissions that contribute to the climate crisis.		GRI-302
4	Waste management	The disposal or recycling of waste products from Imagination sites, including general waste, recycling and WEEE waste.		GRI-306
<b>Social topics</b>				
16	Human rights	Supporting basic rights and freedoms for people within Imagination's value chain globally.	Supporting internationally recognised human rights is vitally important to Imagination's stakeholders.	GRI-412
13 / 14	Diversity and equal opportunity (including Gender pay gap)	Diversity within Imagination's workforce across and treatment of different demographics.	Creating an environment where individuals of all genders, races, sexualities and backgrounds have equal opportunities and treatment is important to Imagination's stakeholders.	GRI-405
12	Employee experience	The experience our employees have working at Imagination.	The experience our people have working at Imagination is of key importance to our internal stakeholders.	GRI-401
<b>Governance topics</b>				
18	Anti-corruption	Imagination's activities that oppose or inhibit corruption.	Conducting business ethically, behaving with integrity and working against all forms of corruption and anti-competitive behaviour are of high importance to Imagination's stakeholders.	GRI-205
19	Competitive behaviour	Conducting business in an ethical manner compliant with international and local laws and the avoidance of anti-competitive practices and behaviour.		GRI-206
20	Ethics and integrity	The code of ethics and behaviours to which Imagination holds itself.		GRI-102

# Governance

## Overview

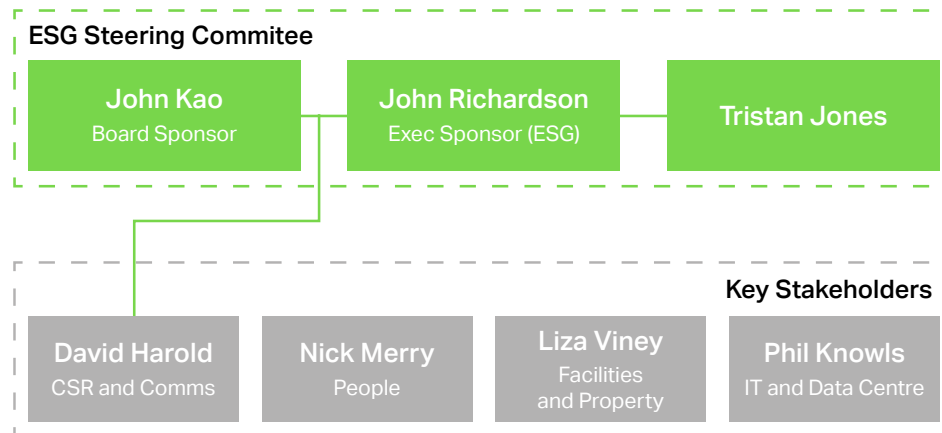
Having the right structures, systems and governance in place is fundamental to not only ensure the business makes sound business decisions but also that it can achieve its ESG ambitions. As our approach to ESG matures, so too will our governance structures around it. Today, ESG is seen as a key matter by the Board of Directors who have put in place a governance structure that fits within the wider governance structures in the company.

## ESG Steering Committee

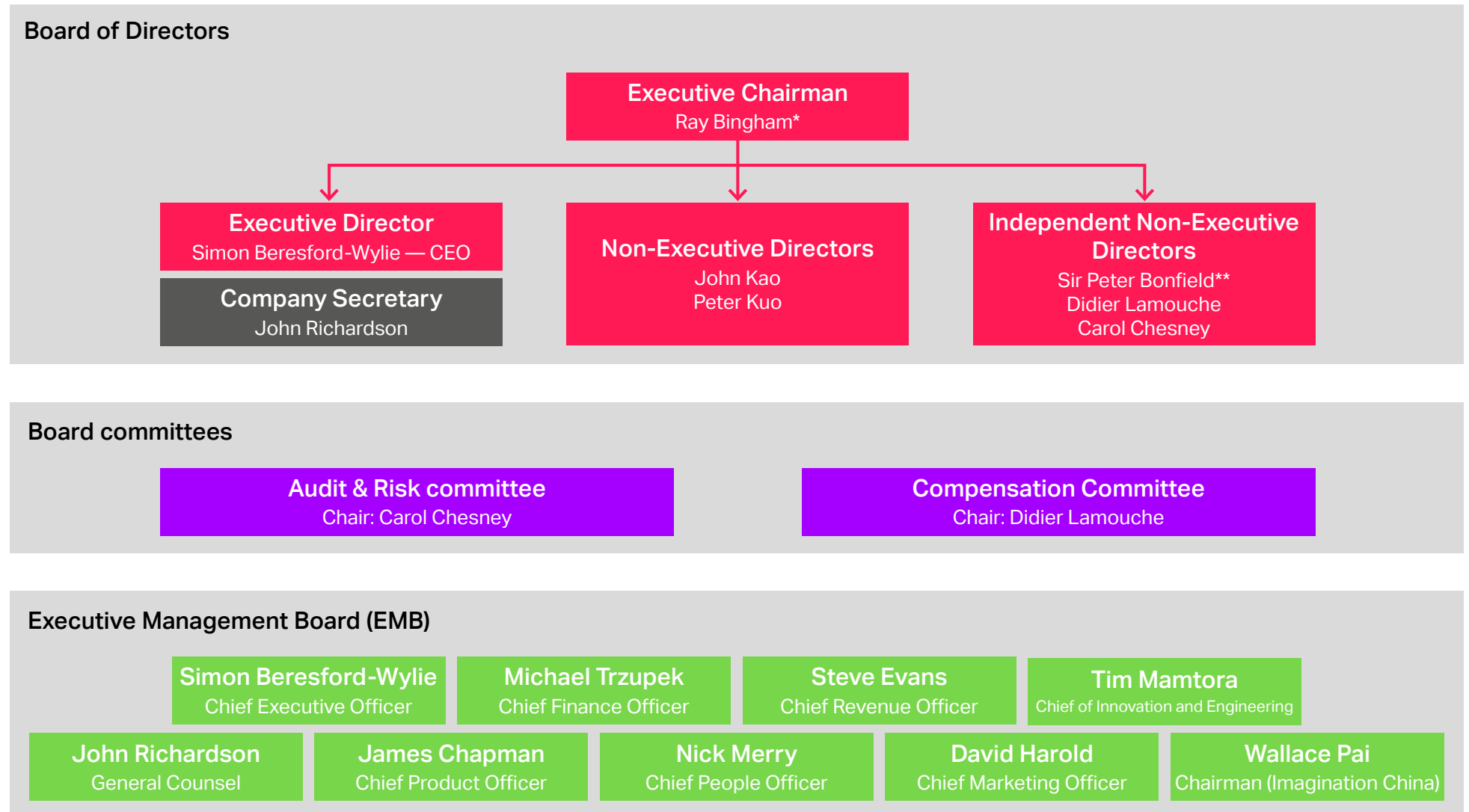
The Board of Directors have installed a formal ESG Steering Committee to guide the company's ESG-related activities. To ensure a suitable level of attention at both Board and EMB levels, the ESG Steering Committee has both Board and Executive representation.

The Steering Committee has the following remit.

- Define a company-wide strategy for ESG.
- Install a transparent reporting structure that meets external requirements.
- Identify and mitigate ESG-related risks.
- Hold the company to account and constructively challenge our behaviours to promote greater ESG awareness.
- Ensure the commitment to ESG is more than a tick-box exercise and avoid the trap of 'greenwashing'.
- Work with stakeholders to define ambitious but achievable ESG goals and support the relevant business areas to deliver on these.



## Governance Structure



\*Also sits on Executive Management Board

\*\* Lead Independent Director

## Board Bios



### Simon Beresford-Wylie

Chief Executive Officer

Simon was previously Chief Executive of Arqiva, a UK leader in the provision of communications, broadcast and media services. Prior to Arqiva he was Global Executive Advisor and Executive Vice President to the Networks Business Unit of Samsung Electronics. Simon has also been founding CEO of Nokia Siemens Networks, and a member of the Group Executive Board of Nokia Corporation (2005 – 2009). He was a member of the Board of Directors of the Vitec Group (2006 – 2013).

During his five-year tenure as CEO of Arqiva, Simon significantly improved the Company's financial performance, employee engagement and customer satisfaction. He departed in July 2020 having completed the sale of Arqiva's telecoms division for £2bn



### Ray Bingham

Executive Chairman

Ray is currently co-founder and partner at Canyon Bridge, a global private equity fund which owns Imagination Technologies.

Ray served as executive chairman of Cypress Semiconductor, chairman of Flextronics International, and lead independent director on the board of Oracle Corporation, as well as on boards at Cadence Design Systems, KLA-Tencor, Freescale Semiconductor, STMicroelectronics, TriNet Group, and Elementum. Earlier in his career he was CFO, president CEO, and then executive chairman at Cadence Design Systems.

He was named an Outstanding Director by the Financial Times in 2009, and received the 2005 Pioneers and Purpose Award from the Silicon Valley Education Foundation and the 2002 Corporate Innovation Recognition Award from the IEEE.



### John Kao

Co-Founder and Partner, Canyon Bridge

Before Canyon Bridge, John spent 20 years at Jones Day, where he specialised in corporate law, M&A, and private equity transactions, and served as Asia chair of M&A and partner-in-charge for the Beijing office. During his career at Jones Day, he worked on more than 100 M&A deals in industries spanning technology, energy, media, automotive, food, and retail.

John was named to the 2012 "Top Lawyers" list by Legal 500. He holds a BS in civil engineering from the Virginia Military Institute and a JD from the William Mitchell College of Law



### Peter Kuo

Co-Founder and Partner, Canyon Bridge

With 20+ years of experience in global technology banking and extensive deal-making experience in China, Peter understands Chinese capital markets and knows how to make complex cross-border transactions work.

Prior to co-founding Canyon Bridge, Peter was a managing director at Lazard and before that at Cowen and Company's Asia subsidiary, as well as a technology M&A banker at Broadview International. He began his career at Pacific Venture Group, an Asia-based VC firm focused on technology. He's worked on transactions worth more than \$100 billion, including M&A transactions for ARM, Alibaba, Google, and Texas Instruments.

A Fulbright Scholar, Peter holds a JD from Harvard and a BS in foreign service from Georgetown.





## **Sir Peter Bonfield**

Non-executive Director

Sir Peter Bonfield has more than 50 years of experience in the international technology business and has served on the boards of 12 international technology companies, including Sony, NXP, Mentor Graphics and Ericsson.

Knighted in 1996 and awarded the CBE in 1989, Sir Peter received the Financial Times Outstanding Director of the Year Award 2019. He is Chairman of Netherlands-based NXP, a world leader in automotive Semiconductors and security. He is a director and Chair of Audit at TSMC in Taiwan, the world's most successful dedicated semiconductor foundry. Sir Peter is an elected Fellow of The Royal Academy of Engineering and holds a US patent for Solid State Software modules.

He is a member of The Longreach Group Advisory Board; Senior Advisor to Alix Partners; and on the US board of the EastWest Institute, as well as holding numerous other senior board and advisory roles.

His prior positions include CEO of BT Group, Chairman and CEO of ICL plc and Deputy CEO of STC plc.



## **Didier Lamouche**

Non-executive Director

Dr Lamouche has more than 30 years of experience leading international technology businesses. His extensive experience includes management leadership as President & CEO of Idemia/Oberthur Technologies, of ST-Ericsson, Bull Group, STMicroelectronics (as COO), Altis Semiconductor and in various senior roles at IBM, Motorola and Philips.

Dr Lamouche graduated from the École centrale de Lyon and holds a PhD in semiconductor technology. He has been a Knight of the Legion of Honor since April 2010. Lamouche is currently sitting on the boards of Adecco Group, ACI Worldwide, and ASM International, and is Chairman of the Board at Quadiant and Utimaco (private company). He has also served on the boards at Soitec, STMicroelectronics, Atari, and Cameca.



## **Carol Chesney**

Non-executive Director

Carol Chesney has more than 35 years of experience in complex finance, audit and company secretary roles and has served on the boards of four listed companies, including Renishaw plc, Hunting plc, Biffa plc and IQE plc.

Carol was previously Group Financial Controller and Company Secretary at Halma, a profitable manufacturing (FTSE 100) group with products primarily used in safety, health and environmental technologies. Prior to this, Carol was Group Accountant at English China Clays, a specialist minerals and chemicals company. Carol began her career at Arthur Andersen where she was Audit Manager.

Carol is Fellow of the Institute of Chartered Accountants in England and Wales and earned her Bachelor of Arts in Mathematics from Randolph-Macon Woman's College.

Carol is Chair of the Audit and Risk Committee.

## Compliance

At Imagination, we hold ourselves to the highest standards of conduct and compliance. We expect all our employees, partners, suppliers, and customers to adhere to legislative requirements that apply to companies and individuals. Our compliance team sits within the Legal & Compliance function. It comprises our General Counsel, Chief HR Officer, Director of Legal, and Legal Counsel who collectively oversee compliance-related matters at the company. All corporate compliance policies are maintained within a Compliance Hub and all staff are required to undergo training on an annual basis on key topics. The content of the compliance hub includes:

- Anti-bribery, Corruption and Fraud
- Code of Conduct
- Competition Compliance
- Confidential Information
- Cybersecurity
- Data Protection & Privacy
- Export Control
- Partner Due Diligence
- Modern Slavery
- Whistleblowing



# Social Impact

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People are at the heart of Imagination's business. In the 2023 Glassdoor Awards Imagination received the accolade of being voted #16 in UK Best Places to Work. We are delighted to be recognised in this award and are proud to be the only UK semiconductor IP company included in the 2023 awards. Many of the initiatives referred to in this section have contributed to our success at the Glassdoor awards.

As our ESG reporting matures, we will develop metrics and data around our social impact. The table below provides a narrative overview of our social impact.

## Internal company initiatives

### Mental Health First Aiders

As part of Imagination's ongoing commitment to positive mental health and well-being, we introduced a Mental Health First Aiders Course ("MHFA") in 2022. An MHFA role in the workplace acts as a first point of contact for someone experiencing mental health issues, providing support and guidance. Over 30 employees from across the company have signed up to this initiative and we will continue to develop this supportive network throughout 2023.

### Hybrid working

We have prioritised an industry-leading hybrid working framework with up to 100% remote working to help achieve the right work-life balance and promote physical and mental well-being for our people. We have found this initiative provides support for those individuals who want to work in the office, remotely and everything in between.





# Social Impact

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## Employee engagement

At Imagination, we carry out an annual Employee Engagement survey with all our employees, as well as ad hoc check-ins. We communicate the results with the whole company, as well as work with each team on their results and post-survey actions.

In our 2022 survey, we received a Response Rate of 84%, an Engagement Index of 83% and an Employee Net Promoter Score of +15%. All of our top-level results have improved following our 2021 and 2021 surveys, and the subsequent actions taken.

## Updates to benefits and policies

We've been updating our global benefits and policies to remain competitive with the market and provide a modern, attractive suite of benefits. These include offerings of contributions to gym memberships as well as free arts and crafts classes in person around the offices.

## Working through COVID 19

Imagination continues to adapt and react to the pandemic as its impact is felt globally across different jurisdictions and offices. As our approach initially centred around our employee's well-being, we have continued to support all employees' physical and mental health throughout the pandemic in 2022.

Taking a local rather than global focus, working with country leads and following country-specific guidance, we continue to support on-site, remote and hybrid working models depending upon the situation. In addition, where needed, we provided staff around the world with equipment to work from home. As the world starts to learn to live with COVID-19, we will continue to put our employee's safety at the heart of what we do.



# Social Impact

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## External Social responsibility

### CSR committee

In 2020 we set up the corporate social responsibility (CSR) committee to help coordinate and focus the company's charitable activities. This committee achieved a lot in 2022, donating over £70,000 to charities and good causes. We've started engaging with initiatives to improve our local area, including litter-picking and setting up our own beehive along with kicking-off corporate partnerships with two charities that are making a difference to hundreds of people in need in the local area.



### Official corporate charity: DENS

We started working with DENS, a Hertfordshire-based charity in the UK that supports people in the local community facing poverty, hunger, and/or social exclusion in 2021. They have continued as one of our official corporate charity partners throughout 2022. We've supported DENS through a range of activities, including their Sponsored Sleepout, their Hill Buster cycling event and creating a giving tree at Christmas where employees could donate money which is fund matched by the company.



### Pakistan Flood Appeal

In August we donated £2,000 to help efforts in response to the devastating flood that left around a third of Pakistan underwater.



# Social Impact

## Official corporate charity: Akshaya Patra

We started working with Akshaya Patra in 2021 and they have continued as one of our official corporate charity partners throughout 2022. Originally founded in India, Akshaya Patra is a charity now working in several regions in the UK as well as in India to tackle classroom hunger and improve the educational outcomes for children living in poverty. The work of Akshaya Patra struck a chord at Imagination we're proud to have them as a corporate charity. Over the Christmas period, Imagination staff took part in a 'buy a stranger a Christmas dinner' fundraiser and this collaboration continued in 2022.

## Other activities

Our charitable work didn't stop at just our official charities, with teams from across the globe engaging in a range of activities including supporting KitAid, working with a local hospice in Poland, donating to the surgical ward of a children's hospital in Timisoara in Romania, and supporting the Red Cross Ukraine Crisis appeal.





# Environmental Impact

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At Imagination, we firmly believe that technology has a key role to play in a sustainable future. By bringing the planet together with efficient, yet high-performance technologies, we can play a part in enabling the solutions to the challenges the world faces today. Be it hyper-efficient data centres, embedded intelligence in industry and agriculture, or autonomous vehicles rewriting the entire model of vehicle ownership, the IP we provide will help enable an era of more sustainable technologies for tomorrow.

By nature, the IP industry has a smaller footprint than many other industries that rely on manufacturing and distribution. By designing and licensing a suite of IP, we can spread the impact of our activities across many different companies, removing the need for them each to develop their own in-house solutions individually and opening up access to leading technologies to a range of companies that may not have the ability, or scale, to carry out in-house development.

With this “multiplier effect” innate to the IP industry, any steps we can take to make Imagination’s activities more sustainable will have a sizable compound impact.

## Net-zero, carbon-neutral and other targets

In 2021 we set out our target of achieving direct net-zero emissions by 2027. We continue to stand by our ambition to aggressively reduce our emissions by 2027 but we have decided to move away from the term ‘net-zero’ in our near-term goals to align with best practice and the SBTi. The more stringent restrictions introduced in the latest net-zero standard mean that it is extremely difficult for any organisation to achieve SBTi aligned net-zero in this timeframe without significant developments in carbon capture technology and the decarbonisation of energy networks. As we go through our validation with SBTi, we will publish a revised net-zero goal.

This doesn’t mean that we’ve weakened our commitments to becoming a sustainable business by 2027, or that our goal as described in the FY21 sustainability report has diminished in any way. While we’re tweaking the language we use, we’re still maintaining the same level of commitment to reducing our emissions footprint, while continuing to strive towards net zero. We also plan to go beyond carbon-neutral by expanding our scope to include all greenhouse gas emissions, rather than just carbon emissions.

## Imagination’s sustainability goals

Our goal for 2027 remains to:

- aggressively reduce our emissions in a manner aligned with the IEMA greenhouse gas management hierarchy by focusing on elimination, reduction and substitution of greenhouse gas emissions before compensating for any residual emissions via offsets (eliminate, reduce, substitute, compensate);
- go further than ‘carbon neutral’ by including all greenhouse gasses in emissions reductions efforts;
- account for our wider Scope 3 emissions, even while our focus remains on our Scope 1 and Scope 2;
- Engage with our suppliers and customers to exert influence and support them in reducing their emissions, accelerating the decarbonisation of the entire value chain;
- achieve SBTi aligned ‘net-zero’ well in advance of the 1.5°C pathway as requisite carbon capture technology becomes available.

### Where we are today – Imagination's footprint

Since we began calculating our footprint in 2021, we've realised that having a reliable, clear carbon inventory is the cornerstone of developing and executing a credible plan towards a lower carbon future. Supporting this, we have partnered with Normative, a leading carbon accounting firm, to help us compile a comprehensive, in-depth inventory of all of our emissions across Scopes 1, 2 and 3 using a hybrid transaction and activity analysis aligned with the GHG protocol. So far, we've used the Normative system to assess our Scope 1 and 2 emissions, along with our Scope 3 emissions related to the transfer and distribution of our electricity consumption during FY22 and work is ongoing to assess our full Scope 3 inventory which will be backfilled for prior years.

Most of our energy consumption remains in our use of purchased electricity, shown in our Scope 2 emissions in the table below. However, with 89% of our energy consumed through electricity being sourced from fully renewable sources, this has allowed us to keep our Scope 2 emissions relatively modest. Accounting for 70% of our total energy use, our data centre remains our single biggest point of energy consumption and identifying methods for optimising its use is key to us achieving our 2027 goals. While we utilise fully renewable energy in all our sites where we have control over the choice of energy provider, we operate several smaller sites across the globe where our landlord chooses the energy supplier. In these locations, we, where possible, elect to take on leases in more environmentally conscious buildings, such as moving our Wroclaw office to a BREAAAM Excellent-rated office during 2023. At our Kings Langley office, we have been using our renewable energy to offer free, EV charging ports to all employees, along with subsidising an EV leasing scheme to allow our employees to access greener modes of transport, both while commuting to the office, and outside of work.

Our Scope 1 is largely focused on our use of natural gas for boilers at our Kings Langley site, which accounts for 80% of our total Scope 1 emissions, with the remainder being relatively small consumption in India, Poland and Romania. Investigating options for reducing our consumption of natural gas in Kings Langley is the focus of our Scope 1 reduction efforts.

Scope 3 continues to be the most challenging area for companies to assess and reduce, and the same is true for Imagination. Working with Normative we have managed to assess our Scope 3 emissions associated with the transfer and distribution of our consumed electricity, which already accounts for 39% of our total emissions. While our business model is relatively limited in terms of downstream purchasing, it is likely that once our Scope 3 inventory is complete and validated, its emissions will count for most of our footprint. Our plan for reducing our Scope 3 emissions will align with the IEMA GHG hierarchy and will prioritise elimination, reduction and substitution where possible. For areas where we have less direct influence, in particular around some of our upstream and downstream emissions, we will look to our suppliers and customers to help promote a reduction in emissions across the entire supply chain.

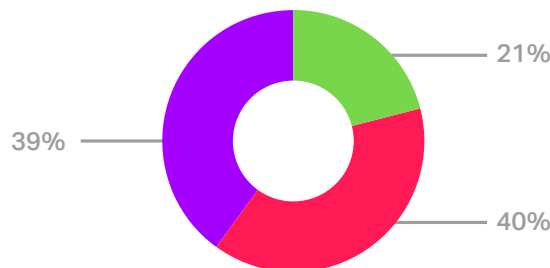
# Environmental Impact

## 2022 Emissions

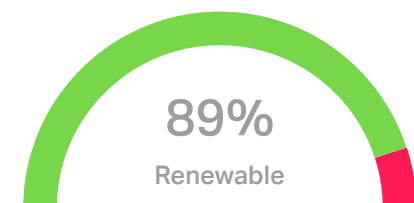
Region	Site	Emissions (tCO2e)				Energy (kWh)		
		Scope 1	Scope 2	Scope 3	Total	Scope 1	Scope 2	Total
UK	Kings Langley	221.29	0	93.5	314.8	1,086,159	875,663	1,961,822
	Data centre*	-	0	271.8	271.8	-	3,986,539	3,986,539
	Brsitol	-	0	9.0	9.0	-	132,441	132,441
	Manchester	-	6.81	1.3	8.1	-	19,38	19,38
	Cambridge	-	20.89	4.1	24.9	-	59,493	59,493
India	Hyderabad	1.95	215.27	53.7	270.9	7,594	259,641	267,235
	Pune	2.25	153.97	38.6	194.8	8,767	185,706	194,473
China	Beijing	-	1.68	0.4	2.1	-	2,227	2,227
	Shanghai	-	27.74	6.4	34.1	-	36,863	36,863
	Shenzhen	-	3.14	0.7	3.9	-	4,173	4,173
Taiwan	Hsinchu	-	12.74	2.8	15.5	-	21,586	21,586
	Taipei	-	38.89	8.5	47.4	-	65,880	65,880
Poland	Wroclaw	19.83	24.20	9.5	53.6	69,513	28,463	97,976
Romania	Timisoara	24.71	7.73	7.1	39.6	121,280	27,448	148,728
Korea	Seoul	-	3.25	0.8	4.0	-	5,887	5,887
Japan	Tokyo	-	4.5	1.0	5.5	-	8,499	8,499
<b>TOTAL</b>		<b>270</b>	<b>521</b>	<b>509</b>	<b>1,300</b>	<b>1,293,314</b>	<b>5,719,897</b>	<b>7,013,211</b>

\* Data centre is a central resource

Emissions breakdown by scope



Renewable percentage for electricity



Total Emissions  
**1,300**  
tCO2e

Equivalent to the emissions of  
**643**  
Diesel cars (per year)

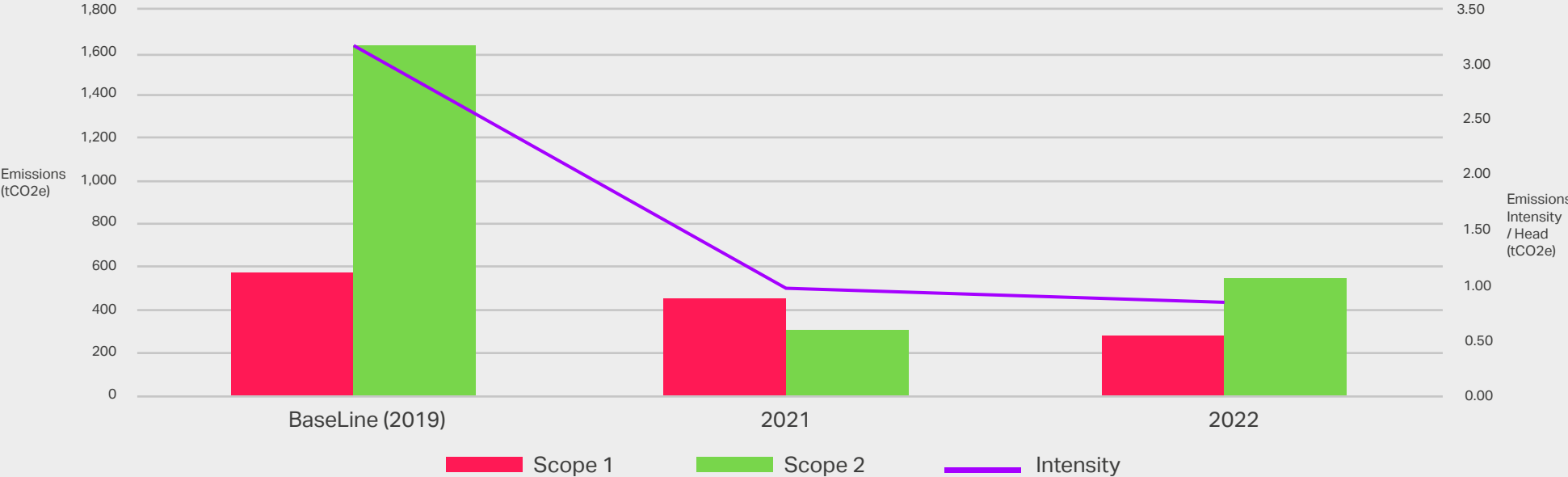
# Environmental Impact

## Change over the reporting period

With many parts of the world moving towards a state of 'new normal' post-Covid, we were able to open most of our offices for the duration of 2022, contrasted to 2021 when we had long periods of lockdowns across several regions. As such, and as expected, our overall Scope 1 and Scope 2 emissions

showed a slight increase during 2022. With China relaxing the dynamic zero-Covid policy in early 2023 and our Chinese offices now expected to be fully open for all of 2023, we'd expect this trend to continue. Importantly, as our 'new normal' begins to solidify, our Scope 1 and 2 emissions remain significantly down from our baseline year and our Emissions Intensity per employee showed a 12% decrease from 2021.

### Scope 1 & 2 Emission Intensity\*

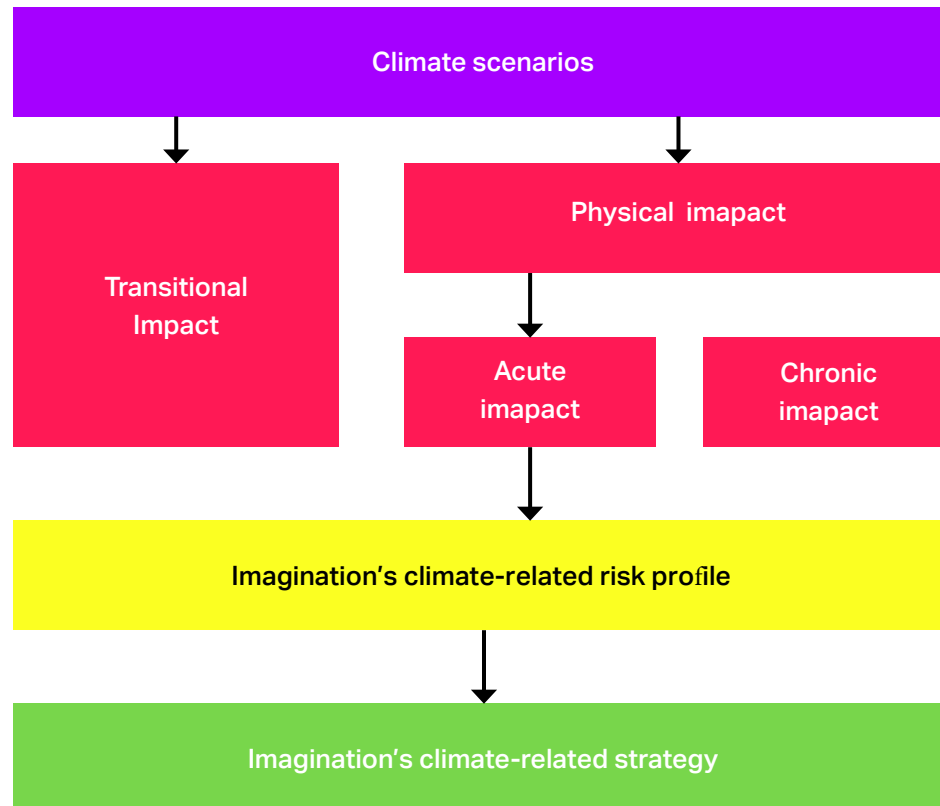


\*2020 data were excluded from the chart due to the significant impact of COVID-19 on working patterns during this period.

# Climate-related risk management and strategy

## Ethos & Approach

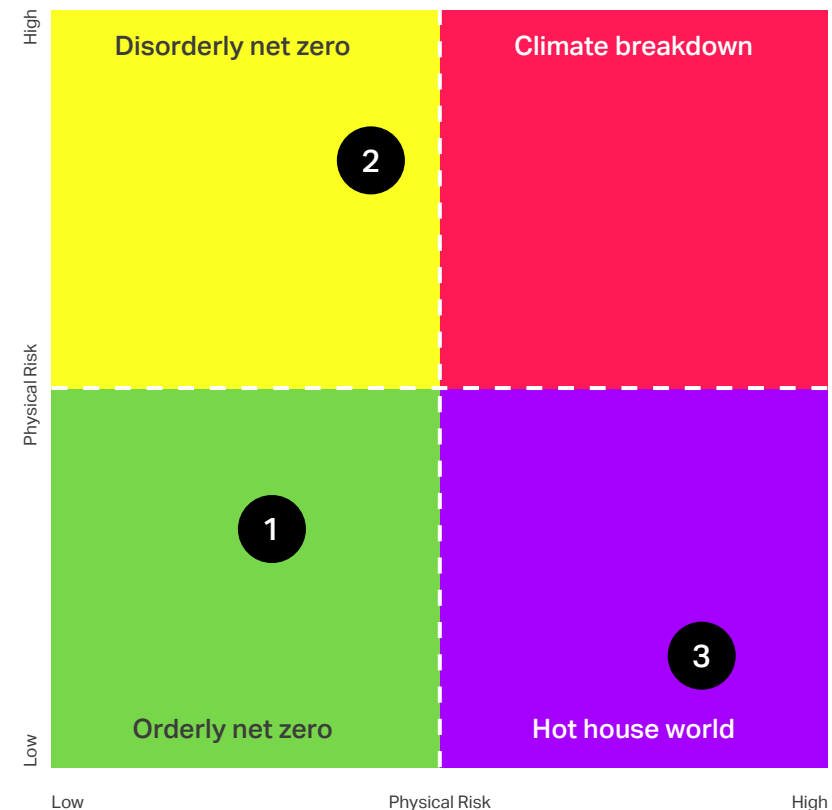
Maintaining an effective climate-related risk management and strategy framework is a key element of a sustainable, resilient business. We have put in place a structure to enable us to navigate through an increasingly complex regulatory and climate environment. Our framework starts with defining potential scenarios, building risk profiles for each of these scenarios and, in turn, looking at the strategic implications for each of these risk profiles.



## Risk framework

We look at climate-based risks in two broad categories, transitional risks and physical risks. Transitional risks are the risks created by the act of moving to a low-carbon economy (e.g. the phasing out of diesel vehicles), where the physical risks are the direct impact of climate change. Physical risks are further broken down into chronic physical risks that take a long time to materialise (e.g., sea level increase) and acute physical risks that are the immediate consequence of climate change (e.g., natural disasters).

### The transitional and physical risks associated with our risk scenarios



1 – Efficient Transition; 2 – Inefficient Transition; 3 – No Transition

# Climate-related risk management and strategy

## Scenarios

As a foundation for our framework, we have defined several climate-related scenarios that support the planning and the modelling of different outcomes. These scenarios are largely based on widely available models provided by organisations such as Network for Greening the Financial System (NGFS) and Climate Action Tracker (CAT) but abstracted to a level that is appropriate and relevant for Imagination’s environmental strategy.

For our planning, we have focused on three scenarios that are relevant and impactful to Imagination’s planning. Two of these focus on different pathways whereby the worst impacts of climate change are avoided, with one scenario considering a significant climate breakdown. We have not considered the scenario of a complete climate breakdown as the impact this scenario has on society is unpredictable and likely to be extreme enough to make any scenario planning of limited value. The scenarios we are tracking are outlined below:

Description:	Included NGFS Scenarios:	Temperature Range:	Rationale for inclusion:
<b>Efficient transition</b>			
Quick and coherent introduction of effective climate policies resulting in a controlled transition to a low-carbon economy. Characterised by speedy technology change and high adoption of carbon capture technology. All potential impacts are minimised and the most damaging consequences of climate change are avoided.	Net zero 2050  Below 2°C	1.4°C – 1.6°C	This scenario gives a foundation for planning around the most optimistic climate outcomes.
<b>Inefficient transition</b>			
While overall net-zero goals are met, and the most significant direct impacts of climate change are averted, there is little cohesion and significant variation in regional policies and measures taken. This scenario places a higher burden on companies and consumers and increased friction costs for doing business internationally.	Divergent net zero.  Delayed transition.	1.4°C – 1.6°C	A more realistic best-case scenario than the efficient transition, where the worst impacts of climate change are averted, but at a far higher cost.
<b>No transition</b>			
Only current policies and all currently pledged policies are implemented. Emission decline may occur, but a high likelihood of climate breakdown remains. While there is a minimal transitional cost of this approach, climate-related risks are likely to be extreme.	Nationally determined contributions  Current policy	1.6°C – 3°C +	A realistic worst-case scenario where the impacts of climate change are significant, but economies and societies continue to function.



# Climate-related risk management and strategy

## Imagination's risk exposure and strategy implications

In each of the broader scenarios, we assess the risks specific to Imagination, both directly, but also more broadly in terms of market, customer and regulatory impacts.

		Scenario 1: Efficient Transition	Scenario 2: Inefficient Transition	Scenario 3: No Transition
Transitional Risks		Moderate: Potential for increased regulation of the semiconductor industry and a move away from "disposable" technology that drives the consumer market. Significant opportunity in being a 'solution' that provides highly-efficient IP.	High: Similar risk profile as for Scenario 1. Lack of coordination among governments exposes us to different restrictions in different regions and potential export control restrictions.	Low: Low transitional risk, largely due to little change in the regulatory environment
Physical Risk	Chronic	Low: Long-term impact of climate change is minimised under this scenario, resulting in low chronic risk.	Moderate: Delay and lack of coordination in action increase the likelihood of certain regions having food shortages or wider disruption, reducing the demand for products using Imagination's IP.	High: Shortages of food and other basic necessities, mass migration and global disruption, risks decimation of consumer goods industries, reducing the number of end customers using our products.
	Acute	Moderate: Disruption from fire, flooding and storms has already been seen in areas we have customers or customers with manufacturing. Risk of further disruption until countries fully adapt.	Moderate: Disruption from fire, flooding and storms has already been seen in areas we have customers or customers with manufacturing. Risk of further disruption until countries fully adapt.	High: While Imagination has limited direct exposure, key customer sites are at risk of severe disruption resulting in the reduction of manufacturing capability.

# Climate-related risk management and strategy

## Strategy implications

The implications of the risk framework for each of our climate scenarios will form a part of our annual strategy review process from the 2023 review cycle onwards. Climate-related risk will feed into the strategy planning process in two ways:

### 1. Consideration of macro-factors.

During the early stages of our strategy review, an analysis of the external environment is carried out. The climate scenarios and risk framework detailed above will be included in this review.

### 2. Sensitivity testing.

Once the strategy has been defined, sensitivity testing is carried out ahead of formal approval. Climate scenarios and risks will be considered within this analysis.



GRI Standard	Disclosure	Cross-reference/Direct answer	
<b>Organisation Profile</b>	102-1	Name of the organisation	Imagination Technologies Limited
	102-2	Activities, brands, products and services	<a href="#">Imagination Products</a> Our business p.4 Global Footprint p.6
	102-3	Location of headquarters	Our HQ is located in Kings Langley, Hertfordshire, UK <a href="#">Our offices</a>
	102-4	Location of operations	Global footprint - p.6 <a href="#">Our offices</a>
	102-5	Ownership and legal form	Imagination Technologies is wholly owned by Canyon Bridge
	102-6	Markets served	Our business - p.4 Global footprint - p.6
	102-7	Scale of the organisation	Global footprint - p.6
	102-8	Information on employees and other workers	<a href="#">Gender Pay-Gap Report</a>
	102-9	Supply chain	Imagination is an office-based company, digital IP using a compute network. The inbound supply chain is mainly comprised of IT equipment, EDA tools, FPGA racks and emulators.
	102-10	Significant changes to the organisation and its supply chain	None
	102-11	Precautionary principle or approach	Imagination takes environmental matters seriously and has committed to aggressively reduce its environmental impact in alignment with SBTi Net-Zero Standard and at a rate aligned with 1.5°C
	102-12	External initiatives	UN Global Compact Science Based Target initiative
	102-13	Membership of associations	UN Global Compact Science Based Target initiative
<b>Strategy</b>	102-14	Statement from senior decision-maker	Board Sponsor Introduction - p.3
<b>Ethics &amp; Integrity</b>	102-16	Values, principles, standards and norms of behaviour	Values - p.5
<b>Governance</b>	102-18	Governance structure	Governance - p.13

<b>Stakeholder Engagement</b>	102-40	List of stakeholder groups	Stakeholders - p.8
	102-41	Collective bargaining agreements	Imagination does not restrict the rights of our people to freedom of association. There are currently no collective bargaining agreements in place.
	102-42	Identifying and selecting stakeholders	Stakeholders are defined as any internal or external group that is either impacted by, or influence our activities. Stakeholder engagement is a core part of Imagination's ESG activities.  Stakeholders - p.8  Material topics - p.9 – 11
	102-43	Approach to stakeholder engagement	Stakeholders - p.8  Material topics - p.9 – 11
	102-44	Key topics and concerns raised	Material topics - p.9 – 11
<b>Reporting Practice</b>	102-45	Entities included in the consolidated financial statements	<u><a href="#">Accounts filed at UK Companies House</a></u>
	102-46	Defining report content and topic Boundaries	Material topics - p.9
	102-47	List of material topics	Material topics - p.9
	102-48	Restatements of information	N/A
	102-49	Changes in reporting	N/A
	102-50	Reporting period	January 1, 2022 - December 31, 2022
	102-51	Date of most recent report	March 2022
	102-52	Reporting cycle	Sustainability report to be compiled on an annual basis in Q1 each year
	102-53	Contact point for questions regarding the report	<u><a href="mailto:sustainability@imgtec.com">sustainability@imgtec.com</a></u>
	102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option
	102-55	GRI content index	GRI Content Index is in our 2022 Sustainability Report
102-56	External assurance	This report has not been externally assured	

## Anti-Corruption

GRI 103: Management Approach	103-1	Explanation of the material topic and its boundaries	In line with the UK Bribery Act 2010 and Imagination's own Code of Ethics, Imagination is committed to operating in an ethical way in respect of our conduct, both at home and abroad, upholding all relevant anti-bribery and corruption laws wherever we operate.  Boundaries: All staff
	103-2	The management approach and its components	Imagination has a zero-tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.  Imagination also expects our business partners to take a similar zero-tolerance approach to bribery and corruption.
	103-3	Evaluation of the management approach	Adequacy of the management approach is reviewed by the Board of Directors
GRI 205: Anti-Corruption 2016	205-1	Operations assessed for risks related to corruption	Given the low-risk nature of our business, no operations have been assessed for risks related to corruption
	205-2	Communication and training about anti-corruption policies and procedures	All our employees, including those on the Executive Management Board receive annual training on Anti Bribery, Corruption and Fraud delivered through the compliance hub.
	205-3	Confirmed incidents of corruption and actions taken	None

## Anti-Competitive Behaviour

GRI 103: Management Approach	103-1	Explanation of the material topic and its Boundaries	Imagination is committed to complying with competition law. We conduct our business to the highest legal and ethical standards and will not tolerate any infringement of competition law.  Boundaries: All Staff
	103-2	The management approach and its components	At present, we do not occupy a dominant position in any market and therefore our primary focus is on our dealings with third parties and the potential competition law impact that they may have. Typically, this means that we must be mindful how we deal with our competitors, but also what information we learn about our competitors. All staff receive annual competition compliance training delivered through the Compliance hub.
	103-3	Evaluation of the management approach	Adequacy of the management approach is reviewed by the Board of Directors
GRI 206: Anti-Competitive Behaviour 2016	206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	None

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## Energy

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GRI 103: Management Approach	103-1	Explanation of the material topic and its boundaries	Environmental Impact p.21 – 24
	103-2	The management approach and its components	Environmental Impact p.21 – 24
	103-3	Evaluation of the management approach	Environmental Impact p.21 – 24
GRI 302: Energy 2016	302-1	Energy consumption within the organisation	Total energy consumption within the organisation in 2022 was 7,013,211 kWh
	301-1	Energy consumption outside of the organisation	None
	302-3	Energy intensity	7565kWh/head
	302-4	Reduction of energy consumption	27% reduction from 2019 base
	302-5	Reductions in energy requirements of products and services	Not available

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## Emissions

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GRI 103: Management Approach	103-1	Explanation of the material topic and its boundaries	Environmental Impact p.21 – 24
	103-2	The management approach and its components	Environmental Impact p.21 – 24
	103-3	Evaluation of the management approach	Environmental Impact p.21 – 24
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	Environmental Impact p.21 – 24
	305-2	Energy indirect (Scope 2) GHG emissions	Environmental Impact p.21 – 24
	305-3	Other indirect (Scope 3) GHG emissions	Environmental Impact p.21 – 24
	305-4	GHG emissions intensity	Environmental Impact p.21 – 24
	305-5	Reduction of GHG emissions	Environmental Impact p.21 – 24
	305-6	Emissions of ozone-depleting substances (ODS)	Not available
	305-7	Nitrogen oxides (NOx), sulphur oxides (SOx), and other significant air emissions	Not available

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## Waste

GRI 103: Management Approach	103-1	Explanation of the material topic and its Boundaries	<p>The handling and disposal of waste generated by Imagination is an issue frequently raised by staff. While the absolute volume of waste generated is not as significant as companies with direct manufacturing, the environmentally safe disposal of electronic equipment at the end of its useful life has a high impact. .</p> <p>Boundaries Sites where Imagination maintains operational control over waste management.</p>
	103-2	The management approach and its components	Our waste management approach varies by location. Our global offices are rented, leased or serviced offices and in most locations, our landlords manage waste removal directly. At our UK sites it is outsourced to third parties..
	103-3	Evaluation of the management approach	Waste management is overseen and reviewed by the Global Head of Facilities. Further assessment of our waste management and its alignment with the company's sustainability goals will be carried out during 2023.
GRI 306: Waste 2016	306-1	Waste generation and significant waste-related impacts	Our waste related impacts will be assessed during FY23 and reported on in future reports
	306-2	Management of significant waste-related impacts	Our waste related impacts will be assessed during FY23 and reported on in future reports
	306-3	Waste generated	This information is not available for FY22. This will be tracked for future reports
	306-4	Waste diverted from disposal	This information is not available for FY22. This will be tracked for future reports
	306-5	Waste directed to disposal	This information is not available for FY22. This will be tracked for future reports

## Employment

GRI 103: Management Approach	103-1	Explanation of the material topic and its Boundaries	<p>As a human capital-intensive business, creating a fair, welcoming working environment is a key priority for Imagination's management both as a tool to attract and retain talent and also as a reflection of our company values.</p> <p>Boundaries: All employees.</p>
	103-2	The management approach and its components	Employment matters are predominantly directed by the HR department under the Chief HR Officer this comprises area-specific HR business partners, learning and development and a specialised talent acquisition function. Employment matters are routinely presented to the Executive Management Board and Board of Directors, with a Compensation Committee tasked with developing and making recommendations on the Company's remuneration structure and policies.
	103-3	Evaluation of the management approach	Employee engagement index is assessed annually and other employee-related metrics are reported in monthly board packs. The CEO, EMB and all people managers have employee engagement elements within their bonus schemes.



GRI 401: Employment 2016	401-1	New employee hires and employment numbers	<p>265 new hires were made during the reporting period. By gender: 53 female, 212 male. By Location: UK 156, China 21, India 55, Romania 15, Poland 7, Other 11. By age: 107 under 30, 138 between 30 and 50, 20 over 50.</p> <p>We do not publish attrition data externally.</p> <p>Data does not include contractors.</p>
	401-2	Benefits provided to full-time employees that are not provided to temporary employees or part-time employees	All benefits provided to full-time employees are also provided to temporary and part-time employees, excluding contractors and summer placements.
	401-3	Parental leave	<p>All employees, excluding contractors and summer placements, are entitled to parental leave (see 405-1 below for gender split).</p> <p>During 2022, a total of 37 employees took parental leave, of which 24 were male and 13 were female. Of the 37 employees who took parental leave, 33 returned to work and have remained employed by the company. 4 employees left the company voluntarily since taking parental leave.</p>

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### Diversity and Equal Opportunity

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GRI 103: Management Approach	103-1	Explanation of the material topic and its Boundaries	<p>Diversity, Equity, and inclusion (DE&amp;I) is crucial to a successful company. By being an open, diverse, and inclusive organisation, we can compete on a global-scale, delivering the industry-leading technology that our customers demand, but also, and just as importantly, create a company that we are all proud to be part of</p> <p>Boundaries: All staff</p>
	103-2	The management approach and its components	<u><a href="#">Diversity, equity and inclusion</a></u>
	103-3	Evaluation of the management approach	DE&I committee, supported by the executive DE&I sponsor track and regularly report on DE&I matters.

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GRI 405: Diversity and Equal Opportunity 2016      405-1      Diversity of governance bodies and employees      The table below shows a breakdown of governance bodies and employees by gender and age. Other measures of diversity are not tracked. Data in table below does not include contractors.

	Board of Directors	EMB	Director level and above	Other employees
Male	6	10	107	614
Female	1	0	6	169
<30	0	0	0	221
30-50	0	1	79	488
>50	7	9	34	74

405-2      Ratio of basic salary and remuneration of women to men      [Gender Pay-Gap Report](#)

**Non-discrimination**

GRI 103: Management Approach      103-1      Explanation of the material topic and its Boundaries      We recognise all humans as being equal and having individual rights and freedoms and hold the view that discrimination on any grounds is contrary to these beliefs. We believe that people are entitled to work in an environment free from any form of discrimination, and we expect that all parties associated with Imagination to act fairly and reasonably towards others.

Boundaries: All staff

103-2      We adhere to, and surpass all employment legislation that protects and safeguards our people.

[Diversity, equity and inclusion](#)

Whistleblowing policy

Code of Conduct

103-3      Evaluation of the management approach      Any incidents of discrimination would be taken very seriously, with mechanisms in place such as the whistleblowing policy to ensure any such incident is managed appropriately.

GRI 416: Non-discrimination 2016      406-1      Incidents of discrimination and corrective actions taken      No incidents of discrimination were reported.

## Human Rights

GRI 103: Management Approach	103-1	Explanation of the material topic and its Boundaries	<p>We recognise all humans as being equal and having individual rights and freedoms. Conduct that conflicts with these principles, including modern slavery, child labour, forced labour or other liberty-constrained employment, is neither acceptable nor tolerated. We also believe that the technology and services we develop and provide must not be used or deployed for any purpose that impinges on the freedoms of others. Imagination will not supply technology or services to third parties who intend to use (or intend to supply to others to use) it for unethical or undemocratic purposes. This includes but isn't limited to use for the commission of crime, terrorism (including cyber-terrorism), civil surveillance of minority groups, suppression of citizens or citizens' rights or for military purposes.</p> <p>Boundaries: All staff</p>
	103-2	The management approach and its components	The approach to Human Rights is outlined in the Code of Conduct all staff are obliged to adhere to. This is communicated via annual training through the Compliance Hub.
	103-3	Evaluation of the management approach	The Code of Conduct is subject to review by the Board of Directors.
GRI 412: Human Rights 2016	412-1	Total number and percentage of operations that have been subject to human rights reviews or human rights impact assessments, by country.	Given our low risk, none of Imagination's operations have been subject to human rights review.
	412-2	Employee training on human rights policies or procedures	Training on the code of conduct is delivered annually.
	412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	All customer contracts include clauses around use of our IP designed to ensure they are not used in products that compromise human rights.



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