



**AMNESTY INTERNATIONAL**

**MODERN SLAVERY ACT 2015**

**STATEMENT**

FOR THE FINANCIAL YEAR 1 JANUARY TO 31 DECEMBER 2019

**AMNESTY  
INTERNATIONAL**





**Amnesty International is a global movement of more than 7 million people who campaign for a world where human rights are enjoyed by all.**

**Our vision is for every person to enjoy all the rights enshrined in the Universal Declaration of Human Rights and other international human rights standards.**

**We are independent of any government, political ideology, economic interest or religion and are funded mainly by our membership and public donations.**

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## FOREWORD

The UK Modern Slavery Act 2015 (the 'Act') came in to force on 31 July 2015. Amnesty International formed part of a group of civil society organisations which successfully lobbied for the inclusion of section 54 reporting requirement on transparency in supply chains to which this statement relates and which came into force on 29 October 2015. While the reporting provisions were being enacted, Amnesty International argued that they were a step in the right direction but did not go far enough. The provisions do not specify the steps that organisations should take to ensure that modern slavery is not in their supply chains. They only amount to a reporting requirement, allowing organisations simply to declare that they have not taken any steps to look for abuses. In addition, there is no enforcement mechanism for non-compliance and therefore, insufficient incentives for companies to comply. These limitations could be addressed to some extent if there were a more cohesive cross-departmental approach, including enhanced labour market inspection and enforcement, and if all public sector bodies were required to exclude from tendering processes bidders that are non-compliant with S54 of the Modern Slavery Act.

Amnesty International's research continues to uncover labour rights abuses around the world. In 2019, the organisation continued to document exploitative labour practices and serious human rights violations linked to the extraction of the minerals used in lithium-ion batteries, particularly in the Democratic Republic of Congo, where we have uncovered children and adults working in artisanal cobalt mines facing health risks. Our investigation linked these mines to the supply chains of many of the world's leading electronics and electric vehicle companies, which use these types of batteries in their products. Amnesty also continued to document and uncover exploitative labour practices on the sites of the World Cup 2022 in Qatar, where we have engaged with the employers of construction workers in order to improve working conditions.

## 1. ABOUT AMNESTY INTERNATIONAL

Amnesty International is a global human rights movement. Our vision is of a world in which every person enjoys all the human rights enshrined in the Universal Declaration of Human Rights. Our mission is to secure throughout the world the observance of the provisions of the Universal Declaration of Human Rights by undertaking research and action focused on preventing and ending grave abuses of these rights.

In view of the nature and structure of our organisation (described at 1.1 below), and the nature of the goods and services procured (as discussed at 1.2 below) our overall assessment is that the risk of modern slavery and human trafficking in our supply chains is low. Nonetheless, there are certain areas of potentially higher risk (discussed further below – section 3.1) and we are committed to improving our practices to combat modern slavery<sup>1</sup>, as part of a broader strategy to ensure that our organisation operates to the same high standards of human rights compliance to which we hold states, companies and other groups accountable.

### 1.1 ORGANISATION STRUCTURE

Amnesty International is a global movement made up of over 60 membership organisations, known as Amnesty International 'Sections', which carry out Amnesty International work at a national level.

The International Secretariat of Amnesty International is responsible for a wide range of functions spanning research, campaigning, communications, advocacy, policy, legal, global governance, growth and development, fundraising and education. It also develops global strategy, policies and standards, and represents Amnesty International externally through the Secretary General. The global movement is joined together through the Amnesty International Statute.

The work of Amnesty International's International Secretariat is organised into two legal entities:

- (i) Amnesty International Limited, a not for profit company registered in England & Wales, limited by guarantee (no. 01606776), with registered office at 1 Easton Street, London WC1X 0DW; and
- (ii) Amnesty International Charity Limited, a not for profit company registered in England & Wales, limited by guarantee

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<sup>1</sup> In this document where reference is made to "modern slavery" this should be read as referring to forced labour or slave-like practices and other forms of debt bondage, as well as human trafficking, as defined by the International Labour Organisation: <https://www.ilo.org/global/topics/forced-labour/definition/lang--en/index.htm>



(no. 02007475) and a registered charity (no. 294230), with registered office at 1 Easton Street, London WC1X 0DW.

This statement is made in respect of Amnesty International Limited, the entity which employs the staff of Amnesty International's International Secretariat and conducts its global operations (the 'International Secretariat' or 'the IS'), for the financial year 1 January to 31 December 2019 ('FY 2019'). The International Secretariat has offices in 20 locations worldwide set up by way of branch or subsidiary of Amnesty International Limited. These international office locations are: Bangkok, Beirut, Brussels, Colombo, Dakar, Geneva, Hong Kong, Jerusalem, Johannesburg, Kiev, Lima, Madrid, Mexico, Moscow, Nairobi, New York, Paris, Tunis and Washington DC ('Regional Offices'). Amnesty International Sections – mentioned above - are legally independent from the International Secretariat; this statement therefore does not cover those national membership entities.

## 1.2 OVERVIEW: FACTS & FIGURES FOR FY2019

In this section we aim to provide an overview of our organisation through some facts and figures about our people and our supply chains. This provides the context for the information provided later about our risk analysis and mitigating steps.

### Our People

As per Figure 2 below, direct staff costs represent the biggest proportion (59%) of our operational expenditure.

Figure 1<sup>2</sup> represents a breakdown of our full-time equivalent employees between permanent staff (81.2%), fixed-term contracts (18.5%) and agency staff (0.4%). This shows that a high percentage of our staff are employed on permanent or fixed-term contracts, whilst a very small percentage are agency staff. These two factors tend to lower the risk of modern slavery amongst our staff because the majority are directly engaged by us.

See Section 2.2 for detail on our People Management Policies.

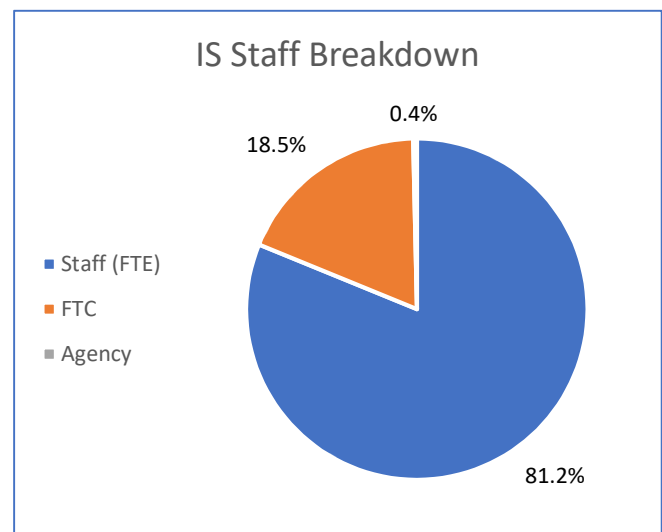
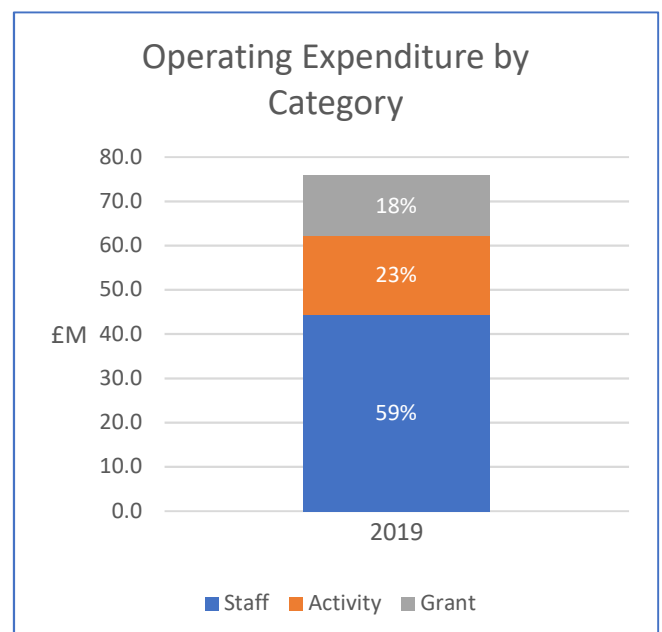


Figure 1

### Our Supply Chains

Given the nature of the International Secretariat's activities and outputs, contracts with 3<sup>rd</sup>-party suppliers are not where we spend most of our money. In fact, of our total operating expenditure ('OPEX') for 2019 (£75.9M), our staff cost (£44.6M) and the cost of grants that we give to other Amnesty entities within our movement (£13.5M) comprised 77% of OPEX, as shown in Figure 2. Activity costs make up the remaining 23% and this is where we spend with 3<sup>rd</sup>-party suppliers. This is a 4% reduction compared with 2018, and we expect this to reduce further in 2020.

At the macro-level then, our engagement with 3<sup>rd</sup>-party suppliers represents the smallest category of our overall spend – which goes some way to lowering our overall risk profile, compounded by a further reduction versus activity expenditure from FY2018. Of course, this is not conclusive in itself. We talk more about measures that we have in place to mitigate risks of modern slavery in our supply chains in Section 2, and more specifically around risks and steps taken against them in Section 3.



The International Secretariat's major area of supplier engagement is in the form of consultancies and professional services to cover

<sup>2</sup> Figures taken as at end December 2019.

(a) substantive human rights work; and (b) operations which support that work. Suppliers therefore vary from experts who assist with human rights research, to photographers who provide audio visual content for our publications, to IT services suppliers which support our global operations. The purchase of goods is a smaller proportion of our overall activity spend.

### 1.3 WHERE ARE SUPPLIERS BASED?

We analysed the geographic location of all suppliers engaged in FY2019 and found that the majority are in lower-risk regions, based on our assessment against Global Slavery Index’s regional vulnerability score<sup>3</sup> (see Table 2 below). Whilst not conclusive in and of itself, it is an indicator of the overall, relatively low risk profile that we have identified.

Table 1 – FY2019 Suppliers by Region

| REGION              | %   |
|---------------------|-----|
| Europe              | 50% |
| South/Latin America | 16% |
| Asia & Pacific      | 11% |
| Africa <sup>4</sup> | 9%  |
| MENA <sup>5</sup>   | 7%  |
| North America       | 6%  |
| Central Asia        | 1%  |

Table 1 – FY2019 Suppliers by Region and **Error! Reference source not found.** show a percentage breakdown of suppliers that we engaged in 2019, and indicate which region suppliers were located in.

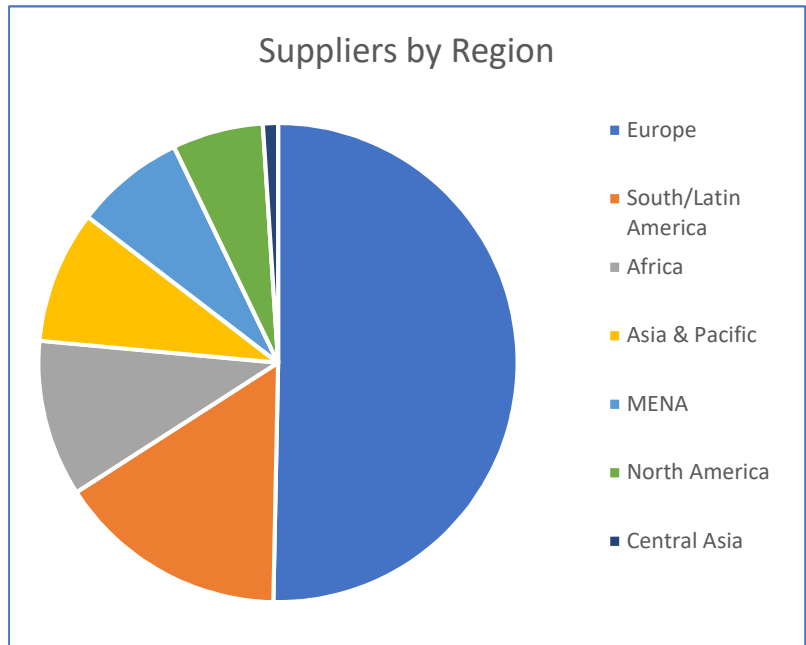


Figure 3 – Supplier by Region

As we did last year, we mapped these locations with reference to the Global Slavery Index’s regional vulnerability score (see Table 2: Suppliers by Global Slavery Index (GSI) Regional Vulnerability scores), and the majority of our suppliers in 2019 were located in lower-risk jurisdictions.

Whilst this does serve to illustrate a lower overall risk-profile, we must and do acknowledge that there are suppliers engaged in regions with a higher vulnerability score and there will continue to be, given we have regional offices in such locations. We also acknowledge that there is still a level of risk in regions with a lower vulnerability scoring. Our procurement policies and procedures apply globally regardless of location, which goes some way to help to mitigate this risk, as discussed below in Section 0.

Table 2: Suppliers by Global Slavery Index (GSI) Regional Vulnerability scores

|                         | GSI'S OVERALL WEIGHTED AVERAGE* | IS SUPPLIERS (%) |
|-------------------------|---------------------------------|------------------|
| AFRICA                  | 62                              | 11%              |
| ARAB STATES             | 57.2                            | 7%               |
| ASIA AND THE PACIFIC    | 46.1                            | 9%               |
| AMERICAS                | 41.4                            | 22%              |
| EUROPE AND CENTRAL ASIA | 28.2                            | 51%              |

\*a higher number indicates a higher vulnerability. Scores out of 100.

<sup>3</sup> Source data: Global Slavery Index - <https://www.globallslaveryindex.org/2018/findings/regional-analysis/regional-findings/#table:1>

<sup>4</sup> Africa category excludes North African countries, which are included under the MENA category.

<sup>5</sup> Middle East & North Africa

## 2. POLICY, PROCEDURE & CONTROLS

### 2.1 PROCUREMENT

As an organisation that campaigns on human rights issues globally, we are alive to the risks of modern slavery and continually strive to ensure that we apply the same high standards to our own supplier arrangements as those to which we hold other organisations.

As described in previous statements<sup>6</sup>, we have detailed procurement policies, processes and procedures that have been reviewed and updated from a modern slavery perspective. These policies apply to all staff across the International Secretariat's global operations who are responsible for purchasing goods or services from third-party suppliers, including consultants. We continually look to maintain and review those as appropriate.

The Procurement & Contracts team are responsible for implementing and managing procurement related policy and procedure; they also provide direct support in higher value and/or higher risk procurement events. The procurement lifecycle is not fully centralised through this team, meaning that they do not have full oversight of all supplier engagements. The procurement process is embedded within the relevant programme teams in all locations globally – though all are subject to the same procurement policies and procedures.

Pre-contractual checks, due diligence and contractual controls include the following:

- For all contracts greater than £50,000 in value, an external ethical check is commissioned prior to engagement (we carried out 14 such ethical checks in 2019).
  - This is desk-based research independently completed by our 3<sup>rd</sup>-party provider and forms part of the selection criteria and pre-qualification of potential suppliers.
  - The ethical check covers various aspects of an organisation including environmental, political and animal-rights related topics. It also covers 'People' – including human rights, workers' rights and supply chain management. Companies that manufacture or procure physical products receive a supply chain management rating, which is based on a review of their supply chain policy that covers International Labour Organisation (ILO) conventions.
  - If anything of concern is reported, the supplier is usually asked directly to offer insight and background to the issue, and we will conduct our own desk-based research to inform a final judgement on the issue.
  - Should a supplier fail to adequately address any concern raised during this process, any planned engagement is cancelled – action which we have taken in the past.
- Additional checks, searches or enquiries of potential suppliers and third parties, based on findings from the steps above can be undertaken as necessary – including external ethical checks for contracts lower than £50,000.
- Collaboration with the International Secretariat's own Business and Human Rights team to identify suppliers / potential suppliers suspected or implicated in human rights abuses. Last year we reported that in 2018, this resulted in the organisation refraining from contracting with a major travel company implicated in human rights abuses and we have maintained that position through 2019.
- The Supplier Code of Conduct [<https://www.amnesty.org/en/documents/fin20/1182/2015/en/>] ("the Code"):
  - The Code is discussed during the supplier selection process and we obtain written confirmation that the supplier has read and will comply with it.
  - The Code is then included in the written contract (it is included by default in the International Secretariat's standard terms and conditions).
  - The Code is a minimum standard for all supplier engagements, with the right to terminate in case of breach of the Code.
- A specific modern slavery questionnaire ('**MSA questionnaire**') is now issued to suppliers where:
  - Contract value greater than £50,000; or
  - Supplier meets the UK statutory requirement for issuing its own MSA statement; or
  - Supplier falls within a geographical or industry area identified as higher-risk.

The MSA questionnaire asks suppliers about modern slavery risk in their business, in their supply chains and details of their risk management processes. Where relevant, we include tailored questions specific to the goods and/or services they provide (e.g. IT equipment providers are asked detailed queries on the provenance of raw materials and steps taken to ensure transparency in these supply chains).

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<sup>6</sup> See e.g. 2017 statement at 1.6

## 2.2 POLICIES RELATING TO INTERNAL PEOPLE-MANAGEMENT

The staff of the International Secretariat conduct the vast majority of our work directly. For that reason, our internal employment practices are relevant to the risks associated with modern slavery. As of 2018, we carry out external reference checks on all new staff and volunteers, regardless of contract duration, which includes identity verification.

Detailed information in relation to each of our people management policies was provided in our 2016 Modern Slavery Act statement, and so an overview of each policy is not duplicated in this report. Details of our volunteer policy were included in the 2017 Modern Slavery Act statement.

## 2.3 REPORTING MECHANISMS

- Implementation and adherence to our Procurement policy, MSA questionnaire and Supplier Code of Conduct is supervised by the Procurement and Contracts Manager based in London. Under the Code, a supplier is required to report any human rights abuses to their contact person at the International Secretariat within 14 days of the information coming to their attention.
- Whistle-blowing policy: available to all staff globally via the intranet; enables staff to use internal mechanisms (or an external hotline) for reporting serious concerns they may have regarding wrongdoing, illegal acts, omissions, or serious malpractice by people who work for the organisation. The policy is due to be updated during 2020 in discussion with an International Board member, appointed to review all disclosures made under the policy on an annual basis. Reports can be made anonymously.

## 2.4 TRAINING & AWARENESS RAISING

We continue to consider how best to improve staff engagement with ethical procurement, including the risks associated with modern slavery. As we did the year before, we delivered ethical procurement training in 2019 remotely from our London-based Procurement & Contracts team to Sections globally in interactive online sessions. This training covered many aspects of ethical procurement, including Modern Slavery Act 2015 compliance and many of the controls described in section 2 above. Under our Core Standards, Sections are required to have an ethical procurement policy in place and so we share learning and current policy at the International Secretariat to inform the development and continuous improvement of staff throughout the movement. In view of the fact that Sections are legally independent from the International Secretariat, we see our role as promoting awareness and best practice across the movement in relation to ethical procurement including modern slavery issues.

For staff at the International Secretariat too, we offered an in-person Contract Training session with pro bono support from an external law firm. We took this opportunity to cover best-practice, our procurement policies and due diligence as part of the contract lifecycle.

Our intention in the course of 2020 is to deliver some modern-slavery specific training to be made available to all of our staff online, and will mandate completion for those who are involved in supplier engagement more regularly.

# 3. RISKS & STEPS TAKEN

## 3.1 PROGRESS UPDATE

The following table aims to highlight certain activities that have modern slavery-related risks, and shows an update of progress we have made to date in addressing these risks:

| ACTIVITY AREA                    | WHAT'S THE RISK?                                                                                                                  | PREVIOUS COMMITMENTS (2019)                                                                                                                                                                                                                                                                                                                                                                                                                               | STATUS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Hotels & Events-related services | We identified this as a high-risk area due to the nature of the industry, which utilises primarily low-skilled, low-paid workers. | We previously reviewed the due diligence process for such engagements and found that whilst our due diligence process for higher value/large international events our due diligence process is suitable, (though with room for improvement) there was a challenge in ensuring that smaller and one-off engagements with hotels and smaller event-venues have consistently undergone the same process. We planned to consider how this could be addressed. | <p><b>In Progress</b></p> <p>Amongst other objectives, the working group One outcome was to set out plans to establish a list of preferred suppliers in relevant locations globally. One objective was to then ensure these selected suppliers were subject to our due diligence procedures.</p> <p>Our progress to date includes:</p> <ul style="list-style-type: none"> <li>• Establishing a cross-functional working group as part of a wider effort to review how travel is</li> </ul> |

| ACTIVITY AREA                                                                 | WHAT'S THE RISK?                                                                                                                                                                                                                                                | PREVIOUS COMMITMENTS (2019)                                                                                                                       | STATUS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                               |                                                                                                                                                                                                                                                                 |                                                                                                                                                   | <p>managed at the International Secretariat;</p> <ul style="list-style-type: none"> <li>• Set the objective to create a list of preferred suppliers in relevant locations globally based on existing patterns of travel;</li> <li>• Engaged our Regional Offices to identify a list of potential suppliers (new &amp; existing)</li> <li>• Entering negotiations on terms &amp; rates with some of those identified;</li> <li>• Engaging our travel management partner to establish feasibility of implementing this model on the travel booking system.</li> </ul> <p>In addition to potential cost-saving benefits, this model will allow more control from a due diligence perspective.</p>  |
| Procurement activities through regional offices in higher-risk locations      | Some of our regional offices are located in higher-risk locations (based on the Global Slavery Index (GSI) Regional Vulnerability scores – see Table 5 above).                                                                                                  | Develop and implement monitoring processes to ensure that procurement policies and processes are consistently applied across all Regional Offices | <p><b>Ongoing</b></p> <p>As we reported last year, our Regional Offices comply with our global Procurement policies &amp; procedures, details of which are discussion in section 2.</p> <p>At the end of 2019 we approved the early stages of a Business Systems Integration project that, if implemented, would mean a new system for our procurement activities. We discuss this and its potential impact in Section 3.3.3.</p>                                                                                                                                                                                                                                                               |
| Provision of grant funds to other parts of the Amnesty International movement | Part of the function of the International Secretariat is to provide funding to smaller Amnesty Sections (where member donations tend to be lower). These Sections are run independently of the IS, meaning we have limited oversight of how the money is spent. | Review potential risks and implement additional controls within grant procedures as required.                                                     | <p><b>Complete</b></p> <p>Last year we reported that we were amending the agreements under which we provide grants to those Sections funded by the International Secretariat. This was completed with (i) explicit requirements to ensure that modern slavery is not taking place in their supply chains and (ii) to immediately any such instance to the International Secretariat. The updated terms were implemented in 2019 and governed all grants given by the IS to Sections as planned.</p> <p>Whilst we have completed this specific action, we will nonetheless continue to review this process to identify any risks &amp; areas for improvement with respect to modern slavery.</p> |
| Workplace Services                                                            | We re-tendered our                                                                                                                                                                                                                                              | In 2019 we committed to:                                                                                                                          | <b>In progress</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |



| ACTIVITY AREA                                                  | WHAT'S THE RISK?                                                                                                                                                                                                                                                                                                                                                                                                                 | PREVIOUS COMMITMENTS (2019)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | STATUS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                | <p>cleaning and security guard service agreements in 2018; given that both services provided by involve low-skilled/low-paid employees through suppliers, we have identified this as a higher-risk area.</p>                                                                                                                                                                                                                     | <ul style="list-style-type: none"> <li>• Ensure that a whistle-blowing policy is made available to supplier operatives i.e. cleaners &amp; security guards in our London office.</li> <li>• Ensure that specific whistleblowing posters are prominently placed in areas frequently used by these operatives, translated into languages relevant to the teams servicing our London office. These will also include contact details for the UK Modern Slavery Helpline.</li> </ul> <p>A longer-term objective (2019-20) will be the review of all contractors performing these services across our Regional Offices for a targeted risk assessment, with a view to agree further actions we can take to mitigate risk.</p> | <p>In 2019 we created &amp; put up posters in relevant locations to these operatives that highlighted our whistleblowing policy and detailed the UK Modern Slavery Helpline telephone number</p> <p>In 2020-21 we aim to review similar service providers in our Regional Offices in order to perform a risk assessment.</p>                                                                                                                                                                                                                                                                                                      |
| <p>Training</p>                                                | <p>Ensuring that our people are sufficiently aware and trained to spot signs of modern slavery and forced labour.</p>                                                                                                                                                                                                                                                                                                            | <ol style="list-style-type: none"> <li>1. Dedicated training on issues of modern slavery, including red-flag indicators to sensitize people to spot signs of increased risk and tell them what to do about it if they do spot something of concern. Available to all IS staff.</li> <li>2. Update our ethical procurement training, which is shared with wider movement, to include specific red-flag indicators of modern slavery</li> </ol>                                                                                                                                                                                                                                                                            | <p><b>Ongoing</b></p> <p>Last year we stated that we would provide targeted training on the risks of modern slavery in the course of 2019. Whilst we did incorporate this into some existing training sessions discussed at section 2.4 above, we did not complete this action. We aim to achieve this in 2020.</p>                                                                                                                                                                                                                                                                                                               |
| <p><b>Subgrants to 3<sup>rd</sup> -party organisations</b></p> | <p>The International Secretariat sometimes is responsible sub granting to 3<sup>rd</sup>-party partners &amp; organisations to deliver specific human rights impact. In the delivery of agreed outputs, those organisations may subcontract services. Whilst we think the risk of modern slavery in those operations to be low, we acknowledge that it could be a possibility and have considered how to mitigate that risk.</p> | <p>We took this course of action in 2019 and have not previously made commitments in our modern slavery transparency statements.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p><b>Complete</b></p> <p>Similar to our grants for Section offices discussed above, these arrangements are subject to subgrant agreements. We reviewed those agreements in 2019 and updated them to include specific obligations on ethical procurement activities. This include:</p> <ul style="list-style-type: none"> <li>• Subcontracts to incorporate a code of conduct similar to our own Supplier Code of Conduct</li> <li>• Taking steps towards ensuring modern slavery is not taking place in its supply chain; and</li> <li>• An obligation to immediately report any concerns relating to modern slavery.</li> </ul> |
| <p><b>Business systems integration project</b></p>             | <p>Our previous statement referenced a project to review</p>                                                                                                                                                                                                                                                                                                                                                                     | <p>In our FY2018 statement we made no commitments to this project but identified the potential for the initial</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p><b>Ongoing</b></p> <p>We are working to ensure that any new system can at the very least</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

| ACTIVITY AREA                                         | WHAT'S THE RISK?                                                                                                                                                                                                                                                                                                                                                                                                         | PREVIOUS COMMITMENTS (2019)          | STATUS                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                       | <p>some of our internal business systems with a view to consider integration on a new platform. At the end of 2019, we kicked-off the early phases of that project.</p> <p>The scope included procurement and the system currently used for our procure-to-pay process in particular. We need to ensure that any new system or change is fit-for-purpose to effectively mitigate against the risk of modern slavery.</p> | <p>phase being initiated.</p>        | <p>support the current controls, processes &amp; procedures that are critical to our ethical procurement approach – including working to mitigate against modern slavery. This is our commitment on this project.</p> <p>We hope, however, to go further and are actively exploring ways in which we can evolve and improve by leveraging new functionality.</p> <p>The project is in its early stages, but this will be a primary focus of 2020.</p> |
| <p><b>Whistleblowing policy review and update</b></p> | <p>Our current policy was updated in February 2019 and is due to be updated in the latter half of 2020 in order to increase clarity around our policies for supplier staff/subcontractors.</p> <p>The intention is that the policy should also apply to these individuals, but this is not as clear as it could be at present.</p>                                                                                       | <p>No previous commitments made.</p> | <p><b>Ongoing</b></p> <p>We have reviewed our updated external-facing Whistleblowing Policy as against our internal-facing policy and find the latter needs to be updated and clarified. We will be doing this in the late summer of 2020.</p>                                                                                                                                                                                                        |

### 3.2 FY2019 SUPPLIER AUDIT

We took a risk-based approach to auditing our 2019 suppliers and focused on high-risk, high-spend areas. In summary:

- We contacted just under 100 suppliers, focusing on our identified high-risk areas (IT, Travel and Events).
- We received a response rate of 22%.
- In addition, we conducted our own desktop research on relevant suppliers of the identified supplier list, including some who did not respond to our audit request.
- This further research was carried out on a range of both suppliers who had responded and those who had not: the selection was based on a risk assessment that considered CORE guidelines<sup>7</sup> including business models, operating context and the nature and location of work.
- We extended the period for suppliers to respond to our audit as – at the time of writing this report and carrying out our FY2019 audit – the COVID-19 pandemic has resulted in global disruption. The above-stated response rate is a 3% drop in response rate versus FY2018's audit – and we continue to review how this is carried out so that we can improve on the response rate overall.

What we found:

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<sup>7</sup> CORE, *Beyond compliance: effective reporting under the Modern Slavery Act: a civil society guide for commercial organisations on the transparency in supply chains*, clause, 7 March 2016, [http://corporate-responsibility.org/wp-content/uploads/2016/03/CSO\\_TISC\\_guidance\\_final\\_digitalversion\\_16.03.16.pdf](http://corporate-responsibility.org/wp-content/uploads/2016/03/CSO_TISC_guidance_final_digitalversion_16.03.16.pdf)

- No specific instances of modern slavery have been identified.
- No grievances or complaints have been received in relation to modern slavery.

We nonetheless recognise that an absence of reported incidents or concerns is not necessarily an indication of success: it is possible that our investigation and reporting mechanisms could have failed to uncover issues that exist in our supply chains. In areas with long and complex supply chains – such as IT equipment - we have limited visibility of conditions and safeguards in Tier 2 and beyond of the supply chain. Ideally, we would seek to provide better incentives to our suppliers to report any issues and take proactive steps to eliminate modern slavery in their own business model. As a non-profit organisation, our spending and bargaining power is limited, but our unique position as an organisation that researches and exposes human rights abuses globally is something we could further seek to leverage with our own suppliers going forward. See further commitments at section 3.3 below.

### 3.3 LOOKING AHEAD & FURTHER COMMITMENTS

In our previous statement, we indicated that the International Secretariat would undergo significant organisational changes in 2019 and 2020 including changes in our leadership team and some restructuring. Our primary goal was to ensure that during this period of change, our controls and mechanisms to prevent modern slavery in our operations and supply chains would not be impacted, and we have ensured consistency. In Section 3.1 we detail more specific commitments made previously; we have made reasonable progress against those but did not complete all them as hoped, so we have updated our plans to complete them accordingly.

We had also mentioned a key project to review the potential integration of certain business systems, including that which drives much of our procurement activity (as discussed in more detail at Section 3.1). This will be a primary focus in 2020, as it could impact how we approach procurement at Amnesty more widely, including our approach to human rights due diligence. This would therefore form an important part of our continuous improvement in respect of modern slavery risk and our ethical procurement practices.

We continue to think that overall our operations and supply chain present a low risk of modern slavery, but we continue to work towards ensuring our ethical procurement practices are effectively implemented and adopted across our organisation and, where relevant, across the Amnesty movement and with our partners.

This statement is approved by the Board of Directors of Amnesty International Limited

A handwritten signature in blue ink, appearing to be "S.B.", written over a light blue circular stamp.

Signed: .....  
**Sarah Beamish, Chair of the Board of Directors**

Date: 25 June, 2020