



AMNESTY INTERNATIONAL MODERN SLAVERY STATEMENT: FINANCIAL YEAR 1ST JANUARY – 31ST DECEMBER 2023

FOREWORD

Throughout 2023, Amnesty International continued to advocate for workers' rights and for better protection against forced labour and human trafficking. For example, the organization exposed serious labour exploitation amongst migrant workers contracted by third-party companies to work in [Amazon's warehouses](#) in Saudi Arabia. This led to [Amazon reimbursing \\$1.9 million](#) in recruitment fees to 700 of its contracted workers, as well stating they had undertaken several other measures to improve workers' accommodation and grievance procedures, and human rights due diligence checks through its supply chain. Amnesty International also continued to advocate for [FIFA and Qatar to provide remedy](#) to migrant workers who were exploited in the preparation and delivery of the 2022 Football World Cup, and [highlighted abuses suffered](#) by migrant security guards during the tournament, [among others](#). In December 2023 Amnesty International reported on the state's failure to ensure corporate accountability for workers' rights [in Bangladesh](#) against the backdrop of repressed protests and "continuing unacceptably high levels of deaths and injuries" amongst ready-made garment workers.

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. Amnesty International would be unable to carry out its human rights work without the time, energy and financial resources which our 10 million members, supporters, activists and volunteers generously give.

In view of the nature and structure of our organisation (described in Section 1.1), and the nature of the goods and services procured (as discussed in 1.2) our overall assessment is that the risk of modern slavery and human trafficking in our value chain is relatively low. Nonetheless, there are areas of potentially higher risk, and we remain committed to improving our practices to combat modern slavery¹, 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.

In this section we aim to put this statement in context by providing an overview of our organisation and what we procure.

1.1 ORGANISATION STRUCTURE

Amnesty International is a global movement made up of 71 membership organisations, known as Amnesty International "Sections", which carry out Amnesty International work at a national level – plus the International Secretariat ("the IS").

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, a not-for-profit company registered in England & Wales, limited by guarantee (no. 02007475) and a registered charity (no. 294230), with registered office at 1 Easton Street, London WC1X 0DW.

¹ 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>

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, for the financial year 1 January to 31 December 2023 ("FY2023"). The IS has offices in 17 locations worldwide set up by way of branch or subsidiary entities of Amnesty International Limited. These office locations are London, and: Bangkok, Beirut, Brussels, Colombo, Dakar, Jerusalem, Johannesburg, Madrid, Mexico City, Nairobi, New York, Paris, Riga, Seoul, Tunis and Washington DC ("Regional Offices"). This statement does not cover Amnesty International Sections as they are legally independent from the International Secretariat. However, the statement will be shared with our Sections as part of a strategy to raise awareness and build capacity to manage modern slavery risk across the Amnesty International movement.

1.2 OUR SUPPLY CHAIN

In 2023, our total Operating Expenditure, or OPEX was £76.9m. Our staff cost comprised the majority of this expenditure at £52.7m or 69%. Activity costs, or expenditure with third-party suppliers, accounted for £24.2m or 31% of OPEX. Capital expenditure in 2023 was £8.3m, so the IS's overall spend on procured goods and services for 2023 was £32.5m.

The International Secretariat's major area of supplier engagement is in the form of consultancies and professional services to cover (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 content for our publications, to IT services suppliers which support our global operations. The purchase of goods is a small proportion of our overall activity spend.

Our engagement of third-party suppliers represents approximately one third of our OPEX which, generally, reduces our overall risk profile. A degree of risk is, however, still present. Measures in place to mitigate the risk of modern slavery in our supply chains are set out in Section 2.

We have identified the highest areas of risk in our value chain, due to modern slavery risks present in any supply tier, as the following:

Temporary Labour; Conference Space/ Venue Hire; IT Consumables; IT Hardware; Print & Merchandise; Hotels & Accommodation; Building Repairs/Maintenance & Building Equipment; Building Security; Catering Supplies; Cleaning & Cleaning Consumables; Courier/Postage; Storage & Archiving; Facilities CAPEX; Mechanical & Electrical (M&E); Office Consumables & Equipment; and Waste & Recycling.

We have identified these areas as high risk as some parts of these supply chains involve minerals which could be from conflict-affected areas; or, they are staffed by low-paid workers who may lack autonomy over their job or may be subject to a power imbalance.

We have now mapped out the proportion of expenditure on these high risk areas. The table below shows the percentage of overall spend on goods and services that each high-risk category represented for 2023.

High Risk Category	% of Overall Spend	No. of Suppliers
Temporary Labour	0.25%	3
Conference Space/ Venue Hire	1.98%	26
IT Consumables	0.01%	5
IT Hardware	0.01%	2
Print & Merchandise	0.22%	11
Hotels and Accommodation	1.94%	385
Building Repairs/ Maintenance & Building Equipment	0.28%	14
Building Security	0.61%	5
Catering Supplies	0.19%	22
Cleaning & Cleaning Consumables	0.63%	23
Courier/Postage	0.11%	21
Storage & Archiving	0.13%	3
Facilities CAPEX	2.81%	16
Mechanical & Electrical (M&E)	0.36%	4
Office Consumables & Equipment	0.03%	13
Waste, Recycling & Utilities	0.02%	6
Total	9.59%	559

1.3 WHERE ARE SUPPLIERS BASED?

In 2023 Amnesty International Limited worked with 961 suppliers from 85 different countries (excluding hotels and accommodation suppliers). Many of these suppliers will be independent consultants, contractors or freelancers. The proportion of our suppliers who are based in the UK reduced from 54% in 2022 to 37% of our supplier base in 2023. The geographical spread of our supplier base and the associated risk of modern slavery in each location is shown below using data from the [Global Slavery Index produced by Walk Free](#). This analysis shows that our highest risk region is Europe & Central Asia, due to the high proportion of suppliers that are located in this region, followed by Africa.

	GSI's Overall Weighted Average	% of Suppliers per Region in FY2023	Risk Score
Europe & Central Asia	27	42%	972
Africa	64	18%	960
Asia & the Pacific	48	21%	864
Americas	44	12%	440
Arab States	56	7%	336

2. POLICY, PROCEDURE & CONTROLS

2.1 PROCUREMENT

As an organisation that researches and campaigns on human rights issues globally, we are mindful of the potential for modern slavery to occur in our own value chain, so we continually strive to ensure that we apply the same high standards to our own supplier arrangements as those to which we hold other organisations.

Our procurement policies and processes, which take account of modern slavery risks, apply globally and must be followed by all staff who are responsible for purchasing goods or services from third-party suppliers.

The Procurement & Contracts Manager, based in London, is responsible for implementing and managing procurement-related policy and procedure. The procurement lifecycle is not fully centralised through the Procurement function, which means that it is not realistic to obtain detailed oversight of all supplier engagements, although direct support with higher value and/or higher risk procurement activities is provided. The procurement process is embedded within the relevant programme teams in all locations globally and programme teams are all subject to the same procurement policies and procedures.

New suppliers undergo ethical screening that is proportionate to planned expenditure, risk exposure and complexity, and a Modern Slavery Questionnaire is issued as part of higher value tenders. If there are adverse findings from due diligence, Amnesty International would seek to mitigate the risks identified, or choose not to engage that supplier if other more ethical suppliers are available.

Suppliers of goods or services to the IS are required to confirm their acceptance of the principles outlined in Amnesty International's Supplier Code of Conduct, available at <https://www.amnesty.org/en/careers/#tab-procurement> ("the Code"), which includes anti-slavery and human trafficking provisions. Reference to the Code is included by default in Amnesty International's standard terms and conditions. Although the Code provides that Amnesty International may terminate its relationship with a supplier if a supplier breaches the Code, Amnesty International encourages the prioritisation of remedial action in its value chain, recognising that a "zero tolerance approach", which often involves the automatic cancellation of supplier contracts upon discovery of a breach, misses the opportunity to provide support to any victims of abuse and to prevent further abuse from occurring.

2.2 POLICIES RELATING TO INTERNAL PEOPLE-MANAGEMENT

Our internal employment practices take account of the risks associated with modern slavery. We carry out external reference checks on all new staff, regardless of contract duration, which includes identity verification by an independent third party.

As per our Supplier Code of Conduct, all suppliers in our value chain are prohibited from charging recruitment fees to workers.

Volunteers are managed at Amnesty International according to a set of guiding principles.

2.3 REPORTING MECHANISMS

Adherence to our Procurement Policy and Supplier Code of Conduct is supervised by the Procurement and Contracts Manager. Under the Code of Conduct, a supplier is required to report any human rights abuses to the IS Procurement function and/ or their contact person at the International Secretariat within 10 working days of the information coming to their attention.

A whistleblowing policy is available to all staff globally via the intranet; it enables staff to use internal mechanisms (or an external hotline) to report anonymously any serious concerns they may have regarding wrongdoing, illegal acts, omissions, or serious malpractice by people who work for the organisation. Details of the external hotline are also made available to consultants, contractors and freelancers via the Code of Conduct for Consultants.

3. RISKS & STEPS TAKEN

In line with our commitment to improve our internal processes to identify and mitigate against the risks of modern slavery and to raise awareness of the topic with our staff and suppliers, Amnesty International's policies and processes continue to evolve.

A cross-functional Modern Slavery Act Working Group ("the Group") is in place, comprised of members of Amnesty's Procurement, Legal, Business & Human Rights and Economic & Social Justice teams, amongst others.

A recent round of recruitment to bolster this group, to bring additional expertise and a broader range of international perspectives was successful and the Group is now comprised of 9 team members that act as ambassadors for modern slavery prevention across the organisation. Membership of the Group is voluntary and Group activity is taken on in addition to the team members' day-to-day work.

The Group meets every 6-8 weeks and worked on the following activities in FY2023:

Activity Area	Challenge	FY2022 Status	FY2023 Status
Re-assess the modern slavery risk ranking per location	Understanding that our main point of reference was the Global Slavery Index from 2018, the group seeks other reliable sources of data that are more up to date.	Work continues to explore useful resources and datasets to obtain a snapshot of high-risk geographies.	Complete: The Group reviewed available resources for mapping modern slavery risk geographically and found the Global Slavery Index to be the best reference point, particularly given that it was updated in 2023.
Re-assess risk ranking per purchase type	The risk ranking per category was set in 2015 so required revisiting.	The Procurement component of our Business Systems Improvement project went live in February 2023. The Group has re-examined high risk areas of spend, using the more detailed categorisation allowed by the new Finance system. The risk ranking per procurement category will help to determine the depth of due diligence required for each type of purchase.	Complete: Risks per Procurement Category have been reassessed and adjusted.
Review the Modern Slavery Questionnaire, when it is used, who by, and what to do with results	The Group recognised that the Questionnaire developed initially does not yield rich enough data and is too often seen as a "checkbox" exercise by those completing it.	A subset of the Group reviewed the questions in the Modern Slavery Questionnaire and provided recommendations for improvements, which are currently being actioned.	Underway: Several iterations of the questionnaire have been put together in the last year and we are testing the usefulness of the questions, answers and format.

Update the Whistleblowing Policy	The Whistleblowing Policy from 2019 requires a routine review and the Group seeks to strengthen the provisions for reporting suspected instances of Modern Slavery.	A review of the policy is underway.	Underway: We are seeking to simplify the policy to make it easier for users to follow.
Develop Modern Slavery Awareness Training and roll this out to key staff	Ensure that IS staff are aware of the risks of modern slavery in our own internal operations and that they are aware of the warning signs.	Training has not yet been delivered due to time constraints caused by the Business Systems Improvement project.	Complete: Internal training was developed and delivered in October 2023.
Develop a network of Modern Slavery Prevention Ambassadors to increase global awareness of the topic across the IS Regional Offices	Modern slavery prevention work is currently too UK-centric as the Procurement & Contracts Manager is based in London. To be most effective, global voices should be heard.	As above, efforts to create a network of internal ambassadors for modern slavery prevention are on hold due to time constraints caused by the Business Systems Improvement project and limited resources in Regional Offices.	Complete: Recent recruitment to the Group was successful in bringing in a broader range of international viewpoints.
Update the Supplier Code of Conduct to enhance the modern slavery prevention commitments	The existing Supplier Code of Conduct requires a routine review and greater specificity about our expectations for our suppliers regarding modern slavery.	A review of the Supplier Code of Conduct is underway.	Complete: The new Supplier Code of Conduct is available on amnesty.org in English, French and Spanish and is incorporated into the IS's standard terms and conditions. Amnesty International: Supplier Code of Conduct - Amnesty International

The Group has the following objectives for 2024:

- Complete the review of the Modern Slavery Questionnaire
- Complete the review of the Whistleblowing Policy
- Continue to develop the expertise of the Group to enable members to act as Modern Slavery Prevention Ambassadors for the IS by increasing internal awareness of the topic and how it relates to our own value chain.
- Identify, or develop and deliver, appropriate training to staff with budget responsibilities in all IS locations.
- With support and guidance from the Procurement and Contracts Manager, build processes and skillsets to enable Group members to review modern slavery due diligence submissions from suppliers to verify their suitability and advise on any areas for improvement.
- Monitor high risk suppliers' progress against advice initially provided by Amnesty International to maintain pressure to improve.
- Develop and report on Key Performance Indicators (KPIs), as best practice recommends, to monitor the impact of modern slavery prevention and awareness activities.
- Review Amnesty International's modern slavery prevention work against the British Standard BS25700 – Organizational Responses to Modern Slavery to identify further areas for improvement.
- Maintain awareness of the progress of the International Standard on addressing modern slavery risk (currently in development).

3.1 INCIDENTS INVESTIGATED IN 2023

No incidents within our own value chain were reported to the International Secretariat or investigated in 2023.

3.2 SUMMARY

Interest in and commitment to Modern Slavery identification, prevention and education activities at the IS continues to grow and the Modern Slavery Act Working Group has achieved many of the objectives set out in the 2022 statement.

Though time and resource constraints limit the speed and scale of improvements that can be made, the IS will continue – through its Modern Slavery Act Working Group – to develop modern slavery mitigation policies and processes and to share knowledge in the spirit of collaboration with global staff and suppliers.

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

Signed:

A handwritten signature in black ink, appearing to read 'P. Fa'afiu', written in a cursive style.

Peter Fa'afiu, Interim Chair of the International Board
Amnesty International

Date: 11th June 2024