



AMNESTY INTERNATIONAL

MODERN SLAVERY ACT 2015

STATEMENT

FOR THE FINANCIAL YEAR 1 JANUARY TO 31 DECEMBER 2016

**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

Around the world millions of people are victims of modern slavery¹. The complexity of today's global supply chains means that consumers are often unknowingly contributing to the exploitation of others.

Forced labour², a key form of modern slavery, is big business. In 2014 the International Labour Organisation estimated the total illicit profit from forced labour globally at US\$150 billion a year³. In the UK, studies commissioned by the Joseph Rowntree Foundation have revealed the prevalence of forced labour across a number of UK based industries, including care, cleaning, hospitality, construction, and meat and poultry processing⁴.

Modern slavery is therefore an urgent challenge, which is why Amnesty International welcomes the UK Modern Slavery Act 2015, the UK's most comprehensive attempt to address these issues via legislation. The Act requires organizations doing business in the UK with a total turnover of £36m or more to report on the steps that they are taking to ensure that modern slavery is not taking place in their global supply chains.

Amnesty International firmly believes that such legislative measures are a necessary step to tackling the root causes and therefore the demand for modern slavery within supply chains. While there is a role for voluntary mechanisms in improving labour rights, reliance on a purely voluntary approach has not been effective in ensuring that companies meet minimum labour standards throughout their global supply chains. Laggard companies can continue to mismanage supply chains creating a situation where the most exploitative labour conditions are tolerated.

Amnesty International has considerable experience in exposing abuses and bringing about human rights change in this area. In relation to human trafficking, we were one of the leading nongovernmental organisations that campaigned for a robust victim-centred approach on the text of the Council of Europe Convention on Action against Trafficking in Human Beings, and we continue to work to promote states' ratification of and compliance with this Convention.

More broadly, Amnesty International's research has uncovered far reaching abuses of labour rights in the construction industry in Qatar⁵, and on palm oil plantations in Indonesia from where some of the world's leading brands, including UK companies, source their palm oil⁶. Forced labour and child labour on these plantations are the outcome of systemic business practices including low wages, the use of targets and 'piece rates' and a complex system of financial and other penalties that compels some workers to toil for 12 hours per day, 7 days per week. Amnesty International uncovered instances where workers on palm oil plantations worked 12 hour days in order to get a daily minimum wage, which constitutes forced labour as defined by the International Labour Organisation (under Indonesian law anyone working more than seven hours should get overtime pay). In our advocacy, we urge companies to be more transparent about where they source their palm oil from, in particular to trace palm oil from plantation to specific product lines and to disclose this information publicly. We also ask them to do much more to influence their buyers to put in place concrete measures to prevent these abuses.

1 In this statement the term 'modern slavery' is used as an overarching term to include: human trafficking, slavery, servitude, forced and bonded labour and the worst forms of child labour.

2 Defined by the International Labour Organization under the Forced Labour Convention No.29 (1930) as 'any work or service exacted under the menace of any penalty, and for which the worker has not offered himself voluntarily'

3 International Labour Organisation, *Profits and poverty: the economics of forced labour*, May 2014, http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_243391.pdf

4 Joseph Rowntree Foundation, *Forced Labour in the UK*, May 2014, <https://www.jrf.org.uk/report/forced-labour-united-kingdom>

5 Amnesty International, *The Ugly Side of the Beautiful Game*, 30 March 2016, <https://www.amnesty.org/en/documents/mde22/3548/2016/en/>; and *The Dark Side Of Migration: Spotlight On Qatar's Construction Sector Ahead Of The World Cup*, 18 November 2013, <https://www.amnesty.org/en/documents/MDE22/O10/2013/en/>

6 Amnesty International, *The Great Palm Oil Scandal: Labour Abuses Behind Big Brand Names*, 30 November 2016; <https://www.amnesty.org/en/documents/asa21/5243/2016/en/>

In the UK, Amnesty International, as part of a coalition with other NGOs, successfully lobbied for the inclusion of provisions on transparency in supply chains, along the model of the California Transparency in Supply Chains Act 2010, which resulted in section 54 of the UK Modern Slavery Act 2015. These provisions are a step in the right direction, but do not go far enough, in that they do not specify the steps that companies should take to ensure that modern slavery is not in their supply chains. They also amount to a reporting requirement, allowing companies to simply 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. We are therefore calling for measures to strengthen section 54 in a way that would help create a corporate culture in the UK that will be intolerant of modern slavery and enable it to be rooted out of the labour market. We are also calling on the UK Government to demonstrate at least the same level of commitment in its own supply chains, in so far as embedding anti-slavery requirements in public procurement policy would send very strong signals to companies to undertake appropriate and effective human rights due diligence or face the risk of being excluded from all public contracts.

EXECUTIVE SUMMARY

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 in respect of Amnesty International Limited⁷, the principal operating entity for Amnesty International's International Secretariat which conducts operations in London, UK and 19 other office locations worldwide.

The statement sets out steps that we have taken during the 2016 financial year to ensure that slavery and human trafficking is not taking place in our supply chains and any part of our own business. In compiling this statement we have followed the framework prescribed by the CORE coalition of NGOs to which Amnesty International contributed⁸, as well as covering all the areas set out at section 54(5) of the Modern Slavery Act.

OUR KEY FINDINGS ARE AS FOLLOWS:

- Our suppliers consist predominately of professional consultancies and service providers to support both our substantive human rights work and the operations which support that work. These services are provided almost exclusively by way of direct service provision without extensive supply chains. As such, our supply chain model is therefore generally low risk.
- In conducting a risk assessment of our suppliers we identified some examples of more complex supply chains and goods or services of higher risk which require further investigation.
- We recognise that our internal working practices represent a potential risk area due to the fact that our staff carry out the majority of our work. Although we have strong processes and policies in place, a review specific to modern slavery risks is required.
- We consider that our current processes, in particular our ethical procurement policies and processes, represent a good basis to manage risks associated with modern slavery. However we have identified areas for further investigation and improvement and therefore plan to further develop our approach by taking the following steps:
 1. further investigate and engage with higher risk suppliers on the issue of modern slavery;
 2. review and update ethical procurement processes to take account of modern slavery risks;
 3. review and update other key policies and processes including those relating to our internal working practices to ensure that the risks of modern slavery are appropriately managed; and
 4. develop and implement a set of specific key performance indicators and related monitoring in relation to modern slavery.

⁷ Registered in England and Wales under the UK Companies Acts as a company limited by guarantee (registered number 01606776) with registered office at 1 Easton St, London WC1X 0DW.

⁸ 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

INTRODUCTION

Amnesty International is a global human rights movement. Our vision is of a world in which every person enjoys all of 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.

Our core values are of an organisation that forms a global community of human rights defenders based on the principles of international solidarity, effective action for the individual victim, global coverage, the universality and indivisibility of human rights, impartiality and independence, and democracy and mutual respect.

Our methods are to address governments, intergovernmental organizations, armed political groups, companies and other non-state actors. We seek to expose human rights abuses accurately, quickly and persistently.

We systematically and impartially research the facts of individual cases and patterns of human rights abuses. These findings are publicized, and members, supporters and staff mobilize public pressure on governments and others to stop the abuses.

In addition to its work on specific abuses of human rights, we urge all governments and all relevant powers to observe the rule of law, and to ratify and implement human rights standards; we carry out a wide range of human rights educational activities; and we encourage intergovernmental organizations, individuals, and all organs of society to support and respect human rights.

1.1 AMNESTY INTERNATIONAL'S INTERNATIONAL SECRETARIAT, ITS ORGANISATIONAL STRUCTURE AND ITS SUPPLY CHAINS

1.1.1 MAIN PRODUCTS/SERVICES/CUSTOMERS

See the Introduction (above) for a description of Amnesty International's activities. Amnesty International's International Secretariat is responsible for:

- co-ordinating and conducting Amnesty International's global human rights work in research, campaigning, communications, advocacy, policy, legal, fundraising, education and other functions as necessary;
- developing global strategy, policies and standards;
- representing the Amnesty International externally through the Secretary General;
- ensuring Amnesty International speaks with one voice globally about the whole range of human rights themes and situations and their impact on people and communities;
- providing expert legal analysis of research data, forming the basis for expert lobbying of international government organisations; and
- supporting Amnesty International's global governance, growth and development and its financial health.

The International Secretariat's major area of supplier engagement is in the form of consultancies and professional services to cover (a) the substantive human rights work; and (b) the 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.

1.2 COMPANY OUTSIDE THE UK

1.2.1 ORGANISATIONAL STRUCTURE:

The work of Amnesty International's International Secretariat is organised into two legal entities, in compliance with the law of England and Wales:

- (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 (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 (referred to hereafter as the 'International Secretariat'). As part of a recent move to distribute the human rights research and campaigning to the relevant geographical regions where we work, the International Secretariat now has offices in 20 locations worldwide set up by way of branch or subsidiary of Amnesty International Limited.

To complete the picture of how Amnesty International operates globally: Amnesty International is a global movement made up of over 60 membership organisations, in the form of Amnesty International sections and structures which carry out Amnesty International work at a national level. They are responsible for:

- lobbying government on our calls for human rights change;
- campaigning/fundraising/communications within their country/region;
- working with local members, supporters and activists to bring about human rights change;
- conducting research projects focusing on local human rights abuses.

1.3 STRUCTURE AND COMPLEXITY OF SUPPLY CHAINS

The International Secretariat's suppliers can be split broadly into two categories: substantive human rights work and operations.

The majority of supply chains for the International Secretariat's substantive human rights work are simple direct services, such as consultancy and research engagements. For example, we engage individual expert consultants to carry out human rights research on the ground that feeds into our public reporting and campaigns.

On the operational side the main areas of spend relate to the provision of direct services to support our global operations and offices such as IT services, office rental and professional services such as insurance. However there are some areas of greater complexity in the supply chains for the procurement of goods, in particular the sourcing of essential IT equipment, printing and stationery supplies to support the International Secretariat's business requirements. A small number of goods are sold to the public, including copies of hard copy publications such as the

Amnesty International Annual Report, the Combating Torture Manual and the Fair Trials manual, and some subscriptions to the International Secretariat magazine, WIRE. Currently the majority of the transactions are selling or distributing to other parts of the Amnesty International movement. The International Secretariat also procures a range of merchandise to support Amnesty International's global campaigns. This includes items such as badges, stickers, t-shirts, tote bags, pens and USB flash memory sticks. These items are distributed to other parts of the Amnesty International movement.

1.4 LOCATION OF COMPANY OPERATIONS AND COUNTRIES THAT THE COMPANY IS SOURCING FROM (INCLUDING LIST OF PRODUCTS OR PRODUCT CATEGORIES BY COUNTRY).

The International Secretariat carries out operations from its London office, as well as through a number of international offices which represent Amnesty's regional office network as follows: Bangkok, Beirut, Brussels, Dakar, Geneva, Hong Kong, Jerusalem, Johannesburg, Kiev, Lima, Mexico, Moscow, Nairobi, New York, Paris, Tunis and Washington DC ('Regional Offices'). The International Secretariat also carries out operations to translate and distribute Amnesty International publications through entities in Paris and Madrid.

An analysis of global spend by supplier revealed that the top suppliers are service providers which support our global operations. These include services relating to IT, insurance, recruitment, pensions, administration and office rental. Those suppliers were UK-based with the exception of office rental.

Due to the higher risk profile, we monitor the supply chains for the printing and merchandise products described in 1.3 above closely and can confirm as follows:

- The USB sticks are supplied by a UK supplier and manufactured in Shenzhen, China.
- The t-shirts and bags are supplied by UK-based suppliers.
- The pens are manufactured in Germany.
- The badges and stickers are UK-manufactured.
- Books are printed by a book printer in the UK.

1.5 WHETHER THE COMPANY'S SUPPLIERS CHANGE ON A SEASONAL BASIS AND PERCENTAGE OF EMPLOYEES ON TEMPORARY/SEASONAL CONTRACTS

The International Secretariat's suppliers do not change on a seasonal basis.

The International Secretariat employs staff on permanent and temporary (fixed term) contracts and, in limited cases, via agencies. It also engages volunteers and interns. The policies which apply to these engagements are dealt with in more detail below.

In 2016 we employed 91 fixed term employees out of a total of 551 employees which amounts to 17%. We currently have 11 agency workers.

1.6 INTERNAL PROCEDURES TO ENSURE ADEQUATE PROCUREMENT PRICING, PROMPT PAYMENT AND GOOD PLANNING

The International Secretariat procurement policy operates to achieve the following objectives:

- 1) obtain best value for money;

- 2) minimise the associated financial, reputational and legal risks;
- 3) obtain optimum performance from suppliers;
- 4) apply ethical procurement practices in accordance with our human rights and environmental standards; and
- 5) provide transparency and accountability.

The policy contains a flowchart outlining the steps to be followed to ensure the required process is undertaken, with timeframes to be planned accordingly. The total value of the proposed procurement determines the applicable supplier selection process and the level of financial authority required to approve and sign the contract.

| TOTAL VALUE | SUPPLIER SELECTION PROCESS | CONTRACT SIGNATORY |
|--|---|--------------------|
| Contract value less than £1,000 | Two quotes preferred | Budget Holder |
| Contract value over £1,000 and up to £5,000 | Minimum two written quotations | Programme Director |
| Contract value over £5,000 and up to £50,000 | Minimum three written quotations and a proposal to Programme Director | Programme Director |
| Contract value over £50,000 | Formal competitive tender process and a proposal to Senior Director | Senior Director |

Ethical procurement requirements are incorporated into the Procurement Policy and process through formal ethical/due diligence checks (for all contracts greater than £50,000 or as necessary), and the Supplier Code of Conduct⁹, which is referenced during the supplier selection process and is incorporated into the International Secretariat's standard supplier terms and conditions. Further information on the Supplier Code of Conduct and ethical checking of suppliers is provided below (sections 2.3 and 3 respectively).

Once contracts have been negotiated, the new supplier is set up by the financial accounting team to enable payment. To request this, a 'New supplier set up form' is completed and submitted for set up along with budget holder approval and proof of the supplier's bank details.

Payment of suppliers is managed by the finance team through an electronic payment requisitioning system. Requisitions are raised and approved to generate a Purchase Order (PO), which is sent to the supplier to reference on the invoice. Goods and services are receipted on IPOS as soon as they have been delivered. The financial accounting team will only pay invoices that have approved and receipted POs and will aim to pay all invoices within 30 days of the invoice arriving with the finance team. The 30 day payment term is included in all contracts as standard.

The finance department is responsible for the purchasing and payment policies in this area; each relevant organisational function is in charge of implementation. The International Secretariat's board of directors reserves for itself the approval of and making amendments to the financial policies and procedures. Financial policies are reviewed and updated at least every two years. The financial control framework has been designed to reduce the risk of fraud and error and to ensure that assets are safeguarded; as such there are finance policies relating to:

⁹ Accessible at the following link: <https://www.amnesty.org/en/documents/fin20/1182/2015/en/>

1. purchases – purchasing and procurement policy, operating and capital expenditure policy, headcount policy;
2. payments – expenses policy, travel policy; and
3. assets – treasury policy, reserves policy

2 AMNESTY'S POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

The following policies are relevant to the issue of modern slavery in terms of (i) procurement of goods and services (ii) our internal labour practices.

2.1. PROCUREMENT POLICY

As explained above, the International Secretariat procures a wide range of goods and services to support all aspects of its work. This policy applies to all staff who are responsible for purchasing goods or services from third party suppliers including consultants. The list of procurement policy objectives is set out at section 1.6 above, and includes as a key objective the application of ethical procurement practices in accordance with Amnesty International's human rights and environmental standards.

Before entering into any contractual relationship with a supplier, the following steps must be followed:

STEP 1: FORMAL ETHICAL/DUE DILIGENCE CHECKS (SEE SECTION 3 BELOW FOR MORE DETAIL)

- For contracts greater than £50,000 in value, an external ethical check is commissioned.
- Additional checks, searches or enquiries of potential suppliers and third parties can be undertaken as necessary.

STEP 2: SUPPLIER CODE OF CONDUCT (SEE SECTION 2.3.2 BELOW FOR MORE DETAIL)

- Reference made to the supplier to the Code of Conduct during the supplier selection process. Obtain written confirmation that the supplier has read and will comply with it.
- Reference made to the Code is included in the written contract (it is included by default in the International Secretariat's standard terms and conditions).

BUSINESS ETHICS:

The following are extracts from rules in the procurement policy which apply to all staff involved in procurement.

- **You must not:**
 - use your position for personal gain.
 - be involved in procurement decisions where you have a conflict of interest.
 - solicit, accept, offer or provide improper payments, gifts or other inducements as part of a tender or procurement process.
- **You must:**
 - Comply with all applicable policies, including the Policy on Anti-Bribery and Corruption.

- Only accept gifts outside the procurement process.
- Only accept gifts of nominal value offered by suppliers as part of their marketing activities (for example calendars, diaries, mugs or pens).
- Only accept hospitality gifts from suppliers in the form of meals or social events in connection with their business activities and provided that acceptance of the hospitality:
 - Is not an inducement to enter into business with a supplier or obtain any advantage in respect of the procurement process;
 - Will not place you or the International Secretariat under any obligation in relation to a supplier; and
 - Could not be reasonably misconstrued as either these points above.
- Disclose your acceptance of gifts of any value to your Line Manager.
- You must also, in accordance with the International Secretariat Policy on Anti-Bribery and Corruption, immediately report any suspicion you have that an undue financial or other advantage [which may amount to bribery] is being offered or provided, by or to any supplier (even if Amnesty International is not directly involved).

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 highly relevant to the risks associated with modern slavery.

2.2.1. POLICY STANDARDS FOR PEOPLE-MANAGEMENT

This is an overarching policy agreed between the International Secretariat and its recognised trade union, Unite. It outlines the standards that underpin people management policies applicable to staff. It requires that policies have due regard for natural justice by embodying the fundamental principles of fair treatment within the workplace, and that they take into account current statutory requirements and externally recognised best practice guidelines and codes of practice. It includes requirements that all policies which articulate individuals' rights and obligations are made accessible to all and adhere to the principle of fairness and demonstrate consistency. Further, that policies are applied in a way that ensures that each party has a reasonable opportunity to fully prepare and present any case, under conditions that do not place them at a disadvantage. This includes fair and adequate access to information, time and facilities, and the opportunity to present information, evidence and arguments at all stages, including any appeals.

2.2.2. COLLECTIVE BARGAINING AND INTERNATIONAL REWARD FRAMEWORK

The International Secretariat has a collective bargaining agreement with the UK trade union Unite, the recognised trade union for all its employees. Under that relationship an 'International Reward Framework' (IRF) was agreed in May 2013 as a base standard for salary structures and minimum standards for benefits for all International Secretariat offices. The International Secretariat is committed to ensuring the standards in the IRF are applied to all employees globally - subject to the operation of local employment law which may provide additional rights or remedies.

2.2.3. THE BEHAVIOUR FRAMEWORK

The International Secretariat has developed an employee behaviour framework, which is a guide to more effective, and less effective behaviours across the following areas: delivering results,

working with others, developing oneself and others, contributing to a dynamic and effective organisation, making decisions, taking the initiative, communicating and influencing.

2.2.4. BULLYING AND HARASSMENT POLICY

The International Secretariat aims to create and maintain a working environment where all individuals are treated equally, fairly and with dignity by colleagues and managers. Individuals who have raised concerns about bullying/harassment will be treated fairly at all times, during and after raising the issue. Where resolving matters informally either is inappropriate or has failed, the Grievance Policy is used to raise concerns of bullying and harassment formally (see 2.2.5 below). The policy reflects the International Secretariat's commitment to creating and maintaining an environment where dignity is important and everyone treats each other with respect and therefore communicates to managers and employees that the any form of the following conduct is unacceptable and will not be tolerated:

- Conduct which violates another individual's dignity; or
- Conduct which creates an intimidating, hostile, degrading, humiliating or offensive environment; or
- Conduct which results in unfair treatment of a person on any grounds but not confined to, sex, gender identity or expression, pregnancy or maternity, sexual orientation, religion or beliefs, marital status, civil partnership status, race, ethnic origin, colour, nationality, national or ethnic origins, disability or age, political viewpoints, membership or non-membership of a trade union, or any other grounds/personal characteristics (whether prohibited by legislation or otherwise).

2.2.5. GRIEVANCE POLICY

This policy aims to uphold the International Secretariat's commitment to promoting and ensuring a working environment where individuals are treated with respect and courtesy. It provides a process for any employee to raise concerns, with the necessary procedures and protections. The procedure is designed to resolve problems, for example, concerns relating to harassment, bullying and victimisation or where an employee feels that they have been unfairly or unreasonably treated and to provide employees with a reasonable and prompt opportunity to obtain redress of any grievance. Concerns can also be raised by staff under the whistleblowing policy (see section 2.4.1 below)

2.2.6. DISCIPLINARY POLICY

This policy aims to ensure that there is a fair and consistent approach to the achievement of standards of conduct throughout the organisation. It outlines the principles and process for dealing with cases of alleged misconduct, or repeated or more serious instances of under-performance that are deemed to be within the employee's control.

2.2.7. EQUAL OPPORTUNITIES AND DIVERSITY POLICY

This policy aims to:

- communicate our commitment to equality of opportunity in employment and diversity in the workplace
- ensure that employment matters adhere to best practice and relevant employment law
- clarify the responsibilities of stakeholders
- provide a framework for dealing with complaints from individuals who believe that they have been unfairly discriminated against

This policy is the instrument through which the International Secretariat complies with its obligations as an employer and a service provider as set out in the UK Equality Act 2010 to ensure that everyone has the right to be treated fairly at work and are protected from discrimination on the basis of nine protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex/ Gender
- Sexual orientation.

2.2.8. RECRUITMENT POLICY

This policy and associated processes aid the effective management of the recruitment of staff by providing a clear and transparent framework to ensure all recruitments are handled in an effective and suitable manner; that candidates are treated consistently and fairly; that recruitment practices are in accordance with good practice and employment law. The policy sets out the principles for the recruitment and selection practice, which is also guided by the UK Equality Act 2010, all other relevant employment legislation. Additional Redundancy, Maternity and Short Term Workers policies cover specific requirements which guide advertising and/or selection practice in those circumstances. At all times we work within the standards set by international human rights law.

2.2.9. PRINCIPLES OF VOLUNTEERING AND INTERSHIPS

Amnesty International as a global not for profit movement would be unable to carry out its human rights work without the time, energy and financial resources which millions of members, supporters, activists and volunteers generously give. We recognise that the contributions of our volunteers has enabled the remarkable work of our movement throughout our history and should be held central to our values as a fundamental for achieving the success of our human rights mission.

THE PRINCIPLES OF VOLUNTEERING AND INTERSHIPS GUIDELINES:

- confirm the terms of volunteering arrangements, and paid internships;
- distinguish between these two types of arrangements;
- clarify supervisory obligations for managers and supervisors;
- provide clarity to volunteers and interns on the nature of their relationship with the International Secretariat and the benefits, protections and opportunities afforded to them;
- ensure that the International Secretariat's engagement with volunteers and interns is fair and consistent, supportive and responsible
- ensure that the International Secretariat's practices are in accordance with good practice and employment law.

Volunteers and interns are encouraged to ensure that they understand the nature of their engagement and flag any concerns they have relating to tasks, support or overall engagement to their supervisor or HR as appropriate. Volunteers are not be covered by the International

Secretariat's policies and procedures such as they relate to employees but standards of management, equality, treatment and values are upheld. Interns, as employees, are covered by relevant policies and procedures and benefits.

2.2.10 POLICIES RELATING TO STAFF TRAINING AND INCREASING AWARENESS OF MODERN SLAVERY

All new staff are subject to an induction programme, the objective of which is to communicate the International Secretariat's culture, values and policies. A general induction training is given to new starters run by different programme teams including Workplace, Finance and HR. The new starters are also directed to key policy documents, which are available on the internal staff intranet page. It is the immediate line manager's responsibility to ensure that a specific induction programme is implemented for new and transferred employees.

Specific training sessions on business ethics are provided to relevant staff groups and include reference to the Procurement Policy. Sessions on the procurement policy are also run as part of finance meetings with budget holders. The organisation is in the process of introducing on-line training for its staff to cover these areas.

2.3. POLICIES THAT CONCERN BUSINESS RELATIONSHIPS

2.3.1. ETHICAL PROCUREMENT

See section 2.1 above for details of the process under the Procurement Policy.

2.3.2. SUPPLIER CODE OF CONDUCT

The Supplier Code of Conduct includes specific obligations on suppliers to respect the fundamental labour rights set out in the eight International Labour Organisation core conventions, including ensuring living wages are paid. For suppliers based in Greater London, the Code requires that workers under the suppliers' control receive a minimum of the Living Wage, or the London Living Wage. The full text of the Code, published on our website, is as follows:

Amnesty International is committed to ensuring that its mission and values are reflected in its approach to buying goods and services. In addition to complying with all applicable statutory and legal requirements, Amnesty International's suppliers must comply with the human rights, labour and environmental standards set out in this Code as an absolute minimum, and take reasonable steps to ensure that those with whom they have a business relationship do likewise. Amnesty International reserves the right to terminate its relationship with a supplier in the case of breach of this Code. Amnesty International keeps this Code under ongoing review and may amend or add to this Code at any time.

1. Overall Statement of Human Rights Compliance

- Suppliers must respect the rights set out in the International Bill of Human Rights
- Suppliers must also respect the fundamental labour rights set out in the eight International Labour Organisation core conventions. Key principles of these conventions as they relate to working practices are set out within the Ethical Trading Initiative Base Code, in summary as follows:
 - employment is freely chosen
 - freedom of association and the right to collective bargaining is respected
 - working conditions are safe and hygienic
 - no child labour

- living wages are paid
- working hours are not excessive
- no discrimination is practised
- regular employment is provided
- no harsh or inhumane treatment

2. Specific Human Rights Compliance

Suppliers must:

- take reasonable steps to ensure that they do not profit directly or indirectly from the exploitation of child labour or that of other vulnerable groups, from bonded labour, indentured labour or any other form of servitude
- take reasonable steps to ensure that any goods that they produce, trade or deal in are not, and have not been, implicated in human rights abuses by military, security or police forces or other state agents or by non-state actors, including equipment which may be used in relation to the death penalty
- not cause or contribute to the commission of serious human rights abuses, whether by state agents or by non-state actors, including torture, cruel, inhuman or degrading treatment, and gross abuses amounting to crimes under international law including war crimes and crimes against humanity

3. Statement of commitment by Suppliers

- Suppliers must exercise human rights due diligence – that is take reasonable steps and make good faith efforts – to avoid causing or contributing to any adverse impact on human rights
- Suppliers must demonstrate an on-going commitment to respect human rights and, appropriate to their size and circumstances, have in place policies and processes that enable them to identify, prevent, mitigate and remedy any actual or potential adverse human rights impacts on individuals, communities or society they cause or contribute to through their activities and relationships
- Suppliers must disclose to Amnesty International information on human rights abuses that has come to their attention both in respect of themselves and along their supply chain, including the names of suppliers associated with these risks, and any risk management plans that have been put in place. Such information must be provided both before contracting with Amnesty International, and during the contractual relationship, and within 14 days of the information having come to the supplier's attention

4. Environmental Standards

Amnesty International strives to reduce its use of energy and other non-renewable resources by complying with the following principles; as part of this effort Amnesty

International will give preference to suppliers who do likewise:

- Keep waste to a minimum and work to the maximum reduce, re-use and recycle
- Minimize the use of substances hazardous to health or the environment and responsibly manage hazardous waste
- Avoid unnecessary use of materials and use recycled materials and materials from sustainable and local sources where possible
- Maximise efficient energy use and minimise harmful emissions

5. London Living Wage

Amnesty International is accredited by the Living Wage Foundation as a Living Wage Employer. Suppliers must ensure that workers under their control receive a minimum of the Living Wage, or the London Living Wage where those suppliers conduct business within Greater London.

2.4. DETAILS OF ANY MECHANISM BY WHICH STANDARDS OR POLICIES ARE ENFORCED

Details of the method of enforcement are contained within each individual policy. All policies are regularly reviewed and updated as required by the assigned policy owner. The implementation of the procurement policy and supplier code of conduct is supervised by the Procurement and Contracts team which consists of two permanent staff members.

2.4.1. WHISTLE-BLOWING POLICY

This policy and procedure enables staff to use internal mechanisms for reporting serious concerns they may have regarding wrongdoing, illegal acts, omissions, or serious malpractice by people who work for the organisation. As malpractice is not easily defined, the following list is given, which is not intended to be exhaustive:

- Fraud;
- Financial irregularities;
- Corruption;
- Bribery;
- Dishonesty;
- Acting contrary to the Amnesty values.

Individuals are encouraged to notify their manager or another senior manager (as appropriate) within the International Secretariat as soon as they have a concern or become aware of a potential occurrence covered by this policy. The policy also provides suggestions for other protected routes for a staff member to make disclosures externally as necessary.

3. AMNESTY'S DUE DILIGENCE PROCESSES IN ITS BUSINESS AND SUPPLY CHAINS RELEVANT TO MODERN SLAVERY

As detailed above, the International Secretariat has a range of procurement and purchasing policies and controls in place which go some way to managing the risk of modern slavery in our business and supply chain, in summary:

- Inclusion of the Supplier Code of Conduct as a minimum standard for supplier engagements, with the right to terminate in case of breach of the Code (see section 2.3.2 above). The monitoring of supplier compliance with the Code is an area requiring review (see section 4.4.2 below).
- Ethical screening reports are run on all high value (over £50k) and high risk suppliers through an external provider. These reports investigate a range of high risk ethical areas, including human rights, worker's rights, and supply chain management. Specifically under worker's rights, the following sub categories are investigated (not exhaustive): payment of wages below that necessary for an adequate living, provision of an inadequate or dangerous working environment, enforcement by a company of a working week over 48 hours, use of forced or slave labour.
- Enforcement of a range of internal labour policies related to people management, recruitment, the work environment and employee rights, as detailed in section 2.2 above.

4. RISK OF SLAVERY AND HUMAN TRAFFICKING AND STEPS TAKEN TO MANAGE IT

4.1. AN ASSESSMENT OF THE RISK FACTORS RELATING TO MODERN SLAVERY OUTLINED IN RELATION TO THE COMPANY'S SUPPLY CHAIN.

In addition to the analysis of specific suppliers set out at section 1.4 above, we conducted a risk assessment of our suppliers to inform areas of focus for further investigation and due diligence. Suppliers were categorised based on the level of spend (suppliers with proportionately higher spend were prioritised) and by applying our knowledge of areas of 'high risk' in supply chains.

We have also considered the risk factors identified in the CORE guidelines¹⁰, including:

Business Models:

- Subcontracting and complex supply chains
- Extended or complex employment relationships
- Presence of labour recruiters in supply chains
- High flexibility and low profit margins

Operating context

- Lack of government regulation and/or poor enforcement of labour standards
- Presence of cheap labour and high numbers of vulnerable workers
- Absence of effective and representative workers organisations/collective agreements

Nature and location of work:

- Reliance upon low-skilled or unskilled labour
- Workforces with high numbers of temporary, seasonal or agency workers
- Work of a dangerous or physically demanding nature
- Worker isolation and lack of access to information
- Home-based workers and workers employed in informal enterprises

¹⁰ See footnote 7 above

TABLE SHOWING CATEGORIES INTERNATIONAL SECRETARIAT ACTIVITY AND ASSOCIATED RISK ASSESSMENT

| INTERNATIONAL SECRETARIAT ACTIVITY | LIKELIHOOD/RISK ASSESSMENT | ACTIONS IDENTIFIED |
|---|-----------------------------------|--|
| Non-standard employee engagements (short term contracts, interns, volunteers) | Low | Review related policies and processes to ensure risks of modern slavery are addressed |
| Consultancies | Low | Monitor supplier relationships to ensure application of key policies and principles. |
| Conferences/venues | Medium | Review due diligence processes for venue engagements. |
| IT Equipment | High | Investigate current suppliers; Develop action plan if modern slavery risks identified. |
| Stationery | Medium | Investigate current suppliers; Develop action plan if modern slavery risk identified. |
| Printing and Promotional Items | Medium | Further develop screening and monitoring process for printing suppliers; Develop and implement due diligence reporting procedures for Regional Offices. |
| International operations – Regional Offices | Medium | Develop and implement monitoring processes to ensure that procurement policies and processes are consistently applied across all Regional Offices |
| Provision of grant funds to other parts of the Amnesty International movement | Low | Review potential risks and implement additional controls within grant procedures as required. |

4.2. DETAILS OF SOCIAL AUDITING AND/OR OTHER RISK MANAGEMENT PROCESSES, INCLUDING WHETHER RISK ASSESSMENT PROCESSES COVER HUMAN TRAFFICKING AND ANY OTHER LABOUR ISSUES DEALT WITH IN THE COMPANY’S POLICY STATEMENTS

Ethical screening reports are run on all high value (over £50k) and high risk suppliers through an external provider (see section 3 above).

The Supplier Code of Conduct requires suppliers to respect the fundamental labour rights set out in the eight International Labour Organisation core conventions, including ensuring living wages are paid (see section 2.3.3 above).

4.3. IMPACT ASSESSMENTS UNDERTAKEN INCLUDING EVIDENCE OF, AND FINDINGS FROM ENGAGEMENT WITH RIGHTS HOLDERS

Every two years the International Secretariat runs an internal employee engagement survey to gather views on all aspects of working life – including internal culture, leadership, management, learning and development, performance and the office space. It also allows the progress made in response to feedback in the previous survey to be measured. All employees are encouraged to complete the survey. Feedback and comments are submitted and recorded anonymously. The follow up discussions, actions agreed at all levels of the organisation are an integral part of the ongoing engagement process.

4.4. ACTION PLANNED AND ACTION TAKEN (INCLUDING HOW ACTIONS HAVE BEEN PRIORITISED) TO:

4.4.1. EMBED RESPECT FOR HUMAN RIGHTS AND ZERO TOLERANCE OF MODERN SLAVERY ACROSS THE BUSINESS

Amnesty International's core values are of an organisation that forms a global community of human rights defenders based on the principles of international solidarity, effective action for the individual victim, global coverage, the universality and indivisibility of human rights, impartiality and independence, and democracy and mutual respect.

To support a zero tolerance approach to modern slavery across our organisation and to raise internal awareness of the specific risks, the following actions are proposed:

- implement a communication and awareness strategy to improve staff awareness of the risks relating to modern slavery;
- ensure adequate support is provided to staff most likely to encounter the risks of modern slavery; and
- review and update key policies (see 4.4.2 below)

4.4.2. ADDRESS ANY RISKS OF MODERN SLAVERY

We consider that our existing policies and processes represent a good basis to manage the risks associated with modern slavery however following our supplier risk assessment and the initial review of our policies and processes we have identified the following actions for further investigation and improvement:

- further investigate suppliers identified as higher risk in the supplier risk assessment (see 4.1 above) including by direct engagement; take necessary remedial action;
- review and update internal procurement policy and processes in the light of modern slavery risks, in particular in relation to supplier compliance with the Supplier Code of Conduct;
- implement internal monitoring procedures to ensure that procurement processes are consistently applied across the International Secretariat's offices;
- review and update applicable policies and processes relating to people management to address the internal risks of modern slavery;
- develop and implement a set of performance indicators specifically related to modern slavery, and implement a strategy for measurement and reporting against them.

4.4.3. SUPPORT BROADER EFFORTS TO ELIMINATE MODERN SLAVERY

As mentioned in the Foreword, Amnesty International has undertaken substantive human rights research and advocacy work on slavery and human trafficking and will continue to do so.

5. ITS EFFECTIVENESS IN ENSURING THAT SLAVERY AND HUMAN TRAFFICKING IS NOT TAKING PLACE IN ITS BUSINESS OR SUPPLY CHAINS, MEASURED AGAINST SUCH PERFORMANCE INDICATORS AS IT CONSIDERS APPROPRIATE

The focus of the upcoming reporting period will be on the actions set out at section 4.4 above. As stated, we will create performance indicators that we will apply moving forward. This will be achieved by identifying where the risks lie within our supply chains, and whether our existing processes adequately address these risks. Current processes will then be updated as necessary. Once the performance indicators have been finalised we will do a snapshot assessment of current status to obtain a benchmark for future reporting periods.

5.1. DISCLOSURE OF ANY IDENTIFIED INSTANCES OF MODERN SLAVERY AND OF RESULTS OF ANY CORRECTIVE ACTION PLANS.

No specific instances of modern slavery have been identified,, but see section 4.1 above for supplier risk areas requiring further investigation.

5.2. COMPANY-LEVEL GRIEVANCE MECHANISMS IN PLACE, NUMBER OF COMPLAINTS MADE THROUGH THESE MECHANISMS AND THEIR RESOLUTION.

No grievances or complaints have been received in relation to modern slavery.

Suppliers are obliged under the Supplier Code of Conduct to report instances of human rights abuse (see section 2.3.2 above).

Staff have a number of mechanisms, including the Grievance and Whistleblowing policies to report practices or incidents of concern (see above)

5.3. REMEDY AND COMPENSATION PROVIDED FOR LABOUR RIGHTS ABUSES.

None

5.4. THE PUBLICATION OF ANY PERFORMANCE INDICATORS USED, INCLUDING DETAILING IF AND HOW BUSINESS DECISIONS ARE INFORMED BY PERFORMANCE INDICATORS.

None (to be implemented for the next financial year).

5.5. EVALUATIONS OF THE EFFECTIVENESS OF TRAINING, FORMALLY OR INFORMALLY

None.

6. TRAINING

The International Secretariat delivers a range of internal face-to-face training, which is compulsory to new starters and also available to existing employees.

The induction programme communicates the International Secretariat's culture, values and policies and includes an introduction by Finance and HR teams which directs staff to the key policy documents available on the internal staff intranet page.

Current training on business ethics is provided on a targeted basis and includes a presentation of the procurement process and associated ethical procurement and related staff conduct.

Procurement policy sessions are also run as part of finance meetings with budget holders.

The organisation is in the process of introducing on-line training for its staff to cover these areas.

This statement is approved by and on behalf of Amnesty International Limited



Nicole Bieske

Chair of the Board of Directors, Amnesty International Limited

Date: 21st June 2017

**AMNESTY INTERNATIONAL
IS A GLOBAL MOVEMENT
FOR HUMAN RIGHTS.
WHEN INJUSTICE HAPPENS
TO ONE PERSON, IT
MATTERS TO US ALL.**

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AMNESTY INTERNATIONAL

MODERN SLAVERY ACT 2015 STATEMENT

FOR THE FINANCIAL YEAR 1 JANUARY TO 31 DECEMBER 2016

Around the world millions of people are victims of modern slavery. The complexity of today's global supply chains means that consumers are often unknowingly contributing to the exploitation of others. Modern slavery is therefore an urgent challenge, which is why Amnesty International worked to help bring about the transparency in supply chain provisions under the UK Modern Slavery Act 2015. The Act requires organizations doing business in the UK with a total turnover of £36m or more to report on the steps that they are taking to ensure that modern slavery is not taking place in their global supply chains.

This is a statement made by Amnesty International's International Secretariat on its own compliance with the requirements of section 54 of the Act. It sets out steps that Amnesty International's International Secretariat has taken to ensure that modern slavery is not taking place in our supply chains and any part of our own business. The statement follows the framework prescribed by the CORE coalition of NGOs to which Amnesty International contributed, as well as covering all the areas set out at section 54(5) of the Act.