



AMNESTY INTERNATIONAL MODERN SLAVERY ACT 2015 STATEMENT: FINANCIAL YEAR 1ST JANUARY – 31ST DECEMBER 2021

FOREWORD

Amnesty International's research continues to uncover labour rights abuses around the world. As an example, in 2021-2, the organisation furthered its work on exploitative labour practices and serious human rights violations linked to the Qatar World Cup 2022. It published new research documenting forced labour practices within Qatar's private security sector and the government's failure to investigate and remedy the deaths of migrant workers, some of which may have been linked to working in the country's extreme heat and humidity, and which may have been prevented had there been adequate health and safety measures in place. Through such research and associated campaigning, Amnesty International repeatedly called on the Government of Qatar to commit to and urgently publish a detailed action plan on how it will effectively tackle forced labour and effectively implement and enforce labour laws and reforms; urged FIFA to improve its human rights due diligence processes and use its leverage in Qatar; and called on employers of construction and service workers to improve working conditions for migrant 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.

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 supply chains 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.

1.1 ORGANISATION STRUCTURE

Amnesty International is a global movement made up of 65 membership organisations, known as Amnesty International 'Sections', which carry out Amnesty International work at a national level – plus the International Secretariat.

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.

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 2021 ('FY 2021'). The International Secretariat 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,

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>

Dakar, Geneva, Jerusalem, Johannesburg, Madrid, Mexico City, Nairobi, New York, Paris, 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 this section we aim to put this statement in context by providing an overview of our organisation and our supply chain.

In 2021 our total Operating Expenditure, or OPEX was £54m. Our staff cost comprised the majority of this expenditure at £37.1m or 69%. Activity costs, or expenditure with third-party suppliers, accounted for £16.9m or 31%.

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 audio visual 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.

1.3 WHERE ARE SUPPLIERS BASED?

Once again, we analysed the geographic location of all suppliers engaged in 2021 and mapped this against [Global Slavery Index's most recent Regional Vulnerability Score](#).

We recognise that the source of this data is now 5 years old. Our intention ahead of the next statement is to re-visit how we assess varying geographical risk levels to ensure that our benchmarking closely reflects current global issues.

Suppliers by Global Slavery Index (GSI) Regional Vulnerability Scores, whereby a higher number indicates a higher vulnerability. Scores out of 100.

	GSI'S OVERALL WEIGHTED AVERAGE	IS SUPPLIERS (%)
AFRICA	62	13%
AMERICAS	41.4	22%
ARAB STATES	57.2	5%
ASIA AND THE PACIFIC	46.1	7%
EUROPE AND CENTRAL ASIA	28.2	53%

2. POLICY, PROCEDURE & CONTROLS

2.1 PROCUREMENT

As an organisation that researches and 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.

We have detailed procurement policies, processes and procedures that take account of modern slavery risks. 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. New suppliers undergo an internal or external ethical screening (depending on planned expenditure and complexity), and a Modern Slavery Questionnaire is issued as part of higher value tenders. The results of both of these data gathering exercises inform our decision about which supplier is most appropriate to appoint.

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 are all

subject to the same procurement policies and procedures.

Suppliers of goods or services to the International Secretariat are required to confirm their acceptance of the [Supplier Code of Conduct](#) (“the Code”) as follows:

- We obtain written confirmation that the supplier has read and will comply with the Code
- 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.

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.

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, 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.

The whistle-blowing 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. The policy was updated in 2019 and is due an update in FY2022.

3. RISKS & STEPS TAKEN

Due to a number of staffing changes in 2021 across the Legal and Procurement teams at the International Secretariat, steps to incrementally improve our modern slavery prevention processes have been limited since the publication of our last transparency statement. With new team members now in post, work has already begun to refresh our approach to modern slavery risk at the International Secretariat, as part of a wider review of our due diligence practices, to ensure our ethical purchasing practices are best-in-class.

An objective from our 2020 statement was to:

Establish a cross-functional working group to leverage our expertise on these issues [including: to refresh our organisational modern slavery risk assessment as part of a wider review of our ethical & sustainable procurement approach] and to ensure an effective and transparent process.

Formation of a Modern Slavery Act working group is underway. The group has the following objectives:

- Re-assess the risk of modern slavery per procurement category, making use of the more detailed categorisation allowed by the new Finance & HR system
- Review and re-rate risks per geographical location based on external sources as well as Amnesty’s own investigative work
- Update and re-circulate to staff the key policies that relate to modern slavery risk
- Develop a network of Modern Slavery Prevention Ambassadors to increase internal awareness of the topic and how it relates to our own supply chain
- Re-deliver training about modern slavery risk and mitigation to key stakeholders globally

For the purposes of transparency, we are including a reminder here of the commitments made in 2020’s statement and their current status:

Activity Area	Risks	Previous Commitments	2022 Status
Hotels & events-related services	Identified as a high-risk area due to the nature of the industry which primarily uses lower-skilled and low-paid workers.	Establish a list of preferred, pre-vetted suppliers in relevant locations globally.	Ongoing Though this is certainly still a high-risk area, this objective will be prioritised once we have rolled out adequate training and engagement regarding modern slavery prevention. Global, trained staff will then be

			well-placed to carry out due diligence on hotel and events providers in their region.
Procurement activities through Regional Offices in higher-risk locations	We acknowledged the inherent risk in operating globally and having differing risk profiles in different geographies.	Implement monitoring processes to ensure that procurement policies and processes are consistently applied across all of our locations.	<p>Transferred to be part of the Business Systems Integration Project</p> <p>This was a broad objective, and we have since noted that to ensure improved monitoring and oversight of the procurement activities of our regional offices we first need to focus our attention on our business systems to ensure the Procurement & Contracts Manager, based in the London office, has real time access to data on the procurement partners within those regional offices. This initiative has therefore been transferred to be part of the Business Systems Integration Project.</p>
Workplace Services	Cleaning and security service agreements identified as higher-risk engagements.	Assess the risk in this area globally, having previously taken mitigating actions at our London office when tendering for these services.	<p>Ongoing</p> <p>As with hotels and events, this is certainly still a high-risk area, but this objective will be -prioritised once we have rolled out adequate training. We also acknowledge that this is an ongoing task without a clear end point. Sense-checking our risk assessments and training staff will be a key step in moving forward with this work area.</p>
Training	n/a	<p>Ensuring that our people are sufficiently aware and trained to spot signs of modern slavery and forced labour.</p> <p>Deliver 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 if they do spot something of concern.</p>	<p>Delayed</p> <p>Training has been developed but has not been rolled out.</p> <p>This will be an area of focus for the new Modern Slavery Act Working Group.</p>
Business Systems Integration Project	n/a	As a minimum, use the rollout of the new Finance and HR system, due to be rolled out during 2022/2023, to maintain our existing level of modern slavery risk assessment and due diligence. Where possible, design in improvements.	<p>Ongoing</p> <p>Progress is being made on the rollout of this new system.</p> <p>New Procurement Categories have been defined. These detailed categories will allow for more nuance in our modern slavery assessments and reporting.</p>
Whistleblowing Policy	n/a	Review the Whistleblowing Policy and ensure that it adequately encourages our employees, partners, suppliers, and anyone we work with to report any concerns, including concerns related to modern slavery or human trafficking.	<p>Delayed</p> <p>This will be an area of focus for the new Modern Slavery Act Working Group.</p>

3.1 INCIDENTS INVESTIGATED IN 2021

No incidents within our own supply chain were reported to the International Secretariat or investigated in 2021.

3.2 SUMMARY

After several years of reporting on the Modern Slavery risk in Amnesty International Limited's supply chain in a similar format, we would like our approach to evolve. Although the focus of our organisation lends itself to spending mainly in lower risk areas, we must continue to monitor and mitigate the risks that remain.

With new team members in post, there is fresh impetus to make further improvements to Modern Slavery prevention and to continue to set the precedent of holding companies to account. We look forward to showing you the evolution of our approach in 2023.

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

Signed:



Anjhula Mya Singh Bais
Chair of the International Board
Amnesty International

Date: 30 June 2022