Modern Slavery and Human Trafficking Statement

Crown Agents supports the UK Modern Slavery Act (2015) and endeavours to ensure that slavery and human trafficking are not taking place in any of its supply chains or any parts of its own business. We have also partnered with Stronger Together, a multi-stakeholder initiative aiming to reduce modern slavery.

To ensure compliance with the Act, we have assessed the following:

(a) Our organisational structure, business and supply chains;

Crown Agents works with leaders to accelerate self-sufficiency and prosperity. We offer supply chain, fund management, programme design, delivery and evaluation, training, institutional efficiency and revenue generation expertise. We do this across health, humanitarian, stabilisation, governance and public administration, prosperity and renewable energy, from Ukraine to Nigeria, Sierra Leone to Bangladesh and Nepal to Iraq. We are a registered social enterprise, 100% owned by the Crown Agents Foundation.

Throughout our supply chain services, we help our clients adopt a strategic sourcing approach. We manage the entire supply chain process from expediting, to customs clearance and last mile logistics. We deliver a diverse range of items, from medical equipment and drugs, to vehicles, telecommunications equipment and solar panels.

(b) Our policies in relation to slavery and human trafficking;

Our Human Resources’ Policy “Tackling Modern Slavery in Business and Supply Chains” enables the integration of Modern Slavery issues into all relevant business systems including our Global Code of Conduct, Ethical Policy, Reporting and Whistleblowing Policy and Child Protection Policy.

(c) Our due diligence processes in relation to slavery and human trafficking in our business and supply chains;

Our specialist Compliance Unit works closely with project teams to implement key ethical policies and processes, including internationally recognised, end-to-end standards throughout the supply chain. Crown Agents has a well-established due diligence process which enables us to make and objective, informed and transparent decisions about whether to associate with a business partner or not. We have updated these processes to cover risks related to slavery and trafficking.

We request all our suppliers and business partners to complete Business Partner Questionnaire. This document invites them to disclose any history or involvement in Modern Slavery, be it media allegations, pending litigation or current court proceedings. Our due diligence process requires all of Crown Agents Group companies, directors, officers and employees to adhere to the standards of our Ethical Code of Conduct for Business Partners. Our contract templates also refer to the UK Modern Slavery Act.
(d) The parts of our business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps we have taken to assess and manage that risk;

Crown Agents recognises that our Supply Chains Services operate in high-risk environments. We therefore need to ensure that the goods we are supplying to our clients are slavery-free. We also ensure that the external consultants we hire are not recruited through exploitative agencies. Similarly, we acknowledge that service providers, such as cleaners, security staff and drivers in our UK and International Offices can be at risk of labour exploitation.

We have developed a “Modern Slavery” checklist for staff undertaking supplier visits. We increasingly consider forced labour and human trafficking into account on our risk registers.

Our Compliance team works closely with our Human Resources Department to ensure that best practices in recruitment are implemented across the board, using Stronger Together implementation guidelines.

(e) Our effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chains, measured against such performance indicators as we consider appropriate;

Our reporting and whistleblowing system relies on an “Ethical Line” hot-line (or TEL), where individuals can report any unethical behaviour in relation to Crown Agents’ businesses or operations anywhere in the world or a breach of Crown Agents’ policies. Our Modern Slavery Policy specifically encourages individuals to use TEL to raise concerns regarding slavery and human trafficking. Crown Agents’ Compliance Team also manages a dedicated email address through which complaints or concerns can be raised directly. All correspondence is dealt with in the strictest of confidence.

(f) The training about slavery and human trafficking available to our staff

As part of Crown Agents’ onboarding program, all our new starters at Crown Agents are required to complete an online Module on Modern Slavery within the first three months of their contract.

Our Senior Compliance Officer attended a mandatory training course run by Stronger Together - “Tackling Modern Slavery in the Supply Chain” and acts as a focal point for queries related to Modern Slavery. Our Compliance Team regularly attends relevant external events in the UK and abroad, including the OECD Forum on Responsible Business Conduct in Paris and the United Nations Forum on Business and Human Rights in Geneva.

In addition, awareness-raising sessions regarding Modern Slavery have been integrated into standard compliance training and capacity building. Crown Agents’ Group Compliance Team holds sessions on Modern Slavery during all country visits. This has recently included trainings in Bangladesh, Ethiopia, Ghana, Kenya, Kyrgyzstan, Nigeria, Singapore, South Sudan, Turkey and Zimbabwe. Similar awareness sessions are regularly arranged for our UK Headquarters Staff.

Our company intranet has a page devoted on the topic of Modern Slavery, which includes; links to the Modern Slavery Act, the Home Office Guidance, the Stronger Together and other useful resources on Modern Slavery in the UK and worldwide. This has been widely circulated across the business.

SIGNATURE:

Fergus DRAKE, Chief Executive Officer