



**March 2019**

**Approved by:** Fergus Drake, CEO

## **Modern Slavery and Human Trafficking Statement**

At Crown Agents we have a zero-tolerance to modern slavery and human trafficking. This statement is made pursuant to the UK Modern Slavery Act (2015) and our endeavours to ensure that slavery and human trafficking does not take place in any of our supply chains or any other parts of the business. Crown Agents have partnered with Stronger Together, a multi-stakeholder initiative aiming to reduce modern slavery.

In order to ensure our compliance with the UK Modern Slavery Act (2015) 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, throughout several geographic regions including Europe, Africa and Asia. 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 Commitment;**

Crown Agents recognizes that modern slavery is a significant human rights issue that includes human trafficking in a variety of forms. Our commitment begins with protecting and respecting all human rights and taking action to prevent all forms of slavery and human trafficking. Crown Agents acts with integrity and ethically in all our relationships and will use reasonable endeavors to take direct action within our business areas and influence to ensure that slavery and human trafficking are not taking place.

### **(c) Modern Slavery Risks in our Supply Chains;**

Crown Agents recognises that our Supply Chains Services operate in high-risk environments. Through our procurement department we purchase and supply different services and supplies. Therefore, we recognize that there are risks attached the global supply chains and that identifying and addressing modern slavery and human trafficking in these contexts poses many challenges. Therefore, we aim to ensure that the goods we purchase and supply to our clients are slavery-free. This assurance also extends to the hiring of employees and the use of other service providers in our UK and International Offices. Therefore, we have a developed



a “Modern Slavery” checklist for staff undertaking supplier visits. Moreover, we increasingly consider forced labour and human trafficking into account on our risk registers. Our Business Integrity Unit works closely with our Human Resources Department to ensure that best practices in recruitment are implemented across the business, through the use and application of Stronger Together implementation guidelines.

**(d) Our Policies and Practices;**

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.

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

Our specialist Business Integrity 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 an objective, informed and transparent decision about whether to associate with a business partner or not.

As part of our due diligence process, we request all our suppliers and business partners to complete a Business Partner Questionnaire. This document invites potential partners to disclose any history or involvement in Modern Slavery. This document encompasses personal and business involvement including, 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 refer to our adherence of the UK Modern Slavery Act (2015).

**(f) Our effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chains;**

Our reporting and whistleblowing system rely on an “Ethical Line” hot-line (or TEL), where individuals can report any unethical behaviour in relation to Crown Agents’ businesses or practices in a confidential manner. In addition, our Modern Slavery Policy specifically encourages individuals to use TEL to raise concerns regarding slavery and human trafficking. Crown Agents’ Business Integrity 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.

**(g) Awareness and Training of Modern Slavery and Human Trafficking;**

Crown Agents operates throughout different regions and countries and recognizes our responsibility to raise awareness on these issues and to provide the necessary training for our employees on modern slavery risks and best practice. As part of Crown Agents’ onboarding program, all our new starters at Crown Agents are required to complete an online Module on



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Modern Slavery within the first three months of their contract. In addition, awareness-raising sessions regarding Modern Slavery have been integrated into standard compliance training and capacity building. Crown Agents' Business Integrity Unit holds sessions on Modern Slavery during all our in-country visits. Sessions have taken place in several countries including Bangladesh, Singapore, South Sudan and Kyrgyzstan. Other training and awareness sessions are provided for our employees based in our UK Headquarters.

In addition, our Business Integrity Head has previously attended mandatory training courses run by Stronger Together - "Tackling Modern Slavery in the Supply Chain" and acts as our main focal point for queries related to Modern Slavery. Similarly, our Business Integrity Unit 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.

We have produced and promoted a page on our company intranet which is devoted to the topic of modern slavery which is widely circulated amongst our employees. This page includes; links to the UK Modern Slavery Act (2015), the British Home Office Guidance on modern slavery and a link to the Stronger Together initiative and other useful and informative resources both from the UK and internationally.

SIGNATURE:

Fergus Drake, Chief Executive Officer



**CROWN AGENTS**  
ACCELERATING SELF-SUFFICIENCY & PROSPERITY

Blue Fin Building  
110 Southwark Street  
London SE1 0SU England

T +44 (0)20 3940 4000  
[enquiries@crownagents.co.uk](mailto:enquiries@crownagents.co.uk)  
[www.crownagents.com](http://www.crownagents.com)

Crown Agents Limited  
Registered in England and Wales No. 3259922  
VAT Reg. No. GB 340 6798 41