



montrose

Improving lives through evidence and impact

Modern Slavery & Anti-Human Trafficking Statement January 2022

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AMENDMENT LOG

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April 2022	V2	Date and version number updated. Content reviewed	BB

MODERN SLAVERY AND ANTI-HUMAN TRAFFICKING STATEMENT

Modern-day slavery and human trafficking are abhorrent and our approach to anti-slavery and human trafficking reflects our commitment to:

- acting ethically and with integrity in all our business relationships;
- implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business (including our supply chains).

The UK Modern Slavery Act (2015) makes "provision about slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims; to make provision for an Independent Anti-Slavery Commissioner; and for connected purposes".

Key provisions within the act include:

- **Slavery, servitude and forced or compulsory labour:** An offence is committed if (a) the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or (b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.
- **Human trafficking:** A person commits an offence if the person arranges or facilitates the travel of another person ("V") with a view to V being exploited. It is irrelevant whether V consents to the travel (or whether V is an adult or a child).
- **Exploitation:** This could include slavery, servitude, forced or compulsory labour, sexual exploitation, removal of organs, securing services by force, threats or deception, or securing services from children and/or vulnerable persons.

Montrose has a zero-tolerance approach to modern slavery, or any form of exploitation or abuse of power in our organisation and our supply chains.

We are a global company that expects everyone to support and uphold measures to safeguard against modern slavery, human trafficking and exploitation. This expectation is not bound by geographies, and we expect our teams and suppliers to meet the standard outlined in the UK Act regardless of the level of legislation or national commitment to anti-slavery and trafficking principles in the countries in which they live or work.

1. WHO WE ARE

Montrose is an international development consultancy company delivering programmes across Africa and Asia Pacific, with teams of staff and consultants across the world. Originally established in 2009 in Uganda, our company values reflect our offer of technical quality, local knowledge, impact and value for money.

Our values, direction and policies are overseen by the Board of Directors who review and approve this statement.

Our clients typically include development agencies such as the UK government, USAID, and UN agencies, as well as the private sector. We have a lean core team of staff working from our offices or remotely, alongside both short- and longer-term consultants. Our business model allows for fast-paced decision-making and adaptation to ensure risks are identified and mitigated, while corporate learning can be taken up quickly and effectively. Our supply chain also includes technical and operational suppliers and service providers.

Anyone who works directly with us as a member of staff, a consultant or a supplier receives and is expected to comply with all our standards, policies and procedures.

2. OUR POLICIES AND PRACTICES

Our framework of policies which support our teams and suppliers include:

- Our Code of Conduct
- Anti-Slavery & Human Trafficking policy
- Anti-Bribery and Corruption Policy
- Anti-Terrorism Policy
- Grievance Policy
- HR Manual
- Recruitment Policy
- Safeguarding Policy
- Supply Chain Management Policy
- Whistleblowing Policy

These are reviewed annually and are available to all staff, consultants and suppliers. Many are also available on the website (www.montroseint.com). A full set of internal policies are available for Montrose staff and may be requested from the Director of Finance and Administration.

2.1. Due diligence processes

Montrose strictly prohibits modern slavery or human trafficking in our operations and supply chain. We have, and will continue to be, committed to implementing, systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our partners will hold their own suppliers to the same high standards.

The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is our collective responsibility. Any individual or company working with us commits not to engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this approach or of our Anti-Slavery & Human Trafficking Policy.

As part of the due diligence process and background checks for both all consultants and suppliers, the programmes team reviews the potential for any breach of the anti-slavery principles. Should there be any suspicion, this will be fully investigated. Montrose will not offer a contract until the investigation is complete and, as far as possible, certainty ascertained that there is no risk or history which links the individual or supplier to slavery or human trafficking.

Montrose is committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

2.2. Risks and mitigation measures

As part of our ongoing risk assessment and due diligence processes we consider whether any circumstances warrant us carrying out audits of suppliers for their compliance with our Anti-Slavery and Human Trafficking Policy as part of their compliance with our Code of Conduct.

Montrose employees, consultants and suppliers are provided with training and testing on the Montrose policies, which includes an overview of the anti-slavery principles and provides clarity on the process for reporting any concerns.

Our corporate and programme risk registers include risks and mitigation measures in relation to anti-slavery principles. These are reviewed on a quarterly basis by the Senior Management Team or Board of Directors.

3. ENSURING OUR APPROACH WORKS

We recognise that the more work that the company delivers across countries, and with growing teams, there will be a risk that the delivery of our standards and principles could be jeopardised, intentionally or otherwise, within our teams or supply chains.

Montrose commits to monitoring the implementation of our Anti-Slavery and Human Trafficking Policy, which is reviewed every year or earlier if necessary, to ensure it remains appropriate and up-to-date.

To date, we have not had an incident involving modern slavery or human trafficking, although we remain vigilant and aim to continually improve our approaches and company awareness to ensure that any such breach or risk is recognised and acted on immediately.

If Montrose finds that other individuals or organisations working on our behalf have breached our policies, we will ensure that we take appropriate action. We consider a breach of our Anti-Slavery And Human Trafficking Policy or standards as a serious offence and it would be treated as such. Therefore, an employee, consultant, sub-contractor or any person or company acting on behalf of Montrose in breach of this policy would face disciplinary action, including dismissal and appropriate legal action.

4. OUR STAFF AND TEAMS

We recognise that our ability to deliver on our standards is wholly dependent on our teams and suppliers, the resources they have to understand the issues relating to anti-slavery and human trafficking, and our openness as a company to discuss and educate each other on the possible risks and approaches that will enable us to address these issues together.

This starts by ensuring we have the right people on our teams and alongside us as partners. Our Recruitment Policy, HR Manual, supplier due diligence packs and Supply Chain Management Policy give us the confidence to know that we are rigorously checking who we bring in and work with. Our induction process ensures that our teams are clear on our standards and equipped to deliver in line with those standards. Routine ethical conduct training is available to all staff, consultants and suppliers.

Montrose places a mandatory obligation on all employees, consultants, sub-contractors, partners and anyone working on behalf of Montrose to report concerns, suspicions, allegations and incidents which indicate actual or potential instances of slavery or human trafficking, or which suggests our policies may

have in any way been breached. Our reporting processes are outlined in the Montrose Whistleblowing Policy.

Concerns would be raised with an individual's line manager, functional lead, supplier contact point or one of the Designated Safeguarding Officers, who would then initiate the necessary procedures for dealing with suspected or actual incidents of abuse.

The Senior Management Team is responsible for ensuring the reporting and investigation procedure outlined in the Montrose Whistleblowing Policy is followed, so that suspected or actual cases of slavery or human trafficking are responded to appropriately and referred to the relevant statutory authority immediately.

We recognise freedom of movement and of association; we adhere to national and international laws governing our work; we prohibit child labour and any threat of violence, harassment and intimidation. We prohibit any unlawful recruitment fees or acts (including the confiscation of documentation).

Our commitments to anti-slavery and human trafficking standards are set and overseen by the Montrose Board of Directors.

ANNEX A: MODERN SLAVERY DEFINITION

'Modern slavery' is a term used to encapsulate both offences in the Modern Slavery Act 2015 c. 30: slavery, servitude and forced or compulsory labour; and human trafficking. The offences are set out in section 1 and section 2 of the Act, which can be found at:

<https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

Definition of slavery and servitude: Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Definition of forced or compulsory labour: Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

Definition of human trafficking: An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation. The meaning of exploitation is set out here: <http://www.legislation.gov.uk/ukpga/2015/30/section/3/enacted>.

Definition of child labour: Child labour is defined by international standards as children below 12 years working in any economic activities, those aged 12-14 engaged in more than light work, and all children

engaged in the worst forms of child labour (ILO). The term “child labour” is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of “work” can be called “child labour” depends on the child’s age, the type and hours of work performed, the conditions under which it is performed and the objectives pursued by individual countries. Children can be particularly vulnerable to exploitation, but child labour will not always constitute modern slavery. It will still be necessary to determine whether, based on the facts of the case, the children in question are being exploited in such a way as to constitute slavery, servitude and forced or compulsory labour or human trafficking. For example, it is possible for children to undertake some ‘light work’ which would not necessarily constitute modern slavery. ‘Light work’ is defined by article 7 of ILO Convention No. 138. Children do have particular vulnerabilities which should be considered when determining whether modern slavery is taking place. The Modern Slavery Act 2015 specifically recognises that it is not necessary for a child to have been forced, threatened or deceived into their situation for it to be defined as exploitation.

The worst forms of child labour: The worst forms of child labour are very likely to constitute modern slavery. The worst forms of child labour are defined by article 3 of ILO Convention No. 182 as: a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict; b) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances; c) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties; d) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

Behaviour constituting modern slavery: Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness seep into instances of human trafficking, slavery or forced labour in a work environment. However, businesses have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment (include wage and work hour), health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications. There will be cases of exploitation that, whilst being poor labour conditions, nevertheless do not meet the threshold for modern slavery – for example, someone may choose to work for less than the national minimum wage, or in undesirable or unsafe conditions, perhaps for long work hours, without being forced or deceived. Such practices may not amount to modern slavery if the employee can leave freely and easily without threat to themselves or their family. Organisations do still nevertheless have a legal duty to drive out poor labour practices in their business, and a moral duty to influence and incentivise continuous improvements in supply chains.