

Ethical Trading Initiative Modern Slavery Statement 2019

1. Introduction

This statement sets out the steps the Ethical Trading Initiative (ETI) has taken to ensure that slavery and human trafficking are not taking place in either its core operations or its supply chains during the calendar year 1/1/2019 - 31/12/2019.

ETI is a non-profit membership organisation with an annual turnover of £4,072,347 (for financial year ending 31/03/19); as such, ETI is not required to produce a Modern Slavery Statement under Section 54 of the Modern Slavery Act 2015.¹ However, modern slavery is something ETI takes very seriously. We have chosen to publish this Statement as we believe it is good practice to be transparent about our work and how we manage modern slavery risks, and to hold ourselves publicly accountable for our actions.

2. Structure, business and supply chains

Structure and function of organisation

Please refer to Section 2 of ETI's [2018 Modern Slavery Statement](#) for information on ETI's mission and values.

ETI's main office is based in London. Additional offices are located in Bangladesh, India and Hong Kong. The Bangladesh and Hong Kong offices are separate legal entities that report into ETI UK. The India office is currently pursuing liaison office status, which would make it a formal legal subsidiary of ETI UK.

In ETI's London office there are 21 permanent staff in addition to 5 on fixed-term contracts. There are a further 2 full-time staff in ETI's Hong Kong and Delhi offices². ETI also has 7 staff on consultancy contracts across the UK, India and Hong Kong offices.

Business operations

ETI is governed by a [Board of Directors](#) who represent our tripartite membership under an independent Chairperson. The Board and its sub-committees guide our strategic direction and provide approval for strategic, business and annual work plans and large-scale projects.

¹ Section 54 of the Act requires all companies with an annual turnover greater than £36m, that are based in or operate in the UK, to produce an annual statement setting out what they have done in the previous financial year to prevent human trafficking and modern slavery from occurring in their operation or supply chain.

Guidance on what ought to be included in a statement has been provided by the Home Office: <https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>

² This was true for the calendar year 2019, which this statement covers. At time of publication, ETI does not currently have a permanent staff member in our Hong Kong office as the position is vacant.

This Statement has been approved by the Board, pending any final changes and comments resulting from external peer reviewers.

Please see Section 2 of ETI’s 2018 [Modern Slavery Statement](#) for additional detail on ETI’s business operations and team structure.

Supply chains

Our supply chains are more typical of a charity than a business. We provide services, and do not sell goods. Nevertheless, we have suppliers and contractors, both for goods not for resale and for services that ETI requires. Wherever possible, we aim to procure supplies from companies who are ETI members. Our supply chains, to the best of our current knowledge, include:

| Goods not for resale | Services |
|--|---|
| Office supplies (stationery, tea/milk, toiletries, etc.) | Long-term consultants & project partners |
| IT equipment (computers, conference phones, peripherals) | Consultancy (short term) |
| Furniture (desk chairs, pods) | Cleaning |
| Kitchen equipment (cafeterias, kettles, etc.) | IT support (e.g. data storage, web hosting) |
| Printed materials | Transport and other logistics (incl. accommodation, travel agency services) |
| | Venue hire |
| | Catering |
| | Design (web and print, photography) |
| | Financial services (bank account, pensions, insurance) |
| | Utilities & office maintenance |

We have 14 Tier 1 suppliers, of whom 4 are ETI members (and John Lewis, owner of Waitrose, is an ETI member also). Our Tier 1 suppliers are:

- Waitrose
- Sainsburys
- Co-op
- Tesco
- M&S
- Evans & Witt
- Paper Round

Ethical Superstore

Pret

Pure

Berkleys

Sands

Eden

Amazon

Organisational activities

Although we consider that the most salient and significant modern slavery risks lie in our supply chains, our definition of supply chains includes project partners and their downstream activities. We have taken a holistic approach to assessing those risks, including an examination of ETI's own operations. The main tool that ETI uses to prevent and mitigate any potentially harmful impacts of its own operations (including but not limited to modern slavery) is our Safeguarding Policy.

Please refer to Section 2 ('Organisational activities') from ETI's 2018 [Modern Slavery Statement](#) for more details on the project work, member services and other activities that ETI carries out that relate to modern slavery (separate from ETI's supply chain and own operation due diligence).

Development of this statement

This statement has been developed by ETI's Modern Slavery Advisory and Operations Manager. After being approved by ETI's Executive Director, it was discussed and approved by ETI's Board.

The statement was approved by the Executive Director on 31st July 2020 and signed by the Chairman of the Board.

3. Policies in relation to slavery and human trafficking

Please refer to Section 3 of ETI's 2018 [Modern Slavery Statement](#) for a full list of relevant policies.

ETI has recently developed a Modern Slavery Policy that sets out our key commitments generally in this area. This policy is included below as Annex 1.

There are no relevant updates to the policies listed under ETI's previous Modern Slavery Statement.

Policies applying to ETI recruitment and internal operations

Modern slavery risks can occur within an organisation's own operations as well as within its supply chains. Consequently, it is important that an organisation assess its own HR policies and procedures to ensure that they effectively protect employees' labour rights and mitigate any relevant risks.

Please refer to Section 3 of ETI's 2018 [Modern Slavery Statement](#) for further information on ETI's Recruitment and Equal Opportunities Policies as well as other policies applying to ETI's own operations.

Implementation and Enforcement of Internal Policies

ETI's trade union members are consulted on the development of new policies or changes to existing policies, as are all affected staff. Whenever a new policy is introduced or an existing policy is changed staff are informed by email, and a discussion is organised at an appropriate staff meeting if complex changes need to be explained. All policies are communicated to staff when they join ETI during an induction meeting. The implementation of HR policies is monitored through the performance review system.

ETI's regional offices all apply ETI's policies, as specified in the ETI Staff Handbook, except where adaptations need to be made in order to bring policies into line with relevant national law in the country of operation. ETI's Operations Manager oversees contracting, Codes of Conduct and supplier due diligence processes across the regional offices. The Operations Manager has carried out visits to both our India and Bangladesh regional offices to induct staff on relevant processes as well as on ETI's Safeguarding and Whistleblowing policies.

Contracting and Procurement Policies

Every new ETI supplier (as of November 2018) must complete the Supplier Due Diligence Questionnaire before a new contract is awarded. The Questionnaire gathers key information about each of ETI's suppliers which is used to inform our organisational risk assessment. The Questionnaire asks suppliers to commit to implementing the new ETI Supplier Code of Conduct.

Please refer to Section 3 of ETI's 2018 [Modern Slavery Statement](#) for more information on the Supplier Due Diligence Questionnaire and Supplier Code of Conduct.

Update on Supplier Due Diligence Procedure

Since its introduction in November 2018, ETI's revised Supplier Due Diligence Questionnaire has been successfully used with several new suppliers. It has allowed ETI to gain a much more in-depth understanding of the risks faced by our suppliers as well as their capacity to address those risks. One challenge of implementing the Questionnaire has been adopting a proportionate approach to smaller suppliers such as individual consultants who do not have dedicated policies or procedures. We have decided in those cases to accept a signed Code of Conduct and not require that the full Questionnaire is completed every time.

As of September 2019, ETI had a total of 14 core suppliers, 4 of whom are members (as above). Most of those suppliers have been contracted by ETI for more than five years.

ETI has engaged with key suppliers over the duration of our relationship with them to ensure (to the best of our ability) that they uphold the principles of the ETI Base Code and that their workers are not subject to any form of labour exploitation.

4. Identification of risks together with steps taken to prevent and manage that risk

Risk assessment procedures

ETI has an organisation-level risk register. This risk register is reviewed by the Operations Team bi-annually and presented to, and reviewed by, the Board on an annual basis. The Executive Director of ETI is responsible for the organisational risk register.

This year we have included a modern slavery line in ETI’s organisational risk register, following a commitment made in our 2018 statement.

ETI’s country offices have developed project-based risk registers linked to donor requirements.

ETI is a small organisation, with a limited supply chain. The risk assessment that we undertake is proportionate to the activities of the organisation. The main risk assessment tool we use is the application of our supplier code of conduct.

Key risks

ETI has begun to identify the most salient and significant modern slavery risks within its operations and supply chain.

In our [first Statement](#) we identified the priority risks that we saw in our operations and supply chains. Those risks are long-term and strategic, identified on the basis of extensive organisational knowledge and a review of policies and procedures; we do not expect these risks to change each year.

We have reiterated these risks here.

| NATURE OF RISK | COMMENT | SEVERITY | LEVERAGE |
|---|---|-----------------|-----------------|
| Overseas offices use services that employ workers on an exploitative basis | e.g. landlord’s staff, cleaning contractors, maintenance etc. ETI has not undertaken adequate due diligence on such service providers. | Medium | Medium |
| ETI Secretariat in London and our regional offices engage suppliers (including local partners) in countries where there is a high risk of modern slavery (e.g. Pakistan, India, China) | ETI projects often operate in countries which are typically higher risk in terms of endemic cases of modern slavery (e.g. child labour, bonded labour) and where management practices may be weaker. ETI has not undertaken adequate due diligence in this area and needs to ensure robust systems at local office level. | Medium | High |
| Instances of modern slavery in the second tier of ETI supply chain in the UK, e.g. exploited agency labour in food suppliers. | ETI has limited visibility of the second tier of our supply chain within the UK, where modern slavery risk may be higher (e.g. food suppliers) ETI is working on extending its knowledge of its supply chains. | Low-Medium | Medium |

Our Action Plan (below, Section 6) includes a series of commitments that relate to each of these risks.

5. Due diligence processes in relation to slavery and human trafficking in business and supply chains

Due diligence processes

ETI conducts different kinds of due diligence depending on the kind of procurement activity undertaken. ETI’s approach to due diligence is in line with our Human Rights Due Diligence Framework (details at Annex 2). ETI expects its members to apply the Human Rights Due Diligence Framework in their own operations and supply chains as a means of preventing and mitigating modern slavery risks. While this represents ETI’s most significant contribution to addressing modern slavery risk generally, this statement only applies to ETI’s own operations and supply chains.

When an ETI member is contracted to supply ETI with goods or services, no additional due diligence is currently undertaken. In future, we plan to change this. Due to staff capacity we were unable to do so this year (as committed to in our last statement) but plan to do so next year. As an ETI member, a company already has an obligation to provide an extensive bi-annual report to ETI detailing its ethical trade activities and subsequently to participate in focused discussions in an effort to improve upon them (including scheduled progression meetings between report submissions).³ When a non-ETI member is contracted to supply goods or services, which is often the case for office supplies, building management, travel and security services, due diligence is undertaken on an ad hoc basis, including a limited review of relevant supplier policies and, where applicable, their modern slavery statement.

ETI also procures services from consultants. A list of approved consultants is maintained internally allowing ETI to build and maintain trusted relationships over time.

6. Effectiveness in ensuring that slavery and human trafficking is not taking place in business or supply chains, measured against appropriate KPIs: ETI’s Action Plan

Below is the Action Plan that ETI set out in our [2018 statement](#), with an ‘Update’ column added where we have recorded the steps we have taken against each of the actions we committed to.

We have not met every commitment we set out in our 2018 statement, in part because several were long-term, strategic actions which will take time to implement. They remain as commitments for 2020.

| RISKS | ACTION | TIMEFRAME | KPIS | UPDATE |
|---|--|--------------|---|--|
| Overseas offices use services that employ workers on an exploitative basis | ETI will review the grievance mechanisms of our first-tier suppliers | By June 2019 | Review completed and recommendations for follow-up identified | Not completed. Delays recruiting staff meant that this piece of work has had to be |

³ ETI supports and advises its members on how best to deal with any incidences of modern slavery that may occur in a member’s supply chain. However, ETI takes no responsibility for any such incidences. They are not considered to be taking place within ETI’s supply chain and ETI has no leverage to respond to such incidences except through its normal membership activities.

| | | | | |
|--|--|---------------------|---|---|
| <p>ETI Secretariat in London and our regional offices engage suppliers (including local partners) in countries where there is a high risk of modern slavery (e.g. Pakistan, India, China)</p> | <p>against relevant Base Code Guidance (requested through Supplier Due Diligence Questionnaire)</p> | | | <p>postponed until 2020.</p> |
| | <p>ETI's regional offices will feed into a specific modern slavery risk assessment covering their activities</p> | <p>By June 2019</p> | <p>A regional office modern slavery risk register is completed</p> | <p>ETI's regional offices have developed project-based risk registers linked to donor requirements (including consideration of potential modern slavery risk). ETI's delivery partner in Pakistan has also completed a project risk register.</p> |
| | <p>ETI will design and implement a new procedure for regular review of supplier compliance with the Supplier Code of Conduct</p> | <p>By June 2019</p> | <p>Supplier compliance information annually updated, as per Supplier Code of Conduct, and factored into contract renewal decisions</p> | <p>Supplier compliance review mechanism has been delayed due to ongoing changes to ETI's data management systems. Now that a new data management system has been introduced, annual review of suppliers will begin in 2020.</p> |
| | <p>ETI will strengthen its procurement processes with a particular focus on modern slavery to ensure all suppliers meet minimum standards (including</p> | <p>By July 2019</p> | <p>All contracted suppliers have an adequate ethical trade policy and approach as per the Supplier Due Diligence Questionnaire (aligned with the Base Code); all supplier Modern Slavery Statements are</p> | <p>All newly contracted suppliers have completed a Supplier Due Diligence Questionnaire. Further supplier due diligence is conducted on an ad hoc basis depending on perceived need (e.g.</p> |

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| | | | | |
|--|--|----------------|---|---|
| | Modern Slavery Statements) | | reviewed and support provided to suppliers to improve them | size/importance of supplier). |
| | ETI will design and deliver targeted modern slavery training for all internal staff | By August 2019 | Increase in levels of knowledge and understanding of modern slavery and how to prevent/mitigate it in ETI's operations and supply chain | Training was carried out for all available Secretariat staff in December 2019. |
| | ETI will include a new modern slavery section in its organisational risk register, which is reviewed by the Board every six months | By August 2019 | Risk register amended and reviewed | A modern slavery line is now included in ETI's organisational risk register, which is reviewed by the Board every six months. |
| Instances of modern slavery in the second tier of ETI supply chain in the UK, e.g. exploited agency labour in food suppliers. | ETI will complete mapping of Tier 1 of supply chain | By June 2019 | Completed mapping available and included in next ETI modern slavery statement | A full list of our Tier 1 suppliers has been provided in this statement. |
| | ETI will identify potentially salient risks in Tier 2 of its supply chain based on responses to its Supplier Due Diligence Questionnaire | | Initial information included in next statement | Not complete. As above, now that a new data management system has been introduced, annual review of suppliers will begin in 2020. This will include review of Tier 2 risks. |
| | ETI will conduct due diligence on our building | By March 2019 | Increased knowledge of modern slavery | No longer applicable as ETI has |

| | | | | |
|--|--|--------------|--|--|
| | management company | | risks in the operations of the management company; risk register updated accordingly; ETI has raised any relevant concerns with the management company | terminated the lease on its existing office and will be moving into a new shared office from July 2020. ETI will conduct due diligence on the new shared office in due course. |
| | ETI will establish a new procedure to conduct additional due diligence in regard to ETI members (beyond their standard ETI reporting requirements) where they are contracted to provide goods or services to ETI | By June 2021 | Procedure is in place and all new suppliers or supply contract renewals incorporate new Supplier Due Diligence Questionnaire | This is currently conducted on an ad hoc basis depending on perceived need (e.g. size/importance of supplier). We have updated the timeframe to reflect reduced staff capacity meaning that this Action has been delayed. |

ETI’s progress against each of these actions reflects ongoing work to ensure our procurement and due diligence processes are as good as they can be. In our 2018 [Modern Slavery Statement](#) we set out an ambitious programme of activities for a small organisation in order to demonstrate best practice. We have successfully completed some of those activities – others have begun but required more time to implement in full. Consequently, in 2020, ETI’s focus will be to progress and complete the outstanding actions from our existing Action Plan. ETI will continue to monitor the organisation’s progress against the listed KPIs and will report against them in our next Modern Slavery Statement.

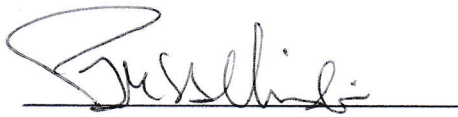
7. Training and capacity building about slavery and human trafficking

ETI staff generally have an in-depth understanding of ethical trade issues. ETI’s recruitment criteria require that all new staff show a commitment to ETI’s vision and values and, depending on specific job requirements, an understanding of ethical trade, human rights and labour law. Knowledge of modern slavery will only be required if the specific role involves work on that issue.

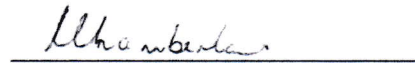
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However, the work of the ETI Secretariat does not normally include applying ethical trade knowledge directly to issues of ETI internal operations and management. Our Action Plan for 2019 included a commitment to roll out a Modern Slavery training to all ETI staff (including regional offices) so that they would be able to address modern slavery issues within any work they may do that is internal to ETI (such as procuring goods not for resale, consultancy services or travel to fragile and conflict-affected countries). We carried out this workshop on 9th December 2019.

This statement has been signed and approved by:



Peter McAilister, Executive Director



Philip Chamberlain, Chair of Board

Annex 1: Modern Slavery Policy

Modern Slavery Policy

At ETI, we take the issues of modern slavery and human trafficking very seriously. We are committed to preventing, mitigating and managing the risks and incidence of modern slavery and human trafficking amongst our corporate, NGO and trade union members, as well as in our business and own supply chains.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking refers to the recruitment and/or transport of a person through deception or coercion, for the purposes of exploitation, including by abusing the vulnerability of that person. Modern slavery is a crime and a violation of fundamental human rights.

ETI's mandate is to protect and advance respect of labour rights in global supply chains, based on nine labour standards enshrined in the ETI's Base Code. This is an internationally recognized code of practice for all organisations engaged in commercial activity and is based on ILO labour standards. The clauses on forced labour and child labour are particularly relevant to Modern Slavery, but the right of all workers to freedom of association and collective bargaining, safe and healthy workplaces, freedom from discrimination, the right to reasonable working hours, living wages and to contracts of employment are all directly relevant to the degree to which workers can enjoy decent work in which they are respected and treated with dignity. The absence of some or all of these rights often results in circumstances of modern slavery, in which workers are vulnerable to exploitation and abuse. ETI will not tolerate these gross rights violations in any circumstances.

Organisation's structure and supply chain

ETI is a not for profit private limited, registered in the UK. Its headquarters as well as most of its staff are based in the UK. A small proportion of its employees are based abroad including, India, Bangladesh, Hong Kong and Turkey. We do not hire staff on a seasonal basis or work in hazardous conditions. ETI exists to improve working conditions in global supply chains by developing effective approaches and practices to implementing the ETI Base Code of labour practice and demonstrating their commitment to year-on-year progress. We influence business to act responsibly and promote decent work. Taking a unique tripartite approach to business and human rights, our members are forward-thinking companies, trade unions and NGOs. Together, we tackle the complex challenges of today's global supply chains, improving the lives of workers worldwide.

Our supply chain involves goods not for resale and services. Goods not for resale include office supplies (IT equipment, stationery, office furniture, etc.); services include professional advisory services from ETI's secretariat staff, partner organisations and individual consultants, as well as IT support and cleaning services.

ETI has staff in a number of country offices, and ETI UK operates worldwide: our staff travel often in developing countries and we occasionally hire temporary support (interpreters, security services, drivers, researchers) in developing countries. While the nature of our business, as advisers, does not have significant direct exposure to modern slavery risks, there may still be risks of modern slavery and human trafficking in our supply chains. In addition, we sometimes work in countries where there is a

high risk of modern slavery and our analysis and recommendations may impact on anti-slavery and anti-trafficking programming.

Our Principles in relation to forced labour, modern slavery, child labour and human trafficking

- We are committed to ensure that we are conducting our business in a lawful and ethical manner
- We do not tolerate human-trafficking, forced labour, child labour or modern slavery practices in our business – this includes the right of all staff and workers in our operations or supply chains to access their fundamental rights to freedom of association, freedom of movement, freedom to terminate employment, freedom from threats of violence, harassment, discrimination, intimidation and debt bondage
- Terms and conditions of employment should include application of international and national labour standards on working hours, wages and freedom from forced or compulsory overtime. These are set out in our People and Safeguarding policies.
- We will collaborate with contractors and suppliers in our supply chain to identify, prevent and mitigate the risks and address cases of human trafficking, bonded labour and modern slavery through the ETI Supplier Code of Conduct and the application of ETI's Human Rights Due Diligence Framework
- We will require all new contractors and suppliers from September 2018 to act in accordance to our values and to this policy, and the Suppliers Code of Conduct
- We will mandate that any ETI employee observing incidents or risks of modern slavery or human trafficking relevant to ETI's operations should report to an ETI Senior Manager to consider appropriate further action
- We take a zero-tolerance approach to inaction. If the supplier is found to violate the Code of Conduct, and if incidents or risks of modern slavery are found, ETI will actively work with the supplier to address these issues over an agreed period of time. If the supplier fails to demonstrate progress over an agreed period of time, consideration will be made for termination after careful consideration of the implications for workers
- Where incidents or risks are found, ETI will seek to ensure that the protection of affected workers is the primary consideration, their needs and wishes are respected, remediation is provided, and any risk of further harm is mitigated and prevented.
- We will ensure that an established procedure is carried out for the provision of remedy to victims of modern slavery (either directly or through relevant authorities) where an instance of modern slavery is discovered within our operations or supply chain.
- We will not retaliate, discharge, suspend or discriminate in any manner any person who will report or make an ethics complaint about our practices
- We will consider the impact on slavery and trafficking risks when making relevant recommendations to clients due to the course of our work

Risk assessment and management

Our risk management processes aim at ensuring that particular areas of risk in our business and supply chains are identified and impact assessments undertaken before projects start. In cases where a specific ethical concern has been raised, including those related to forced labour, modern slavery and human trafficking, it will be reported to the Executive Director, who is responsible for determining the appropriate course of action.

In addition, as part of producing a Modern Slavery Statement, we will conduct a thorough assessment of the risks of modern slavery and human trafficking occurring in our operations or supply chain. We

will identify the most significant, salient and tractable risks and put in place an action plan to prevent and mitigate them, and we will report on our progress in implementing that action plan.

Effective action and way forward

ETI has always sought to operate ethically and lead by example. This includes being a Living Wage Employer (see www.livingwage.org.uk). It also includes having procedures to escalate any ethical concerns and issues to the designated Manager and freedom of employees to terminate employment. Under no circumstances will ETI tolerate enforced, debt related or bonded labour or any form of worker-paid recruitment fees or utilise a disciplinary measure including an obligation to work.

We provide workshops for our stakeholders and employees with a commitment to continuously improving our approach to addressing modern slavery and human trafficking risk.

| <p align="center">DRAFT GOOD PRACTICE FOR ETI AND ITS SUPPLIERS</p> <p align="center">Procedures to prevent slavery and human trafficking</p> | | |
|---|--|---|
| | Policy, process or approach | Evidence |
| 1 | Designated team or individual with lead responsibility for preventing modern slavery and human trafficking from occurring in your operations or supply chain with clear reporting lines to senior management. | |
| 2 | A specific modern slavery policy as well as mainstreaming modern slavery within other relevant policies. | Provide or link to policy |
| 3 | Efforts to map supply chains and identify actual and potential risks of modern slavery and child labour in operations and supply chains, drawing on expert sources of knowledge (such as the ITUC Human Rights Index) in order to do so. | Provide risk register or similar |
| 4 | A specific time-bound plan to address any identified risks of modern slavery or human trafficking in the short, medium and long term. | Provide or link to action plan |
| 5 | Regular carrying out of human rights due diligence of operations and suppliers, with appropriate recognition of the limits of audits and the importance of supplier relationships. | Provide short explanation with relevant documentation |
| 6 | Review of internal business procedures (e.g. purchasing practices) to ensure that they are neither causing nor contributing to modern slavery, such as by making unrealistic demands on suppliers – with any necessary revisions made accordingly. | |
| 7 | Review of the policies and practices of suppliers on preventing and addressing modern slavery to ensure they are realistic and achievable. | |
| 8 | Specific staff who have been trained to recognise and mitigate identified risks of modern slavery (e.g. human resources or procurement staff), as well as training for other relevant staff. | Provide or link to training strategy |
| 9 | A child labour prevention policy. | Provide or link to policy |

| | | |
|----|--|--|
| 10 | Procedures for workers to safely and anonymously report grievances or concerns within operations and supply chains. Procedures should be advertised in the appropriate languages throughout operation and supply chains. | |
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Annex 2: Human Rights Due Diligence Framework

ETI HUMAN RIGHTS DUE DILIGENCE FRAMEWORK

Key steps that companies should take to prevent, manage and mitigate human rights abuses in their own operations and supply chains.

