

# MSI Reproductive Choices

## Anti-Modern Slavery and Human Trafficking Statement

### Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Anti-Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2020. The Statement was approved by the board of MSI Reproductive Choices ("MSI") on 26 May 2021.

### 1. Organisational Structure

1.1. MSI is an international non-governmental organisation that provides sexual and reproductive healthcare, mostly to girls and women. We operate through branch offices and affiliates in 37 jurisdictions, many of them in the developing world. Our head office is in London.

### 2. Business and Supply Chain

2.1. We have an extensive network of operations with:

- Over 300 healthcare clinics worldwide.
- Outreach operations where we provide access to sexual and reproductive healthcare to remote communities.
- Partnerships with existing private health providers who deliver services with our support.
- Partnerships with public sector health providers to deliver high quality contraception and services at public facilities in rural and remote communities.
- Engagement of mobile midwives (MS Ladies) to provide access to sexual and reproductive healthcare to girls and women in specific communities where there is unmet need.
- Contact call centres which provide comprehensive information and support about MSI related products and services to clients.
- Distribution and marketing of affordable and quality condoms, contraceptive pills and other contraceptive products to pharmacies, community-based distributors and other private providers.

2.2. The key areas in which we engage suppliers are:

- Staff recruitment
- Supply of medicinal products and medical devices
- Supply of non-medical equipment and consumables
- Facilities management and maintenance
- Research and evaluation
- Finance and audit
- Legal
- Marketing and communications
- Security
- Information technology
- Waste management
- Logistics

### 3. Our Policy on Slavery and Human Trafficking

- 3.1. As an organisation that promotes the rights of women and girls, we are absolutely opposed to modern slavery and human trafficking in all its forms. We are committed to implementing systems and controls to reduce the risk of modern slavery and human trafficking in our supply chains and all other parts of our business.
- 3.2. We have an Anti-Modern Slavery and Human Trafficking Policy ("**Anti-Slavery Policy**"). The Anti-Slavery Policy is disseminated to staff, and we expect all staff to be aware of, and to discharge, their obligations under them. Additionally, all our employees are required to sign our Code of Conduct which includes a commitment to anti-modern slavery principles. We will take any breach of the Anti-Slavery Policy very seriously, any employee who commits a breach will be disciplined and may be dismissed.

### 4. Employment Practices

- 4.1. We commit to ethical principles in our employment practices. We do not use forced, bonded or child labour. Our employees are free to terminate their employment upon reasonable notice. We do not demand fees from anybody who wishes to be employed by us or retain any original actual or potential employees' identity or travel documents. Our ethical principles extend to the terms and conditions of employment that we offer. As a minimum, we ensure that our employees' salaries and working hours comply with national laws, and that our employees have a safe and hygienic working environment, and full access to grievance procedures.
- 4.2. All MSI staff (including short term and volunteer staff) are subject to background checks and identity verification.
- 4.3. Further information on our employment practices may be found in the Anti-Slavery Policy and in the following policies:
- Global pre-employment and recruitment policy;
  - Global Equality and Diversity Policy;
  - Global Dignity at Work Policy;
  - Sexual Harassment Policy;
  - Child Safeguarding Policy for International Operations;
  - MSI Adult Safeguarding Policy for International Operations;
  - Safeguarding Adults, Children and Young People Policy (UK programme); and
  - Global Speaking Up Policy.

### 5. Due Diligence and Assessment of Business Partners

- 5.1. We require those who assist us to implement donor funded projects ("**external partners**"), and those from whom we procure ("**suppliers**"), to have the same approach to modern slavery and human trafficking that we have.
- 5.2. We do the following when working with suppliers and external partners:
- Enforce our Global Due Diligence Policy which requires all suppliers with whom MSI has an annual projected spend above £1000 to sign up to our Business Partner Code of Conduct which includes anti-modern slavery and human trafficking obligations. All suppliers with whom MSI has an annual projected spend above £5000 also undergo vetting against a global database of sanctions and other published lists of serious crime and misconduct.
  - When we enter into a new contract with an external partner or material supplier, we include clauses that give MSI the right to terminate that contract if the external partner or supplier breaches its anti-modern slavery or human trafficking undertaking.
  - Ensure that the approach taken by external partners who work with us in delivering aspects of our donor funded programmes, in relation to implementing anti-modern slavery and human trafficking processes, is considered when deciding whether to work with them.

- 5.3. Where we believe that an external partner or supplier may be involved in modern slavery or human trafficking, we will assess our relationship with that partner or supplier as quickly as possible, which may result in termination of the contract. We also refresh our due diligence processes periodically to review emerging information and remain up to date on our Business Partners.
- 5.4. Every two years we conduct a modern slavery risk assessment of global suppliers managed through MSI's centralised Global Supply Chain team who source the material pharmaceutical and contraceptive products required by MSI's county programmes. During this exercise we analyse the geographic location of our suppliers against the Global Slavery Index's regional vulnerability score and International Trade Union Confederation Global Rights Index to determine which of our suppliers are in higher risk locations. Our suppliers and/or manufacturers are primarily based in high-risk areas. MSI is committed to working with those that value both the quality of their product and their people, and this is supported by visits to supplier premises.

## 6. Training and Awareness

- 6.1. The Anti-Slavery Policy have been disseminated and is posted on the global intranet. Managers are also required to ensure that their team members adhere to the Code of Conduct which includes principles from the Anti-Slavery Policy.
- 6.2. All UK head office staff for international operations do training on modern slavery through e-modules. During 2021, we are developing a global e-module which all international staff will be required to complete. MSI Reproductive Choices UK (which is the entity operating MSI healthcare clinics in the UK) also requires staff in relevant roles to undertake advanced levels of safeguarding training which incorporates issues raised by modern slavery.
- 6.3. The aim of MSI's training is to raise awareness of modern slavery and the risks and to equip staff on how to consider modern slavery in procurement and recruitment practices, recognise signs of modern slavery and know how to report suspicions of modern slavery.

## 7. Reporting of Concerns

- 7.1. We recognise the importance of remaining vigilant to identify and address issues associated with slavery and human trafficking in the organisation and throughout our supply chains. The Anti-Slavery Policy, MSI's Speaking Up Policy and Business Partner Code of Conduct set out a system for reporting concerns for employees, external partners and suppliers. We also have an external independent speaking up hotline through which any misconduct, including suspicions of any activity which could amount to modern slavery, may be reported confidentially.

## 8. Our Commitments

- 8.1. We are committed to continue taking actions which affirm our zero-tolerance approach to modern slavery, and have set out KPI's in section 9 below, which ensure we deliver against key commitments. In February 2021 we updated our Anti-Modern Slavery and Human Trafficking Policy to clarify its impact and strengthen our internal processes to reduce the risk of modern slavery. During 2021 we are y:
- introducing a new modern slavery e-module training for all global staff, to ensure consistent training on modern slavery and MSI's policies;
  - creating specific guidance and training for our country programme procurement teams on identifying and managing modern slavery risks in procurement and supply chains, including new site inspection guidance and guidance on reporting;
  - enhancing our modern slavery risk assessment processes and country programme due diligence practices; and
  - planning an enhanced modern slavery mapping exercise which will attribute our supply base with the highest risk locations to priority country visits and bona-fide checks

We continue to be a participant to the United Nations Global Compact (“**UNGC**”) in support of the UNGC’s ten principles relating to Human Rights, including the principle of elimination of all forms of forced and compulsory labour.

## 9. Key Performance Indicators (“KPIs”)

9.1. We have set out the following key performance indicators to review and assess our implementation of our Anti-Modern Slavery and Human Trafficking Policy and Procedures:

- MSI will review its policies, procedures and processes at least every 2 years to ensure they are fit to meet its objective of zero tolerance to modern slavery.
- MSI will conduct a risk assessment of its Global Suppliers as detailed in section 5.4 every 2 years and take relevant action in response, including:
  - Supplier support to recognise and mitigate risks of modern slavery
  - Supplier visits, where appropriate, to identify operational risks
  - Contract reviews and updates, as appropriate, to ensure adherence to MSI’s Business Partner Code of Conduct
- MSI will monitor completion of training by its staff
- MSI will monitor completion of its Supplier Questionnaire by suppliers in accordance with its Global Due Diligence Policy

## Review

This Statement is reviewed by the trustees annually and updated as appropriate.

Glenda Burkhart



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Chair of the Trustees of MSI Reproductive Choices

Date: 7 June 2021