

# 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 2021 detailing the steps taken, and planned, by MSI Reproductive Choices to prevent modern slavery and human trafficking across MSI's business and supply chain operations. The Statement was approved by the board of MSI Reproductive Choices ("MSI") on 30 May 2022.

### 1. Organisational Structure

- 1.1. MSI is an international non-governmental organisation that provides sexual and reproductive healthcare, mostly to girls and women, reaching over 75,000 women every day.
- 1.2. We operate through branch offices and affiliates in 37 jurisdictions, many of them in the developing world, and have just under 9,000 team members. Our head office is in London (the "London Global Support Office").
- 1.3. In 2021, across our 37 Country Programmes, and in partnership with governments, civil society organisations and implementing partners, MSI supported 19.4 million people to access healthcare<sup>1</sup>.

### 2. Business and Supply Chain

2.1. We have an extensive network of operations with:

- 280 healthcare clinics and maternity centers 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 centers 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. We have a complex and dispersed supply chain, including operations across high-risk locations. MSI's supply chain operates via:

- A centralized Global Supply Chain team based at the London Global Support Office who manage large scale supply of pharmaceutical and medical products for MSI's Country Programmes with:
  - A Global Requisition Platform introduced in 2021 which automates source-to-pay procedures;
  - Spend of approximately £6.5 million for international commodities;

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<sup>1</sup> 13.4 million client visits to MSI service delivery sites, and 5.9 million users of contraception, safe abortion or post abortion care products supported through social marketing.

- Local procurement, supply chain and logistic staff based in all Country Programmes, supporting the international procurement process but also sourcing locally;
- MSI's UK division conducts its own procurement

2.3. 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 Modern 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**"). 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, and any employee who commits a breach will be disciplined and may be dismissed.

3.3. We are aware that some women who seek our services may be the victims of sexual and gender-based violence (SGBV) which could include those subject to modern slavery or human trafficking. In the UK we work with other agencies like the Police and social services to support clients who maybe victims of modern slavery or human trafficking. This approach is managed in accordance with our UK division's "Safeguarding Adults, Children and Young People Policy." We require any staff who are concerned that someone is in immediate danger of modern slavery and/or human trafficking to ring 999, and report this to the Police. In our Country Programmes, we are seeking to increase our ability to recognise victims, provide mental first aid and a range of sexual-reproductive health services, and then refer these women to safe and appropriate local support organisations where they exist.

### 4. Employment Practices

4.1. We commit to ethical principles in our employment practices. We have processes in place to ensure we do not use forced, bonded or child labour. Our employees are free to terminate their employment on 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 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:

- Require 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 MSI enters 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 an allegation or concern arises which implicates an external partner or supplier as being 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 on our Business Partners.

5.4. Our suppliers and/or manufacturers are primarily based in high-risk areas. We recognise there are risks of forced labour associated with the procurement of manufactured goods, particularly condoms, rubber gloves and surgical equipment. MSI is committed to working with suppliers that value both the quality of their product and their people. To support this, we conduct a risk assessment for suppliers with a minimum spend of £10,000.00 identifying key modern slavery factors by supplier location and industry. This is supported by visits to supplier premises where necessary.

5.5. In 2021 MSI partnered with The Mekong Club, a non-profit organisation focused on ethical and responsible business practice in global supply chains. This partnership supports MSI in assessing our supply chains, strengthening our approach to preventing modern slavery, and improving transparency in our supply chains through technical advice, training resources and guidance on legislation and compliance.

## 6. Training and Awareness

6.1. The Anti-Slavery Policy is posted on the global intranet. Managers are also required to ensure that their team members adhere to the Code of Conduct which includes the key principles from the Anti-Slavery Policy. All staff are also required to do an online training on the Code of Conduct, which covers MSI's approach to modern slavery.

- 6.2. All London Global Support Office staff, Country Programme Human Resource and Procurement staff and Senior Leadership are required to complete a mandatory e-learning on preventing, identifying, and responding to modern slavery concerns within MSI's operations and supply chains.
- 6.3. All Country Programme Procurement and Supply Chain staff are required to complete training on the application of MSI's Procurement and Supply Chain Manuals which outline MSI's approach to ethical procurement practice, due diligence and reducing modern slavery risks in supply chains.
- 6.4. MSI Reproductive Choices UK (which is the division operating MSI healthcare clinics in the UK) requires staff in relevant roles to undertake advanced levels of safeguarding training which incorporates issues raised by modern slavery.
- 6.5. The aim of MSI's training is to raise awareness of modern slavery risks and equip staff with the knowledge and ability to consider modern slavery in procurement and recruitment practices, recognise signs of modern slavery and 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 use an external independent speaking up hotline, [SafeCall](#), 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. Throughout 2021 and 2022 we:
- introduced new modern slavery e-module training for global staff, to ensure consistent training on modern slavery and MSI's policies, with specific modules on modern slavery in supply chains for global procurement, supply chain and logistics staff;
  - are continuing to deliver modern slavery training and due diligence guidance to Country Programmes, helping them to identify and address risk areas in their context, providing awareness of tools and guidance on how to use them;
  - established an enhanced modern slavery mapping exercise which attributes our supply base with the highest risk locations and triggers priority country visits and bona-fide checks;
  - are implementing a new supplier site inspection guidance for use by MSI's Global Supply Chain and Country Programme Procurement / Supply Chain staff. This includes a checklist to identify concerns of modern slavery and guidance on reporting;
  - are rolling out an enhanced supplier questionnaire as part of the onboarding process and due diligence refresher programme; and
  - are continuing to roll out our global procurement platform to manage global supply contracts, logistics and requisitions to ensure supplier contracts comply with MSI policy
- 8.2. 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”)

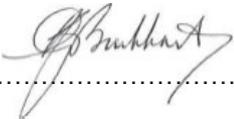
9.1. We have set out the following key performance indicators to assess our implementation of our Anti-Modern Slavery and Human Trafficking Policy and Procedures:

- MSI will review its policies, procedures, and processes 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 where required:
  - Support to suppliers to recognise and mitigate risks of modern slavery
  - Supplier visits to identify operational risks
  - Contract reviews and updates to ensure adherence to MSI’s Business Partner Code of Conduct
- MSI will monitor completion of training by its staff
- MSI will monitor Supplier Questionnaire completion according to 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: 30<sup>th</sup> May 2022