

MSI Reproductive Choices

Anti-Modern Slavery and Human Trafficking Statement 2026

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 2025 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 3rd June 2026.

1. Organisational Structure

- 1.1. MSI is an international organization, registered as both a charity and a company limited by guarantee, that provides sexual and reproductive healthcare, reaching over 100,000 women every day.
- 1.2. We operate through branch offices and affiliates in 36 jurisdictions across low- and middle-income countries and have 9,153 team members. Our head office is in London (the "Global Support Office").
- 1.3. In 2025, across our 36 country programmes, and in partnership with governments, civil society organisations and implementing partners, MSI supported 27.8million people to access life-changing healthcare to 100,000 women and girls every day.

2. Operations

2.1. We have an extensive network of operations, and key facts and figures are set out below

2.1.1. UK: MSI UK Healthcare

- Contracted by National Health Service (NHS) to provide sexual and reproductive health care in England.
- In 2025 MSI UK provided abortion, vasectomy, and long-acting reversible contraception services to 123,204 clients.
- Operates 12 Regional treatment centres.
- Partnerships with existing local doctors' surgeries and clinics to operate 59

community hubs and treatment centres.

- 822 team members operating in the centres and support office.
- Contact call centres that operate 7 days a week and provide comprehensive information and support about MSI related services to clients. In 2025, the contact centre handled over 585,000 client interactions across calls, texts and webchat.
- A comprehensive website that provides information and access to an online client portal 'Blue Door', enabling clients to create an account, complete their details and request appointments.

2.1.2 The Global Support Office: International Healthcare

- The Global Support Office provides technical, governance, and quality services to support global operations through oversight, monitoring, and reporting.
- It has 267 staff based in London and overseas.

2.1.3 Outside the UK

- Operations in 36 countries, through "Country Programmes"
- 317 healthcare clinics and maternity centers worldwide with over 8,000 team members.
- 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.
- Outreach operations where we provide access to sexual and reproductive healthcare to 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 that 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

3. Supply Chain

3.1 We have a complex and dispersed supply chain, including operations across high-risk locations.

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

3.2 UK: MSI UK and the Global Support Office for International Operations

3.2.2 MSI UK healthcare

- MSI UK operates as a division of MSI and as a stand-alone Country Programme, and as such follows MSI International's Global Procurement Policy and associated procedures. It has its own supply chain team responsible for managing the procurement of pharmaceutical and medical products, covering both international procurement and local sourcing with all top five suppliers located in the UK.
- In 2025, its annual expenditure was approximately £19.8 million. Services such as facilities management, equipment maintenance, and cleaning are outsourced to third-party providers.
- MSI UK top five key suppliers are located in the UK.

3.2.3 Global Support Office: International healthcare

- The Global Support Office manages procurement for technical services for international operations only, mainly communication, finance, legal and facility management by following the global procurement policy and process, with no designated procurement team.

3.3 Operations outside of the UK

MSI's international supply chain operates through two primary channels:

- A centralised Global Supply Chain team based at the Global Support Office in London, responsible for the registration and large-scale supply of strategically important pharmaceutical and medical products to 27 Country Programmes, with a total spend of £13 million in 2025.
- Local procurement, supply chain, and logistics staff within each Country Programme, who support international procurement activities while also undertaking locally sourced procurement.

4 Our approach to Modern Slavery and Human Trafficking

- 4.1 As an organisation that promotes the rights of women and girls, we are unequivocally opposed to any actions or behaviours which could amount to modern slavery and human trafficking. 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.
- 4.2 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 seriously, and any employee who commits a breach will be disciplined and may be dismissed.
- 4.3 We have a comprehensive Safeguarding framework to prevent and respond to incidents of sexual exploitation, abuse, and harassment. Incidents are addressed with survivor and whistleblower safety as a priority, reviewed by a global Safeguarding Decision Committee according to the policy. We use safe recruitment practices with background checks and try to ensure we employ people who treat others with care and respect. Country safeguarding leads work with management to identify and manage safeguarding risks. We conduct safeguarding 'Community of Practices' to share experiences, discuss challenges, and learn from each other to implement the programme effectively. We promote an annual 'Safeguarding Awareness Week' where all teams participate in initiatives to raise awareness about MSI's safeguarding approaches. Team members' duty of care and safeguarding responsibilities are reinforced by ensuring all team members sign the MSI Code of Conduct, and through behaviour change initiatives designed to equip each of us with the skills to sensitively respond to nuanced safeguarding issues. In the public sector, MSI complements the existing safeguarding frameworks and advocates for improvements when needed.
- 4.4 Vulnerable women who seek our services within our Country Programmes may be victims of sexual and gender-based violence (SGBV) which could include victims of modern slavery or human trafficking. Wherever possible, staff in the Country Programmes seek to increase their ability to recognize these victims, provide mental health first aid and a range of sexual and reproductive health services and then refer them to local support organizations known as 'referral partners' where these exist. We encourage Country Programmes to carry out due diligence on these local organizations and confirm that they subscribe to MSI safeguarding and anti-modern slavery approaches before listing them as possible referral partners.
- 4.5 In the UK we work with other agencies like the police and social services as part of

our approach to Safeguarding, to support clients who may be 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.

5. Employment Practices

- 5.1 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 ensure that no fees are demanded from anybody who wishes to be employed by us or retain any original actual or potential employees' identity or travel documents. All recruitment agents complete our supplier's due diligence processes, which require the signing of our Business Partner Code of Conduct. 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.
- 5.2 All MSI staff are subject to background checks and identity verification. 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;
 - Anti-Sexual Harassment Policy;
 - Child Safeguarding Policy for International Operations;
 - Adult Safeguarding Policy for International Operations;
 - Safeguarding Adults, Children and Young People Policy (UK programme); and
 - Global Speaking Up Policy.

6. Due Diligence and Assessment of Business Partners

- 6.1 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 anti-modern slavery and human trafficking that we have.
- 6.2 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 sets out expectations on supplier standards including compliance with local laws, forced labour, child

labour, non-discrimination and ensuring fair treatment, and specifies reporting channels should concerns arise. 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. The vetting process must be completed prior to the creation of a supplier in MSI's payment systems, and the Finance team is responsible for verifying that a vetting report has been provided.

- 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.
- **MSI UK** adopts this same approach of due diligence to their suppliers and business partners.

6.3 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.

6.4 MSI's global suppliers and manufacturers are predominantly located in regions where there is an inherently higher risk of modern slavery. As a result, we recognise that our supply chains carry an elevated exposure to risks such as forced labour and exploitative practices.

6.5 In response, MSI is strengthening its understanding of these risks through ongoing due diligence and continuous improvement. This includes the use of supplier self-assessment tools, risk-based segmentation by geography and sector, and the development of supply chain route mapping to improve visibility of how products move across different tiers of the supply chain. These approaches have been supported through MSI's partnership with The Mekong Club, which has contributed to the development of tools, guidance, and internal capability in managing modern slavery risks.

6.6 The centralised Global Supply Chain function prioritises engagement with key strategic suppliers, applying risk assessments that incorporate modern slavery indicators. This is complemented, where appropriate, by supplier engagement activities, including site visits, during which a structured modern slavery checklist is

used to assess adherence to expected labour standards and practices. Where risks are identified, MSI engages with suppliers to support improvement and mitigation actions.

7. Training and Awareness

- 7.1 The Anti-Modern Slavery Policy is posted on MSI's 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-Modern Slavery Policy. All staff are also required to do online training on the Code of Conduct, which covers MSI's approach to modern slavery.
- 7.2 All Global Support Office staff, Country Programme Human Resource and Procurement staff and Senior Leadership are required to complete mandatory e-learning on preventing, identifying, and responding to modern slavery concerns within MSI's operations and supply chains.
- 7.3 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.
- 7.4 MSI UK (the division operating MSI healthcare clinics in the UK) requires all staff to undertake advanced levels of safeguarding and anti- modern slavery training annually.
- 7.5 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.
- 7.6 **Reporting of Concerns:** We recognize the importance of remaining vigilant to identify and address issues associated with slavery and human trafficking. The Anti- Modern 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, which is accessible to all staff and through that any misconduct, including suspicions of any activity which could amount to modern slavery, may be reported confidentially.

8. Actions taken in 2025

In 2025, MSI made measured progress against its Global Supply Chain commitments relating to modern slavery risk management. It looked at issues across its supply chain including modern slavery and completed a Supply Chain Risk and Modern Slavery Assessment. It reviewed the practicality of its existing risk management approach and concluded that it is too operationally intensive and not scalable across the full Supplier base and so moved to a more streamlined self-assessment model, supported by evidence-based submissions. This will enable broader coverage and more consistent Supplier monitoring from 2026 onwards.

MSI has continued to strengthen its capability through its partnership with The Mekong Club, who conducted a comprehensive baseline assessment of MSI's policies, governance framework, and overall exposure to modern slavery risks. In addition, The Mekong Club undertook a detailed review of MSI's Supplier Code of Conduct, procurement toolkits, tender templates, contractual documentation, and existing due diligence processes, and supported their further development and alignment with recognised good practice. This work has established a clear baseline position and provides a foundation for ongoing improvement in MSI's assessment score over time.

MSI continued to visit alternative or potential suppliers to increase its understanding of both alternative supply options and logistics-related risk across the supply chain as well as relevant supplier conferences and exhibitions. MSI believes these events are an important component of its overall approach, providing visibility of the wider supplier landscape, enabling direct dialogue with both existing and potential suppliers, and supporting a broader understanding of supply chain practices and risks beyond the core supplier base. The programme of visits continues in 2026, focusing on priority suppliers where both spend and risk exposure are the highest.

MSI trained 200 individuals from Procurement and Management teams across 36 Country Programmes in due diligence practices and indicators of modern slavery.

It vetted 3,198 suppliers across 36 countries using an external Dow Jones vetting database, against various matters including proscribed lists, sanctions and where available, adverse media.

9. Actions planned for 2026

In 2026, we plan to complete the following:

- Enhance executive leadership understanding and accountability through high-level training led by an external specialist.

- Provide targeted training to the top five pharmaceutical and medical device suppliers on identifying and mitigating modern slavery risk.
- Request our top five global commodity suppliers to complete a remote Modern Slavery risk assessment.
- MSI UK healthcare will conduct modern slavery risk assessments for high-risk suppliers in the categories of facility maintenance, cleaning services and stock management and evaluate their compliance with MSI Anti- Modern Slavery Controls.
- Review and update our Anti-Modern Slavery and Human Trafficking Policy to reflect best practices and evolving regulatory requirements.
- Enhance our modern slavery e-module by providing additional information on supply chain risks and mitigations strategies.
- Monitor the completion of e-module training by our Procurement leads, HR leads, and Management teams to ensure all do training every 2 years.
- Create a self-audit to assist Country Programmes to verify compliance with due diligence controls within CPs.
- Maintain rigorous vetting of all new suppliers with an annual projected spend of £5,000 or more, as well as all new staff.

Review

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



Frank Braeken

Chair of the Trustees of MSI Reproductive Choices

Date: 3rd June 2026