



CTG

Committed to Good



**SLAVERY & HUMAN TRAFFICKING
STATEMENT 2020**

www.ctg.org

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1. INTRODUCTION

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

CTG's vision is to be the provider of choice for the humanitarian sector enabling them to implement rapid-response and development projects in fragile and conflict-affected countries.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business.

2. CTG'S POLICY

CTG's policy is to conduct all business ethically and with integrity and takes a zero-tolerance approach to modern slavery.

An ethical approach is at the heart of all we do at CTG and we therefore assess and address the risk of violations of anti-modern slavery and anti-human trafficking laws and are committed to implementing and enforcing effective procedures and controls that aim to ensure slavery and human trafficking is not taking place anywhere in our supply chains. CTG also expects the companies and organisations with whom we do business to adopt and enforce policies which comply with anti-modern slavery and anti-human trafficking legislation.

Our policy is reinforced by other CTG policies and procedures such as our Code of Conduct, our Whistleblowing Procedure which encourages disclosure from any person (internal or external) and sets out CTG's commitment to protecting whistleblowers and our Due Diligence Procedure which reflects the requirements of the Modern Slavery Act 2015.

CTG is a participant of the UN Global Compact, supporting principles with respect to human rights, gender equality, labour and anti-corruption. Specifically, CTG is committed to Sustainable Development Goal 8, target 8.7 to "Take immediate and effective measures to eradicate forced labour,

end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms". CTG reports annually on its progress against the UN Global Compact's ten principles and the 17 Sustainable Development Goals (SDG) including SDG 8.

CTG is committed to supporting our staff, suppliers and clients to address issues arising from modern slavery. Lawful and Ethical Conduct is one of our core values and together with integrity, accountability, transparency, operational excellence, respect and inclusion is at the heart of all that we do:

- (a) CTG's values specify how we expect our staff to behave with their colleagues, clients and any third party with whom they come into contact;
- (b) CTG strives for gender equality, inclusion and diversity, seeks to treat everyone fairly and consistently and to create a workplace and business environment that is transparent and trusted; and
- (c) Our policies and procedures relating to the Act are in line with our culture and values.

3. CTG'S STRUCTURE AND SUPPLY CHAINS

CTG is a limited company incorporated in the United Kingdom under company registration number 11655728. CTG has companies in twelve countries of operation, each a separate legal entity.

CTG's supply chain includes the purchase of goods and services necessary for the operation of the company; CTG's suppliers are from a wide range of sectors and include individuals as well as commercial entities.

CTG's contracts with third party providers cover areas such as information technology, marketing, insurance, security services and logistics. To mitigate the risk of modern slavery we shall require third party providers to comply with our due diligence procedure, responsible procurement standards and the provisions of the Modern Slavery Act 2015.

4. CTG'S PROCEDURES

(a) Employment

- (i) CTG has rigorous recruitment procedures which are in line with UK employment laws covering areas such as right to work document checks, checks to ensure everyone employed is 16 and above and the provision of contracts of employment.
- (ii) CTG offers market-competitive pay and reviews rewards on an annual basis.

- At all times follow any applicable law and good practice in relation to the ethical procurement of goods and services including but not limited to minimising the risks of supporting fraud, bribery, corruption and human rights abuses.

- (iii) CTG is committed to ensuring that all contracts with suppliers (even those which do not contract on CTG's standard terms) contain appropriate provisions requiring all suppliers to adhere to CTG's values in respect of modern slavery and the requirements set out above.

(b) Supply Chain

- (i) We require suppliers to acknowledge and agree to CTG's Supplier Code of Conduct.
- (ii) In general, we require suppliers to contract on CTG's standard terms. These terms require suppliers to commit to ensuring compliance with the Modern Slavery Act 2015 and:
 - Pay all staff the National Living Wage and pay any contract or sub-contract staff the National Minimum Wage;
 - Comply with any applicable wage minimum requirements for another country, for those staff members, contract or sub-contract staff, where such individuals are based in that other country;
 - Ensure that all staff are subject to UK Right to Work checks or other checks necessary to ensure compliance with UK or where applicable other countries' immigration requirements;
 - Comply with Committed to Good's due diligence process to assess risk generally when dealing with suppliers and partners; and

- (iv) The CTG legal team oversees compliance with contractual obligations to comply with anti-slavery and human trafficking obligations and undertakes supplier due diligence where appropriate.

- (v) CTG recognises that CTG is exposed to greater risk when dealing with suppliers who have operations/suppliers in other territories and as our supplier base grows we shall map the suppliers according to location, size and industry to identify potential indicators of slavery.

- (vi) CTG commits to working closely with its suppliers to educate them and help them understand the Act and how to work towards compliance.

- (vii) CTG's Supplier Due Diligence Procedure reflects our commitment to focus on our suppliers' ethical supply chains and request suppliers provide their modern slavery statements and attest to the fact that they have not previously been investigated or convicted for any activities relating to modern slavery.

5. CTG PROGRESS IN TACKLING MODERN SLAVERY IN 2019

During 2019, Committed to Good took the following measures which are currently being implemented, monitored and improved:

- We included in our training for employees and new joiners relevant information related to modern slavery and a clear explanation of our internal procedures, so they are well placed to identify potential instances of modern slavery and/or human trafficking and know how to report this appropriately.
- The Legal & Compliance Associate was nominated the company's Modern Slavery Champion, responsible for driving awareness of modern slavery throughout our network.
- The Supplier Code of Conduct was updated, so that suppliers are aware of our expectations of business behaviour.
- Due Diligence processes were reviewed and strengthened to ensure they are adequate according to the risk profile of the supplier. The supplier/partner due diligence form was updated and improved.
- A Safeguarding Policy was been developed and all employees were required to undertake. An online training course on the topic of safeguarding.

6. MOVING FORWARD: 2020 GOALS AND TARGETS

Recognising that modern slavery is an on-going threat, CTG is committed to continuous improvement of our practices to combat slavery and human trafficking. Therefore, the company shall continue to monitor this area and aim to achieve the following goals in 2020:

- We shall roll out training to all our employees to ensure they are aware of the risks and are better placed to identify potential instances of modern slavery and/or human trafficking and know how to report this appropriately, in line with our procedures.
- The company's Modern Slavery Champion shall:
 - Identify and assess potential risk areas when considering taking on new suppliers and/or partners, regularly review existing supply chains.
 - Monitor the adherence of suppliers with the company's values in respect of modern slavery.
- Circulars shall be sent out to all employees and connected companies to raise awareness and ensure they know how to report suspected instances of human trafficking and/or concerns related to this.
- We shall introduce a mechanism by which Committed to Good Limited can monitor the adherence of suppliers with its values in respect of modern slavery. This will be achieved incrementally by insertion of a contractual right to do so on renewal of existing contracts and in new contracts.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement throughout Committed to Good Limited's first financial year, ending 31 December 2020.



Alice Laughher
Director
Committed to Good Limited
Date: 1 January 2020