

CONCERN WORLDWIDE MODERN SLAVERY ACT TRANSPARENCY STATEMENT

Introduction

This statement is given on behalf of Concern Worldwide, and its group companies, Concern Worldwide (UK) and Concern Worldwide (Northern Ireland) (together "**Concern**").

Concern is a non-governmental, international humanitarian organisation that strives for a world free from poverty, fear and oppression. We operate in approx. 26 countries worldwide. We deliver life-saving and life-changing interventions in the world's poorest and most crisis-affected countries. From rapid emergency response to innovative development programming, we go to the hardest to reach places to make sure that no-one is left behind.

Concern has zero tolerance of all forms of modern slavery and human trafficking and regards them as abhorrent. Actions to safeguard the wellbeing of adults and children and prevent harm, abuse or exploitation is at the core of what we do. We are committed to working to ensure that the way we conduct our business and dealings with our suppliers, service providers and contractors ("**Suppliers**") and partners reflects our values. We strive to ensure that the way in which we work prevents and deters any form of modern slavery and human trafficking from occurring anywhere in our business and supply chain and are committed to the continuing evaluation of our systems and processes to ensure that we can better raise awareness of, prevent, report and respond to issues of modern slavery across the organisation.

Definition

"Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the [UK] Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after."¹

Our Staff

Concern employs around 4,500 people worldwide. The dedication and commitment of our staff to our core values is essential to the achievement of our objectives. It is therefore essential that the way we engage with our staff reflects our core values and that we treat people with dignity and respect.

Our recruitment standards prohibit the solicitation of a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretences, representations, or promises regarding that employment, charging employees recruitment fees, or providing or arranging housing that fails to meet the host country housing and safety standards.

Our Supply Chains

Given the nature of our work, our supply chains can be quite extended involving a broad range of participants such as suppliers, freight forwarders, transporters, warehousing and distribution personnel.

It is essential that we have confidence that our Suppliers are working towards meeting the same high standards as we do. In particular, we aim to ensure our Suppliers treat their own employees and workers with dignity and respect in a fair and ethical environment. This is reflected by our requirement that all significant Suppliers to our country programmes are expressly bound to comply with the following Concern policies:

- Programme Participant Protection Policy (See Section 1a below);
- Child Safeguarding Policy (see Section 1b below);
- Anti-Trafficking in Persons Policy (see Section 1c below);
- Whistleblowing Policy (see Section 2 below); and
- Standard Terms and Conditions of Procurement (See Section 4 below).

¹ UK Government, Modern slavery and public health, 7 December 2017

<https://www.gov.uk/government/publications/modern-slavery-and-public-health/modern-slavery-and-public-health#definition-of-modern-slavery>

Any failure to adhere to these requirements is a fundamental breach of the terms of the engagement.

Our Policies

We have developed and implemented a number of policies and procedures designed to ensure that the way we work, and the way those working with us behave, is reflective of the principles and standards we hold ourselves to including the following:

1. The Concern Code of Conduct

The Concern Code of Conduct (the “Code”) is a tool for the prevention of harassment, exploitation, abuse and/or inappropriate behaviour by staff. It applies to partner organisations engaged on Concern programmes, consultants, contractors, interns, and volunteers.

Our Code stresses that any form of inappropriate behaviour is incompatible with Concern's fundamental belief in the human dignity of all people, and with our core values. For Concern employees, a failure to comply with the Code may result in disciplinary action up to and including dismissal, and for our partner organisations, it may result in the suspension or termination of our agreement with them.

The Code specifically highlights the requirement that individuals' conduct is in-keeping with Concern's beliefs, values and mission. It also requires them to avoid any engagement in activities which are illegal, contravene human rights, or compromise the work of Concern, as well as refraining from any form of bullying, harassment, discrimination, abuse, intimidation or exploitation.

The Code includes the duty to report; staff and all those who work with or on behalf of Concern are required to bring to our attention any potential incident, abuse or concern that they are witness to, made aware of, or suspect, which appears to break the standards of the Code.

The Code is supplemented by three associated policies:

a. Programme Participant Protection Policy

Concern prohibits any abusive or exploitative behaviour and is committed to the protection of its programme participants. This policy stresses the importance of being aware of, and mitigating against, the potential for the abuse of power. Specifically, to reduce the risk that the allocation of benefits is used as an exploitative tool, it requires that no individual can create a situation where he or she alone is perceived to be the sole and final authority responsible for allocating benefits. We expressly reserve the right to dismiss any staff found to be in breach of the policy and terminate any third party relationship if a breach or suspected breach of the policy occurs.

b. Child Safeguarding Policy

Concern believes that children deserve particular protection given their potential vulnerability to specific risks. Therefore, the safeguarding of children is a key element of our Code and this policy seeks to ensure that we integrate robust mechanisms to prevent and mitigate the risk of harm to and abuse of children.

c. Anti-Trafficking in Persons Policy

Concern strongly condemns trafficking in human beings and this policy prohibits all individuals with whom, and entities with which, Concern works from engaging in any form of trafficking in human beings. This includes, but is not exclusive to: trafficking for sexual exploitation; forced marriage; the illicit organ or narcotics trade; involuntary servitude; or labour by threats of serious harm.

2. Whistleblowing Policy

We are committed to the highest possible standards of openness, transparency and accountability in all our affairs.

We have implemented a Whistleblowing Policy so that all staff, volunteers, partners, consultants or contractors (engaged by Concern Worldwide or any of its subsidiaries and affiliates) can, and are encouraged to, raise or disclose concerns at an early stage. We operate a designated whistleblowing helpline as well as making clear our commitment that no one raising concerns in good faith is subject to any harassment or other harm as a result.

3. Complaints Procedure

Concern is committed to providing safe, accessible and effective ways both locally and via global reporting channels for anyone to exercise their right to raise complaints about the work and behaviour of its staff, volunteers and partner organisations. Our complaints reporting and response mechanisms across the globe deliberately offer a means of reporting should there be any instances of violation of the Code of Conduct or any of its associated policies (including this Statement). We ensure that appropriate and timely action is taken in relation to all complaints, both to deal with the situation, and to stop the same thing happening again.

4. Standard Terms and Conditions of Procurement

Suppliers to our country programmes are required to adhere to certain ethical standards as part of Concern's Standard Terms and Conditions for Procurement which are available on our website at <https://www.concern.net/accountability/supply-chains>. These ethical standards include adhering to International Labour Organisation conventions; ensuring working conditions are safe and hygienic; and ensuring exploitation of children is not tolerated and reflect the Ethical Trading Initiative Base Code of labour practice.

5. Purchasing Policy

We have also put in place a specific policy, which applies to the way in which we engage with our Suppliers. It ensures that Concern staff are clear about the standards which are expected of those with whom we contract and reflects our recognition of the safety, health, environmental and ethical impacts of all supply decisions and involves our Supplier in addressing issues that may arise.

The central message underlying our policy is that we seek to purchase goods and services which are produced and delivered under conditions that do not involve the abuse or exploitation of any persons. We ensure that all procurement activities are fully and transparently documented, and that all employees involved in procurement comply in all respects with laws that apply to their purchasing activities. Potential Suppliers will be considered ineligible if (amongst other things) we become aware that they have engaged in any corrupt, fraudulent, collusive or coercive practices. Our policy also makes it clear that we will seek alternative sources where the conduct of Suppliers violates basic human rights, or where companies anywhere in the supply chain are involved in the manufacture of arms or the sale of arms to governments, which systematically violate the human rights of their citizens.

Training

It is important to us that our employees are aware of the issues surrounding modern slavery and support our values. All employees are required to adhere to our Code of Conduct and the values and principles contained in it. We regularly work with all staff to help them to understand and comply with their obligations. All staff were required to complete safeguarding refresher training in 2023.

Risks

Concern has a risk management policy that provides a framework for management to identify, analyse and evaluate risk, and to develop strategies to deal with those risks identified so as to provide reasonable assurance that Concern Worldwide's objectives can be achieved in accordance with the organisation's risk appetite. The Concern risk register is updated annually and monitored on a monthly basis. One of the key organisational risks identified within this register relates to safeguarding. It is stated under this risk that Concern has zero-tolerance for exploitation in all its forms and is investing significant resources to design policies and procedures that reduce its occurrence.

Action Plan

In 2022, Concern completed the UK Foreign, Commonwealth and Development Office (FCDO) Modern Slavery Assessment Tool (MSAT) to identify areas in its current management of modern slavery risks which could be strengthened. Based on the outcome of this assessment, an action plan was developed which supports two main objectives over two phases to be completed by the end of 2024.

The first set of actions continuously improve compliance with the commitments made in this Statement and the policies referred to around eliminating modern slavery from our supply chain and are well progressed. In 2023 a number of policies were updated to include information related to modern slavery and training on modern slavery took place within our country programme offices as part of an ongoing

process. The second set of actions address areas highlighted by the MSAT assessment and include a review of supply chains in a sample of countries to identify the principal risk areas for modern slavery and identify the steps needed to evaluate and manage those risks. The review and evaluation will be carried out in 2024, together with the completion of any actions outstanding from the first phase.

This work will lead to a refreshed action plan which looks more specifically at partners and suppliers and key performance indicators to measure the effectiveness of the steps being taken to combat modern slavery. Once this has been done, the MSAT will be repeated and updated.

Looking Ahead

Compliance with the Modern Slavery Act is an ongoing commitment. As an organisation we are continuing to develop the way we work to ensure that slavery and human trafficking play no part in our business or supply chain. In 2024 we will continue to implement an agreed action plan to further strengthen the management of modern slavery risks in our operations.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Concern's slavery and human trafficking statement for the financial year ending 31st December 2023.

This statement was approved by Concern Worldwide's Board of Directors.



Chair of Concern Worldwide

May 6, 2024

Date