

MAG MODERN SLAVERY STATEMENT

Introduction

Global statistics demonstrate beyond dispute that slavery and exploitation are a reality in our world. Modern Slavery is the term commonly used to refer to illegal exploitation of people for personal or commercial gain. Victims often find themselves trapped, against their will, in situations of domestic servitude, sexual exploitation, forced marriage, forced criminality and forced labour often as the result of coercion, bribery, deceit or human trafficking.

At MAG, we value not only our own people, but those whom we serve and work with; our beneficiaries and their communities, and so must be vigilant in both our recruitment, partnership arrangements and supply chains.

Our response to modern day slavery embodies our values. We will:

- raise awareness across our teams to support and encourage the reporting of any concerns about our supply chain activities;
- ensure our employment and remuneration practices are fair and transparent across all territories; and
- promote and enforce ethical standards with our suppliers and be vigilant that suppliers don't engage in any practice that could undermine any aspect of human dignity.

1. Organisation Structure and supply chains

MAG is a charity limited by guarantee and is governed by a non-executive Board of Trustees, operating from a head office in Manchester and currently delivering activities in countries across Europe, Africa, the Middle East, South and South East Asia and the Americas. We directly employ over 5,000 staff, 95% of whom are local nationals. We work in partnership with six international organisations and 12 national organisations to deliver our work.

Since 1989, MAG has helped over 20 million people in 68 countries rebuild their lives and livelihoods after war. We find, remove and destroy landmines, cluster munitions and unexploded bombs from places affected by conflict. MAG also provides education programmes, particularly for children, so people can live, work and play as safely as possible until they clear the land. In addition, we work in communities to reduce the risk of armed violence through weapons and ammunition management programmes which keep guns and munitions safe and secure. Our income for the 18-month period ended 31st December 2020 was £119.9m.

2. Summary of progress against actions planned 2019–2020

Planned actions July 2019-December 2020:	Actions taken:	Planned actions to 31 st December 2021:
Enhanced due diligence process for MAG International Suppliers (7M USD in 2020)	All suppliers that were already under contract with MAG have been integrating their contract with all additional documentation/engagements encompassing as well modern slavery.	Any new international supplier will go through full-enhanced on-boarding process, including engagement on ethical and sustainable business practices.
Develop and deliver training on suppliers' management (ethics/safeguarding, etc.).	Developed training package but implementation was put on stand-by due to Covid-19. Procurement roll-out project was put on stand-by due to Covid-19.	Target: First pilot finalized and second pilot arranged for Procurement & inventory roll-out, this contains the practical procedural and process changes within suppliers mgmt. area. The roll-out will continue progressively into 2022 across all priority programmes (high volume procurement).
Advocated to include Supply Chain as specific Risk area within the MAG Risk Management Framework.	Not achieved, Supply Chain risk is spread across multiple other risks areas (operational/financial).	No Action planned.
Assess Suppliers Management Process in MAG and identify gaps.	Procurement & Inventory Framework contains a whole chapter on suppliers management promoting good practices, including a component on suppliers screening, evaluation and selection.	Target: First pilot finalized and second pilot arranged for Procurement & inventory roll-out, this contains the practical procedural and process changes within suppliers mgmt. area. The roll-out will continue progressively into 2022 across all priority programmes (high volume procurement).
Implement its Safeguarding Strategy and work plan, encourage reporting and continuously review learning from its handling of cases.	Completed. MAG's Safeguarding framework implemented, updated etc. Work-plan developed and delivered with regular reporting to the Health, Safety, Security and Safeguarding Board Committee and the full Board as appropriate. Various lessons learnt exercises have been conducted, changes made and additional tools developed. Completed a second independent review on MAG's Safeguarding Culture and Practice. The recommendations of the external review have informed our safeguarding work plan for 2021. Continued to implement our Safeguarding Strategy and work plan, encouraging reporting and continuously reviewing learning from our handling of cases. Further development of in-country Safeguarding Units, for example in Sri Lanka and Iraq, who have their own dedicated Safeguarding Managers, and further development of reporting mechanisms for anyone who comes into contact with our work.	Further embed, and continue to develop, our Safeguarding Strategy and work plan, taking into consideration the recommendations of the recent independent, expert external review. Continued focus on lessons learnt, and continual improvement within our Safeguarding framework. Review our complaints mechanisms, to ensure that anyone who comes into contact with our work can raise a complaint, and it's dealt with appropriately. Ensure that we have appropriate systems for monitoring complaints at an appropriate level, generating useful management information. Continue to develop in-country Safeguarding units where possible, creating a network of experts within the organisation.
Hold regional workshops on safeguarding and will be replicated in each programme. The background checks policy will be launched and training will also be conducted on how to implement it.	Regional workshops were completed, with the exception of West Africa due to Covid-19. However, additional support visits, training and other resources have been developed and deployed. The background checks policy was reviewed and updated, and re-launched, with support given to programmes to implement it. Held workshops on safeguarding (on line and face to face). MAG is implementing criminal record checks on all HQ and Internationally contracted staff, and on national staff where it's possible in the local jurisdiction, and where their role is considered higher risk. Held briefings and ongoing training to HQ and international managers on recruitment and safeguarding. In addition, we continued the training on our Safeguarding Framework for all staff globally, including running regional workshops and on line training during the global pandemic.	Ensure that MAG remains up-to-date on safeguarding best practise, through attendance at training, networking etc. Continue to train staff on areas related to modern slavery, including safeguarding, reporting and safe recruitment, either through induction or on-going annual training. Further embed our background checks policy, ensuring that it is included in national staff handbooks and in-country HR processes. Provide support and training to in-country teams on its implementation.

3. Risk Management Framework

During the course of 2020, MAG set out to update, improve and strengthen our organizational approach to risk management. A Risk Management Working Group was established in 2020 that included board and executive representation to establish a Risk Management framework that is customised to the scope and context of MAG's global operations. MAG has used the ISO 31000:2018 Risk Management guidelines in the development of the framework

The output of this work has produced

- An overall risk management framework
- An updated Risk Management Policy (Dir/POL006) to align with the framework
- Comprehensive Risk Management Procedures to support the implementation of the policy
- An implementation plan to support the effective roll out of the framework

Risks associated with modern slavery are identified with in the risk assessment process and are managed through the application of the suite of policies set out below and MAG's wider HR and Procurement policy frameworks.

4. Risk mitigation

Given that the majority of our work is delivered by our directly employed staff on the ground, with relatively small scale supply chains, we believe that the risk of slavery, human trafficking or exploitation having a connection with our business is relatively low; however, the policies and procedures outlined in this statement further mitigate this risk, to the point that we are satisfied that we are compliant with the Modern Slavery Act 2015.

- i) **Recruitment and Selection Policy:** this policy ensures that all recruitment decisions are made fairly and transparently; that processes are free from all types of unlawful or unfair discrimination and bias to ensure that equality of opportunity is maintained for all candidates and prospective candidates.
- ii) **Remuneration Policy:** seeks to ensure that we pay our people in line with the respective laws, cultures and market conditions of the relevant country context.
- iii) **Financial Misconduct and Crime Policy:** MAG is committed to the highest ethical standards and requires all staff, consultants, trustees, contractors, partners, agents and other associates to be familiar with and comply with both the detail and the spirit of this policy. We have established a 'zero tolerance' culture across the organisation to financial misconduct and crime and all forms of corruption and criminality, including slavery, human trafficking and exploitation.
- iv) **Safeguarding Policy:** MAG is committed to safeguarding the health, wellbeing and human rights of all staff, partners and beneficiaries, and to providing a safe and trusted environment for anyone who comes into contact with our work. The Safeguarding Policy, sets out our approach and refers to a number of policies, procedures and guidelines in place to ensure all individuals who are involved with, or affected by our work come to no harm, distress, abuse and neglect caused by MAG. This Policy was reviewed in March 2021 and the associated policies are:
 - a) **Reporting Malpractice and Raising Concerns (Whistleblowing) Policy:** encourages employees and others who come into contact with our work who have serious concerns to voice those concerns. MAG is committed to ensuring that genuinely held concerns will be thoroughly investigated and those who raise them will be protected against victimisation and discrimination. Concerns can be raised by sending a message to the email address reporting@maginternational.org
 - b) **Policy on Personal Conduct:** sets out the expectations that MAG has of all employees (including trustees, consultants, volunteers) as well as providing examples of behaviours and

actions that will always be unacceptable. This policy also creates an obligation to report any concerns about the behaviour of other staff members. All concerns will be treated with urgency, consideration and discretion. All new staff are required to sign to say they understand the Policy on Personal Conduct.

- c) **Protection of Children and Vulnerable Adults Policy:** any form of abuse towards children or vulnerable adults by MAG representatives or other parties will not be tolerated. The Protection of Children and Vulnerable Adults Policy recognises that all MAG representatives have a duty of care to protect children and vulnerable adults from harm. We have measures in place to prevent and minimise the risk of abuse, protect staff and safeguard the reputation of the organisation. This policy creates a strict obligation on all staff to report any concerns they may have which involve children and/or vulnerable adults. Anyone who is found to have deliberately or accidentally withheld information or prevented full and thorough reporting to have taken place could face disciplinary action.
- d) **Dignity at Work Policy:** all staff should be free to carry out their work with dignity and respect in an environment that is free from discrimination, intimidation, harassment and bullying. In this policy, MAG sets out that it will take a zero-tolerance approach to any behaviours, which compromise these basic rights.
- v) **Procurement Policy (Transparency in Supply Chains (TISC) clause):** We are committed to ensuring that all procurement activities adhere to the principles of value for money, transparency and fair and open competition. We will not trade with any suppliers, which we have good reason to believe exploit people. Our procurement policy is clear that suppliers must comply with local laws and regulations and that all procurement activities are in accordance with MAG's Ethical Statement and Financial Misconduct and Crime Policy.

MAG's Supplier Registration Questionnaire is used to collect all information that enables us to perform key checks on whether our suppliers are linked with terrorist organisations or financial crimes. All suppliers working with MAG are asked to confirm in writing that they will adhere to and respect MAG's policies. This allows MAG to suspend immediately a relationship with a supplier who breaches our ethical and professional standards. Whenever a supplier's behaviour relates to a criminal offence against applicable legislation, MAG will raise the issue with the competent authority and co-operate to provide information that might be needed for an investigation

These standards are in line with the principles and values of the Inter Agency Procurement Group (IAPG) and specifically with the Suppliers' Code of Conduct for IAPG Agencies:
<http://www.iapg.org.uk/vendors/>.

- vi) **Ethical Statement Part I:** This protects MAG from engagement in relationships that have the potential to have severe negative impact on our perceived or actual integrity or reputation. Such relationships are those, which we judge to be in conflict with our achievement, fulfilment or adherence to our stated vision, mission and values and the activities which institutions and individuals fund MAG to undertake. We take reasonable steps to undertake due diligence on providers of services and individuals and organisations providing financial and in-kind support. The Statement sets out our minimum ethical expectations of clients, suppliers, investors, companies, organisational and individual donors. We ensure reasonable due diligence steps to satisfy ourselves that each partnership complies with our Ethical Statement.

5. Due diligence processes

- i) **MAG's Background Checks Policy:** sets out the checks required for all new employees, trustees, volunteers and consultants, before they engage with MAG. This policy was reviewed in 2020 and

MAG will continue to provide training on it, to HR teams and senior managers throughout the organisation. Key elements of this relate to modern slavery and include:

- References
- Criminal record checks
- Identity and right to work checks

ii) **MAG's Partnership Policy:** defines the organisation's approach to selecting and formalising partnerships. This approach mitigates the financial and reputational risks to MAG, and maximises the benefits of the partnership for both parties.

MAG has three types of partnerships: contracted partnership, sub-contracting partnership and association partnership. Our due diligence process ensures that MAG does not enter into partnerships with organisations with a vision, purpose or mission that stand at odds with MAG's own. It also helps to mitigate financial and reputational risks. Any partnership concept should meet basic criteria: the partner and goal of the partnership is compatible with MAG's mission and vision; and that the partnership is unlikely to pose a reputational or financial risk to MAG. MAG will only formally pursue a partnership if these criteria are met.

iii) **Vendor Due Diligence Process:** MAG performs a vetting process to ensure that suppliers are not included in any US or EU list of individuals and organisations involved in supporting or financing terrorist activities or being involved in international crimes. Additionally, for suppliers with whom a significant financial volume is expected to be engaged, an additional review of financial sustainability is performed. MAG has a proportional approach in managing suppliers' related risk, for which the level of controls performed is directly proportional to the overall expected financial volume being potentially engaged and / or the level of potential risk related to the type of goods and services being sourced.

6. Training on modern slavery and trafficking

All new staff undergo an induction programme when they join MAG. This includes a briefing on the key policies that are listed above and training on MAG's other policies, procedures and processes including the Modern Slavery Statement. MAG runs refresher training each year on safeguarding and in local languages. Training is also conducted on effective and safe recruitment practises.

7. Our Commitment

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes MAG's slavery and human trafficking statement for the financial year ending 31st December 2020. It has been approved by our trustees, who will review and update it annually.

Karen Brown
Chair
June 2021