



Modern Slavery Policy

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Introduction

MannionDaniels is a global health and social development consultancy and fund manager. We work to create an equitable, inclusive and sustainable world with a focus on reaching the poor and most vulnerable. We work in partnership with governments, local communities and like-minded organisations to create sustainable solutions with a respect for the natural world.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour. It is a heinous crime and violates fundamental human rights. MannionDaniels have zero-tolerance for any form of abuse and promote the highest ethical principles in every aspect of what we do. MannionDaniels are committed to tackling modern slavery and human trafficking within our operations and supply chains, consistent with our obligations under the Modern Slavery Act 2015.

To embed and promote these principles we have aligned to best practice international ethical standards. We are a certified B Corp organisation, practicing business as a force for social and environmental and we are signatories to the ten principles of the UN Global Compact with respect to human rights, labour, environment and anti-corruption.

This policy describes our approach to preventing Modern Slavery. It applies to all persons working for MannionDaniels, including employees at all levels (whether permanent, fixed-term or temporary), directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, sponsors and business partners.

General Principles

At MannionDaniels, we take a zero-tolerance approach to modern slavery. We have put in place effective systems to ensure modern slavery and human trafficking is not taking place in our own business or in our supply chains. In order to adhere to our commitments, we adopt the following principles and measures to safeguard against modern slavery:

- Implement policies and procedures across our operations to prevent, detect, and report modern slavery and human trafficking in any part of our operations or supply chain
- Assess the areas of potential risk within our supply chain, delivery partners and grant funding schemes and evaluate the capability of our suppliers in respect to Modern Slavery
- Continue to increase our understanding of risk within our sector and supply chain to combat modern slavery and trafficking. Ongoing analysis will allow us to identify increased risks within our contracts and with third parties
- Uphold and promote international Labour rights including Freedom of association and the effective recognition of the right to collective bargaining; freedom from forced or child labour, non-discrimination, occupational health and safety and the right to decent working conditions.
- Comply with all applicable laws and respect internationally recognized human rights including: Freedom of expression; Access to culture; Rights of women and/or girls; Rights of indigenous peoples; Free & prior informed consent; Rights of refugees and migrants
- Raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If it is unclear whether a particular act, the treatment of workers more generally, or their working conditions within our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

Policies in relation to Modern Slavery

MannionDaniels have a suite of ethical and operational policies which are used to prevent Modern Slavery and provide effective controls across the organisation. This include the following:

- **HR policies and Employment Contract:** When recruiting and hiring staff we have a set of HR policies which include pre-employment checks which are relevant to the prevention of slavery in our workforce
- **Prompt Payment Policy:** Our prompt payment policy ensures that suppliers with a valid invoice are paid within 30 days without attempting to change the terms retrospectively
- **Risk Management Policy:** sets out a detailed methodology for assessing and mitigating risks including Modern Slavery
- **Whistleblowing Policy:** Staff and other stakeholders are encouraged to raise concerns. Our Whistleblowing policy is publicly available with a anonymous online or telephone reporting service.
- **Procurement and Due diligence Policies:** Our procurement policy provides a framework for procuring services from suppliers in a responsible way. This includes our approach to due diligence to assess the risk and capability of suppliers in relation to Modern Slavery.

Modern Slavery Assessment

MannionDaniels have adopted the government developed Modern Slavery Assessment Tool (MSAT) to assess the strength of our approach and to help reduce the risk of modern slavery occurring. The MSAT provides a score and identifies areas for improvement. The MSAT is carried out on an annual basis and the recommendations used to strengthen our approach.

Key Performance Indicators (KPIs)

MannionDaniels have adopted the following KPIs to demonstrate our progress in relation to Modern Slavery.

- Complete an annual assessment of our approach to Modern Slavery using the UK Government Modern Slavery Assessment Tool (MSAT)
- Provide Annual training to all staff on Modern Slavery
- Delivery chain map completed for all contracts which identifies any Modern Slavery Risks.

Responsibility

MannionDaniels' Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Director of Operations has primary and day-to-day responsibility for implementing this policy and is supported by the Compliance Manager.

Line managers are responsible for ensuring staff understand and comply with the policy and complete their mandatory training.

Training, Communication and Awareness

Training on this policy is mandatory and provided to all staff. It forms part of the induction training for new starters, and an annual refresher training is mandatory for all staff on an annual basis.



Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship through our procurement and contracting process.

Breach of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with consultants, contractors, partners, suppliers and associated third parties who breach this policy.

Review of policy

The MannionDaniels Group will review this policy annually to reflect new legal and regulatory developments and ensure good practice. This statement was approved by MannionDaniels' Directors.