

Adam Smith International

Modern Slavery and Human Trafficking Statement 2018

Introduction

Adam Smith International (“ASI”) is a global advisory company that works locally to transform lives by making economies stronger, societies more stable, and governments more effective. The ASI group is headquartered in the UK and employs over 400 people worldwide. It partners with thousands of individuals and organisations to deliver its work across Central Africa, East Africa, West Africa, the Middle East, South Asia and the Pacific Islands.

As a company delivering sustainable development, including in fragile states or where there is conflict, we strive to maintain the highest standards of integrity, professionalism and efficiency in carrying out our work. We set out these principles in our [Code of Conduct](#). We see it as our responsibility to support transparency, identify and address risks, regularly review our business practices, and collaborate with others to protect the rights of those who are most vulnerable to abuses such as modern slavery. Beyond basic compliance with applicable employment and labour laws, ASI is committed to working with donors and partners to apply best practice through our supply chains and to use our expertise to help end human trafficking, modern slavery (sex trafficking and compelled labour) and all human rights abuses.

This is our third Human Trafficking and Modern Slavery statement. Our previous statements are available through the [Transparency In Supply Chains website](#). In this statement, we describe the steps we have taken over the past 12 months to identify and mitigate the risks of human trafficking and modern slavery in our supply chains.

This Statement covers our entire global operations including the activities of our network of subsidiaries.

ASI’s commitment to addressing Human Trafficking and Modern Slavery through developments since our last statement



B-Corp

B Corp™ certification is an indication that a company is doing business in a way that meets rigorous standards of social and environmental performance, transparency and accountability and is certified by B Lab, a third party non-profit organisation.

In September 2019, ASI's main operating entity, Adam Smith International Limited, together with its holding company, Adam Smith Advisory Group Limited, earned B-Corp certification after a rigorous 2 year assessment. These entities will be recertified every 3 years through independent assessments.



The Sophie Hayes Foundation

We have partnered with The Sophie Hayes Foundation; a charitable organisation that provides support to female survivors of human trafficking, by empowering them to transition smoothly from statutory emergency care to sustainable freedom through employability. Offering a bespoke coaching, facilitation and training programme, the organisation renews the confidence of trafficked women by equipping them to rebuild independent and purposeful lives without fear.



Development Sector Networks and Forums

We are collaborating with organisations across the development sector on the topic of safeguarding and human trafficking. We are a member of the Cross-Sector Safeguarding Group (CSSG) which brings together representatives from NGOs, the private sector, the UN, research and financial institutions to collaborate and work on the area of Safeguarding.

We also regularly attend the Safeguarding Lead network, a private sector led group borne out of the CSSG and the Human Trafficking Foundation, a network of anti-trafficking experts, NGOs and other organisations that work together to combat modern slavery by providing policy recommendations to HMG.



ASI Staff Council

In our last statement we identified the higher risks of forced or compulsory labour amongst low skilled workers. Our global workforce includes a variety of lower skilled occupations such as drivers in the Democratic Republic of the Congo and cleaners in Pakistan. In 2019, we launched an ASI Staff Council to give all those working for ASI a voice and create an improved channel of communication between employees, the Executive Team, the Board and the Trustees of the ASI Employee Owned Trust. Since our last statement we have also carried out significant work to promote our independent, multilingual Speak Up hotline and all our offices worldwide have posters raising awareness of this hotline which are visible to those in our workforce.

Transparency in Our Supply Chains

Our supply chains consist of third party suppliers, self-employed consultants and partner organisations spread across our global operational platforms.

While we are aware that modern slavery exists in the UK, our supply chain in the UK presents a much lower risk of modern slavery abuses than the potential for those in our international operations across sub-Saharan Africa, the Middle East, North Africa, South Asia and Asia Pacific. We recognise that many countries in these regions are high-risk environments for modern slavery and human trafficking, with high levels of poverty, lack of awareness and weak enforcement of any legislation which may exist to prevent modern slavery and human trafficking.

We strive to ensure that all goods and services purchased as part of programme delivery and ongoing operations are free from modern slavery and human trafficking. We have a thorough supply chain due diligence process with the use of market-leading compliance software to support the screening process for all third parties above a de minimis spend threshold (applicable to all third parties exposed to the risks of modern slavery and human trafficking). As well as ensuring that ASI does not engage any third parties that appear on sanctions lists or other watchlists, this screening software also helps us identify whether our suppliers are known to have engaged in modern slavery or human trafficking.

As part of the screening process, the Third Party Screening Questionnaire requires suppliers and other third parties to confirm compliance with the UK Modern Slavery Act and that the supplier does not promote or practice slavery, forced or compulsory labour or employ anyone under the age of 18.

Speaking Up and Investigations

We can report that no instances of human trafficking or modern slavery have ever been reported or found in our business or supply chains.

Continuous Improvement

We are always seeking ways to improve our approach to mitigating the risks of modern slavery and human trafficking. As part of our 2019/20 approach, we would like to make improvements in the following areas:

- **Partner Code of Conduct**
The ASI Supplier Code of Conduct is being rolled out as part of the Third Party Screening process, which will assist in raising awareness of the need to tackle modern slavery and human trafficking among our suppliers.
- **Programme-level Risk Assessments and Risk Registers**
Safeguarding, modern slavery and human trafficking risks will be embedded into the risk assessments carried out at the inception phase of each programme and will form part of the continuous risk management process, where relevant.
- **Review and update our Background Checks Policy**
We will review and update our Background Checks Policy and process to ensure that low-skilled staff in particular are hired through reputable agencies, if not hired directly.
- **Capacity building**
Building capacity of our supply chain partners is crucial in order to help them understand the importance of ensuring that their own workforce and supply chain is free from modern slavery. Where appropriate, we will work with suppliers to improve their own policies and processes to mitigate the risks of modern slavery and human trafficking.

Conclusion

Our efforts in identifying and mitigating the risks of modern slavery and human trafficking have focused on prevention through our third party screening process and awareness-raising through training and policies, which clearly set out ASI's stance towards modern slavery and human trafficking. Our independent Speak Up hotline has been in place since August 2017 and enables the reporting of breaches that could relate to modern slavery and human trafficking. However, there is more to be done.

We understand that as we continue to gain a better understanding of our supply chains, we will expose further risks of modern slavery and we recognise that we will need to continually renew our efforts to minimise the negative impact on vulnerable people in our supply chain. We are therefore continuously reviewing potential processes to proactively identify and address modern slavery across our operations. Our ongoing commitment means that we will progress year on year in our efforts towards transparency, prevention, identification and mitigation of human trafficking and modern slavery deeper down our supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes ASI's Modern Slavery and Human Trafficking statement for the financial year 1 January 2018 to 31 December 2018.

Signed on behalf of the Board by

A handwritten signature in black ink, appearing to read 'Jonathan Pell', written over a horizontal line.

Jonathan Pell
Chief Executive Officer
Adam Smith International