



AMNESTY INTERNATIONAL

MODERN SLAVERY ACT 2015

STATEMENT

FOR THE FINANCIAL YEAR 1 JANUARY TO 31 DECEMBER 2018

**AMNESTY
INTERNATIONAL**





Amnesty International is a global movement of more than 7 million people who campaign for a world where human rights are enjoyed by all.

Our vision is for every person to enjoy all the rights enshrined in the Universal Declaration of Human Rights and other international human rights standards.

We are independent of any government, political ideology, economic interest or religion and are funded mainly by our membership and public donations.

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FOREWORD

The UK Modern Slavery Act 2015 ('Act') came in to force on 31 July 2015. Amnesty International formed part of a group of civil society organisations which successfully lobbied for the inclusion of section 54 reporting requirement on transparency in supply chains to which this statement relates and which came into force on 29 October 2015. While the reporting provisions were being enacted, Amnesty International argued that they were a step in the right direction but did not go far enough. The provisions do not specify the steps that organisations should take to ensure that modern slavery is not in their supply chains. They only amount to a reporting requirement, allowing organisations to simply declare that they have not taken any steps to look for abuses. In addition, there is no enforcement mechanism for non-compliance and therefore, insufficient incentives for companies to comply. Our research continues to uncover labour rights abuses around the world.

1. ABOUT AMNESTY INTERNATIONAL

Amnesty International is a global human rights movement. Our vision is of a world in which every person enjoys all the human rights enshrined in the Universal Declaration of Human Rights. Our mission is to secure throughout the world the observance of the provisions of the Universal Declaration of Human Rights by undertaking research and action focused on preventing and ending grave abuses of these rights.

In view of the nature and structure of our organisation (described at 1.1 below), our overall assessment is that the risk of modern slavery and human trafficking in our supply chains is low. Nonetheless, there are certain areas of potentially higher risk (discussed further below – section 3.1) and we are committed to improving our practices to combat modern slavery¹, as part of a broader strategy to ensure that our organisation operates to the same high standards of human rights compliance to which we hold states, companies and other groups.

1.1 ORGANISATION STRUCTURE

Amnesty International is a global movement made up of over 60 membership organisations, known as Amnesty International 'Sections', which carry out Amnesty International work at a national level.

The International Secretariat of Amnesty International is responsible for a wide range of functions spanning research, campaigning, communications, advocacy, policy, legal, global governance, growth and development, fundraising and education. It also develops global strategy, policies and standards, and represents Amnesty International externally through the Secretary General. The global movement is joined together through the Amnesty International Statute.

The work of Amnesty International's International Secretariat is organised into two legal entities:

- (i) Amnesty International Limited, a not for profit company registered in England & Wales, limited by guarantee (no. 01606776), with registered office at 1 Easton Street, London WC1X 0DW; and
- (ii) Amnesty International Charity Limited, a not for profit company registered in England & Wales, limited by guarantee (no. 02007475) and a registered charity (no. 294230), with registered office at 1 Easton Street, London WC1X 0DW.

This statement is made in respect of Amnesty International Limited, the entity which employs the staff of Amnesty International's International Secretariat and conducts its global operations (the 'International Secretariat' or 'the IS'), for the financial year 1 January to 31 December 2018 ('FY 2018'). As part of a recent move to distribute the human rights research and campaigning to the relevant geographical regions where we work, the International Secretariat now has offices in 20 locations worldwide set up by way of branch or subsidiary of Amnesty International Limited. These international office locations are: Bangkok, Beirut, Brussels, Colombo, Dakar, Geneva, Hong Kong, Jerusalem, Johannesburg, Kiev, Lima, Madrid, Mexico, Moscow, Nairobi, New York, Paris, Tunis and Washington DC ('Regional Offices'). Amnesty International Sections – mentioned above - are legally independent from the International Secretariat; this statement therefore does not cover those national membership entities.

¹ In this document where reference is made to "modern slavery" this should be read as referring to forced labour or slave-like practices and other forms of debt bondage, as well as human trafficking, as defined by the International Labour Organisation: <https://www.ilo.org/global/topics/forced-labour/definition/lang--en/index.htm>

1.2 OVERVIEW: FACTS & FIGURES FOR FY2018

In this section we aim to provide an overview of our organisation through some facts and figures about our people and our supply chains. This provides the context for the information provided later about our risk analysis and mitigating steps.

Our People

As per Figure 2 below, direct staff costs represent the biggest proportion (58%) of our operational expenditure.

Figure 1² represents a breakdown of our full-time equivalent employees between permanent staff (73%), fixed-term contracts (24%) and agency staff (2%). This shows that a high percentage of our staff are employed on permanent or fixed-term contracts, whilst a small percentage are agency staff. These two factors tend to lower the risk of modern slavery amongst our staff (because the majority are directly engaged by us).

See Section 2.2 for detail on our People Management Policies.

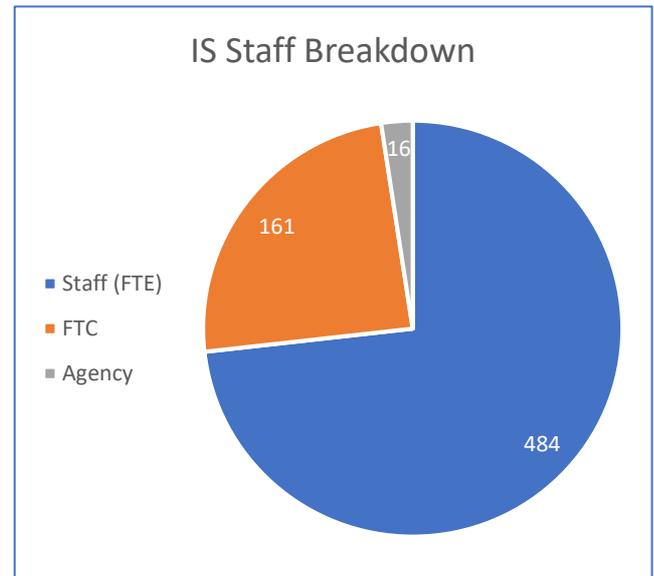


Figure 1

Our Supply Chains

Given the nature of the International Secretariat's activities and outputs, contracts with 3rd-party suppliers are not where we spend most of our money. In fact, of our total operating expenditure ('OPEX') for 2018 (£73.2M), our staff cost (£42.0M) and the cost of grants that we give to other Amnesty entities within our movement (£11.0M) comprised 73% of OPEX, as shown in Figure 2. Activity costs make up the remaining 27% and this is where we spend with 3rd-party suppliers.

At the macro-level then, our engagement with 3rd-party suppliers represents the smallest category of our overall spend – which goes some way to lowering our overall risk profile. Of course, this is not conclusive in itself. We talk more about measures that we have in place to mitigate risks of modern slavery in our supply chains in Section 2, and more specifically around risks and steps taken against them in Section 3.

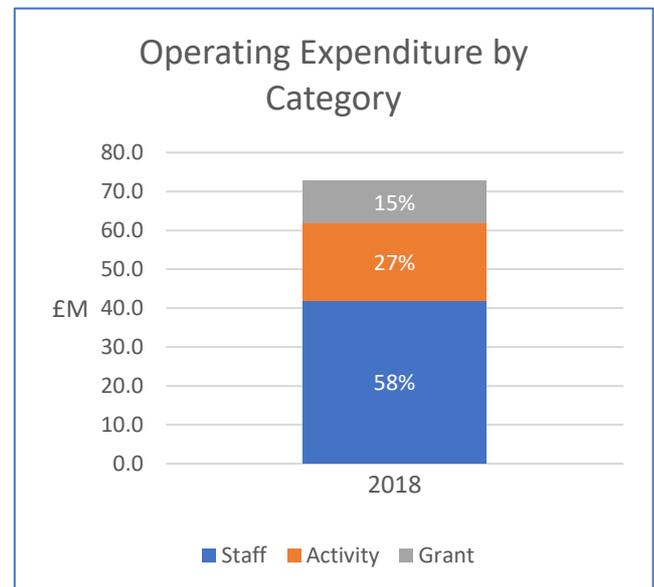


Figure 2

The International Secretariat's major area of supplier engagement is in the form of consultancies and professional services to cover (a) the substantive human rights work; and (b) the operations which support that work. Suppliers therefore vary from experts who assist with human rights research (all consultancy costs account for approximately 15% of activity expenditure), to photographers who provide audio visual content for our publications, to IT services suppliers which support our global operations (which accounts for approximately 13% of activity costs). The purchase of goods is a smaller proportion of our overall activity spend.

² Figures taken as at end December 2018.

1.3 WHERE ARE SUPPLIERS BASED?

We analysed the geographic location of all suppliers engaged in FY2018 and found that the majority are in lower-risk regions, based on our assessment against Global Slavery Index’s regional vulnerability score³ (see Table 5 below). Whilst not conclusive in and of itself, it is an indicator of the overall, relatively low risk profile that we have identified.

Table 1 – FY2018 Suppliers by Region

REGION	%
Europe	49%
South/Latin America	13%
Asia & Pacific	12%
Africa ⁴	12%
MENA ⁵	8%
North America	5%
Central Asia	1%

Figure 3 – Suppliers by Region

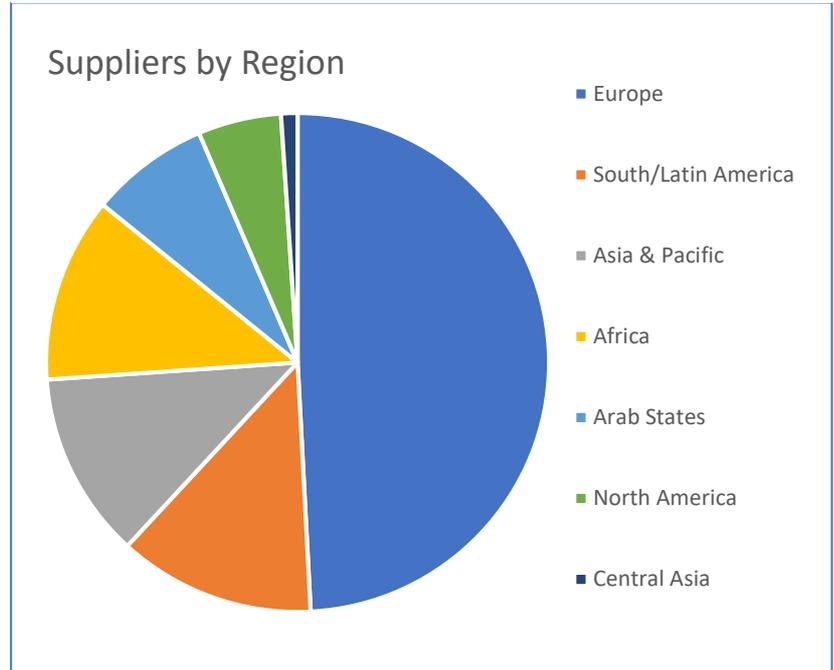


Table 1 – FY2018 Suppliers by Region and Figure 3 – Suppliers by Region show a percentage breakdown of suppliers that we engaged in 2018, and indicate which region suppliers were located in.

We then mapped these locations with reference to the Global Slavery Index’s regional vulnerability score (see Table 2: Suppliers by Global Slavery Index (GSI) Regional Vulnerability scores), and the majority of our suppliers in 2018 were located in lower-risk jurisdictions.

Whilst this does serve to illustrate a lower overall risk-profile, we must and do acknowledge that there are suppliers engaged in regions with a higher vulnerability score and there will continue to be, given we have regional offices in such locations. We also acknowledge that there is still a level of risk in regions with a lower vulnerability scoring. Our procurement policies and procedures apply globally regardless of location, which goes some way to help to mitigate this risk, as discussed below in Section 2.

Table 2: Suppliers by Global Slavery Index (GSI) Regional Vulnerability scores

	GSI'S OVERALL WEIGHTED AVERAGE*	IS SUPPLIERS (%)
AFRICA	62	12%
ARAB STATES	57.2	8%
ASIA AND THE PACIFIC	46.1	12%
AMERICAS	41.4	18%
EUROPE AND CENTRAL ASIA	28.2	50%

*a higher number indicates a higher vulnerability. Scores out of 100.

³ Source data: Global Slavery Index - <https://www.globallslaveryindex.org/2018/findings/regional-analysis/regional-findings/#table:1>

⁴ Africa category excludes North African countries, which are included under the MENA category.

⁵ Middle East & North Africa

2. POLICY, PROCEDURE & CONTROLS

2.1 PROCUREMENT

As an organisation that campaigns on human rights issues globally, we are alive to the risks of modern slavery and continually strive to ensure that we apply the same high standards to our own supplier arrangements as those to which we hold other organisations.

As described in previous statements⁶, we have detailed procurement policies, processes and procedures that have been reviewed and updated from a modern slavery perspective – some in 2018, including our Procurement Policy. These policies apply to all staff across the International Secretariat’s global operations who are responsible for purchasing goods or services from third-party suppliers, including consultants. We continually look to maintain and review those as appropriate.

The Procurement & Contracts team are responsible for implementing and managing procurement related policy and procedure; they also provide direct support in higher value and/or higher risk procurement events. The procurement lifecycle is not fully centralised through this team, meaning that they do not have full oversight of all supplier engagements. The procurement process is embedded within the relevant programme teams in all locations globally – though all are subject to the same procurement policies and procedures.

Pre-contractual checks, due diligence and contractual controls include the following:

- For all contracts greater than £50,000 in value, an external ethical check is commissioned prior to engagement (we carried out 25 such ethical checks in 2018).
 - This is desk-based research independently completed by our 3rd-party provider and forms part of the selection criteria and pre-qualification of potential suppliers.
 - The ethical check covers various aspects of an organisation including environmental, political and animal-rights related topics. It also covers ‘People’ – including human rights, workers’ rights and supply chain management. Companies that manufacture or procure physical products receive a supply chain management rating, which is based on a review of their supply chain policy that covers International Labour Organisation (ILO) conventions.
 - In the event that anything of concern is reported, the supplier is usually asked directly to offer insight and background to the issue, and we will conduct our own desk-based research to inform a final judgement on the issue.
 - Should a supplier fail to adequately address any concern raised during this process, any planned engagement is cancelled – action which we have taken in the past.
- Additional checks, searches or enquiries of potential suppliers and third parties, based on findings from the steps above can be undertaken as necessary – including external ethical checks for contracts lower than £50,000.
- Collaboration with the International Secretariat’s own Business and Human Rights team to identify suppliers / potential suppliers suspected or implicated in human rights abuses. In 2018, this resulted in the organisation refraining from contracting with a major travel company implicated in human rights abuses
- The Supplier Code of Conduct [<https://www.amnesty.org/en/documents/fin20/1182/2015/en/>] (“the Code”):
 - The Code is discussed during the supplier selection process and we obtain written confirmation that the supplier has read and will comply with it.
 - The Code is then included in the written contract (it is included by default in the International Secretariat’s standard terms and conditions).
 - The Code is a minimum standard for all supplier engagements, with the right to terminate in case of breach of the Code.
- A specific modern slavery questionnaire (**‘MSA questionnaire’**) is now issued to suppliers where:
 - Contract value greater than £50,000; or
 - Supplier meets the UK statutory requirement for issuing its own MSA statement; or
 - Supplier falls within a geographical or industry area identified as higher-risk.

The MSA questionnaire asks suppliers about modern slavery risk in their business, in their supply chains and details of their risk management processes. Where relevant, we include tailored questions specific to the goods and/or services they provide (e.g. IT equipment providers are asked detailed queries on the provenance of raw materials and steps taken to ensure transparency in these supply chains). See section 3 below for details of how we used the data received from these questionnaires and any non-responses.

⁶ See e.g. 2017 statement at 1.6

2.2 POLICIES RELATING TO INTERNAL PEOPLE-MANAGEMENT

The staff of the International Secretariat conduct the vast majority of our work directly. For that reason, our internal employment practices are relevant to the risks associated with modern slavery. As of 2018, we now carry out external reference checks on all new staff and volunteers, regardless of contract duration, which includes identity verification.

Detailed information in relation to each of our people management policies was provided in our 2016 Modern Slavery Act statement, and so an overview of each policy is not duplicated in this report. Details of our volunteer policy were included in the 2017 Modern Slavery Act statement.

2.3 REPORTING MECHANISMS

- Implementation and adherence to our Procurement policy, MSA questionnaire and Supplier Code of Conduct is supervised by the Procurement and Contracts team, which consists of two permanent staff members, based in London. Under the Code, a supplier is required to report any human rights abuses to their contact person at the International Secretariat within 14 days of the information coming to their attention.
- Whistle-blowing policy: available to all staff globally via the intranet; enables staff to use internal mechanisms (or an external hotline) for reporting serious concerns they may have regarding wrongdoing, illegal acts, omissions, or serious malpractice by people who work for the organisation. The policy is due to be updated during 2019 in discussion with an International Board member, appointed to review all disclosures made under the policy on an annual basis. Reports can be made anonymously.

2.4 TRAINING & AWARENESS RAISING

In our previous statement, we said that we would consider how best to improve staff engagement with ethical procurement, including the risks associated with modern slavery. In 2018 we delivered ethical procurement training remotely from our London-based Procurement & Contracts team to Sections globally in interactive online sessions. This training covered many aspects of ethical procurement, including Modern Slavery Act 2015 compliance and many of the controls described in section 2 above. Under our Core Standards, Sections are required to have an ethical procurement policy in place and so we share learning and current policy at the International Secretariat to inform the development and continuous improvement of staff throughout the movement. In view of the fact that Sections are legally independent from the International Secretariat, we see our role as promoting awareness and best practice across the movement in relation to ethical procurement including modern slavery issues.

We will continue to deliver this training and will continue to review how best we can develop it and make it more broadly available to staff at the International Secretariat and colleagues in the wider Amnesty movement.

3. RISKS & STEPS TAKEN

3.1 PROGRESS UPDATE

The following table aims to highlight certain activities that have modern slavery-related risks, and shows an update of progress we have made to date in addressing these risks:

ACTIVITY AREA	WHAT'S THE RISK?	PREVIOUS COMMITMENTS (2016-18)	STATUS
Standard & Non-Standard Employee Engagements ⁷	<ul style="list-style-type: none"> • Ensuring those who work for us are who they say they are has a safeguarding perspective: we need to make sure they are not the victims of forced labour • Permanent, temporary and/or agency staff are sometimes engaged through a 3rd party, which may increase the risk that they could be victims of 	<ul style="list-style-type: none"> • Review of people-management policy and procedure, including short-term contracts, interns and volunteers; • Implement any findings following the review 	<p>Complete</p> <p>The review was completed in 2017: we were satisfied that we are managing associated risks effectively, but we committed in last year's statement to implement recommended updates to a number of policies. These updates were completed in 2018. One result is that all types of engagement now require the same augmented level of identity & background</p>

⁷ Permanent, temporary and agency staff; interns and volunteers. Consultants are not included in this category (they are classed as suppliers and subject to procurement processes instead of recruitment and HR policies).

ACTIVITY AREA	WHAT'S THE RISK?	PREVIOUS COMMITMENTS (2016-18)	STATUS
	forced labour and/or trafficking.		checks (including volunteers).
Hotels & Events-related services	We identified this as a high-risk area due to the nature of the industry, which utilises primarily low-skilled, low-paid workers.	<ul style="list-style-type: none"> • Suppliers will be required to fill in our newly developed supplier questionnaire and sign up to our supplier code of conduct (as well as the usual checks through our procurement policy). • Review due diligence processes for venue engagements. • Specific training and support will be provided to the organization's international events team to address specific risks relating to this area. 	<p>In Progress</p> <p>We reviewed the due diligence process for such engagements and found that for higher value/large international events our due diligence process is suitable, though with room for improvement. Another finding, however, was the challenge of ensuring that ensuring smaller and one-off engagements with hotels and smaller event-venues have consistently undergone the same process. We continue to explore ways to address this, including the feasibility of an approved supplier list.</p>
IT Equipment	<p>Raw materials are often sourced / mined in countries and areas where the risk of modern slavery in the supply chain is high.</p> <p>A generic questionnaire risks the audit of suppliers becoming a 'check-box' activity and undermines the effectiveness of the audit.</p>	We previously committed to investigate current suppliers and a key aim for 2018 was to implement a more targeted approach to investigating suppliers, and to develop action plan if modern slavery risks identified.	<p>Complete; to monitor on ongoing-basis</p> <p>With support from our Business & Human Rights team, we created a specific questionnaire that includes targeted questions on risk areas such as source of raw materials. Whilst our investigations did not reveal any instances of modern slavery, we do not treat this finding as conclusive and will continue to monitor and conduct checks where possible.</p>
Printing and Promotional Items	<p>Multi-tiered supply chains are common and can often contain manufacturers in higher-risk locations.</p> <p>In 2018, however, this comprised less than 1% of our activity spend.</p>	<p>Further develop screening and monitoring process for printing suppliers;</p> <p>Develop and implement due diligence reporting procedures for Regional Offices.</p>	<p>Complete; to monitor on ongoing-basis</p> <p>In 2018 formal guidance was introduced for print buying and was distributed to our regional offices. The guidance includes how to ensure the printing is ethically produced.</p> <p>We also maintain an approved supplier list, as detailed in our FY2017 statement, who are put through enhanced due diligence checks. This list has not changed in 2018.</p>
Procurement activities through regional offices in higher-risk locations	Some of our regional offices are located in higher-risk locations (based on the Global Slavery Index (GSI) Regional Vulnerability scores – see Table 5 above).	Develop and implement monitoring processes to ensure that procurement policies and processes are consistently applied across all Regional Offices	<p>Ongoing</p> <p>We completed an update of our Procurement Policy in 2018 which applies globally, and all that we outline in Section 2 above also applies globally.</p> <p>Our audit of suppliers was done in 2018 (see Section 3.2) and included suppliers engaged through our regional offices. As a result, we have a reasonable level of visibility, however we recognise that there is room for improvement.</p> <p>This is not, however, a standalone consideration. How we plan to progress is discussed in Section 3.3.</p>
Provision of grant funds to other parts of the Amnesty	Part of the function of the International Secretariat is to provide funding to smaller Amnesty Sections (where	Review potential risks and implement additional controls within grant procedures as required.	<p>In progress</p> <p>We reviewed this in 2018 and found room for improvement. We issue these grants under a standard agreement with receiving</p>

ACTIVITY AREA	WHAT'S THE RISK?	PREVIOUS COMMITMENTS (2016-18)	STATUS
International movement	member donations tend to be lower). These Sections are run independently of the IS, meaning we have limited oversight of how the money is spent.		Sections: this agreement was therefore updated in 2018 to specifically require Sections to take steps to ensure modern slavery is not taking place in their supply chains.
Workplace Services	We re-tendered our cleaning and security guard service agreements in 2018; given that both services provided by involve low-skilled/low-paid employees through suppliers, we have identified this as a higher-risk area.	We identified this risk area during the course of 2018; as such, no previous commitments were defined in respect of this area.	<p>In progress</p> <p>As part of the tender exercises in question, completed in 2018, our standard due diligence requirements applied. Moreover, we ensured that proactive training, development and staff wellbeing & benefits initiatives constituted a key selection criterion.</p> <p>In 2019, we will:</p> <ul style="list-style-type: none"> • Ensure that a whistle-blowing policy is made available to supplier operatives i.e. cleaners & security guards in our London office. • Ensure that specific whistleblowing posters are prominently placed in areas frequently used by these operatives, translated into languages relevant to the teams servicing our London office. These will also include contact details for the UK Modern Slavery Helpline. <p>A longer-term objective (2019-20) will be the review of all contractors performing these services across our Regional Offices for a targeted risk assessment, with a view to agree further actions we can take to mitigate risk.</p>
Training	Ensuring that our people are sufficiently aware and trained to spot signs of modern slavery and forced labour.	<ol style="list-style-type: none"> 1. Dedicated training on issues of modern slavery, including red-flag indicators to sensitize people to spot signs of increased risk and tell them what to do about it if they do spot something of concern. Available to all IS staff. 2. Update our ethical procurement training, which is shared with wider movement, to include specific red-flag indicators of modern slavery 	<p>Ongoing</p> <p>We held Ethical Procurement training as interactive sessions available to wider colleagues in the Amnesty movement that included modern slavery risk awareness. It also promoted our whistleblowing policies. We will continue to develop and deliver this training in 2019.</p> <p>We aim to create a targeted e-training session available online in 2019 regarding modern slavery and forced labour and associated red-flags.</p>

3.2 FY2018 SUPPLIER AUDIT

We took a risk-based approach to auditing our 2018 suppliers and focused on high-risk, high-spend areas, which we identified to be IT and Travel/Events as outlined in last year's statement. In summary:

- We contacted over 100 suppliers, focusing on our identified high-risk areas (IT, Travel and Events).
- We received a response rate of 25%.
- In addition, we conducted our own desktop research on 41% of the identified supplier list, of which 67% was IT and the rest non-IT suppliers.
- This further research was carried out on a range of both suppliers who had responded and those who had not: the selection was based on a risk assessment that considered CORE guidelines⁸ including business models, operating context and the nature and location of work.

What we found:

- No specific instances of modern slavery have been identified.
- No grievances or complaints have been received in relation to modern slavery.
- Almost 1 in 2 of companies that we carried out our own research on have a Modern Slavery Act statement published on their website (or the parent company's if a subsidiary).
- We saw an increase from 2017 in organisations partnering with anti-trafficking charities to deliver innovative projects aimed at tackling human rights abuses in their supply chains – for example a modern slavery reporting application.

We nonetheless recognise that an absence of reported incidents or concerns is not necessarily an indication of success: it is possible that our investigation and reporting mechanisms could have failed to uncover issues that exist in our supply chains. In areas with long and complex supply chains – such as IT equipment - we have limited visibility of conditions and safeguards in Tier 2 and beyond of the supply chain. Ideally, we would seek to provide better incentives to our suppliers to report any issues and take proactive steps to eliminate modern slavery in their own business model. As a non-profit organisation, our spending and bargaining power is limited, but our unique position as an organisation that researches and exposes human rights abuses globally is something we could further seek to leverage with our own suppliers going forwards. See further commitments at section 3.3 below.

3.3 LOOKING AHEAD & FURTHER COMMITMENTS

As per Section 3.2 – we have made reasonable progress against commitments made in our previous statements, but there are limitations in our current approach that we recognise; progress on some of our commitments has also been slower than previously anticipated. An example of this is on our development of Key Performance Indicators. The specific challenge here is developing indicators that we can ensure are achievable and measurable for our people who execute procurement activities, and that the same can be developed as required from an operations perspective. This has proved more challenging than we previously anticipated.

As we look ahead and consider our future commitments, we must acknowledge the significant organisational changes taking place during the course of 2019 and 2020. This will inevitably have an impact on how we continue to evolve our efforts in mitigating the risk of modern slavery in our supply chains and operations. Whilst it is difficult for us to make ambitious commitments at this time, we will commit to the following:

- maintain and continually review our existing policies, procedures and controls
- continue to audit our suppliers as we have done in 2018 – using a more tailored and risk-based approach
- improving staff awareness, particularly in higher-risk locations, through training engagement
- establish a larger working group in 2019-2020, with representatives from across our organisation in order to effectively coordinate our efforts and support the maintenance of our existing approach. We would envisage that this working group will comprise representatives from at least the Procurement, Recruitment, Business & Human Rights and Workplace teams.

There is also a planned review of internal business systems in 2019, which may impact our monitoring of supply chains and execution of procurement activities. This will also influence our approach and potentially offer new opportunities to evolve and improve.

⁸ CORE, *Beyond compliance: effective reporting under the Modern Slavery Act: a civil society guide for commercial organisations on the transparency in supply chains*, clause, 7 March 2016, http://corporate-responsibility.org/wp-content/uploads/2016/03/CSO_TISC_guidance_final_digitalversion_16.03.16.pdf

This statement is approved by the Board of Directors of Amnesty International Limited



Signed:
Mwikali Muthiani, Chair of the Board of Directors

Date: **27th June, 2019**