



**AMNESTY INTERNATIONAL**

**MODERN SLAVERY ACT 2015**

**STATEMENT**

FOR THE FINANCIAL YEAR 1 JANUARY TO 31 DECEMBER 2020

**AMNESTY  
INTERNATIONAL**





**Amnesty International is a global movement of more than 10 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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First published in 2021

by Amnesty International Ltd

Peter Benenson House, 1 Easton Street

London WC1X 0DW, UK

**AI Index Number: ORG 20/4337/2021**

**Original language: English**

**amnesty.org**

## Contents

Foreword .....	4
1. About Amnesty International .....	4
1.1 Organisation Structure .....	4
1.2 Overview: Facts & Figures for FY2020 .....	5
1.3 Where are suppliers based? .....	6
2. Policy, Procedure & Controls .....	7
2.1 Procurement .....	7
2.2 Policies relating to internal people-management .....	7
2.3 Reporting mechanisms .....	7
3. Risks & Steps Taken .....	8
3.1 Progress Update .....	8
3.2 FY2020 Supplier audit .....	9
3.3 Looking Ahead & Further Commitments .....	10

## FOREWORD

The UK Modern Slavery Act 2015 (the 'Act') came into 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 simply to 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. The limitations to enforcement could be addressed to some extent if there were a more cohesive cross-departmental approach, including enhanced labour market inspection and enforcement, and if all public sector bodies were required to exclude from tendering processes bidders that are non-compliant with S54 of the Modern Slavery Act.

Amnesty International's research continues to uncover labour rights abuses around the world. In 2020, the organisation furthered its work on exploitative labour practices and serious human rights violations linked to the extraction of the minerals used in lithium-ion batteries, particularly in the Democratic Republic of Congo, where we have uncovered cases of children and adults working in artisanal cobalt mines facing health risks. Our investigation linked these mines to the supply chains of many of the world's leading electronics and electric vehicle companies, which use these types of batteries in their products. Amnesty also continued to document and uncover exploitative labour practices on the sites and associated infrastructure of the World Cup 2022 in Qatar, where we have called on the Government of Qatar to implement labour reforms, urged FIFA to use their leverage, and called on employers of construction workers to improve working conditions of migrant workers.

## 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), and the nature of the goods and services procured (as discussed at 1.2 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 slavery<sup>1</sup>, 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 accountable.

### 1.1 ORGANISATION STRUCTURE

Amnesty International is a global movement made up of 64 membership organisations, known as Amnesty International 'Sections', which carry out Amnesty International work at a national level – plus the International Secretariat.

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, 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.

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<sup>1</sup> 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>

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 2020 ('FY 2020'). The International Secretariat has offices in 20 locations worldwide set up by way of branch or subsidiary entities 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'). This statement does not cover Amnesty International Sections as they are legally independent from the International Secretariat.

## 1.2 OVERVIEW: FACTS & FIGURES FOR FINANCIAL YEAR 2020

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 at December 2020 97% of staff were directly employed by the International Secretariat. See Section 2.2 for detail on our People Management Policies.

In previous years we have taken this to be an indication of a lower-risk organisation versus others that rely more heavily on temporary labour and/or labour provided by third parties, where there can be increased risk of exploitation. However, this may be an overly simplistic interpretation that does not address issues such as those of workers misclassified as "independent contractors" (as further discussed in 1.3 below). We will therefore look to adopt a more nuanced analysis of workers provided by third parties or directly engaged by the International Secretariat.

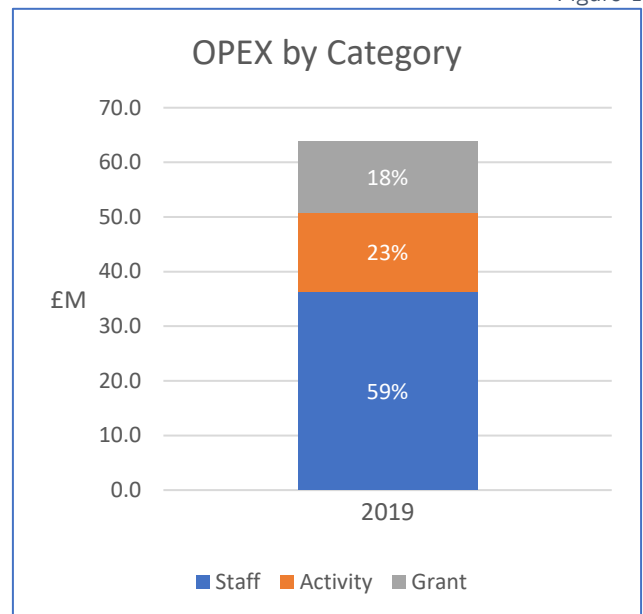
### Our Supply Chains

Given the nature of the International Secretariat's activities and outputs, contracts with third-party suppliers are not where we spend most of our money. Of our total operating expenditure ('OPEX') for 2020 (£63.8M), our staff cost (£36.3M) and the grants that we give to other Amnesty entities within our movement (£13M) comprised 77% of OPEX, as shown in Figure 1. Activity costs - where we spend with third-party suppliers - accounted for 23%.

Our engagement of third-party suppliers represents approximately one quarter of our OPEX which lowers our overall risk profile. This in and of itself is not conclusive. Measures in place to mitigate risks of modern slavery in our supply chains are set out in Section 2, and more specifically around risks and steps taken against them in Section 3.

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

Figure 1



### 1.3 WHERE ARE SUPPLIERS BASED?

We analysed the geographic location of all suppliers engaged in 2020 and mapped this against Global Slavery Index's regional vulnerability score<sup>2</sup> (see Table 2 below).

Table 1: FY2020 Suppliers by Region

REGION	%
Europe	48%
South/Latin America	12%
Africa*	13%
Asia & Pacific	11%
MENA (Middle	7%
North America	7%
Central Asia	2%

Table 1 and the corresponding graph at Figure 2 show a breakdown of suppliers that we engaged in 2020 by which region suppliers were located in.

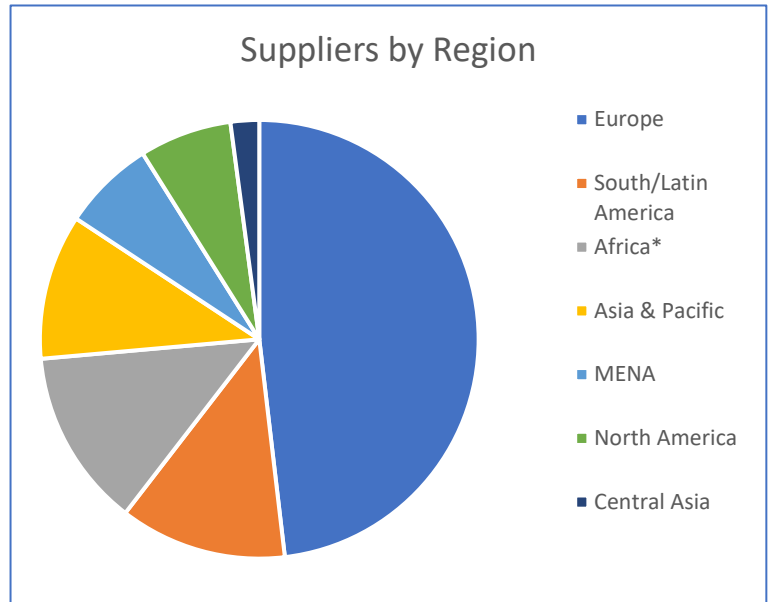


Figure 2

We 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 half of our suppliers in 2020 were located in lower-risk jurisdictions. However, for several years now, the International Labour Organization (ILO) as well as unions, have been raising concerns over the practice of (mainly) digital platform companies to misclassify workers as "independent contractors".<sup>3</sup> In growing case law, courts in several countries, including Spain and the UK, found such misclassification unlawful but the problem of enforcement of these rulings persists.<sup>4</sup> Treating workers as "independent contractors" negatively affects their workers' rights and protections, including the minimum wage, access to paid sick leave, protection from unfair dismissal and maximum working hours.

In addition, 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 a growing level of risk in regions with a lower vulnerability scoring due to continuing increase of non-standard work arrangements with less workers' rights protections.<sup>5</sup> What this highlights for us is a need to renew our underlying risk assessments to capture the changing nature of risks across all geographic locations, and how that intersects with industry/sector risks. We discuss our plans for this effort in Section 3.3.

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

	GSI'S OVERALL WEIGHTED AVERAGE*	IS SUPPLIERS (%)
AFRICA	62	13%
AMERICAS	41.4	19%
ARAB STATES	57.2	7%
ASIA AND THE PACIFIC	46.1	11%
EUROPE AND CENTRAL ASIA	28.2	50%

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

<sup>2</sup> Source data: Global Slavery Index - <https://www.globallslaveryindex.org/2018/findings/regional-analysis/regional-findings/#table.1>

<sup>3</sup> International Labour Organization. 2021. *Platform work and the employment relationship*. Geneva: ILO; Spasova, S. et al. 2021. *Non-standard workers and the self-employed in the EU: social protection during the Covid-19 pandemic*. ETUI aisbl, Brussels

<sup>4</sup> <https://www.legalfutures.co.uk/associate-news/thousands-of-claims-lodged-against-uber-to-enforce-worker-rights>; <https://www.foxglove.org.uk/uber-petition>

<sup>5</sup> ILO. 2021. *World Employment and Social Outlook The role of digital labour platforms in transforming the world of work*. ILO: Geneva. [https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms\\_771749.pdf](https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms_771749.pdf)

## 2. POLICY, PROCEDURE & CONTROLS

### 2.1 PROCUREMENT

As an organisation that researches and 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.

We have detailed procurement policies, processes and procedures that take account of modern slavery risks. 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 and are all subject to the same procurement policies and procedures.

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

- An external ethical check may be commissioned prior to engagement (we carried out 30 such ethical checks in 2020) over and above our own checks.
  - This is desk-based research independently completed by our third-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 human rights, workers' rights, and supply chain management and environmental, political and animal-rights related topics. 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 all core International Labour Organisation (ILO) conventions.
  - If 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.
- Collaboration with the International Secretariat's own Business, Security and Human Rights team to identify suppliers / potential suppliers suspected or 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.

### 2.2 POLICIES RELATING TO INTERNAL PEOPLE-MANAGEMENT

Our internal employment practices take account of the risks associated with modern slavery. We carry out external reference checks on all new staff and volunteers, regardless of contract duration, which includes identity verification by an independent third party.

We intend to undertake a review of our people management policies in 2021.

### 2.3 REPORTING MECHANISMS

- Implementation and adherence to our Procurement policy, Modern Slavery Act questionnaire and Supplier Code of Conduct is supervised by the Procurement and Contracts Manager 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.

The whistle-blowing policy is available to all staff globally via the intranet; it enables staff to use internal mechanisms (or an external hotline) for reporting serious concerns anonymously they may have regarding wrongdoing, illegal acts, omissions, or serious malpractice by people who work for the organisation. The policy was updated in 2019.

### 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 (2020)	STATUS
Hotels & events-related services	<p>We identified this as a high-risk area due to the nature of the industry, which utilises primarily low-skilled, low-paid workers.</p> <p>We previously reviewed the due diligence process for such engagements. We found that our due diligence process for higher value/large international events is suitable, (though with room for improvement). There was a challenge in ensuring that smaller and one-off engagements with hotels and smaller event-venues have consistently undergone the same process. We planned to consider how this could be addressed.</p>	<p>Having formed a Travel &amp; Events cross-functional working group, we had set an objective to establish a list of preferred suppliers in relevant locations globally, subject to targeted due diligence.</p>	<p><b>On Hold</b></p> <p>Due to the coronavirus pandemic, we implemented a travel ban for the majority of 2020 for the safety and wellbeing of our staff and partners. As a result, the Travel &amp; Events working group was put on hold.</p>
Procurement activities through Regional Offices in higher-risk locations	<p>Some of our Regional Offices are in higher-risk locations (based on the Global Slavery Index Regional Vulnerability scores – see Table 2 above).</p>	<p>Whilst our procurement policy &amp; procedures are global and apply to all Regional Office locations, we committed to implementing monitoring processes to ensure that procurement policies and processes are consistently applied across all our locations.</p> <p>We highlighted a key step towards that objective being the Business Systems Integration project leading to a new system for our procurement activities.</p>	<p><b>Ongoing</b></p> <p>The project was launched and is ongoing with an anticipated go-live date of Q4 2021. We discuss this and its potential impact in Section 0.3.</p>
Workplace Services	<p>We had previously identified cleaning and security service agreements as higher-risk engagements, and acknowledge the need to assess this risk globally, having previously taken mitigating actions at our London office when tendering for these services.</p>	<p>We stated that in 2020 and 2021 we aim to review similar service providers in our Regional Offices to perform a targeted risk assessment.</p>	<p><b>In Progress</b></p> <p>It is still our intention to carry out this risk assessment, however it will form part of our wider review of our risk assessment and associated due diligence practices. We discuss this further at section 3.3.</p>
Training	<p>Ensuring that our people are sufficiently aware and trained to spot signs of modern slavery and forced labour.</p>	<p>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 if they do spot something of concern. Available to all IS staff.</p>	<p><b>Delayed</b></p> <p>We did not achieve our objective to provide modern-slavery specific training to raise awareness.</p> <p>We acknowledge the need for this and will factor this in as a key workstream as part of our review discussed at Section 3.3. This will</p>



ACTIVITY AREA	WHAT'S THE RISK?	PREVIOUS COMMITMENTS (2020)	STATUS
		2. Update our ethical procurement training, which is shared with wider movement, to include specific red-flag indicators of modern slavery	not be restricted to awareness raising, and will consider specific needs for those involved in any higher-risk activity from a modern slavery perspective (for example, procuring high-risk services)
<b>Business systems integration project</b>	Kicked-off in late 2019, the Business Systems Integration project aims to integrate and replace two legacy systems, including a finance system within which our procure-to-pay process is executed. This underpins all our procurement activity and means it is vital we ensure it is fit for purpose to effectively mitigate against the risk of modern slavery.	In our previous statement the project was in the early stages, and we committed to ensuring at the very least that existing controls, processes & procedures critical to our ethical procurement approach – including efforts to mitigate against modern slavery – would still be supported on the new system. We also said that our aim would be to improve and strengthen those where possible.	<p><b>Ongoing</b></p> <p>The project is still ongoing and has been a priority throughout 2020 and indeed 2021 at the time of publishing this statement.</p> <p>We upheld those principles of at least maintaining existing controls but have looked to leverage new functionality to improve those.</p> <p>Our expectation is still that the new system will enable greater transparency in the goods &amp; services we are buying.</p> <p>Specifically, we reviewed and updated all categories of procurement spend that the system will hold going forwards, aiming at improving accuracy and detail. This in turn should enable more effective risk-assessment per product/service from the modern slavery perspective.</p>
<b>Whistleblowing policy review and update</b>	All organisations should have a whistleblowing policy which encourages our employees, partners, suppliers, and anyone we work with to report any concerns, including any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The International Secretariat has a whistleblowing policy which enables reports to be made either internally or via an external hotline.	Our current policy was updated in February 2019 and was due to be updated in the latter half of 2020 to increase clarity around our policies for supplier staff/subcontractors. The intention is that the policy should also apply to these individuals, but this is not as clear as it could be at present.	<p><b>Delayed</b></p> <p>Unfortunately, due to a combination of staffing issues and the impacts of the coronavirus pandemic, work on updating policies was delayed.</p>

### 3.2 2020 SUPPLIER AUDIT

Using the same methodology as the previous two years, we took a risk-based approach to auditing our 2020 suppliers and focused on higher risk areas. In summary:

- We contacted 87 suppliers, focusing on our identified higher-risk areas (IT, Travel and Events).
- We received a response rate of 25%.
- In addition, we conducted our own desktop research on relevant suppliers of the identified supplier list, including some who did not respond to our audit request.

What we found:

- During routine due diligence in 2020, we discovered allegations of forced labour in the supply chain of a supplier. We

refreshed the third-party ethical screening and conducted our own further investigation into the allegations and contacted the supplier directly. Based on our findings and the response from the supplier, we were satisfied with the conduct of the supplier in question and their response to it, but we continue to monitor the situation.

- As part of the audit process, allegations against two suppliers were identified and are being investigated further. One is relating to forced labour in supply chains and another relating to worker's rights and the misclassification of 'independent contractors' as discussed in section 1.3. We continue to investigate both cases and the results of these investigations will inform our subsequent course of action.
- No grievances or complaints were made to the International Secretariat in relation to modern slavery.

As we have acknowledged in the past, and although our due diligence processes have uncovered some allegations of concern as described above, we are alive to the fact that our investigation and reporting mechanisms could have failed to uncover other 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 will further seek to leverage with our own suppliers going forward.

We also recognise the need to comprehensively review our initial modern slavery risk assessment of both our operations and our supply chains, which was performed several years ago. This should not be a standalone review of modern slavery as a single issue, but rather a wider reaching risk assessment relating to our approach to ethical and sustainable operations and procurement.

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### 3.3 LOOKING AHEAD & FURTHER COMMITMENTS

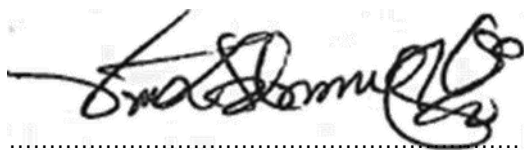
Our Business Systems Integration project will deliver a new finance system that drives much of our procurement activity. This was a primary focus in 2020 and continues to be in 2021/early 2022. This is a significant undertaking and the benefits we hope to realise include increased accuracy and transparency in our supplier spend. It should also enable improved engagement with new and existing suppliers, including our supplier selection processes and criteria. The objectives of the project are broad in scope, but they include ethical & sustainable procurement.

We have identified the need to refresh our organisational modern slavery risk assessment as part of a wider review of our ethical & sustainable procurement approach. To achieve this, we need to:

- Review & refresh the risk assessment including by product/service and geographic location
- Review our analysis of modern slavery risks in our workforce
- Ensure the risks we are assessing are up to date and reflect the realities our operating context and those of the suppliers with which we engage
- Establish a cross-functional working group to leverage our expertise on these issues and to ensure an effective and transparent process
- Develop a long-term plan with appropriate level of senior oversight to appropriately reflect the seriousness with which we take this issue
- Aim to develop a process and methodology that is both informed by expertise in the wider Amnesty movement and that supports Sections to effectively implement ethical & sustainable operations and procurement.

In previous years we have maintained that overall, our operations and supply chain present a relatively lower risk of modern slavery, but we have identified specific areas where we can improve. We hope to implement the learnings from recent years and issues we have discussed in this statement to achieve that across our organisation and, where relevant, across the Amnesty movement and with our partners.

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



Signed: .....  
**Vincent Adzahlie-Mensah, Chair of the Board of Directors**

Date: **18<sup>th</sup> June, 2021**