

MODERN SLAVERY STATEMENT of the Mines Advisory Group

Introduction

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 our recruitment, partnership arrangements and supply chains.

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

- Raise awareness and understanding across our programmes and teams to support and encourage the reporting of any concerns about our supply chain activities
- Understand our exposure to modern slavery risk and put in place appropriate controls
- 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 employ over 5,500 staff, 95% of whom are local nationals. We work in partnership with many different types of organisations to deliver our work, including other international NGOs, local and national NGOs, academic institutions, and state institutions.

Since 1989, MAG has helped over 20 million people in 70 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 12-month period ended 31st December 2021 was £75.0m.

2. Key initiatives

Some of the key initiatives that MAG has in progress that contribute towards addressing modern slavery are:

- Enhancing supplier due diligence
- Supplier management training
- Embedding safeguarding practices across the organization

A summary of progress against actions planned for 2021 are described in **Annex A** to this statement

3. Risk Management

MAG systematically considers our exposure to the risks of modern slavery across the organization within our risk management framework. Working across a wide range of geographical locations and using a mixture of local and international supply chains there is a level of complexity that MAG needs to consider ensuring that we are compliant with the principles of the Modern Slavery Act 2015. To navigate through this complexity

MAG has a range of control and mitigation measures in place to minimise any possible occurrences of modern slavery.

4. Risk control and mitigation

The policies and procedures outlined below are some of the key control measures that MAG has in place to reduce the likelihood and impact of modern slavery in our organization. Through the implementation of these control measures MAG is satisfied that we are compliant with the Modern Slavery Act 2015.

- i) **Recruitment and Selection 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 suite 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.
 - 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 new staff are required to sign to say they understand the Policy on Personal Conduct.
 - c) **Protection of Children and Vulnerable Adults Policy.** This policy recognises that all MAG representatives have a duty of care to protect children and vulnerable adults from harm. Any form of abuse towards children or vulnerable adults by MAG representatives or other parties will not be tolerated. 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.
 - 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:** MAG is 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.

- vi) **Ethical Statement Part I:** 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. Key elements of this relate to modern slavery and include: Reference checks, Criminal record checks, Identity and right to work checks
- ii) **MAG's Partnership Policy:** This policy sets out our due diligence process to ensure that MAG does not enter into partnerships with organisations with a vision, purpose or mission that are at odds with our own. The due diligence MAG carries out checks to ensure partner organisations and key partner staff are not included on any US or EU list of individuals and organisations involved in supporting or financing terrorist activities or being involved in international crimes.
- 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. MAG has a proportional approach in managing suppliers' related risk, for which the level of vetting 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 for all staff 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 2021. It has been approved by our trustees, who will review and update it annually.

Julia Palca
Chair
April 2022

ANNEX: Summary of Progress

Planned actions to 31 st December 2021:	Actions taken:	Planned actions to 31 st December 2022:
<p>Enhanced due diligence process for MAG International Suppliers:</p> <p>Any new international supplier will go through full-enhanced on-boarding process, including engagement on ethical and sustainable business practices.</p>	<p>Due diligence process for international supplier is strengthened and all suppliers provide contractual engagement to key MAG Policies.</p>	<p>No planned actions.</p>
<p>Develop and deliver training on suppliers' management (ethics/safeguarding, etc.). 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).</p>	<p>Due to incapacity to deploy to Programmes throughout 2021 there has been no roll-out at Programmes level. The project has been reviewed and the priority in the short term is to set minimum standards across all Programmes, including enhanced suppliers due diligence and new standard contract templates.</p>	<p>By December 2022 the objective is to have top 10 MAG Programmes in terms of procurement volume to adopt new global minimum standards and use new contract templates.</p>
<p>Assess Suppliers Management Process in MAG and identify gaps.</p> <p>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).</p>	<p>Gap is identified, but strategy to fix the issue is divided in several steps to allow programmes adoption in a combined approach of remote-field deployed support.</p>	<p>By December 2022, the objective is to have top 10 MAG Programmes in procurement volume adopting standard supplier database and contracts follow up tool, increasing visibility on Programme-contracted Suppliers and allowing enhanced verifications and analysis.</p>
<p>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.</p> <p>Review our complaints mechanisms, to ensure that anyone who encounters 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.</p> <p>Continue to develop in-country Safeguarding units where possible, creating a network of experts within the organisation.</p>	<p>Work continued throughout 2021 to embed best practice on safeguarding throughout the organisation.</p> <p>This included implementing improvements to our incident reporting register and reporting mechanisms, a review of policies, continuous training and revision of our safeguarding standards.</p> <p>We have robust systems in place for dealing and reporting of concerns or complaints and we continuously review our practice.</p>	<p>MAG's current safeguarding workplan is in place for 2022 and will continue to embed safeguarding policies and best practice across the organisation to ensure we reach the highest of standards. Our safeguarding work will be alongside our work on Equity, Diversity and Inclusion and embedding our new set of values that will work towards creating safe work environment. This year we also intend to review our recruitment procedure and practice, alongside our induction process.</p>
<p>Ensure that MAG remains up to date on safeguarding best practise, through attendance at training, networking etc.</p> <p>Continue to train staff on areas related to modern slavery, including safeguarding, reporting and safe recruitment, either through induction or on-going annual training.</p> <p>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.</p>	<p>MAG continues to participate in sector wide initiatives such as the Disclosure of Misconduct Scheme and the sharing of best practice across the section.</p> <p>Our induction and refresher training refers to the areas that relate to modern slavery; all new staff receive an induction session and all existing staff are expected to attend refresher training once a year.</p> <p>MAG has implemented a thorough background checks process including references, anti terrorism and, criminal records checks, as part of its recruitment process.</p>	<p>See above.</p>