

# Slavery and Human Trafficking Statement December 2018

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## Introduction

Palladium International Limited supports the Modern Slavery Act 2015 in all parts of its business services. We are committed to preventing the existence or prospect of modern slavery within our organisation and are endeavouring to ensure that modern slavery and human trafficking are not taking place within our supply chains.

This statement is made pursuant to section 54(1) of the UK's Modern Slavery Act 2015 and is Palladium's updated modern slavery and human trafficking statement for the calendar year starting 1st January 2019.

## Our structure, business and supply chains

Palladium International Limited is a private limited company registered in England. It is part of the Palladium group of companies which has corporate offices in the United States of America, United Arab Emirates, Nigeria, Indonesia and Australia, and a presence in more than 60 countries across the globe. Our core business services include business consulting, programme and project management, impact investing and capacity building. We work with corporations, governments, foundations, investors and communities to formulate strategies and implement solutions that generate lasting social, environmental and financial benefits.

Our supply chain consists of external businesses, self-employed consultants and business partner organisations located within the UK and overseas. Due to the nature of our work, we recognise that some of our supply chains operate in high-risk environments for modern slavery including countries with high levels of poverty, a lack of awareness and understanding of human trafficking and modern slavery and weak national systems to monitor and respond to human rights abuses including incidences of modern slavery. Across our operations, we strive to ensure that all goods and services we supply to clients are free of modern slavery through diligent and regularly updated policies, guidelines and mechanisms to detect and prevent modern slavery.

## Progress since 1<sup>st</sup> January 2018

### Our Guidelines

In our 2018 statement we committed to developing Modern Slavery Guidelines and these have been developed and published. These Guidelines provide further information and guidance on the implementation of our Code of Conduct Policy with regards to the prevention of all forms of Modern Slavery and Human Trafficking. The Guidelines are applicable globally to all of Palladium's operations, staff and all

representatives of the company. As well as outlining the duty to comply, these guidelines seek to educate readers on identifying and reporting modern slavery, with links to the Home Office website's 'Truth and Myth' section on modern slavery and human trafficking, as well as recommending links to leading anti-slavery organisations.

## Our Due Diligence Policy

In our 2018 statement we committed to improving our due diligence practices to help us to gather greater information about our supply chain and to build the capacity of our supply chain in this area. Palladium conducts due diligence on all parties with which it enters into business relationships. Our due diligence policy reflects the fact that many of our operating environments are high-risk for modern slavery and human trafficking.

The due diligence we undertake on all organisations we plan to work with on Department for International Development contracts and other UK government contracts includes a section entitled 'Is there any risk related to Modern Slavery?'. We require every organisation that wants to work with Palladium to state whether they are required to issue a Modern Slavery Statement under the Modern Slavery Act and, if so, to provide the URL to the current statement; whether they have a policy, code or statement on modern slavery/human trafficking and if so, how they communicate this policy to their staff and their supply chain; whether they provide training to personnel; and whether they have a procedure for dealing with suspected cases of modern slavery or human trafficking in their supply chain. If the organisation answers 'no' to any of the questions, the organisation must agree to work with us to introduce measures that are appropriate to the size of the organisation and the work they are planning to undertake with Palladium.

## Our risk assessments

Over the last 12 months we have updated our risk assessment policy to ensure that we assess the potential risk of modern slavery and human trafficking in our business development pipeline. This informs our decisions and efforts to mitigate the risk of modern slavery and human trafficking in our supply chain. In addition, our projects are assessed for potential risk in this area and this is an on-going process. Risk assessment is widely based – assessing country risk, industry or product risk as well as supply chain risk.

## Our global commitment

Palladium became a participant of the UN Global Compact on the 22nd January 2018. Palladium is committed to the UNGC initiative and its universal principles and we are building on this to embed these principles in our day-to-day operations and strategy for future growth.

## Looking Forward

We will continue to work to identify opportunities to eliminate modern slavery and human trafficking within our supply chain and our business operations. We have taken steps to increase awareness of modern slavery by embedding it in our due diligence process and we have tested external trainings where we have projects operating in areas we have assessed to be at high risk of coming into contact with modern slavery and human trafficking. In 2019 we will develop a compulsory training for all our teams. This will support our commitment to the eradication, and our effort to raise awareness of, modern slavery and human trafficking.



Christopher Hirst  
Chief Executive Officer - Palladium  
20 December 2018