

# Anti-Slavery and Human Trafficking Statement

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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 our supply chains, through the continuous improvement of our own policies and improved engagement with our suppliers.

This statement seeks to illustrate that Palladium understands its responsibility to go beyond legal compliance and how we are committed to proactively tackling modern slavery in our supply chains. We sought consultation in order to obtain feedback on our approach to reducing modern slavery in our supply chains and reflect this commitment in the comprehensiveness of our annual statement. Palladium's annual statement for 2019 was recognised as being within the top 60% of the UK government's 100 largest suppliers.<sup>1</sup> In 2019 we scored 73% in our Modern Slavery Assessment Tool score, which improved to 81% in 2020.

We are committed to continuous improvement and this year's statement provides a clear roadmap for what we aim to achieve in 2021. Last year we focused on awareness raising within the EMEA company, in 2021 we aim to roll this awareness raising out to our global company. We will be taking a risk-based approach when reviewing all the points in our supply chain where there is a possible intersection with modern slavery

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 2021.

## 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 90 countries across the globe.

Our core business services include business consulting, programme and project management, impact investing and capacity building. We work across different sectors and we work with corporations,

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<sup>1</sup> Sancroft Tussell, *Eliminating Modern Slavery in Public Procurement* (2019) <https://sancroft.com/wp-content/uploads/2017/11/The-Sancroft-Tussell-Report-1.pdf>

governments, foundations, investors and communities to formulate strategies and implement solutions that generate lasting social, environmental and financial benefits.

Currently Palladium International Ltd works with more than 600 organisations across 90 countries. Our supply chain consists of external businesses, self-employed consultants and business partner organisations located within the UK and overseas.

## Reporting against our KPIs

In 2020 we set corporate KPIs to train staff and raise corporate awareness of modern slavery, improve internal reporting mechanisms of incidents of modern slavery, and capacity build our supply chain to improve their modern slavery policies.

**KPI 1:** Training and capacity building of staff about modern slavery issues and increasing awareness

**Target:** 80% of UK employed permanent staff attend online training, completing a test before and afterwards to record whether understanding of the issues and awareness has increased.

**Description:** In 2019 Palladium took steps to improve the understanding of modern slavery and human trafficking with staff operating in areas that we have assessed to be at high risk of coming into contact with modern slavery and human trafficking. We researched available trainings and spoke to third parties about the content, but we found that they did not provide the breadth we needed to train staff across 90 countries. In 2020 we started to develop and test our own bespoke training, and we will roll this out in 2021 as a compulsory training for all UK employed permanent staff. We will collect data and report findings in our 2022 statement.

**Achievement to Date:** During 2020 we conducted 2 awareness raising sessions attended by 150 members of staff. 15 members of staff and a further 20 external researchers were given extensive training on *Understanding Human Trafficking & Unsafe Migration* and *Understanding Safeguarding* in the context of modern slavery.

**KPI 2:** Whistle-blowing hotline and reporting mechanisms monitored for cases involving modern slavery and cases dealt with appropriately and efficiently.

**Target:** 100% of cases recorded through reporting procedures handled appropriately and efficiently.

**Description:** Successful awareness raising training may lead to an increase in reported cases. Palladium is committed to responding to these reports efficiently and appropriately and will report back on figures in our next annual statement.

**Achievement to Date:** No incidents were reported. We do not work in a sector that puts us in the higher risk categories for modern slavery in our supply chain and there were no incidents reported in the last 12 months. We will monitor the data and report on this KPI in our 2022 statement.

**KPI 3:** Capacity building our major suppliers to develop modern slavery policies.

**Target:** 80% of Tier 1 suppliers<sup>2</sup>, without a modern slavery policy or guidelines develop these documents within the first year of being contracted by Palladium.

**Description:** Palladium is committed to the continuous improvement of its policies, and those of its suppliers. We do not enter into contracts with companies that are subject to but do not comply with the UK's Modern Slavery Act 2015. In addition, it is our policy to work with suppliers not covered by the 2015 Act to develop policies and/or procedures where none exist, or to strengthen policies and/or procedures using our own as a benchmark.

**Achievement to Date:** All suppliers and contractors are required to pass our due diligence assessment before being contracted. As part of the due diligence assessment at the beginning of the supplier/contractor

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<sup>2</sup> Tier 1 Suppliers are those organisations who are direct supply partners for Palladium for the UK Government's Foreign, Commonwealth and Development Office (FCDO) contracts.

contracting process and during the contract term, we ask suppliers/contractors to confirm their compliance with the Act. We have encouraged suppliers to indicate their willingness to develop modern slavery policies and/or procedures where none exist and where they are not obligated by law. Our 2022 statement will include quantitative data on the number of suppliers/contractors we have supported.

## Ambition for 2021

We are committed to continuous improvement and in 2021, whilst our business activities might not be high risk for modern slavery, we will review our policies, guidelines and mechanisms to detect and prevent modern slavery in order to ensure that they capture all areas where we believe our supply chain may be at the greatest risk of intersecting with modern slavery.

We are confident that our employment practices protect staff against poor working conditions. We know that precarious work in low-paid, unregulated labour sectors can create conditions for labour abuses to develop, sometimes leading to extreme exploitation and forced labour. In 2021 we will look at those organisations who provide ancillary services to our projects. As part of our procurement processes, we will ask providers to disclose their hiring practices, and we will ensure that final procurement decisions will include a review of these responses, ensuring that staff security remains central to all decision making.

We know that employees are better able to protect themselves against abuses such as poor working conditions and low pay when they are aware of their rights. Through its work in the field of international development, Palladium delivers job creation programming to educate communities about fair wages and employment rights. As part of our contracting for Tier 1 suppliers we confirm an organisation's commitment to our Business Partner Code of Conduct. This includes our expectations for upholding and protecting the rights of employees. In 2021 we will do a review of our policies to see if we identify any gaps and we will document our actions in our statement for 2022.

In 2021 we will continue to collect data and report against the KPIs we set in 2020. We are developing a compulsory global training that will be in addition to our compulsory Code of Conduct training and which will be rolled out this year.

## Key achievements to date

In 2018 we developed and published our Modern Slavery Guidelines. 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.

We strengthened our risk assessment policy to ensure that we assess the potential risk of modern slavery and human trafficking in our business development pipeline. Risk assessment is widely based – assessing country risk, industry or product risk as well as supply chain risk.

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.

We established reporting mechanisms outlined in Palladium's Investigation SOPs and include the need to immediately report any suspected or alleged instances of Modern Slavery, Human Trafficking or Code of Conduct non-compliance using the Company Whistle-blower Hotline: Email: [tellus@thepalladiumgroup.com](mailto:tellus@thepalladiumgroup.com). The whistle-blower hotline is advertised in all offices from which Palladium does business.

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.

In 2019 we strengthened our due diligence process by moving to an online system for all of our UK government funded work (which forms the largest part of our business). This allows us to track data from suppliers, ensures that all due diligence for every supplier is updated on a 6-12 monthly basis and that

suppliers cannot slip through the cracks. We are also committed to carrying out spot-checks and 'deep dives' to gather further information about a supplier and their supply chains. We committed to working with suppliers to develop modern slavery policies where none exist or to strengthen these policies where necessary. Where suppliers are not fully compliant, they are required to provide an action plan highlighting gaps in their process and corrective action they are taking. Gaps identified during the due diligence process are revisited after an agreed period of time (up to 6 months) and, where a supplier fails to fulfil an action plan, we will consider further measures including the termination of our relationship.

Palladium started implementing its first anti-slavery programme and is the implementing partner for the Foreign, Commonwealth and Development Office (FCDO) Stamping out Trafficking in Nigeria (SoTiN) programme. SoTiN closed after 15 months due to the UK government's overseas development assistance (ODA) spending review. However, learning from SoTiN has and will continue to be shared across the organisation to strengthen and contextualise the understanding of modern slavery.

We strengthened our Code of Conduct policy and launched our Sustainable Business Approach. This approach shows how Palladium brings together Diversity and Inclusion, Safeguarding and Environmental policies which, although distinct fields, have shared goals and commitments.

In 2020 we set corporate KPIs to train staff and raise corporate awareness of modern slavery, improve internal reporting mechanisms of incidents of modern slavery and capacity build our supply chain to improve their modern slavery policies. We continue to monitor the data against these KPIs.

This statement under the Modern Slavery Act 2015 was approved by the Board of Directors of Palladium International Limited on 5<sup>th</sup> January 2021.



Rhys Morris

Regional Business Partner for EMEA  
Palladium International Limited