

**Our policy on slavery and  
human trafficking**

March 2021

## Anti-slavery policy

At Agulhas, we take the issues of modern slavery and human trafficking very seriously. We are committed to embedding practices to combat slavery and human trafficking in our business and in our supply chain. We will submit our policies and procedures annually to UK Government for their supplier Modern Slavery Assessment tool which has designated our business activities as low risk. The assessment report is used to set a pathway to improvement including the instatement of key performance indicators to continually improve our corporate approach to modern slavery.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

## Organisation's structure and supply chain

Agulhas Applied Knowledge Ltd. (Agulhas) is a private limited consulting firm registered in the UK. Its headquarters as well as most of its staff are based in the UK. A small proportion of its employees are based abroad including in the US and Kenya. We do not hire staff on a seasonal basis or work in hazardous conditions which could expose people to exploitative employment practices. We are a research-based consultancy company which helps public, private and third sector clients in their international development work. Our core business includes helping clients with organisational development and learning and advising on policy. We also help with the evaluation of international development portfolios and with accountability.

Our supply chain involves professional advisory services, office supplies and IT. Agulhas operates worldwide: our staff travel often in developing countries and we occasionally hire temporary support (interpreters, drivers, researchers) in developing countries. While the nature of our business, as advisers, does not have significant direct exposure to modern slavery risks, some of our supply chains may operate in riskier environments for modern slavery and human trafficking. In addition, we sometimes work in countries where there is a high risk of modern slavery and our analysis and recommendations may impact on anti-slavery and anti-trafficking programming.

## Our Principles in relation to forced and bonded labour, modern slavery and human trafficking

- We are committed to ensure that we are conducting our business in a lawful and ethical manner
- We do not tolerate human-trafficking, bonded labour and modern slavery practices in our business – this includes ensuring freedom of movement, freedom to terminate employment, prohibiting threats of violence, harassment and intimidation, debt

bondage, obligation to work as a disciplinary measure and compulsory overtime as set out in our People and Safeguarding policies

- We will collaborate with contractors and suppliers in our supply chain to mitigate the risks and address cases of human trafficking, bonded labour and modern slavery through the Agulhas Suppliers Code of Conduct and our Due Diligence Process
- We will require all new contractors and suppliers from February 2018 to act in accordance to our values and to this policy, and the Suppliers Code of Conduct
- We will mandate the reporting of suspicion, incidents or risks of modern slavery or human trafficking observed the course of our work, including by third parties, to a Director to consider appropriate further action
- Wherever examples of modern slavery are discovered in our work we will endeavour to facilitate access to remedy, compensation and justice either directly or through the relevant authorities
- We will not retaliate, discharge, suspend or discriminate in any manner any person who will report or make an ethics complaint about our practices
- We will consider the impact on slavery and trafficking risks when making relevant recommendations to clients due to the course of our work.

## Risk assessment and management

Our risk management processes aim to ensure that particular areas of risk in our business and supply chains are identified and impact assessments undertaken before projects start. In cases where a specific ethical concern has been raised, including those related to forced labour, slavery and human trafficking, it will be reported to the company Directors who are responsible for determining the appropriate course of action.

## Effective action and way forward

Agulhas has always sought to operate ethically and to lead by example. This includes being a Living Wage Employer (see [www.livingwage.org.uk](http://www.livingwage.org.uk)) and always paying interns a fair wage. It also includes having procedures to escalate any ethical concerns and issues to the Directors and freedom of employees to terminate employment. Under no circumstances will Agulhas tolerate enforced, debt related or bonded labour or any form of worker-paid recruitment fees or utilise a disciplinary measure including an obligation to work.

On the Agulhas website, we display both this Anti-Slavery Policy and will report annually any recorded incidences of non-compliance internally or via our suppliers.

In acknowledgment of the relevance of these issues, we are taking steps to increase awareness of modern slavery and human trafficking in our supply chain and in our business. We have attended sector-specific workshops, provided a training forum for our employees and commit to continuously improving our system.

**Nigel Thornton, CEO and Director, and Lauren Pett, COO and Director, lead Agulhas' approach to Modern Slavery and update the policies and procedures on an ongoing basis.**

Resources:

- Online published policy: <http://agulhas.co.uk/agulhas-policies-modern-slavery-human-trafficking/>
- Modern Slavery Act 2015 supporting documents: <https://www.gov.uk/government/collections/modern-slavery-bill>
- Agulhas Policies: Risk management, Due Diligence, Supplier Code of Conduct, Recruitment, Equality, pay and performance management

**Directors signatures:**



Nigel Thornton, Director



Catherine Cameron, Director



Marcus Cox, Director



Lauren Pett, Director

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