

**Code of Conduct and
Safeguarding and People
Policy Pack – Anti-slavery
Policy**

July 2023

Introduction and Principles

Agulhas provides evidence-based consultancy and advice to help our clients achieve their objectives in a world of increasing insecurity, inequality and interdependence. In doing so, we commit to providing the utmost levels of professionalism and integrity, operating in compliance to the highest international standards where possible. Our organisational principles, policies and guidelines have been established to help us to do this. All Agulhas people commit to six core principles:

Integrity	We will conduct ourselves in a way in which we can be proud. We will be honest with each other, our clients and ourselves. We will provide challenge where it is needed and praise where it is due.
Respect	We will treat each other and our clients, contractors and communities with respect. We will take the time to listen to others, look for the best in people and strive to empower others to be their best.
Equity	We will be mindful of power imbalances in everything we do. Our approach will continuously evolve, recognising our collective responsibility to unlearn biases and re-learn what it means to be equitable, inclusive and just.
Openness	We will share ideas and good practice. We will raise concerns quickly and deal with them fairly.
Commitment	We will always keep in mind Agulhas's goal of harnessing knowledge and learning for sustainable development.
Effectiveness	We will strive to deliver the highest quality work in the areas where we can use our skills to make the greatest impact. We will continually look for ways to do better: individually; together; and with clients, contractors and communities.

These principles underpin the way we work and the policies included in this pack. Agulhas commits to provide adequate and appropriate resources and training to implement these policies and will ensure they are communicated and understood by all relevant staff and contractors. Agulhas' Directors commit to leading by example and fostering an environment that supports implementation of the policies and of continuous improvement. Agulhas aspires to be a workplace leader by providing clear, practical and proportionate policies developed with the participation of all staff members and made publicly available.

Agulhas will review these policy statements at least annually and more frequently if necessary to reflect new legal and regulatory developments and ensure good practice. Each policy has an assigned a Responsible Officer, to ensure they are up to date and compliant with benchmarks including FCDO and HMG guidelines. The company Risk Register is reviewed quarterly by the Directors. The Directors are:

Lauren Pett (CEO): lauren@agulhas.co.uk
Nigel Thornton (CFO): nigel@agulhas.co.uk
Catherine Cameron: catherine@agulhas.co.uk
Marcus Cox: marcus@agulhas.co.uk

Please send any comments and suggestions for improving our policies to the operations team at sanum@agulhas.co.uk

Our Responsibility

At the heart of Agulhas’s policies is a responsibility to our clients, our community, our people and our environment. We take that commitment seriously and strive to have a positive impact where we work and to be consistent with global standards of integrity and social responsibility. We operate in accordance with the B Corp framework, ensuring our policies and procedures take into account all stakeholders as far as is possible – our Governance structure, People, Customers, Partners, our Community and the Environment. In certifying as a [B Corporation](#), we are using internationally recognised standards and best practice throughout our business operations. This aligns with our Employee Ownership structure and ethos. We certified participants of the [UN Global Compact](#) and as a supplier of services to FCDO, we apply the [FCDO Supplier Code of Conduct](#).

B Lab framework for B Corporation certification



The rigorous BCorp process ensures that Agulhas is meeting high standards of verified performance, accountability, and transparency on sustainability factors including environmental stewardship, employee benefits, charitable giving, supply chain practices and [client] social impact.

Anti-slavery Policy

Previous Versions	December 2022
Last Updated	July 2023
Next Update	July 2025 (or on an ad hoc basis if legal or operational changes require a revision of the policy)
Responsible Person	The responsible person is the CEO. This policy is managed by the Operations Manager.
Scope	This policy applies to all Agulhas employees and associated personnel, including sub-contractors and clients.

Introduction

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 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.

Definitions

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 number of employees may be from time to time based abroad, including in South Africa. 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 ensure that any staff member involved in procurement of goods or services are aware of the risks of Modern Slavery and are aware of the appropriate action to take if they suspect a case of slavery or human trafficking.
- 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 to act in accordance to our values and to this policy, and to the Suppliers Code of Conduct.
- We will mandate the reporting of suspicion, incidents or risks of modern slavery or human trafficking observed during 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 at ensuring 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 lead by example. This includes being a Living Wage Employer (see 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.

We display this Anti-slavery Policy on the Agulhas website 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.

Resources and guidance used by Agulhas:

- Online published policy, [link](#).
- Modern Slavery Act 2015 supporting documents, [link](#).