

Mercy Corps Europe Modern Slavery Statement – 2017-2018

Introduction

In 2015 the UK Parliament took the progressive step of passing the Modern Slavery Act, which UK civil society had campaigned for over a number of years. The Act states that UK organisations with a turnover of £36 million or more must prepare a slavery and human trafficking statement for each financial year of the organisation.

Beyond this legal requirement, Mercy Corps Europe recognises its responsibility and is committed to preventing modern slavery and human trafficking within its organisation, and to ensuring its operations, its supply chain and the programmes which we manage and support are free from slavery and human trafficking.

Organisational Structure

Mercy Corps Europe is a registered charity structured as a registered company limited by guarantee in the UK.

Mercy Corps Europe is part of the Mercy Corps global agency, collectively known as “Mercy Corps”, which consists of two main entities: Mercy Corps, a/k/a Mercy Corps Global (MCG), a not-for-profit organisation with headquarters in the US and Mercy Corps Europe, the UK entity.

Business and Supply Chain

A Mercy Corps exists to alleviate suffering, poverty and oppression by helping people build secure, productive and just communities.

As of 30 June 2017, Mercy Corps Europe employs 89 persons and Mercy Corps globally has over 5000 employees.

Mercy Corps’ supply chain comprises sub-grantees, partner organisations, contractors, outside experts (including attorneys), consultants, agents, representatives and any other organisation or individual that acts on Mercy Corps’ behalf or at Mercy Corps’ direction, known collectively as “Partners”.

Mercy Corps works in over 42 countries and procures a wide range of goods and services from suppliers around the world, including suppliers directly or indirectly in countries deemed to be higher risk on the Global Slavery Index.

Mercy Corps engages in partnerships with communities, government agencies, private businesses and civil society organisations. Partnering can take different forms but the most common types of partnerships entered into by Mercy Corps are strategic partnerships, capacity-building partnerships and project-specific partnerships.

Policies and Procedures

Mercy Corps has policies in place to minimise the risk of modern slavery in its supply chain

Code of Conduct

Mercy Corps' Code of Conduct reflects the values of Mercy Corps and details the high standards of behaviour and conduct we expect of all team members. The Code of Conduct applies to all team members globally and any accompanying dependents sponsored by Mercy Corps. The undertakings in this code that are relevant to the prevention of modern slavery are:

All Mercy Corps team members commit to:

- Interact with other team members with a spirit of equality and mutual respect, refraining from behaviour which could be perceived as discrimination on the basis of race, color, gender, religion, age, sexual orientation, national or ethnic origin, disability including HIV/AIDS status, marital status, veteran status, or gender reassignment status, in keeping with Mercy Corps' Equal Opportunity and Diversity policy.
- Treat all people with dignity (including team members, beneficiaries and the populations of host countries in which Mercy Corps works) and abide by Mercy Corps Unacceptable Behaviour policy, avoiding any behaviour which could be construed as harassment or bullying. Refrain from engaging in any activity which may be exploitative or intimidating. In particular adhering to the Child and Vulnerable Adults Protection Policy and the Prevention of Sexual Exploitation and Abuse Policy.
- For employees, any breach of the Code of Conduct may lead to disciplinary action up to and including termination of employment. For non-employee team members, any breach may lead to early termination of the assignment. reflects
- Respect local laws and customs.

Mercy Corps Anti-Trafficking Policy

It is the policy of Mercy Corps to comply with laws and regulations prohibiting trafficking in persons. Mercy Corps team members and Partners must avoid and are prohibited from active engagement, complicity in or benefiting from any practice that constitutes trafficking in persons. The consent of a victim in trafficking is irrelevant.

The Mercy Corps Field Procurement Policy and Procedures (FP3)

The Mercy Corps Field Procurement Policy and Procedures (FP3) is committed to implementing and maintaining the highest standard of efficiency and integrity in the procurement of Goods, Services, and

Works. It includes as one of its core principle that Mercy Corps will only select Suppliers that uphold basic social rights and working conditions based on international labour standards, and that do not engage in human trafficking or child labour.

Mercy Corps screens suppliers against required restricted party lists as well as Mercy Corps' Graylist using third party software as defined by Mercy Corps' Ineligibility and Compliance Checking (ICC) Policy and mandatory procedures. The Procurement department is responsible for ensuring that Mercy Corps' ICC policies and procedures are followed in the supplier selection process.

Contract templates: Mercy Corps' contract terms include a specific clause under which suppliers acknowledges that Mercy Corps must comply with the Donors' principle of Ethical Procurement including adhering to the minimum ethical standards of the avoidance of child labour, and the respect of basic social rights and working conditions based on international labour standards.

Mercy Corps' Whistle-blower Policy

Mercy Corps expects all employees and Partners to adhere to the highest standards of accountability, which requires honest and ethical conduct. Mercy Corps expects management to maintain a culture that supports and strengthens commitment to these high standards. In accordance with Mercy Corps' Ethics and Whistleblowing Policy, it is the responsibility of all team members to raise allegations of violations or suspected violations of Mercy Corps Code of Conduct Policies, waste and/or mismanagement of funds, abuse of authority, substantial and specific danger to public health and safety caused by Mercy Corps or its Partners, or violations of any law, rule or regulation related to donor requirements, or other illegal conduct (collectively referred to herein as "Violations") in good faith, without fear of retaliation. It is the responsibility of all team members and expectation of all Partners to protect Mercy Corps, its mission and its beneficiaries and donors from Violations and to ensure that Violations are reported and addressed.

Mercy Corps' Anti-Fraud Policy

Mercy Corps expects prohibits and takes a zero tolerance stance towards all forms of corruption, including fraud, theft, embezzlement, unapproved conflicts of interest, false claims, and bribery. Employees who engage in or assist any form of corruption will be subject to discipline, up to termination, and may be subject to criminal prosecution. Partners will be in breach of their agreement with Mercy Corps and may have their agreements terminated, be prohibited from working with Mercy Corps in the future and/or be subject to criminal prosecution.

Mercy Corps Anti Bribery Law

Mercy Corps prohibits and takes a zero tolerance stance towards accepting or requesting any form of bribe from any person or organisation and giving, offering, promising, authorising or assisting any form of bribe to any employee of any organisation, including any government official.

Policies for working with Partner Organisations

Mercy Corps has in place policies and procedures for working with Partner Organisations which are designed to reduce the risk of modern slavery and human trafficking.

The Mercy Corps Due Diligence process of Partner Organisations includes assessments of their financial and programmatic capacity, systems and processes. These assessments include sections on Safeguarding and Ethics, HR, and procurement.

Mercy Corps Response

Mercy Corps works in many countries that are affected by conflict, weak governance, poverty, migration and these contexts present an elevated risk of modern slavery. Mercy Corps takes appropriate measures to safeguard against these risks, through our supply chain and recruitment procedures and through monitoring by country level teams, internal audit and external statutory audits.

Mercy Corps raises awareness of slavery and human trafficking through its policies and training. As part of the on-boarding process, Mercy Corps informs all team members about the commitment to combating trafficking-related activities and what actions are prohibited. Additionally, flyers that set out our requirements on prohibited conduct and how to report it are displayed in a visible location in all Mercy Corps offices.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Mercy Corps Europe's modern slavery and human trafficking statement for the financial year 01 July 2017 to 30 June 2018 and covers all the activities of Mercy Corps Europe.

Approved by the Board on 21 June 2018



Signed on behalf of the Board by Thomas Kenneth Murray, Chairman