



AMNESTY INTERNATIONAL MODERN SLAVERY ACT 2015 STATEMENT: FINANCIAL YEAR 1ST JANUARY – 31ST DECEMBER 2022

FOREWORD

Through its research and advocacy Amnesty International has continued to expose labour rights abuses and campaign for strengthening workers' rights protections around the world. For example, in 2022, the organization furthered its work on exploitative labour practices and serious human rights violations linked to the Qatar World Cup 2022, launching a global campaign calling on FIFA to fulfil its responsibility to provide remedy for victims of forced labour and other labour abuses in the context of the tournament. Amnesty International also published new analysis of the Government of Qatar's progress on protecting migrant workers from such abuse and provided a roadmap of action needed to fulfil its promises in this regard, and initiated labour rights investigations in the wider Gulf region. Other recent examples of labour rights abuses covered by Amnesty International include widespread violations suffered globally by health workers during the Covid pandemic; the exploitation of migrant domestic workers in Lebanon; gender discrimination in the Hungarian workforce; various abuses in the nickel mining sector in the Philippines and child labour in cobalt mines in the DRC.

1. ABOUT AMNESTY INTERNATIONAL

Amnesty International is a global human rights movement. Our vision is of a world in which every person enjoys all the human rights enshrined in the Universal Declaration of Human Rights. Our mission is to secure throughout the world the observance of the provisions of the Universal Declaration of Human Rights by undertaking research and action focused on preventing and ending grave abuses of these rights. Amnesty International would be unable to carry out its human rights work without the time, energy and financial resources which our 10 million members, supporters, activists and volunteers generously give.

In view of the nature and structure of our organisation (described in Section 1.1), and the nature of the goods and services procured (as discussed in 1.2) our overall assessment is that the risk of modern slavery and human trafficking in our supply chains is relatively low. Nonetheless, there are areas of potentially higher risk, and we remain committed to improving our practices to combat modern slavery,¹ as part of a broader strategy to ensure that our organisation operates to the same high standards of human rights compliance to which we hold states, companies, and other groups.

In this section we aim to put this statement in context by providing an overview of our organisation and our supply chain.

1.1 ORGANISATION STRUCTURE

Amnesty International is a global movement made up of 71 membership organisations, known as Amnesty International "Sections", which carry out Amnesty International's work at a national level – plus the International Secretariat ("the IS").

The International Secretariat of Amnesty International is responsible for a wide range of functions spanning research, campaigning, communications, advocacy, policy, legal, global governance, growth and development, fundraising and education. It also develops global strategy, policies and standards, and represents Amnesty International externally through the Secretary General. The global movement is joined together through the Amnesty International Statute.

The work of Amnesty International's International Secretariat is organised into two legal entities:

- (i) Amnesty International Limited, a not-for-profit company registered in England & Wales, limited by guarantee (no. 01606776), with registered office at 1 Easton Street, London WC1X 0DW; and
- (ii) Amnesty International Charity, a not-for-profit company registered in England & Wales, limited by guarantee (no. 02007475) and a registered charity (no. 294230), with registered office at 1 Easton Street, London WC1X 0DW.

This statement is made in respect of Amnesty International Limited, the entity which employs the staff of Amnesty International's

¹ In this document where reference is made to "modern slavery" this should be read as referring to forced labour or slave-like practices and other forms of debt bondage, as well as human trafficking, as defined by the International Labour Organisation: <https://www.ilo.org/global/topics/forced-labour/definition/lang--en/index.htm>

International Secretariat and conducts its global operations, for the financial year 1 January to 31 December 2022 (“FY 2022”). The IS has offices in 17 locations worldwide set up by way of branch or subsidiary entities of Amnesty International Limited. These office locations are London, and: Bangkok, Beirut, Brussels, Colombo, Dakar, Jerusalem, Johannesburg, Madrid, Mexico City, Nairobi, New York, Paris, Riga, Seoul, Tunis and Washington DC (“Regional Offices”). This statement does not cover Amnesty International Sections as they are legally independent from the International Secretariat. However, the statement will be shared with our Sections as part of a strategy to raise awareness and build capacity to manage modern slavery risk across the Amnesty International movement.

1.2 OUR SUPPLY CHAIN

In 2022, our total Operating Expenditure, or OPEX was £65m. Our staff cost comprised the majority of this expenditure at £43.1m or 66%. Activity costs, or expenditure with third-party suppliers, accounted for £21.8m or 33%.

The International Secretariat’s major area of supplier engagement is in the form of consultancies and professional services to cover (a) substantive human rights work; and (b) operations which support that work. Suppliers therefore vary from experts who assist with human rights research, to photographers who provide audio visual content for our publications, to IT services suppliers which support our global operations. The purchase of goods is a small proportion of our overall activity spend.

Our engagement of third-party suppliers represents approximately one third of our OPEX which, generally, reduces our overall risk profile. A degree of risk is, however, still present. Measures in place to mitigate the risk of modern slavery in our supply chains are set out in Section 2.

We have identified the highest areas of risk in our supply chain, due to modern slavery risks present in any tier of the supply chain, as the following:

Temporary Labour; Conference Space/ Venue Hire; IT Consumables; IT Hardware; Print & Merchandise; Accommodation; Building Repairs/Maintenance & Building Equipment; Building Security; Catering Supplies; Cleaning & Cleaning Consumables; Courier/Postage; Storage & Archiving; Facilities CAPEX; Mechanical & Electrical (M&E); Office Consumables & Equipment; and Waste, Recycling & Utilities

We have identified these areas as high risk as some parts of these supply chains involve minerals which could be from conflict-affected areas; or, they are staffed by low-paid workers who may lack autonomy over their job or may be subject to a power imbalance.

1.3 WHERE ARE SUPPLIERS BASED?

Given Amnesty International’s roots and large staff presence in London, 54% of the IS’s suppliers are based in the UK.

The geographical spread of our supplier base and the associated risk of modern slavery in each location is shown below using data from the [Global Slavery Index’s most recent Regional Vulnerability Score](#).

Suppliers by Global Slavery Index (GSI) Regional Vulnerability Scores, whereby a higher number indicates a higher vulnerability. Scores out of 100.

	GSI’S OVERALL WEIGHTED AVERAGE	IS SUPPLIERS
AFRICA	62	4%
AMERICAS	41.4	11%
ARAB STATES	57.2	4%
ASIA AND THE PACIFIC	46.1	6%
EUROPE AND CENTRAL ASIA	28.2	75%

2. POLICY, PROCEDURE & CONTROLS

2.1 PROCUREMENT

As an organisation that researches and campaigns on human rights issues globally, we are alive to the risks of modern slavery and continually strive to ensure that we apply the same high standards to our own supplier arrangements as those to which we hold other organisations.

We have detailed procurement policies, processes and procedures that take account of modern slavery risks. These policies apply to all staff across the IS’s global operations who are responsible for purchasing goods or services from third-party suppliers.

The Procurement & Contracts Manager, based in London, is responsible for implementing and managing procurement-related policy and procedure. The procurement lifecycle is not fully centralised through the Procurement function, which means that it is not realistic to obtain detailed oversight of all supplier engagements, although direct support with higher value and/or higher risk procurement activities is provided. The procurement process is embedded within the relevant programme teams in all locations globally and programme teams are all subject to the same procurement policies and procedures.

New suppliers undergo an ethical screening that is proportionate to planned expenditure and complexity, and a Modern Slavery Questionnaire is issued as part of higher risk tenders. If there are adverse findings from due diligence, Amnesty International would not proceed to engage that supplier.

Suppliers of goods or services to the IS are required to confirm their acceptance of Amnesty International's [Supplier Code of Conduct](#) ("the Code"), which includes anti-slavery and human trafficking provisions. Reference to the Code is included by default in Amnesty International's standard terms and conditions. The Code provides that Amnesty International may terminate its relationship with a supplier if a supplier breaches the Code.

2.2 POLICIES RELATING TO INTERNAL PEOPLE-MANAGEMENT

Our internal employment practices take account of the risks associated with modern slavery. We carry out external reference checks on all new staff, regardless of contract duration, which includes identity verification by an independent third party.

Volunteers are managed at Amnesty International according to a set of guiding principles.

2.3 REPORTING MECHANISMS

Adherence to our Procurement Policy and Supplier Code of Conduct is supervised by the Procurement and Contracts Manager. Under the Code of Conduct, a supplier is required to report any human rights abuses to their contact person at the International Secretariat within 14 days of the information coming to their attention.

The whistle-blowing policy is available to all staff globally via the intranet; it enables staff to use internal mechanisms (or an external hotline) to report anonymously any serious concerns they may have regarding wrongdoing, illegal acts, omissions, or serious malpractice by people who work for the organisation.

3. RISKS & STEPS TAKEN

Since the publication of our last statement, we have commenced a number of activities to review and refine our internal approach to modern slavery prevention.

A cross-functional Modern Slavery Act Working Group ("the Group") is in place, comprised of members of Amnesty's Procurement, Legal, Business & Human Rights, and Economic & Social Justice teams.

The Group has the following objectives:

- Re-assess the risk of modern slavery per procurement category
- Review risks per geographical location
- Update and re-circulate to staff the key policies that relate to modern slavery risk
- Develop a network of Modern Slavery Prevention Ambassadors to increase internal awareness of the topic and how it relates to our own supply chain
- Re-deliver training about modern slavery risk and mitigation to key stakeholders globally

The Group meets every 6-8 weeks and since its establishment has worked on the following activities:

Activity Area	Challenge	Progress
Re-assess the modern slavery risk ranking per location	Understanding that our main point of reference was the Global Slavery Index from 2018, the group seeks other reliable sources of data that are more up to date.	Work continues to explore useful resources and datasets to obtain a snapshot of high-risk geographies.
Re-assess risk ranking per purchase type	The risk ranking per category was set in 2015 so required revisiting.	The Procurement component of our Business Systems Improvement project went live in February 2023. The Group has re-examined high risk areas of spend,

		using the more detailed categorisation allowed by the new Finance system. The risk ranking per procurement category will help to determine the depth of due diligence required for each type of purchase.
Review the Modern Slavery Questionnaire, when it is used, who by, and what to do with results	The Group recognised that the Questionnaire developed initially does not yield rich enough data and is too often seen as a “checkbox” exercise by those completing it.	A subset of the Group reviewed the questions in the Modern Slavery Questionnaire and provided recommendations for improvements, which are currently being actioned.
Update the Whistleblowing Policy	The Whistleblowing Policy from 2019 requires a routine review and the Group seeks to strengthen the provisions for reporting suspected instances of Modern Slavery.	A review of the policy is underway.
Develop Modern Slavery Awareness Training and roll this out to key staff	Ensure that IS staff are aware of the risks of modern slavery in our own internal operations and that they are aware of the warning signs.	Training has not yet been delivered due to time constraints caused by the Business Systems Improvement project.
Develop a network of Modern Slavery Prevention Ambassadors to increase global awareness of the topic across the IS Regional Offices	Modern slavery prevention work is currently too UK-centric as the Procurement & Contracts Manager is based in London. To be most effective, global voices should be heard.	As above, efforts to create a network of internal ambassadors for modern slavery prevention are on hold due to time constraints caused by the Business Systems Improvement project and limited resources in Regional Offices.
Update the Supplier Code of Conduct to enhance the modern slavery prevention commitments	The existing Supplier Code of Conduct requires a routine review and greater specificity about our expectations for our suppliers regarding modern slavery.	A review of the Supplier Code of Conduct is underway.

3.1 INCIDENTS INVESTIGATED IN 2022


No incidents within our own supply chain were reported to the International Secretariat or investigated in 2022.

3.2 SUMMARY

Having formed a Modern Slavery Act Working Group, interest in and action on the topic of modern slavery risk mitigation and prevention within Amnesty International’s own supply chain is evolving.

Though time and resource constraints limit the speed at which improvements can be made, our approach to policy and risk mapping has advanced since our previous statement. We remain committed to securing human rights for all, especially within our own supply chain.

This statement is approved by the Board of Directors of Amnesty International Limited.

Signed: 
Anjhula Mya Singh Bais
Chair of the International Board
Amnesty International

Date: 16 May 2023