Our approach to Modern slavery and human trafficking
Coffey welcomes the opportunity, provided by the Modern Slavery Act (MSA), to open up the conversations it has been conducting regarding its supply chain sustainability.

We believe that all large international institutions are likely to be affected by modern slavery issues. Only by engaging in honest, supportive and collaborative dialogue within and across industry sectors about these problems, will we begin to fully understand the challenges we all face and be able to design sustainable solutions.

I have approved this statement for publication.

Ben Ward
Managing Director
Coffey International Development Europe

- We are part of the Tetra Tech group, which for over 30 years has provided solutions in the water, environment, infrastructure, resource management, energy and international development sectors.
- Our work helps to improve agricultural productivity and drive economic growth.
- Our projects seek to mitigate the effects of climate change, encourage democracy and better governance, create sustainable energy solutions and protect the natural environment.
- We also help indigenous people with land tenure and property rights issues, secure water supplies and sanitation, create harmonious architecture through our engineering, and construction services, and help to bring security to those living in fear.

- Our aim is to work with our colleagues, suppliers and competitors to reduce the exploitation and abuse that characterises modern slavery and to raise awareness throughout the supply chain of just how serious an issue this is.
- We are trusted partners to our clients, including the UK’s Department for International Development (DFID) and Foreign and Commonwealth Office, and the European Commission.

We facilitate international development projects all over the world.
Coffey is committed to maintaining business practice standards that honour and protect the dignity and integrity of everyone with whom the company conducts business, employs, and serves. This includes an opposition to slavery and human trafficking in any form.

As an organisation, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. We are committed to preventing slavery and human trafficking in all our activities and ensuring that our supply chains are free from slavery and human trafficking.

Everyone who works for or with Coffey must be left in no doubt that we will not tolerate any form of labour abuses within our organisation and that we will work to highlight and eradicate such abuses wherever we find them.

We build our Modern Slavery Act policy into our practices

Our Modern Slavery Statement covers two areas of focus in which we work to ensure that:

- **the supply chains in our consultancy services** are corruption and slavery free, which often take place in challenging locations.

- **the goods and services we procure** to help improve productivity, efficiency and routes to market for beneficiaries of DFID aid projects, are as far as practicable - corruption and slavery free.

We conducted an internal investigation into the goods and services we procure within the UK, and found that these present a low risk of modern slavery abuses. This statement is therefore focused on our work overseas, although we will keep this position under review for our 2018 statement.

At the end of 2016, Coffey UK had live projects with long term in-country teams in the following countries:

- Pakistan
- Afghanistan
- Kenya
- Nigeria
- Sierra Leone
- South Sudan
- Zimbabwe
- Somalia
- Ethiopia

Our commitment to understanding the risks to our business from modern slavery comes from the very top of the business. Our Managing Director, the board and the shareholders view this issue as critical to our success. We see it as an opportunity to examine our practices and procedures, honestly observe the mistakes we make and commit to a program of continual improvement.
Coffey has sought specialist advice and guidance from reputable national and international organisations to make sure that our policies and procedures are industry-leading.

**Transparency International**

We have worked with TI to design an anti-bribery training course that is now part of Coffey’s internal training and development program. It is monitored and updated to ensure that all employees are aware of their responsibilities.

Anti-bribery policies and procedures are also central to the fight against modern slavery as many of the practices overlap and intersect.

**Clarkslegal LLP Sustainable Supply Chain team**

We worked with the specialist Supply Chain team at Clarkslegal, to better understand and manage our modern slavery risks. The team - which is led by James Sinclair and the Chairman, Michael Sippitt - has contributed to the development of Coffey’s MSA statement and, as a result of their engagement, we will be rolling out a program of policy developments during 2017/18.

James is an international human rights lawyer and co-founder of a UN award-winning ethical employment organisation. He has over a decade of experience developing sustainable supply chains in challenging environments.

Michael is chairman of Clarkslegal and a director of Forbury People, a specialist HR consultancy practice as well as Chairman of the Commonwealth Environmental Investment platform.

**Working with others**

One aspect of the Modern Slavery Act reporting process that is of particular interest to Coffey is the opportunity to innovate and collaborate with customers, peers and NGO groups.

Coffey is aware of the work of the Institute for Collaborative Working and is looking forward to the imminent publication of ISO44001, the international standard for collaborative working.

It is vital that the business community learns from the experiences of others, both within sectors and across sectors. Coffey will certainly play its part in helping to develop and disseminate the knowledge base in the area of modern slavery.

**Building capacity**

We firmly believe that the fight against modern slavery requires involvement from all levels of our business and our supply chain.

It is not enough that we set an example: we must build robust and sustainable infrastructure in the countries in which we operate. This will provide vulnerable communities with the tools to protect themselves from exploitation and abuse.

We seek to build capacity both within our own organisation and within the organisations we are seeking to help with donor funding.
For example, in the waste recycling sector we have partnerships with waste collecting and aggregating firms, with plastic manufacturing companies, with State Governments, with cooperative groups for women and youth. In turn there are further partnerships and suppliers down the chain.

Working in a sector like waste recycling, in a developing country context, we are aware that there is heightened risk of irregular working practices, such as use of child labour. Our partnership agreements have clear clauses relating to our zero tolerance in this regard, and the risk is monitored and checked as part of our wider risk monitoring framework.

Capacity building
We are also assisting the small agricultural, retailing and waste management businesses to build their capacity and improve their productivity and routes to market. Our commercial assistance networks on the programme are helping to increase capacity and embed resilience both in young entrepreneurs and project staff, to ensure that the local economy grows and provides sustainable employment and incomes for years to come.
Areas of concern

Irregular workers

The use of day-laborers or other unofficial workers is a common practice in many developing countries.

While irregular workers can be a source of efficient and flexible labour, they can also be vulnerable to abuse and exploitation.

We seek to source our workers through recognised and credible systems, where we are able to keep records of their terms of engagement, and work with our partners and suppliers to help them maintain similar standards.

Cash payments

The use of cash is unavoidable, particularly in many developing countries where sophisticated banking facilities may not be trusted or accessible. The risks associated with cash payments are significant, however, as they can easily be intercepted or used inappropriately – particularly in the facilitation of modern slavery practices.

Where possible we use electronic payment systems, mobile phone payments and other forms of micro-banking, which help to ensure that payments are made and received in full, on time and in a way that can be audited and monitored.

Where the use of cash cannot be avoided, we ensure that our staff and partners are aware of the risks associated with cash payments and are vigilant about recording and monitoring transactions.

Child labour

In some of the countries where we operate there is a risk of child labour and other forms of exploitation.

When Coffey starts working with new partners and suppliers, we make it very clear that nobody under the minimum legal age should be employed on our projects.

Where we have identified a high risk of child labour – whether because of the nature of the project or because of the location – we will institute an elevated due diligence protocol.

The use of child labour is a serious human rights violation and we are committed to ensuring that our operations do not contribute to this.
Mitigation efforts

Conflict of Interest and Anti-bribery Policy
Coffey has a comprehensive anti-bribery policy, which helps staff and relevant project partners to understand their obligations under the Bribery Act 2010.

This policy has been incorporated into a comprehensive anti-bribery and corruption learning and development module that is delivered to all staff and key partners as part of our training schedule.

Monitoring, evaluation and remedy
Coffey is acutely aware that harm reduction measures must include effective monitoring and remedy procedures. The nature of our work means that we are often operating in challenging environments, where exploitation and abuse is common. If a project is considered high-risk, we will activate a more intensive monitoring program to ensure that the projects we are facilitating progress appropriately. This might include more active contact with our personnel on the ground and/or closer monitoring or auditing of the project.

It is vitally important that we react appropriately if and when we encounter such abuse. We have a robust set of internal protocols that trigger responses to allegations of improper conduct. This recognises that some violations are worse than others and that responses need to be graduated and fair to all parties.

The ultimate sanction would be to terminate a contract or project. However, we recognise that this may have unintended consequences and that a better course could be to impose a remedial structure onto the project with close scrutiny.

Employee code of conduct
This document requires all Coffey employees to act in accordance with all relevant national and international laws and to abide by the specific codes of practice; e.g. in relation to bribery and equality of opportunity.

Whistleblowing policy
We want all of our staff to feel that they can safely expose any wrongdoing that they encounter at Coffey.

The policy, which is provided to all staff members, gives detailed support and guidance on the whistleblowing procedure. The policy is clear that any matters raised will be investigated quickly and confidentially.

Employee engagement and employment
Coffey is passionate about empowering its staff to take responsible and ethically sound decisions. We recognise that sometimes urgent decisions have to be taken without reference to senior management personnel. As such, we strive to ensure that all local managers are trained to understand and insist upon ethical trading practices.

Our empowerment training includes the anti-bribery course and periodic additional training courses. We will ensure the widespread dissemination of this MSS and a project specific factsheet for managers to use when considering how best to manage their projects.

Supplier diligence and local intelligence
As part of our onboarding process for new suppliers and partners, we conduct a comprehensive corporate and personal background checks.

We check data provided to us against public registers and, where necessary, police, trades unions and chambers of commerce records deemed.

Coffey is also in the process of drafting a comprehensive supplier code of conduct.

Risk mapping
Coffey has a dedicated risk management and compliance team and regularly monitors and maps its project risk profiles.

We operate a dynamic risk reduction strategy, which recognises that some projects and some locations will present a higher risk than others.

Where we identify a high risk of exploitation and abuse, we implement appropriate risk reduction measures. However, we are equally careful not to become complacent about relatively ‘safe’ jurisdictions, as these too can present risk challenges that need to be considered and addressed.
Continually improving

We are always seeking ways to improve our approach to the Modern Slavery Act.

In 2017/18, areas we would like to improve include:

Supply chain transparency and modern slavery monitoring and audits
As part of a recent British government request we undertook an audit of the supply chain within our Growth and Employment in States – Wholesale and Retail (GEMS4) programme in Nigeria.

Building on this exercise we plan to embark on series of supply chain and modern slavery audits across a sample of programmes within our portfolio. This initiative will commence in May 2017 and will be carried out on an annual basis. Where there is scope for improvement identified we will ensure that programme teams are provided clear action points for what needs to be remedied and by when.

Detailed child labour risk mapping
We do not believe that our supply chains are currently afflicted by child labour abuses. However, we recognise that it remains a potential threat.

As such, we will create a dedicated risk register for child labour in those countries where we identify that it is a high risk. This will be added to our other risk registers and will contain a checklist of actions to take in the event that child labour is discovered or suspected.

The use of cash
We are launching an internal investigation into the possibility of rolling out greater use of cashless transactions on our projects. We consider that this could provide a higher level of protection from exploitation for workers and suppliers in our value chains.

We will publish the findings of our study and will share lessons learned with our clients and colleagues.

Dedicated modern slavery web page
We will create and maintain a dedicated page on our website that will link to cutting edge thought leadership on modern slavery issues.

We will publish regular updates on our Modern Slavery Statement compliance progress as well as promoting other individuals and companies who are developing innovative ethical supply chain practices.

We will encourage participation from our staff, customers, NGOs and others.
Conclusions

It is entirely unacceptable that people, wherever they live and work, should be subject to abusive labour practices.

*We recognise that, as a company responsible for the distribution of donor funding we have an obligation to ensure that our processes are robustly ethical and sustainable.*

In this statement we have highlighted some of the policies and processes we have implemented to ensure that, as far as possible, our value chains are free from slavery. However, we will remain vigilant to ensure that we are not unwittingly party to this most insidious of crimes.

We approach this problem with resolve but also with humility. The challenges we face are serious and on-going. We will need to engage in collaborative and mutually supportive conversations around these issues with clients, employees and other stakeholders. Only by doing so will we be able to make real progress towards ending modern slavery and thus helping to develop a fairer and more sustainable world.