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MODERN SLAVERY STATEMENT

Modern Slavery Statement

Introduction

Slavery and exploitation are a reality in our world. At The HALO Trust (“HALO”), we value not only our own people, but those whom we serve, our beneficiaries and their communities, and so must be vigilant in both our recruitment and supply chains.

HALO will be Determined, Expert, Professional, Enabling and Responsive in our response to modern day slavery through:

- Raising awareness across our teams to bring forward any concerns about our supply chain activities;
- Ensuring our employment and remuneration practices are fair and transparent across all territories; and
- Challenging and supporting our suppliers to lead the fight against slavery and exploitation.

Our Structure and Business

HALO is a charity and a company limited by guarantee and is governed by a non-executive Board of Trustees. It operates from a head office in south-west Scotland and currently has activities in countries across Europe, Africa, Latin America, the Middle East, and Central, South and South East Asia. We employ over 7,500 staff, 98% of whom are local national staff.

Since being founded in 1988, HALO’s work has helped millions of families living in conflict-affected communities, giving them greater safety and the opportunity to rebuild their lives, livelihoods and futures. We clear landmines and unexploded ordnance, and provide risk education, training and education, and weapons and ammunition management, and we contribute to the international mine action and weapons management policy arena.

Given that the majority of HALO’s work is delivered by staff whom we employ on the ground, with relatively small-scale supply chains, we believe that the risk of slavery, human trafficking or exploitation having a connection with our business is relatively low.

Fundamental provisions of HALO’s policy on Modern Slavery include:

- Freedom of employees to terminate employment;
- Freedom of movement;
- Prohibition of any threat of violence, harassment and intimidation;
- Prohibition of debt bondage and bonded labour;
- Prohibition of any disciplinary measure which includes an obligation to work;
- Prohibition of compulsory overtime;

- Prohibition of the use of worker-paid recruitment fees.

The policies and procedures outlined below mitigate the risk of HALO having any connection with Modern Slavery, to the point that we are satisfied that we are compliant with the Modern Slavery Act 2015:

- **Whistleblowing Policy and Reporting Malpractice:**

Supports HALO in maintaining the highest standards of openness, integrity and accountability in its work, through encouraging staff to be vigilant for signs of illegal or dishonest practices and serious misconduct and to report any concerns that they have. HALO is committed to ensuring that genuinely held concerns will be thoroughly investigated and that those who raise these concerns will be protected against victimisation and discrimination as a result.

- **Financial Crime:**

We recognise that financial crime in all its forms is contrary to HALO's values of professionalism, transparency and accountability, and that it undermines organisational effectiveness. In line with HALO's Ethics Policy, we are committed to the highest ethical standards and require all staff, consultants, trustees, contractors, partners, agents and other associates to adhere to similar standards and make themselves aware of, and comply with, this policy. We have established a 'zero tolerance' culture across the organisation in which financial crime and all other forms of corruption and criminality, including slavery, human trafficking and exploitation are unacceptable.

- **Procurement Policy:**

We are committed to ensuring that all procurement activities adhere to the principles of value for money, transparency and fair and open competition. We will not trade with any suppliers which we have good reason to believe exploit people. Our procurement policy is clear that suppliers must comply with local laws and regulations and that all procurement activities are in accordance with HALO's policies, including our Ethics Policy, and procedures relating to financial crime and Modern Slavery.

- **Recruitment and Selection:**

Seeks to ensure that all recruitment decisions are made fairly and transparently; that processes are free from all types of unlawful or unfair discrimination and bias in order to ensure that equality of opportunity is maintained for all candidates and prospective candidates; that recruitment and selection initiatives will be carried out in line with relevant legislative obligations and best practice, and that appointments will only be made on the basis of the skills, experience and aptitudes required for the role.

- **Staff Code of Conduct:**

All employees are required to commit to abide by HALO's policies and procedures and terms and conditions of employment and to ensure <https://www.halotrust.org/about-us/policies/modern-slavery-statement/>

All employees are required to commit to abide by HALO's policies and procedures and terms and conditions of employment, and to ensure that conduct is in keeping with our aims and values. By following HALO's Staff Code of Conduct, all international staff should be aware of what is expected of them and make the greatest contribution to achieving HALO's mission. The Staff Code of Conduct sets out the expectations that HALO has of employees, as well as providing examples of behaviours and actions that will always be unacceptable; it aims to ensure that professional and personal action does not bring the organisation into disrepute.

- **Training**

As part of a comprehensive induction process, all international staff are given training on HALO policies and procedures, and are required to sign up to the Staff Code of Practice and Policies.

- **Remuneration:**

We seek to ensure that we pay our people in line with the respective laws, culture and market conditions of the relevant country. HALO aims to provide remuneration packages that:

- attract the calibre and develop and motivate the mix of people required;
- are fair, transparent and non-discriminatory;
- are legally compliant with national HR requirements;
- are competitive and comparable with organisations of a similar nature; and
- are affordable to HALO and ensure accountability to our donors.

- **Protection of Children and Vulnerable Adults:**

We believe that any form of abuse towards children or vulnerable individuals with whom we work is unacceptable; any such abuse will not be tolerated.

All people have the right to protection from abuse and exploitation, and we recognise our responsibility to ensure that our staff, consultants, trustees, contractors, partners, agents and other associates are clear about the standards of behaviour and practice that are required of them when in contact with children or vulnerable individuals in the course of HALO's work. This is achieved by dissemination of relevant policies and including appropriate clauses in procurement documentation and subcontracts.

through its policies and training, HALO aims to prevent and minimise the risk of abuse, to protect staff and to ensure transparency and safeguard the reputation of the organisation. We will meet the commitment to protect children and vulnerable individuals from abuse through Awareness, Prevention, Reporting and Responding.

- **Ethics Policy**

This is intended to protect HALO from engagement in relationships or activities that have the potential to have a negative impact, whether perceived or actual, on our integrity or reputation. Such relationships are those which we judge to be in conflict with the achievement, fulfilment or adherence to our mission and values and the activities which institutions and individuals fund HALO to undertake. We take reasonable steps to conduct due diligence on providers of services and individuals and organisations providing financial and in-kind support. The Ethics Policy sets out our minimum ethical expectations of suppliers, subcontractors or organisations with which we work and on which we conduct due diligence, and our Ethical Donor Acceptance and Refusal Policy establishes procedures for considering institutional and private donations.

Our Commitment to the Modern Slavery Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes HALO's slavery and human trafficking statement for the financial year ending 31 March 2018. It has been approved by the Trustees of The HALO Trust and it will be reviewed by them annually.