



CTG Slavery and Human Trafficking Statement

1. Introduction

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. CTG's vision is to be the provider of choice for the humanitarian sector enabling them to implement rapid-response and development projects in fragile and conflict-affected countries. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business.

2. Policy Statement

CTG's policy is to conduct all business ethically and with integrity and takes a zero-tolerance approach to modern slavery. CTG continually assesses and addresses the risk of violations of anti-modern slavery and anti-human trafficking laws. We are committed to implementing and enforcing effective procedures and controls that aim to ensure slavery and human trafficking is not taking place anywhere in our supply chains. CTG also expects the companies and organisations with whom we do business to adopt and enforce policies which comply with anti-modern slavery and anti-human trafficking legislation.

Our policy is reinforced by other CTG policies and procedures. These include:

- Code of Conduct which applies to all staff working with CTG and that sets out a commitment to ensuring fair treatment and the promotion of an inclusive workplace.
- Whistleblowing Procedure which encourages disclosure from any person (internal or external),
- Supplier Code of Conduct
- Supplier Due Diligence Procedure which reflects the requirements of the Modern Slavery Act 2015.

CTG is a participant of the United Nations Global Compact (UNGC), and upholds its principles with respect to human rights, labour, environment and anti-corruption. CTG is also committed to advancing Sustainable Development Goal 8, which includes target 8.7 to "Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms". CTG reports annually on its progress against the UNGC's Ten principles and the 17 Sustainable Development Goals (SDGs), including SDG 8. CTG is committed to supporting our staff, suppliers and clients to address issues arising from modern slavery. Lawful and Ethical Conduct is one of our core principles and together with integrity, accountability, transparency, operational excellence, respect and inclusion is at the heart of all that we do:

- a) CTG's core principles specify how we expect our staff to behave with their colleagues, clients and any third party with whom they come into contact;
- b) CTG strives for gender equality, inclusion and diversity, seeks to treat everyone fairly and consistently and to create a workplace and business environment that is transparent and trusted; and
- c) Our policies and procedures relating to the Act are in line with our culture and principles.

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3. CTG's Structure and Supply Chains

CTG is a limited company incorporated in the United Kingdom under company registration number 11655728. CTG has companies in over twenty countries of operation, each with a separate legal entity. CTG's supply chain includes the purchase of goods and services necessary for the operation of the company; CTG's suppliers are from a wide range of sectors and include individuals as well as commercial entities. CTG's contracts with third party providers cover areas such as information technology, marketing, insurance, security services and logistics. To mitigate the risk of modern slavery we require third party providers to comply with our due diligence procedure, responsible procurement standards and the provisions of the Modern Slavery Act 2015.

4. Procedures

4.1. Employment

- CTG has rigorous recruitment procedures which are in line with UK employment laws covering areas such as right to work document checks, checks to ensure everyone employed is 16 or above in age, and the provision of contracts of employment.
- CTG offers market-competitive pay and reviews rewards on an annual basis.

4.2. Supply Chain

Suppliers are required to acknowledge and agree to CTG's Supplier Code of Conduct. In general, we require suppliers to contract on CTG's standard terms. These terms require suppliers to commit to ensuring compliance with the Modern Slavery Act 2015 and:

- Pay all staff the National Living Wage and pay any contract or sub-contract staff the National Minimum Wage where such requirements exist;
- Comply with any applicable minimum wage requirements of other countries, for those staff members, contract or sub-contract staff, where such individuals are based in that other country;
- Ensure that all staff are subject to UK Right to Work checks or other checks necessary to ensure compliance with UK or where applicable other countries' immigration requirements;
- Comply with Committed to Good's due diligence process to assess risk generally when dealing with suppliers and partners; and
- At all times follow any applicable law and good practice in relation to the ethical procurement of goods and services including but not limited to minimising the risks of supporting fraud, bribery, corruption and human rights abuses.

CTG is committed to ensuring that all contracts with suppliers (even those which do not contract on CTG's standard terms) contain appropriate provisions requiring all suppliers to adhere to CTG's values in respect of modern slavery and the requirements set out above.

The CTG legal team oversees compliance with contractual obligations to comply with anti-slavery and human trafficking obligations and undertakes supplier due diligence where appropriate.

CTG recognises that CTG is exposed to greater risk when dealing with suppliers who have operations/suppliers in high-risk territories and as our supplier base grows, we shall map the suppliers according to location, size and industry to identify potential indicators of slavery.

CTG commits to working closely with its suppliers to guide them and help them understand how to mitigate risks that could result in slavery and how to work towards compliance with the Modern Slavery Act.

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CTG's Supplier Due Diligence Procedure reflects our commitment to focus on our suppliers' ethical supply chains and request suppliers to attest to the fact that they have not previously been investigated or convicted for any activities relating to modern slavery.

5. Progress in Tackling Modern Slavery 2023

During 2023, Committed to Good took the following measures which are currently being implemented, monitored and improved:

- Integrated a broader range of human rights considerations into the Supplier Due Diligence Assessment process, which includes a number related to identifying slavery and trafficking risks.
- Participated in the UNGC Business and Human Rights Accelerator and developed a Human Rights Action Plan which sets out to address and mitigate identified human rights risks across CTG's operations and beyond.
- We continued to provide all newly onboarded staff with a clear explanation of our internal procedures to ensure they are well placed to report concerns regarding modern slavery and/or human trafficking.
- The CTG Ethics Committee continues to be responsible for driving awareness of modern slavery throughout our network.
- CTG regularly reviews the Supplier Code of Conduct to ensure continued adherence to the Modern Slavery Act.

6. Moving Forward: Goals and Targets for 2024

Recognising that modern slavery is an on-going threat, CTG is committed to continuous improvement of our practices to combat slavery and human trafficking. Therefore, the company shall continue to monitor this and aim to achieve the following goals in 2024:

- Continue to educate staff on existing human rights, modern slavery and human trafficking risks across our countries of operation.
- Issue frequent reminders to all staff on how to report concerns in accordance with CTG's Whistleblowing Procedure.
- Continue conducting comprehensive Due Diligence on prospective partner and supplier organisations to ensure consistency with CTG's operational standards and expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement throughout Committed to Good Limited's financial year, ending 31 December 2024.

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