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**Modern Slavery Act statement 2025**

The Modern Slavery Act (the ‘Act’) became law on 26 March 2015.

Section 54 of the Act, ‘Transparency in Supply Chains’, requires every organisation carrying on a business in the UK with a total annual turnover of £36m or more to produce an annual Statement; setting out the steps they have taken to tackle slavery and human trafficking in their organisation and supply chains.

This statement has been prepared with reference to the UK Home Office’s updated statutory guidance on Transparency in Supply Chains published in March 2025. While the legal requirements under section 54 remain unchanged, AAUK has sought to align this statement with the guidance’s emphasis on meaningful action, transparency, and continuous improvement.

**1. Our organisation**

ActionAid UK (AAUK) is a member of the ActionAid International Federation; a global justice federation working together to achieve social change, gender equality and to address the structural causes of poverty and injustice. The federation is coordinated by the ActionAid International (AAI) Global Secretariat based in Johannesburg, South Africa.

We focus our efforts on working with women, girls and their communities. We raise funds in the UK to support the work of ActionAid Federation member countries who are working with partners, including social movements, youth networks and women’s rights organisations. We also tackle the

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root causes of global inequality and injustice by influencing UK Government commitments and policies on a range of interlinked issues.

## 2. Principles

### 2.1. Our values

We are guided by feminist and human rights based principles and approaches. We believe that modern slavery or any kind of forced or involuntary labour is wrong. For this reason, we are committed to zero tolerance of modern slavery in any form. We hold ourselves to the highest ethical standards and expect the same of our partners and suppliers.

### 2.2. Our supply chains

Firstly, to support our UK operations, fundraising, and influencing work, AAUK procures goods and services across a wide range of categories; including marketing, public outreach, event management, media, research, facilities, insurance, finance, HR services, IT, and the lease of our office premises. We do not have any significant UK spend in the agriculture, construction, hospitality or manufacturing sectors.

Secondly, we have programme activities in communities across Africa, Asia and Latin America which are managed locally by our partners, AAI, and federation member organisations (Delivery Partners), rather than directly by AAUK. These organisations receive grants from AAUK, and they in turn may work with additional partner organisations to procure goods and services as required to deliver programmes. We are reliant on our Delivery Partners to put in place policies and procedures to prevent modern slavery within their supply chains, the steps we take to monitor this are set out in Section 4.

While we have not identified any confirmed cases of modern slavery within our organisation or supply chains to date, we recognise that modern slavery is often hidden and underreported, particularly in contexts of poverty and inequality. We therefore treat the absence of identified cases with caution and continue to strengthen our approach to risk identification and monitoring. We set out below our approaches both in the UK and in the ActionAid Federation's international programmes.

## 3. Our approach in the UK

We are an Accredited Living Wage employer, which means that we pay a living wage to our staff and also all contracted staff who work directly with us. We have in place the following policies, procedures, agreements, and resources which form part of our approach to mitigate the risk of modern slavery among our activities and direct suppliers in the UK.

- Supplier Code of Conduct
- Staff Code of Conduct
- Procurement Policy
- Recruitment and Selection Policy
- Grievance Policy & Procedure
- Dignity and Respect at Work Policy

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- Sexual Harassment, Exploitation and Abuse (SHEA) and other Safeguarding Concerns Overarching Policy
- Protection from Sexual Exploitation and Abuse (PSEA) Policy
- Sexual Harassment Exploitation and Abuse (SHEA) at Work Policy
- Child Safeguarding Policy
- Whistleblowing Policy
- Access for staff to free Confidential Counselling and Advice Helpline
- Union Recognition Agreement with Unite
- Federation Corporate Engagement Framework
- Federation Financial Management Framework
- Donations Acceptance Policy
- Data Protection Impact Assessment process
- Records Retention & Disposal/Information Asset Register
- Privacy Policy
- Information Security Policy

We are governed by a [Board of Trustees](#) whose role it is to make sure that we stay true to our [mission and values](#), set our [strategic direction](#) and monitor delivery against our strategic objectives.

Under our Board of Trustees, our [co-CEOs and directors](#) together make up our Executive Leadership Team. The Executive Leadership Team is responsible for day to-day decision making and managing our five departments:

- Advocacy and Influencing
- Funding
- Innovation and Impact
- People, Culture and Transformation
- CEO Office (including Finance, Media and Internal Audit)
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Our Head of Internal Audit and Risk provides assurance to our Board and Management; through reviewing the effectiveness of our governance, risk management and control processes, and also working with the ActionAid International audit team to carry out reviews of ActionAid programmes globally.

In the UK, we carry out due diligence (including financial, adverse media and sanctions checks, and references where needed) prior to using any new suppliers with a total spend of £5k or more. Any processing of personally identifiable information also requires a Data Protection Impact Assessment regardless of spend and this applies to new and existing suppliers. For freelancers or consultants, we carry out due diligence on all new engagements regardless of spend.

### 3.1 Actions

Given our direct contractual relationship with UK suppliers of goods and services, we have taken the following steps to prevent modern slavery in our supply chains.

#### a. Supplier Code of Conduct

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We have a Supplier Code of Conduct which explains the manner in which we will behave as an organisation, and the standards which we want our suppliers and partners to also achieve. It is a mandatory requirement that all our direct suppliers (with whom we spend £5k or more per year) agree to comply with our Code.

### **b. Enhanced Due Diligence**

We carry out enhanced due diligence on all new UK-based direct suppliers with whom we will spend £20k or more (based on total contract value). This includes New Supplier Questionnaires, with Terms, which specifically investigate a company's adherence to both labour wages, London Living Wages, and modern slavery legislation adherence. Once a Supplier is selected, we conduct a review by vetting questions related to Modern Slavery Act compliance, as well as require adherence in subsequent contracts or agreements which stipulate assurances relating to tackling modern slavery in their own organisation and supply chains.

### **c. Contracts**

Our standard supplier contract forms include a right to terminate in the event that we find, or have reasonable grounds to believe, that modern slavery or any form of forced or involuntary labour is being used. For all spend over £5k we have the following in our AAUK contracts:

### **Modern Slavery and Child Labour**

We apply a zero-tolerance approach to tackling the practice of modern slavery, child labour, trafficked, bonded, or compulsory labour in any of its forms.

This applies to both supplier and consultant contracts. In addition, when a supplier prefers to use their contract and we are not able to persuade them otherwise, we always ask for this to be included. However, where appropriate we will work with suppliers and partners to address any issues which arise, always bearing in mind the best interests of those who may have been badly treated, harmed or exploited in our organisation or anywhere in our supply chains due to modern slavery or any forced or involuntary labour.

### **d. Safeguarding Policies**

ActionAid has a suite of Global Safeguarding-related policies which dovetail with the global Anti-Modern Slavery Policy. The Global Safeguarding policies were developed by colleagues from around the ActionAid International Federation before being further localised to the AAUK context and ratified by AAUK trustees in May 2025.

### **e. Staff Policy Induction**

We are committed to ensuring that all employees are aware of our policies and procedures, including those related to ethical working practices and modern slavery. As part of our induction process, managers follow a structured checklist that requires employees to read and acknowledge key policies, of which the Anti-Modern Slavery policy is one. Additionally, our policies, including those relevant to modern slavery, are accessible through our online MyHR platform, where employees must confirm they have read and understood them.

#### **f. Awareness and Training**

All staff also undertake mandatory Safeguarding training as part of their induction, either a 2 hour introduction or a full day workshop. A refresher training is carried out every two years.

All staff are made aware of our Supplier Code of Conduct and the Modern Slavery statements it includes when they join. We also hold regular training sessions for any staff who require an update.

#### **g. Monitoring Effectiveness**

We monitor the effectiveness of this Policy Statement with UK-based direct suppliers and aim to ensure all suppliers have zero tolerance to modern slavery

### **4. Our approach to international programme delivery**

We recognise that there is a heightened risk of modern slavery in the [countries where our partners deliver programmes](#), as we know that poverty is a key driver of slavery and is often used unethically as a justifier of modern slavery practices.

Good progress has been made to increase awareness of modern slavery across the ActionAid Federation.

In relation to international programme procurement, we continue to work with our partner organisations to develop effective policies which address the unique challenges of the development sector in each individual country, and see these adopted and embedded within each member organisation's operations. This will take time, but AAUK are committed to achieving this over the medium term.

In accordance with AAI's Membership Regulations, it is for the General Assembly of AAI to set policies and procedures to be adopted across the global federation and to monitor compliance with these by every member organisation (including AAUK). In June 2019 a global Anti-Modern Slavery Policy was adopted formally by the General Assembly and has subsequently been rolled out across the ActionAid Federation. The policy:

- sets out a zero-tolerance approach to modern slavery within our organisation and our supply chains;
- establishes global minimum standards in respect of labour within our organisation and those of our partners and suppliers;
- puts in place procedures for the identification and investigation of incidents of modern slavery;
- puts in place due diligence monitoring of partners to minimise modern slavery within our supply chains (including programme partners).

AAI undertake scheduled Internal Audits on all federation members to confirm they have a Partnership Policy in place with their Partnership Organisations, these audits also consider their

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procurement and partner due diligence arrangements more broadly. AAUK receives copies of internal audits for all delivery partners.

An annual attestation process is followed globally to highlight any countries which might be struggling to fully comply with all Anti-Modern Slavery policy terms. Where this occurs, action plans are drawn up. Progress against the plans is monitored throughout the year and AAUK works with AAI and countries to understand the challenges that contribute to any delays.

### 5. Review and responsibility

The Board of Trustees has overall responsibility for ensuring that this statement complies with our legal and ethical obligations, and that it is reviewed on an annual basis. Management is responsible for raising awareness and implementing the policy.

### 6. Approval

This statement covers the financial year ending 31 December 2025. It was approved by the Board of Trustees on 24 April 2026 and will be published on the ActionAid UK website and uploaded to the UK Government's Modern Slavery Statement Registry by 30 September 2026.

AAUK Policy Governance Sheet

AAUK Policy Name:	AAUK Modern Slavery Act Statement
Version:	2.0
Policy Owner:	Company Secretary

Ratified on	April 2026	Update Frequency	Yearly
Ratified by	Board	Next Update Due	April, 2027

Key Changes Since the Previous Version	<ul style="list-style-type: none"> <li>○ Updated in alignment with the April 2025, updates to The Modern Slavery Act (the 'Act').</li> <li>○ Incorporates Non-mandatory guidance that encourages deeper, evidence-based disclosures.</li> </ul>
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Policy Sharing	Open Information Policy / AAUK Website
Essentials Reviewers	<ul style="list-style-type: none"> <li>○ Department Director</li> <li>○ DPO</li> <li>○ Procurement Manager</li> <li>○ Senior Safeguarding Specialist</li> <li>○ Assurance and Policy Specialist</li> <li>○ Internal Audit</li> </ul>
Training & Monitoring	<ul style="list-style-type: none"> <li>○ N/A</li> </ul>
Applicable Legislation	<ul style="list-style-type: none"> <li>○ The Modern Slavery Act- 2015                             <ul style="list-style-type: none"> <li>○ Section 54 of the Act, 'Transparency in Supply Chains'</li> <li>○ UK GDPR</li> </ul> </li> </ul>
Related AAUK Policies	<ul style="list-style-type: none"> <li>○ Supplier Code of Conduct</li> <li>○ Staff Code of Conduct</li> <li>○ Procurement Policy</li> <li>○ Recruitment and Selection Policy</li> <li>○ Grievance Policy &amp; Procedure</li> <li>○ Dignity and Respect at Work Policy</li> <li>○ Sexual Harassment, Exploitation and Abuse (SHEA) and other Safeguarding Concerns Overarching Policy</li> <li>○ Protection from Sexual Exploitation and Abuse (PSEA) Policy</li> <li>○ Sexual Harassment Exploitation and Abuse (SHEA) at Work Policy</li> <li>○ Child Safeguarding Policy</li> <li>○ Whistleblowing Policy</li> <li>○ Access for staff to free Confidential Counselling and Advice Helpline</li> <li>○ Union Recognition Agreement with Unite</li> </ul>

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	<ul style="list-style-type: none"><li>○ Federation Corporate Engagement Framework</li><li>○ Federation Financial Management Framework</li><li>○ Donations Acceptance Policy</li><li>○ Data Protection Impact Assessment process</li><li>○ Records Retention &amp; Disposal/Information Asset Register</li><li>○ Privacy Policy</li><li>○ Information Security Policy</li><li>○ Data Protection Impact Assessment process</li><li>○ Records Retention &amp; Disposal/Information Asset Register</li><li>○ Privacy Policy</li><li>○ Information Security Policy</li></ul>
Related AAI Policies	<ul style="list-style-type: none"><li>○ N/A</li></ul>