

Modern Slavery and Anti Human Trafficking Statement

1. Organisation structure, stakeholders and supply and delivery chains

SNV is a global organisation with over 1,500 team members, the vast majority of whom come from the contexts where we work, in more than 20 countries in Africa and Asia. Together, we are committed to effective and efficient stewardship of resources and expertise, and to maximising positive, lasting impact. The wealth of national talent is also what enables the organisation to build on the expertise of people who deeply understand and belong to the environmental, economic and social contexts they operate in, while fostering their professional growth and contributing to more sustainable impact.

SNV's core values of people-centeredness and respect, equity and equality, diversity and inclusion are fundamental to SNV's identity and work. This is reflected in our vision, mission and strategy.

In line with the SDGs, SNV strives to ensure that our work sets people on a stable trajectory towards financial independence and stability. SNV's main stakeholders consist of those we are working with, and for, in the communities where our interventions occur. We also work with partners, including subcontractors and grantees, consultants and vendors, mainly in the countries in which SNV operates. We deliver our projects with funding from several bilateral and multilateral donors, as well as private sector donors and foundations, and we collaborate extensively with other partners, such as knowledge institutes, consultancy firms and local and international NGOs, to expand and deepen our impact.

While the term "Modern Slavery" can be perceived as a broad term, focusing primarily on the harshest and most visible forms of slavery on a large scale, for example illegal mining, forced child labour, trafficking or bonded labour, it is important to underline its pervasive existence in smaller and more granular realities, such as domestic slavery disguised as domestic work, bonded labour, inhumane working conditions, coercive labour arrangements, exploitative recruitment practices, excessive working hours, restriction of movement, confiscation of identity documents or threats and intimidation. These forms of slavery and labour exploitation are extremely common and, in many contexts, somewhat socially accepted and therefore underreported or not reported at all. SNV's commitment is to raise awareness on this issue and promote action, both at an institutional and individual level.

For the purposes of this statement, SNV's supply and delivery chains include both the primary delivery chain (Tier 1 provider) through which SNV designs, manages and implements programmes, and the secondary supply chain (Tier 2 provider) that supports SNV's operations, including SNV vendors and onward funding entities. It also includes labour arrangements (Tier 3 provider) linked to these services, where workers may be recruited, contracted or managed directly or indirectly by SNV's vendors and/or onward funding entities.

2. Policies and procedures in relation to modern slavery and human trafficking

Over the years SNV has striven to ensure that diversity, equity and inclusion, as well as the negative externalities and the risks people could be subject to, are taken into consideration in every project, regardless of its primary scope. To guide team members on the priorities of SNV, and to give them access

to the necessary tools to align their work with SNV's ethical standards, the SNV Policy House was established. This platform, available to all SNV team members, includes the SNV Code of Conduct and the operational policies, procedures and instructions which underpin SNV's operations globally.

Operational policies are always global in nature. They apply to all SNV team members, regardless of their role, position in the organisation, country or office of employment. Procedures and instructions are generally global documents, although some may be adapted or created ex novo for a specific country context. These country-adapted documents sit beneath the relevant operational policy alongside global procedures and instructions.

Contained within the SNV Policy House are several specific policies which have been developed to pre-empt and address situations that could be detrimental for our team members, for the organisation and for the people we work with and for. SNV carefully considers and evaluates the social implications and potential for unintended consequences from its operations, and over the years has responded by developing and institutionalising policies that aim to protect team members, project participants, partners and other stakeholders. This includes acknowledging and addressing rights, inequities, and power dynamics and imbalances to better respond to the needs of communities that are increasingly at risk due to the fragile contexts around them.

At the same time, SNV acknowledges that larger projects, increased migration, urbanisation and staggering inequalities across the world demand that the existence of Modern Slavery and Human Trafficking, and the risks of occurrences in our supply and delivery chains, are acknowledged and addressed. In an effort to ensure the protection of any person who may be at risk and/or subject to a power imbalance that prevents them from seeking protection and redress, SNV has developed the following policies and procedures. As outlined below, each of these plays a part in mitigating the risks of Modern Slavery and Human Trafficking occurring in our project design and implementation, people management and within our supply and delivery chains.

SNV Ethical Standards Policy/Code of Conduct, including the Whistle-blower protection Statement

The SNV Code of Conduct and its operational instruments are a commitment to good governance, a guidance document and set of resources to address ethical matters where conflict of interest or potential misconduct may occur, in line with international conventions and guidelines. It reflects the organisation's values and through it SNV commits to integrity, transparency and accountability, impact and results, legal compliance, social and environmental sustainability, a safe environment for all team members and lastly to be and to engage only with responsible businesses.

The Code of Conduct provides the ethical basis for SNV's expectations towards team members, partners, consultants and other parties working with or on behalf of SNV. It supports SNV's commitment to prevent and address misconduct, exploitation, abuse, harassment, discrimination and other practices that may create or increase vulnerability to Modern Slavery and Human Trafficking.

SNV Safeguarding, Child Protection and Protection from Sexual Exploitation, Abuse and Harassment Procedure

This procedure defines SNV's approach to safeguarding and delves into more detail than the Code of

Conduct itself regarding what child protection and sexual exploitation, abuse and harassment are, and how SNV implements preventive measures and addresses incidents, fact-finding processes and investigations. The procedure also outlines how the organisation will handle any misconduct, including against minors, in the best interest of the child, for example sanctions and disciplinary measures, involvement of national authorities, referral to support services, or other protective measures as required.

SNV Inclusion and Elimination of Workplace Discrimination & Harassment Procedure

This procedure outlines what can be defined as workplace harassment and discrimination and the internal processes to address it: from the individual to the organisation, and from the reporting process to the measures being taken to address the incident and prevent similar incidents from happening again. It also underlines the importance of creating an accessible and inclusive environment for all, as prevention of bullying and misconduct, which, when rooted in the fabric of a team, are harder to eradicate.

SNV's Contracting and Procurement Policy

The SNV Contracting and Procurement Policy, Procedures and Instructions are founded on the principles outlined in the SNV Code of Conduct. They establish the minimum requirements for the acquisition of goods, works, services and partners. Furthermore, under the Contracting and Procurement Policy, the SNV Code of Conduct is an annex to SNV's standard onward funding agreements and vendor contracts. Vendors and onward funding entities are required to adhere to these standards when working with SNV and/or through funding provided by SNV on behalf of our funders. The following clause is included within SNV's Partner Agreements:

'The Implementing Partner shall perform all its obligations under this Agreement with the necessary skill, diligence, efficiency, and economy to satisfy general accepted professional standards expected from experts and in accordance with SNV's Code of Conduct.'

SNV continues to strengthen its onward funding agreements and vendor contracts to integrate relevant clauses from the SNV Code of Conduct. This strengthens SNV's ability to hold the second tier on project implementation, where the first tier is SNV's team members, accountable for their actions and clearly determines the measures SNV may take in case of breach of this Code of Conduct.

3. Risk assessment and management

Risks to people

SNV assesses Modern Slavery and Human Trafficking risks as risks to people, and not only as risks to the organisation. The people most at risk may include project participants, community members, workers

engaged by suppliers and subcontractors, migrant workers, workers in informal or casual labour arrangements, domestic workers, young workers, women and girls, persons with disabilities, people affected by displacement, poverty or crisis, and others who may face restricted access to information, representation, services or remedies.

In SNV's operating contexts, the risk of Modern Slavery and Human Trafficking may arise through several pathways, including:

- labour-intensive project activities, works or service contracts;
- subcontracted or outsourced services;
- partner and grantee delivery arrangements;
- informal work arrangements in local markets;
- recruitment practices that may involve fees, debt, deception or intermediaries;
- restrictions on worker movement or access to identity documents;
- child labour risks in community or value chain contexts;
- exploitative domestic work, bonded labour or debt-linked labour practices;
- power imbalances between project actors, local authorities, employers, workers and communities;
- fragile contexts, displacement, poverty, migration and weak enforcement of labour protections.

SNV recognises that many of these risks may not be immediately visible, and that modern slavery can appear as ordinary work, particularly where exploitative practices are normalised or underreported. SNV therefore aims to combine policy, due diligence, reporting, internal controls, training and management oversight to support prevention, early identification, proportionate response and learning.

Risks to the organisation

Both internal and external auditing and evaluations are the cornerstone of assessing the compliance of SNV's work in line with stated policies, procedures and regulations, from internal processes to client services. SNV's financial statements are audited annually by an independent external auditor, both in the Netherlands as well as in SNV countries as appropriate. The external auditor reports to SNV's Management Board and Supervisory Board, including the Audit and Risk Committee. SNV has received an unqualified opinion each year since becoming a fully independent organisation in 2002.

SNV has established an Internal Control Framework, which is in principle the first line of control and mitigation against risks occurring across its functional areas. It is the blueprint for the internal control environment of SNV, setting its tone and influencing the control consciousness of SNV staff. The Internal Control Framework is regularly updated with the participation of the units supporting the business processes covered, including Project Management, Human Resources, Business Development and Finance.

SNV further deploys a Control Self-Assessment, which is designed to be carried out annually in each country and is part of the second line of control. Addressing compliance, the Control Self-Assessment supports the implementation of the Internal Control Framework by monitoring the internal controls and evaluating their effectiveness.

The third line of control in the Internal Control Framework model is Internal Audit. It is performed for individual countries and related to global policy areas selected by risk profile, and gives further support to organisational risk management, follow up of earlier audits, fraud investigations and other special assignments. SNV's Internal Audit team has a direct reporting line to the SNV Managing Board and to the

SNV Supervisory Board's Audit and Risk Committee. Based on the information provided, SNV's Managing Board takes measures where needed to improve organisational practice and stimulate learning.

Together, these components of SNV's internal controls not only target the identification and address risks that may affect the effectiveness and efficiency of operations, and reliability of financial reporting, but also consider with equal importance those that may affect compliance with applicable laws, regulations and ethical standards, including Modern Slavery and Human Trafficking.

4. Due diligence in relation to modern slavery and human trafficking

SNV is committed to responsible business practices and will, therefore, only work with vendors and onward funding entities whose business practices are in line with our Ethical Standards as defined by our Ethical Standards Policy Code of Conduct. SNV refrains from engaging with vendors or onward funding entities with a known record of incidents of exploitation, slavery and human trafficking. For new partnerships, SNV's diligence checks decrease the risk of partnering with stakeholders who might be or have been engaged in activities where people's dignity, safety and lives were put at risk.

SNV's due diligence approach is embedded in its procurement, contracting, onward funding, recruitment, safeguarding, ethical standards and internal control processes. It is intended to identify, prevent, mitigate and address actual and potential risks of Modern Slavery and Human Trafficking within SNV's own operations and in its supply and delivery chains.

Before entering into contractual relationships with vendors and onward funding partners, SNV applies relevant due diligence processes in line with its Contracting and Procurement Policy. For implementing partners, the Partner Systems Assessment provides an important mechanism for assessing whether the partner has systems, policies and practices that allow them to comply with SNV's standards. This includes considering the existence and adequacy of policies and procedures relevant to Modern Slavery and Human Trafficking.

SNV's recruitment procedure has also been strengthened by mainstreaming across all countries compliance with the Misconduct Disclosure Scheme through which safeguarding vetting is done, and performing anti-money laundering and anti-terrorism checks aligned with the donor mandated databases for candidates ahead of a job offer. This process helps SNV to prevent the inclusion of people who have previously done harm from joining the organisation.

5. Monitoring and response

Responsibility for identifying, assessing and responding to risks of Modern Slavery and Human Trafficking sits across all of SNV. Senior oversight is exercised through SNV's governance and control structures, including the Managing Board and the Supervisory Board's Audit and Risk Committee. SNV has direct visibility over its own team members, vendors, and onward funding entities. We recognise that visibility is more limited in relation to lower tiers of supply chains and labour arrangements used by vendors and onward funding entities. SNV therefore continues to strengthen its internal controls, due diligence processes and contractual expectations, with the aim of increasing year-on-year understanding of where risks may exist and how they can be prevented, mitigated and addressed.

During implementation, SNV's project, country and functional teams are expected to monitor compliance with contractual, operational and ethical standards. Concerns may be raised through management lines, project monitoring, partner engagement, internal controls, audits, donor compliance processes, safeguarding channels or the online reporting mechanism. Where concerns are raised, SNV assesses them in line with the relevant procedures and determines appropriate next steps.

SNV Online Reporting Mechanism

Any act of misconduct under the Code of Conduct and related procedures can be reported through the SNV online reporting mechanism, thus ensuring fair reporting and an immediate and standardised response to incidents. The online reporting mechanism is available to both SNV team members and external stakeholders, who can find it on the SNV website, on the Accountability page under Preventive and Corrective Action. It can also be shared by SNV country offices in the form of a poster with a QR code for better ease of access.

The online reporting mechanism takes reports in four languages, English, French, Spanish and Portuguese, and can be filled in anonymously as well as on behalf of a third party, for example by a witness. The report generated by the online form is then immediately received by SNV's Global Safeguarding and Inclusion Advisor. The person submitting it, if known, receives an acknowledgement email and the fact-finding process can start, always following a survivor-centred approach.

Where reports or concerns indicate possible Modern Slavery or Human Trafficking, SNV will assess the matter under its relevant ethical standards, safeguarding, procurement, human resources and risk management procedures, and will take appropriate action in line with the nature of the concern, the applicable legal framework, the safety and wishes of affected persons, and the need to prevent further harm.

SNV's response to suspected or identified Modern Slavery and Human Trafficking is guided by the principles of safety, confidentiality, accountability, non-retaliation, survivor-centred practice, child safeguarding and do no harm. SNV seeks to avoid responses that may unintentionally increase risk to affected persons, such as sudden disengagement without considering the impact on workers, project participants or communities.

Where a concern is identified, SNV may take one or more of the following actions, depending on the nature and seriousness of the concern:

- immediate protective measures to prevent further risk to affected persons;
- referral to appropriate support services, where available and appropriate;
- fact-finding or investigation in line with SNV procedures;
- engagement with the partner, vendor, consultant or subcontractor concerned;
- corrective action plans and monitoring;
- suspension or termination of contractual relationships where warranted;
- notification to donors, authorities or regulators where required or appropriate;
- disciplinary measures for SNV team members where misconduct is substantiated;
- review of internal controls, procedures or management practices;
- learning measures to prevent recurrence.

Where children may be affected, SNV will act in the best interest of the child and in line with the Safeguarding, Child Protection and PSEAH Procedure. Where national authorities, law enforcement or statutory safeguarding bodies need to be involved, SNV will assess this in line with applicable law, safety considerations and the relevant organisational procedures.

SNV also recognises that responsible disengagement may be required where a partner, vendor or other stakeholder is unwilling or unable to address serious risks or breaches. In such cases, SNV seeks to take decisions in a manner that avoids or mitigates further negative impact on affected persons and communities.

6. Training, awareness and capacity strengthening

SNV prioritises the respect for human rights and well-being of team members and stakeholders, beyond the specific scope of any project. Training and awareness-raising are essential to ensuring that SNV team members, and where relevant partners and other stakeholders, understand SNV's ethical standards, can identify concerns and know how to report and respond. SNV requires team members to complete the Ethical Standards course. The content of this course, together with that of the Inclusion and Safeguarding course, has also been used by some country offices to develop training sessions for partners. Taking the course ensures that team members, regardless of their function, have an essential understanding of the social implications and potential risks of their work, in line with the principle of Do No Harm. Training and awareness efforts support SNV team members to understand the links between ethical conduct, safeguarding, inclusion, responsible business practices and the prevention of Modern Slavery and Human Trafficking. This includes attention to power imbalances, abuse of authority, discrimination, harassment, exploitation, child protection risks, reporting obligations and the importance of acting when warning signs arise.

7. Key performance indicators to measure effectiveness of steps being taken

SNV prioritises the respect for human rights and well-being of team members and stakeholders, beyond

the specific scope of any project. We are a signatory to the UN Global Compact. Both the corporate Key Performance Indicators and the annual Global Priorities cut across sectors and take into consideration not only the technical and financial aspects of our work, but also its social implications.

Over the past 12 months, as in each year, SNV has taken steps to strengthen the organisation's ethical standards, policies and procedures. In addition to those already set out elsewhere in this document, these measures include:

- continued implementation of SNV's Ethical Standards courses and trainings including learning materials on Inclusion and Safeguarding;
- continued availability of the online reporting mechanism in four languages, with the option to report anonymously or on behalf of a third party;
- continued inclusion of the SNV Code of Conduct in standard Partner Agreements;
- continued implementation of safeguarding vetting through the Misconduct Disclosure Scheme ahead of job offers;
- continued use of the Internal Control Framework, Control Self-Assessment and Internal Audit as mechanisms for identifying and addressing compliance and ethical risks;
- continued strengthening of diversity, equity and inclusion as one of the pillars of the People, Culture, Talent strategic direction under the implementation of SNV's Global Strategy 2030.

SNV monitors the effectiveness of its approach through a combination of quantitative and qualitative information, including completion of mandatory learning, reports received through the online reporting mechanism, due diligence checks, Partner Systems Assessments, internal audit findings, Control Self-Assessments, management follow-up actions, donor compliance requirements, partner engagement and lessons learned from incidents and reviews.

SNV will continue to strengthen its approach by focusing on the following priorities:

- improving organisational understanding of Modern Slavery and Human Trafficking risks in supply and delivery chains;
- continued review and updates to procedures and instructions to increase efficiency and to remain compliant with evolving funder requirements and regulations.
- strengthening the integration of modern slavery risk considerations in procurement, partner due diligence and project design;
- development and launch of Onward funding procedure and improved Partner Systems Assessment as part of due diligence for implementing partners;
- reviewing and further strengthening contractual clauses and partner obligations related to ethical standards, safeguarding, responsible business practices and Modern Slavery and Human Trafficking;
- increasing awareness among team members and relevant partners on how to identify and report risks;
- using reporting, audit and control findings to inform organisational learning and preventive action;
- continuing to ensure that diversity, inclusion and safeguarding have a pivotal role in policy and project design processes and are addressed professionally by dedicated expertise.

SNV recognises that preventing and addressing Modern Slavery and Human Trafficking is a continuous process. We will continue to review our policies, procedures, training and due diligence practices to ensure that our approach remains proportionate, effective, and responsive to the contexts in which we work.

Approval of this statement

Approval of this statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes our Modern Slavery and Human Trafficking statement for the Dutch financial year ending December 2025.

Approved by: *Simon O'Connell*

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