

Modern Slavery and Anti Human Trafficking Statement

1. Organisation structure and stakeholders

SNV is one team of over 1,500 people, 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 maximising positive, lasting impacts. The wealth of national talent is also what enables the organisation to avail itself of the expertise of people who know deeply 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 the vision and mission, and in its 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 many partners (including subcontractors and grantees), consultants and vendors, mainly in the countries in which SNV operates. We deliver our projects in partnership with many bilateral and multilateral donors and we collaborate extensively with other partners - such as knowledge institutes, consultancy firms and local and international NGOs - to expand and deepen our impact.

SNV's strong focus is therefore on Power and Rights: with the commitment to focus more explicitly on power dynamics, inequalities, and a rights-based approach across all that is done, to best respond to the needs of and work with the extreme poor, increasingly made more vulnerable by fragile contexts.

Over the years SNV has striven to ensure that the diversity and the specific needs of people, and the negative externalities and risks they could be subject to, are taken into consideration in every project, regardless of the scope. To achieve this and SNV's goals, the SNV Policy House was established. This includes 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 country or office of employment. Procedures and instructions are generally global documents. They may be adapted or created 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.

2. Policies in relation to modern slavery and human trafficking

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 partners and stakeholders.

It is clear 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 chains are acknowledged and addressed. SNV is committed to continually strengthening its policies and procedures to mitigate the risk of occurrences of Modern Slavery and Human Trafficking in its supply chains and the risk of such offences being perpetrated by any SNV team member, whether intentionally or as the result of ignorance or oversight.

SNV is aware that the term "Modern Slavery" can be perceived as a very broad term, focusing primarily on the most harsh and visible forms of slavery on a large scale (e.g. illegal mining, children employed in factory work, etc.). It is important for SNV to underline that more granular forms of slavery (e.g. domestic work, bonded labour, inhumane working conditions even when a person is formally paid a wage, etc.) are extremely common and, in many contexts, somewhat socially accepted and therefore not reported. SNV's commitment is to raise awareness on this issue and promote action, both at an institutional and individual level.

In an effort to ensure the protection of any person in a position of vulnerability 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, these documents each play their part in mitigating the risks of Modern Slavery and Human Trafficking occurring in our project design and implementation, people management and supply chains.

SNV Ethical Standards Policy/Code of Conduct (including the former Whistle-blower protection Procedure) – The SNV Code of Conduct (CoC) is a commitment to good governance, as well as being a guidance document and set of resources to, in line with international conventions and guidelines, address ethical matters, where conflict of interest or risk of other forms of misconduct may arise. It reflects the organisations' values, namely trust and respect; equity and equality; and diversity and people centredness. Through the CoC SNV commits to integrity, transparency and accountability, impact and results, legal compliance, social and environmental sustainability, a safe environment for all employees and lastly to be and to engage with responsible businesses.

Any act of misconduct under the Code of Conduct can be reported through an online mechanism, thus ensuring fair reporting and an immediate and standardised response to incidents. The online reporting mechanism ([here](#)) is currently active as an internal tool and will be made available to the wider public by publishing it on the SNV website in January 2023. The online reporting mechanism takes reports in 4 languages (English, French, Spanish and Portuguese) and can be filled in anonymously as well as on behalf of a third party. The report generated by the online form is then immediately received, the person submitting it (if known) receives an acknowledgement email and the fact-finding process can start, always following a survivor centred approach.

SNV Safeguarding, Child Protection and Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Procedure – This procedure defines what SNV intends when the word safeguarding is used, and then delves into more detail regarding what child protection, and sexual exploitation, abuse and harassment are and how SNV intends to implement preventive measures and to address incidents when they occur. The procedure also outlines how the organisation will handle any misconduct, including against minors, in the best interest of the child.

SNV Inclusion and Elimination of Workplace Discrimination & Harassment Procedure – This procedure outlines what can be defined as workplace harassment and discrimination and what the internal processes to address it are: from the individual to the organisation, and from the reporting process to the measures being taken to curb the incidence sustainably. It also underlines the importance of creating an accessible and inclusive environment for all, as prevention of bullying and misconduct, which, when cemented, 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.

In line with the SNV Contracting and Procurement policy, we carry out extensive due diligence before engaging with all vendors, consultants and partners. Additionally for potential partners with a planned total contract value of over fifty thousand Euros, we conduct, prior to contracting, a full Partner Systems Assessment to ensure that they can be held to the same standards to which SNV holds itself. A Partner Systems Assessment evaluates their compliance with minimum performance indicators. This includes specific checks for the existence of policies protecting against the risk of occurrences of Modern Slavery and Human Trafficking within their operations and supply chains.

Furthermore, under the Contracting and Procurement Policy, a third-party Code of Conduct is being developed to be adhered to by all our vendors, consultants and partners. This will aim 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 intends to take in case of breach of this CoC.

Operational Review of our Existing Policies

In an effort to strengthen these policies and procedures and to ensure that they have the most meaningful possible impact, as well as to ensure compliance to our donors' requirements and

regulations, starting in 2021 and continuing into 2022, SNV undertook a major operational review of our existing policies and procedures for their compliance with our key donor requirements. Among the recommendations from this assessment, some of which have been outlined elsewhere in this document, that have already been adopted, was ensuring that Modern Slavery and Human Trafficking and the responsibilities of SNV, its teams and representatives in mitigating these risks are specifically set out in our Ethical Standards Policy and Code of Conduct (to which all team members are expected to sign and comply with, and to which all partners and consultants are expected to adhere).

Through this process, SNV's recruitment procedure has also been significantly strengthened during 2022. SNV has enrolled in the Misconduct Disclosure Scheme promoted by the Steering Committee for Humanitarian Response, to ensure that vetting is as thorough as possible on issues relating safeguarding and potential candidates that have a history of misconduct are eliminated from the shortlist, irrespective of their experience and professional references.

Responsible Business Practices

SNV is committed to responsible business practices and will, therefore, only work with partners 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 partners with a known record of incidents of exploitation, slavery and human trafficking. For all new partnerships SNV also requires a due diligence check to 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.

3. Risk assessment and management

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 (ICF) 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 ICF is regularly updated with the participation of the units supporting the business processes covered (i.e. Project Management, Human Resources, Business Development, and Finance).

SNV further deploys a Control Self-Assessment (CSA), which is designed to be carried out annually in each country and is part of the 'second line of control'. Addressing compliance, the CSA supports the implementation of the ICF by monitoring the internal controls and evaluating their effectiveness. The ICF (encompassing the CSA) has been updated and was rolled out in June 2022 with a view to re-instituting this key risk management mechanism across the organisation.

The third line of control in the ICF 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).

SNV's current Environmental and Social Safeguarding Procedure (ESSP) aims to mitigate potentially adverse environmental and social impacts of SNV projects. This Procedure is currently under revision and a new version will be published in the course of 2023.

4. Key performance indicators to measure effectiveness of steps being taken (including capacity building and strengthening)

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 (KPIs) 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 SNV has been taking 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:

- A new version of the Ethical Standards e-course, updated and better accessible to SNV team members with disabilities, was developed and launched in September 2022 and its completion is a mandatory annual requirement for all SNV team members, including all new joiners. This is a step towards a more internalised understanding of SNV's ethical standards, as well as an appropriate way to ensure that all team members, regardless of their function, have an essential understanding on the social implications and potential risks of their work, in line with the principle of "Do No Harm".
- The 4 modules e-course reflect SNV's mission, vision and values and the content is fully compliant with donor's requirements. Furthermore, Module 3 of this e-course is solely focused on safeguarding, with an overview of the concept of Modern Slavery as well as how SNV commits to prevent and address it. SNV is also developing its approach to ensure that its partners are adequately trained on Modern Slavery and Human Trafficking.
- In 2023 an e-course specifically on Inclusion and Safeguarding will be released which will delve more deeply into the practical aspects of safeguarding, including Modern Slavery.
- SNV is committed to ensure that diversity, inclusion and safeguarding have a pivotal role in the policy and project design processes and guarantees that they are addressed professionally by a dedicated expert. To this end, the Global Inclusion and Safeguarding Advisor, who has led many of these developments, will continue to mainstream safeguarding across policies, procedures, capacity strengthening and awareness raising of all team members.

Approval of this statement

Approval of this statement is made pursuant of 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 2022.



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