

# MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

NIRAS-LTS International (hereafter NIRAS-LTS) is a project management and consultancy company that delivers contracts for public and private sector organisations across the developing world with a particular focus on East and Southern Africa and on South East Asia. To deliver this work, NIRAS-LTS has a team of in-house consultants and project management staff, and works with individual experts, other project management and consultancy firms and a range of other service providers to deliver its projects. As such, the supply chain for each project varies depending on the size and scope of the project and the geographical location of the work.

## 1 Responsibility

Project level implementation of this policy lies with the Project Manager and Contract Director for each project.

The NIRAS-LTS Directors have responsibility for ensuring this policy complies with our legal and ethical obligations, for ensuring compliance with it, for monitoring its use and effectiveness and dealing with any queries on its interpretation.

Consultants at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate training on it.

## 2 Principles

### 2.1 Risk Assessment and Due Diligence

Modern Slavery and Human Trafficking issues are considered in our Risk Assessment and Due Diligence processes.

#### 2.1.1 Risk Assessment

NIRAS-LTS conducts a risk assessment prior to bidding for a contract and then conducts a more detailed assessment for each project during contracting and inception. This assessment involves a process of identifying and then eliminating or mitigate risk factors and includes an assessment of compliance with labour laws. The risk register for each project is a living document.

Whilst risk assessment in the supply chain can be subjective it is nonetheless required that where a significant risk is identified, the nature of the risk shall be identified and communicated to stakeholders, together with possible mitigation strategies, alternative solutions or contingencies.

We have identified that certain of our activities create particular risks for our organisation relating to modern slavery and human trafficking, in particular:

- Implementing projects in partnership with organisations based in developing or middle income countries;
- Public procurement on behalf of government organisations in developing countries.

To address these risks we take the following steps:

- Prepare a standard clause relating to relevant acts (e.g. the UK Modern Slavery Act section 54) for inclusion in key contractual documentation.
- Map the supply chain to identify particular geographies where the risks of modern slavery and human trafficking are high;
- Create a risk profile for each partner and sub-contractor on the project based on the due diligence (see below);

- Evaluate the modern slavery and human trafficking risks of each new contractor, in addition to an evaluation of their performance relating to general human rights and social responsibility;
- Record the risks and appropriate risk mitigation measures in the project risk matrix;
- If the risks are high, take steps to provide access to a training programme for the project manager and long term sub-contractors operating on the project;

The Project Manager, supported by the Contract Director, are responsible for risk assessment and management on their projects.

### **2.1.2 Due Diligence**

NIRAS-LTS undertakes due diligence when considering new consultants or company partners. All supply chain partners/sub-contractors are required to complete a due diligence questionnaire which covers key compliance areas about the organisation or individual, labour practice, health and safety, duty of care and conflict of interest, in order to identify any problems prior to entering into a contractual agreement.

All partners/sub-contractors must confirm that they understand and adhere to the compliance requirements of our clients' and NIRAS-LTS's policies.

All personnel on a project are paid a daily rate, which is above the minimum wage or legal requirements in the country of operation or origin. NIRAS-LTS sub-contractors' rates of pay are documented in their contracts. Monitoring of timesheets ensures that sub-contractors are compensated appropriately for their time. Where local companies, communities and/or people are involved in a project, level of effort and local rates of pay, based on benchmarking in compliance with local labour laws are established before contracts or rates of pay are agreed, so that it is possible to check that the rates are compliant. Sub-contractors are required to do likewise.

### **2.1.3 Training**

All employees will receive training on how to implement and adhere to this policy, this is a component part of wider ethical training. Certain subcontractors operating in areas or circumstances that are deemed by any NIRAS-LTS Director to be at high risk or where required by a client, will also receive training, or will have to confirm that they have already received sufficient training.

Our zero-tolerance approach to modern slavery and human trafficking must be communicated to all subcontractors, suppliers, agents and other business partners at the outset of our relationship.

## **3 Policies relevant to Modern Slavery and Human Trafficking**

NIRAS-LTS operates the following policies that incorporate modern slavery and other human rights issues into them. Collectively these aim to prevent slavery and human trafficking in our projects.

**Code of conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee and sub-contractor conduct and ethical behaviour when operating abroad and managing its supply chain

**Equal Opportunities and Fair Treatment:** NIRAS-LTS is committed to active Equal Opportunities and Fair Treatment policies, from recruitment and selection through to training and development, appraisal, promotion and finally to retirement.

## **4 Whistle-blowing**

NIRAS-LTS encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation about any issue or suspicion of malpractice at the earliest possible stage. Normally these concerns would be raised through the Project Manager or Contract Director. However, if this direct approach is not considered appropriate for any reason, an alternative approach is set out in our Whistle-blowing Policy.

Patrick Abbot

*Managing Director, NIRAS-LTS International*

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