



**saving the lives
of people with
blood cancer**

ANTHONY NOLAN ANTI MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 1ST APRIL 2018 TO 31ST MARCH 2019

INTRODUCTION

Anthony Nolan is a registered charity in England and Wales and Scotland that helps save the lives of people with blood cancer or blood disorders who need a blood stem cell or bone marrow transplant. We use our register to match remarkable individuals willing to donate their blood stem cells to people who desperately need lifesaving transplants.

This statement is designed to comply with the requirements of Section 54 of the Modern Slavery Act 2015 and outlines the steps that Anthony Nolan has taken to ensure that slavery and human trafficking are not present in our business operations or any part of our supply chain. Anthony Nolan has a zero-tolerance approach to slavery and human trafficking. We will not offer contracts to suppliers that do not take all reasonable steps to ensure that slavery and human trafficking are not present within their own activities and supply chain.

This statement has been approved by Anthony Nolan's Board of Trustees and Strategic Leadership Team and they recognise the importance of the Modern Slavery Act. The Finance and Resources Director takes the lead to ensure that processes to comply with the Act continue to be implemented across Anthony Nolan.

OUR BUSINESS OPERATIONS

Anthony Nolan is committed to ensuring that its own operations are free from slavery and human trafficking.

We employ over 300 direct employees within the UK. We check that all of our employees have the right to work in the UK. As a Living Wage Foundation accredited employer, we are proud to pay the London Living Wage or UK Living Wage to all employees and contractors; this is a voluntary commitment above the National Living Wage set by the government, which is the minimum wage for over-25s.

We work with recruitment agencies and self-employed contractors to cover permanent and temporary assignments. We use only reputable employment agencies, which have been appraised in line with our supplier appraisal procedure, to source labour and we always verify the practices of any new agency we use before accepting workers from that agency.

OUR SUPPLY CHAIN

The supply chain for Anthony Nolan can be divided into the following top-level categories:

- Human Tissue, goods and services for our Operations & Patient Services division (including recruitment of stem cell donors);
- Laboratory equipment, consumables and services;
- Fundraising materials and services;
- Communications and marketing goods and services;
- IT equipment and services;
- Travel and accommodation;
- Facilities, utilities and property related goods and services;
- Recruitment agencies;
- All other professional services.

As the supply chain is large and complex we are unable to guarantee that the whole supply chain is completely free from forms of modern slavery and human trafficking. However, we take steps, based on our supplier appraisal process and ongoing collaboration with those suppliers, to ensure that our suppliers are free of all aspects of modern slavery or human trafficking occurring in their direct operations. These steps include inserting a clause, drafted for Anthony Nolan by external lawyers, or accepting suppliers' own clauses where adequate, into new supplier contracts to ensure that they satisfy the requirements of the Modern Slavery Act 2015. We also communicate our anti-slavery and human trafficking policies to our staff and supply chain.

SUPPLIER APPRAISAL

To ensure that Anthony Nolan's suppliers comply with the Modern Slavery Act 2015, suppliers are appraised by our Procurement Team. We include a Modern Slavery compliance section in our appraisal process alongside sections on corporate social responsibility, ethical policies, and Real Living Wage compliance for any personnel who are contracted to work on any of our sites.

Our contracts management process includes a review stage to ensure that current suppliers maintain all standards and procedures disclosed by them during the supplier appraisal. Suppliers are required to provide statements, and any professional accreditations available, to satisfy compliance with the Modern Slavery Act.

Our Procurement staff complete the Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement and Supply qualification annually, keeping them up to date with the best practices for identifying and acting on slavery and human trafficking within the supply chain.

ACTIONS TAKEN THIS YEAR

In line with our commitment to stronger internal communication of our Modern Slavery Act policies, we published our 2018 Risk Report and Mitigation Plan on our intranet along with an article highlighting our 2018-2019 statement. We also published, for the first time, our statement via the

Transparency In Supply Chains (TISC) Report and the Modern Slavery Registry.

In our 2018-2019 statement we included our intention to examine the effectiveness of our relevant policies and procedures at reducing the risk of modern slavery and human trafficking occurring in our supply chain.

This examination included an assessment of the strengths and weaknesses of each policy or procedure as well as considering the effectiveness of the implementation of the combined relevant policies and procedures.

It is not possible completely to eliminate all risk of modern slavery in a supply chain, or to determine the degree of effectiveness in practice of our policies and procedures. However, following our review, we believe that our policies and procedures are effective at reducing the risk of slavery and human trafficking occurring in our supply chain, while recognising the importance of ongoing improvement.

In early 2019, we launched an enhanced supplier appraisal process. Improvements included asking all relevant suppliers to provide details of their ethical, environmental, sustainability, and corporate social responsibility policies along with their Modern Slavery Act statements. The new process also emphasises our commitment to paying the Real Living Wage for any personnel who are contracted to work on any of our sites.

WORK FOR THE FUTURE TARGETS FOR 2020

By the end of the 2019-2020 financial year, we aim to:

- Produce the next risk report and mitigation plan, updating and maintaining the supplier risk register as appropriate;
- Strengthen and improve the effectiveness of our relevant policies and procedures at reducing the risk of modern slavery and human trafficking occurring in our supply chain; and
- Implement a modern slavery awareness training programme for key staff.

LONG TERM AIMS

Ultimately, we aim to:

- Produce a biennial risk report and mitigation plan covering our active suppliers;
- Continually review and update as necessary our policies in relation to anti-modern slavery and human trafficking;
- Continually review and improve sign-off processes for potentially high-risk and high-value suppliers.

We will provide regular updates to the Audit & Finance Committee and the Board of Trustees on our annual policy review, as well as progress against our aims, with a view to including future plans in the charity's business strategy.

This statement will be reviewed in 2020 and published in line with the requirements of the Modern Slavery Act 2015.



Ian Krieger, Chairman

Date: 9/7/19



Henny Braund, Chief Executive

Date: 9.7.19