# Modern Day Slavery and Anti-Human Trafficking

# **Statement**

UK Modern Slavery Act

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# I. DAI's Organizational Structure

DAI is a private development company based in Bethesda, Maryland with corporate offices in London and Apsley, United Kingdom. DAI's mission is to make a lasting difference in the world by helping people improve their lives. DAI operates worldwide to accomplish this mission and has a strong presence in developing countries around the world including Central and South Asia, Africa, and the Middle East.

DAI is led by its Global Executive Team, which is responsible for setting and reinforcing a culture of ethical behavior and compliance. DAI's Global Ethics and Compliance Program is overseen by the Global Ethics and Compliance steering committee, which includes members from the company's Internal Audit, Contracts, Operations, and Human Resources departments, Office of General Counsel, and others, as necessary. DAI's Code of Business Conduct and Ethics ("the Code") alerts DAI employees and affiliates to areas of ethical risk, and provides guidance on recognizing and handling issues, including suspected human-rights violations, properly.

### II. DAI's Policies and Procedures

DAI is committed to enforcing anti-human trafficking and anti-slavery practices worldwide. DAI will only engage with vendors, suppliers, consultants, subcontractors, grantees, and clients who demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws. All contracts issued to third-party suppliers, vendors, consultants, and grantees ("contractors") require compliance with DAI's core values as described in the Code., The Code contains information for DAI's employees and contractors on upholding the integrity of DAI's work and reiterates DAI's zero tolerance for modern-day slavery and human trafficking.

All DAI employees are expected to review and understand the Code, and all employees and contractors are required to sign an agreement stating that they will adhere to the Code. To report unethical behavior, or suspected breaches of DAI policies, employees may contact their supervisor, manager, or Chief of Party/Team Leader. There are many ways to submit a concern or a complaint. Concerns or complaints may also be submitted via email (ethics@dai.com), website (www.dai.ethicspoint.com), ethics hotline telephone (+1-503-597-4328), fax (+1-240-823-2550), or mail (*United States*: 7600 Wisconsin Avenue, Suite 200, Bethesda, MD 20814, United States; *United Kingdom*: 3<sup>rd</sup> Floor Block C, Westside, London Road, Apsley, Hertfordshire, England HP3 9TD).

DAI has a strict non-retaliation policy. DAI will not discharge, demote, suspend, threaten, harass, or in any manner discriminate against any person in terms and conditions of employment based upon any lawful actions that person may take in making a good-faith report of ethics or compliance concerns.

In addition to the standards set forth in the Code and internal implementing policies, DAI promotes and supports the freedom of each employee to terminate his or her own employment, as well as the freedom of movement of its employees. DAI prohibits threats of violence, harassment, and intimidation, as well as involuntary servitude, including debt bondage and bonded labor. DAI does not engage in disciplinary measures which include an obligation to work or compulsory overtime, and rejects the use of worker-paid recruitment fees.

### III. Due Diligence

Because DAI is responsible for complying with restrictions from various governments, DAI exercises due diligence on all aspects of its work. DAI considers the nature and the business practices of every party it engages with to ensure that vulnerable workers are not being trafficked or enslaved in filling positions of low or unskilled labor along the supply chain. DAI always promptly investigates and responds to any allegations or reports of potential violations of human rights.

### IV. Assessing and Managing Risk

Supervisors and managers have a special responsibility to lead by example, to establish the expectations for behavior within the firm, and regularly speak with staff about the importance of ethics to maintain a work environment that is not only knowledgeable about assessing and managing risks, but also conducive to openness in reporting potential violations.

Executives from the Global Executive Team ensure that all employees are trained and meet the ethical standards laid out in the Code. The Global Executive Team monitors risks of supply-chain slavery and human trafficking issues. All members of the Global Executive Team can propose changes needed in policy and practice in order to better assess and manage risk.

### V. Effectiveness of Policies and Procedures

DAI's primary governing body is the Board of Managers, which oversees DAI's Global Ethics and Compliance Program and ensures the program is appropriate and effective. Most members of the Board of Managers are external to DAI, which allows the Board to have an independent and objective perspective on issues. This ensures that performance incentives, such as utilizing the lowest cost products or vendors, do not create an increased risk of slavery or human trafficking.

# VI. Available Training

DAI requires employees to attend an annual ethics training and provide a written certification that he or she has reviewed, understood, and agrees to comply with DAI's Code of Business Conduct and Ethics. The Code is readily accessible to all at <a href="https://www.dai.com/who-we-are/ethics-integrity">https://www.dai.com/who-we-are/ethics-integrity</a>, under "Featured Links." In addition, DAI is taking steps to comply with the Modern Slavery Act by developing awareness training on modern-day slavery and human trafficking.