



Taysha

Modern Slavery and Anti-Trafficking Statement and Policy

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Modern Slavery and Anti-Trafficking Statement and Policy

INTRODUCTION

1. Taysha Consulting, Ltd. is committed to the principles and required conduct needed to prevent modern slavery and trafficking. The Company support the UK Modern Slavery Act (2015) in its entirety throughout the Company's operations.
2. Our commitment to prevent the existence of modern slavery and trafficking extends beyond our own business practices and to the operations, policies and practices of our supply chain.

STRUCTURE AND SUPPLY CHAINS

3. Taysha Consulting, Ltd. is a privately-held, woman-owned international development consultancy based in London, United Kingdom. The Company's mission is to "do good through the implementation of collaborative, locally-led sustainable solutions through the use of communications." To achieve this mission, the Company operates worldwide mostly in developing countries and conflict zones located in sub-Saharan Africa, Central and Southeast Asia and the Middle East.
4. Within our supply chain the Company works with external businesses, self-employed consultants, public traded companies, non-governmental organisations, community-based organisations and not-for-profits located within the UK, internationally and overseas. The Company recognises that some of our partners operate in origin, transit and destination countries for human trafficking and countries with high levels of modern slavery. Therefore, the Company works with our supply chain partners to conduct due diligence and to operate with transparency.
5. The Company's leadership is under the direction of the Company's Owner and Director, who is responsible for the enforcement of the Company's policies with all representatives. A Company Code of Conduct was introduced to ensure that all representatives adhere to uniform policies to prevent exploitation, protect children, institutionalise equality and how to handle grievances, human rights violations and abuse.

POLICES ON MODERN SLAVERY

6. Taysha Consulting, Ltd. is committed to enforcing anti-slavery and anti-trafficking practices in all of its work. All partners, consultants, contractors, representatives and clients that the Company engages with must demonstrate a serious commitment to complying with human rights laws and, where legislation is weak, to standards set by international organisations and agreements.
7. All contracts issued to third parties require compliance with ethical and compliance standards set forth in the Taysha Consulting, Ltd. Code of Conduct and other policies. All employees, consultants, contractors and representatives are required to read all policies and sign a declaration stating they have read, understand and will comply with the Company's policies and Code of Conduct.

- 8.** The Company takes a zero-tolerance approach to modern slavery and trafficking; and has embedding practices in the Company's policies to prevent modern-slavery and trafficking in the supply chain. The policies include issues related to recruitment, reporting of violations and ethics. They are shared widely and include, but not exclusively:
- Code of Conduct
 - Supplier Code of Conduct
 - Anti-Discrimination and Equality Policy
 - Child Protection Policy
 - Information Security Policy
 - Whistleblowing Policy
 - Integrity and Governance Policy
 - Procurement Policy
 - Anti-Terrorism Policy
 - Anti-Bribery Policy
- 9.** The Company expects its entire supply chain to obey the law and comply with policies and guidelines. However, should an employee, consultant, contractor or representative be suspected of not obeying the law or conducting business in an unethical manner, the Company's Whistleblowing Policy may be enacted.

DUE DILLIGENCE

- 10.** Taysha Consulting, Ltd. has a due diligence process that applies to all service providers in our supply chain. The Company conducts due diligence on companies and individuals with whom the Company enters agreements. Our due diligence reflects the fact that much our work takes place in high-risk environments.
- 11.** When conducting due diligence, the Company considers the nature of the business (listed company, private company, individual consultant, charity etc.) and conducts it accordingly to ensure that vulnerable workers are not being trafficked or enslaved in filling positions of low or unskilled labour along the supply chain.

RISK ASSESSMENT AND MANAGEMENT

- 12.** The Company takes seriously the management of risks in all its operations. The Company holds a Risk Register and regularly reviews and revises based on changing contexts. In addition to risk associated with individual operating environments and operating risks, the risk register documents and assesses risks associated with forced slavery and trafficking in the supply chain and factors that contribute to serious violations of workers' human rights. Our risk assessments take into account the following issues which can contribute:
- Subcontracting and the complexity of a supply chain
 - Nature of the relationship between the supplier and the Company
 - Presence of any labour recruiters within the supply chain
 - Existence or non-existence of government regulation and/or poor enforcement of labour standards
 - Presence of cheap labour and high number of vulnerable workers
 - Absence of effective workers' organisations / collective agreements
 - Nature and the location of the work

13. All suppliers are required to sign declarations stating that they will respect human rights and operate with a zero tolerance of modern slavery across their business, address any identified risks of modern slavery, monitor and evaluate measures in place and communicate and report any incidents of modern slavery.

REPORTING VIOLATIONS

14. All employees, representatives, contractors, consultants and suppliers are informed of how to report modern slavery, trafficking and human rights violations and are provided with the Company's Whistleblowing policy.
15. All employees, representatives, contractors, consultants and suppliers are informed about their rights and how to report any concerns or grievances in a format and language they can understand. Grievance mechanisms are outlined in all contracts
16. Any suspected or reported incidents of modern-slavery or trafficking that have been reported to or identified by the Company and will be investigated and reported to the appropriate authorities. All information relating to the incident(s) will be held on a secure network, with password protected documents and hard copies kept in a locked file cabinet.

TRAINING ON MODERN SLAVERY AND TRAFFICKING

17. The Company provides annual training on modern slavery and trafficking to employees and representatives. It is available to contractors, consultants and suppliers, who are identified as requiring the training based on the risk assessment. It is also included in employee induction.
18. The training is updated as required with new laws, international agreements, country-specific information and training feedback forms. The content includes awareness raising of the signs of modern slavery, information on how to raise complaints, related company policies related to modern slavery, human trafficking and forced labour.



Signed: Stacy M. Hilliard
Director
Taysha Consulting, Ltd.

26 March 2018