



## Modern Slavery Statement

### Year 9 Statement

International Medical Corps (UK) (the “Charity”) is an international humanitarian non-governmental organisation (NGO) with its headquarters in London. The Charity is an independent affiliate of International Medical Corps, a US-registered non-profit organisation, and International Medical Corps Croatia, a Croatian non-profit association that share the same mission. Through an Administrative Services Agreement, International Medical Corps (UK) engages International Medical Corps in the delivery and implementation of its programmes in accordance with the terms and conditions of its grants. International Medical Corps (UK) and its affiliates are committed to preventing modern day slavery and human trafficking within its organisation, its partners and its supply chains. This statement applies to the financial year ended on 30 June 2025 and outlines the steps that the Charity has taken to address and eliminate, as far as possible, the risk of modern slavery and human trafficking.

### Organisational Structure and Business

The Charity is governed by six trustees who are also directors of the company for the purposes of the Companies Act. The day-to-day management of the Charity is delegated to the Charity’s Managing Director, who makes operational decisions in coordination with a team of senior staff. During the year ended 30 June 2025, the Charity provided assistance to vulnerable populations in twenty-six countries and territories:

Afghanistan	Libya	Sudan
Cameroon	Mali	Syria
Central African Republic	Myanmar	Ukraine
Democratic Republic of Congo	Nigeria	USA
Ethiopia	Pakistan	Venezuela
Iraq	Palestinian Territories	Yemen
Jamaica	Puerto Rico	Zimbabwe
Jordan	Somalia	
Lebanon	South Sudan	

Humanitarian programmes in these countries are implemented by the Charity’s US affiliate and their project activities are conducted from decentralised sites determined by the humanitarian needs of affected populations.

The Charity works in six main areas:

- Strengthening health capacity
- Emergency response and preparedness

- Mental health and psychosocial support
- Women and children's health
- Water, sanitation, and hygiene (WASH)
- Nutrition and food security

Neither the Charity nor its US affiliate knowingly enter into business with any organisation, in the United Kingdom or abroad, which supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to the Charity in its own work is obtained by means of slavery or human trafficking. The Charity strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the above-listed countries and in many cases exceeds those minimum requirements for its employees. Both the Charity and its implementing affiliate have assigned officers to monitor the implementation of Safeguarding and Anti-Slavery/Anti Human Trafficking policies. The Charity and its US affiliate have not received any credible allegations in the reported period related to slavery or human trafficking.

## Supply Chain

In order to fulfil its humanitarian mission, the Charity funds programmes that utilise goods, services and works procured from a variety of suppliers. The Charity's US affiliate's main supply chains include suppliers of:

- Medical commodities (pharmaceuticals, medical and laboratory supplies and equipment)
- Nutrition food and micronutrients (for therapeutic and supplementary feeding of children)
- Food items (cereals, pulses, oil, sugar, salt etc.)
- Non-food items (water, sanitation and hygiene supplies, shelter materials, household supplies, clothing and footwear, etc.)
- Non-medical supplies and equipment (such as vehicles, power supply equipment, water and sanitation equipment, ICT and database equipment etc.)
- Construction works (such as rehabilitation or construction of health facilities and water and sanitation network supply)

## Potential Exposure

The Charity understands that, due to its extensive work and related procurement in countries where human rights protections may be limited, it is exposed to the risk of doing business with an entity that facilitates, supports, or engages in modern slavery and/or human trafficking. The Charity and its US affiliate actively and continuously works to eliminate the risk to the extent possible.

## Policies, Procedures, and Training Related to Modern Slavery and Human Trafficking

The Charity and its US implementing affiliate have the following policies and procedures that set forth its commitment to preventing modern slavery and human trafficking:

- Code of Conduct and Ethics

- Safeguarding Policy encompassing trafficking prevention and policy against sexual exploitation and abuse
- Whistleblower Policy and anonymous or confidential Hotline Reporting Mechanism (EthicsPoint)
- Mandatory All-Staff Training (MAST) and annual refresher to ensure all staff are trained on the above policies and related procedures

New employees are informed about these organisational policies by the human resources function during the on-boarding orientation. Additionally, all employees are provided with discrete annual trainings about the prevention of both trafficking in persons and sexual exploitation and abuse. Related information is made available to employees on the organisation's intranet, as well as through posters and informational sheets that are displayed in all field and headquarters offices.

International Medical Corps has a variety of reporting mechanisms that allow individuals—including beneficiaries, staff, volunteers, partners and donors—to confidentially or anonymously report any cases of misconduct, policy violations, or any other conduct inconsistent with International Medical Corps' Code of Conduct and Ethics. One mechanism is the confidential internet hotline called EthicsPoint which can be accessed at: [www.internationalmedicalcorps.ethicspoint.com](http://www.internationalmedicalcorps.ethicspoint.com). The hotline information is available on our intranet and posted in all offices. In addition, we provide email reporting mechanisms at: [report@internationalmedicalcorps.org](mailto:report@internationalmedicalcorps.org).

International Medical Corps' Safeguarding management mechanisms include an HQ-based Safeguarding Case Management Team comprising inter-departmental senior managers responsible for reviewing safeguarding complaints (including those of modern slavery and Human Trafficking), overseeing investigations and facilitating survivor assistance. Safeguarding focal points are assigned at the country level, with support and guidance from the Safeguarding Unit based from Headquarters.

International Medical Corps has a dedicated internal Safeguarding Task Force to consolidate and better coordinate actions related to PSEA and broader safeguarding.

The Charity's implementing affiliate has nearly one hundred Safeguarding Focal Points identified at country level. Safeguarding Focal Points are nominated by the Country Director in accordance with a standardised TOR. Safeguarding Focal Points are provided orientation and ongoing training and are supported by safeguarding staff at Headquarters. Safeguarding Focal Points' responsibilities include training, monitoring the implementation of the safeguarding action plan, coordinating with the Headquarters Safeguarding Taskforce, and liaising with other focal points from partner agencies and working groups.

International Medical Corps' Partnerships and Subawards Manual provides a clear guidance on the partners due diligence process, which is comprehensive and consists of two parts: 1) Section A evaluates the organisation's technical ability to design and implement projects and 2) Section B assesses their operational infrastructure, financial soundness, and risk level. This two-step process ensures our partners are both technically proficient and operationally capable of meeting the high standard required by us and our donors. Furthermore, depending on the risk assessment rating, as a part of the sub-award negotiations, additional risk mitigation measures and capacity strengthening plans can be introduced in the effort to mitigate any risks related to safeguarding compliance.

These policies and procedures and structures embody the Charity's and International Medical Corps' commitment to ethical standards in all their work and to comply with those standards by implementing and enforcing effective systems and controls to eliminate, as far as reasonably practicable, the risk of modern slavery and human trafficking in their work and supply chain. In addition, the Charity has a Safeguarding Officer who also serves as the Slavery Compliance Officer to whom all concerns regarding modern slavery are required to be addressed.

### **Due Diligence Processes to Combat Modern Slavery and Human Trafficking**

The Charity and its US affiliate carry out due diligence to further limit the risk that modern slavery and/or human trafficking takes place in their organisation or supply chains. To this end, both the Charity and its US implementing affiliate have implemented the following processes:

- Registration for all suppliers that supply over \$1,000 of goods or services and require agreement to our standard terms and conditions and Vendor Code of Conduct that include a ban on any activities that violate international laws prohibiting corruption, sexual exploitation, trafficking, child labour and other abuse of persons or facilitate or support trafficking in persons in any form (including sex trafficking or the recruitment, harbouring, transportation, provision or obtaining of a person for labour or services through the use of force fraud or collusion). Violation of any of above constitutes a breach of an essential term of the Purchase Order/Contract leading to revoking vendor's registration with IMC, cancelling orders and inclusion of the company in International Medical Corps' internal watch list that is maintained by our Ethics & Compliance department;
- Requirement for subcontracts to contain a provision prohibiting the conduct described above;
- Screening all suppliers that meet our risk-based thresholds through a third-party *prohibited party* sanctions screening database. High value procurements undergo additional enhanced due diligence checks;
- Procurement staff must observe and report any noted signs of modern slavery including human trafficking, child labour, forced labour and other unethical behaviour issues, when performing vendor physical verification;

- Include compliance with ethical requirements as part of supplier's performance evaluation;
- Guidance & recommendations for country teams to conduct annual physical due diligence visits & ethical checks on our suppliers wherever feasible;

The Charity has not, to its knowledge, conducted any business with another organisation that has been found to be involved in modern slavery and/or human trafficking. Where there have been non-compliance allegations against any supplier or related ban/suspension that the Charity has been aware of, the Charity and its implementing affiliates have suspended business relationships with any such supplier. International Medical Corps' internal audit, legal, and compliance teams are involved in ensuring that the systems described above work effectively and, in addition to management, monitor them regularly, adapting as necessary to changing circumstances and needs.

### **Future Plans**

The Charity and its implementing affiliate are planning to undertake the following activities over the next twelve months to improve our processes and procedures in respect of Modern Slavery Act:

- Continue monitoring of violations and banning work with businesses with credible allegations or proven misconduct and marking them and their products as ineligible for procurement or receipt as donation.
- Ensure International Medical Corps staff have access to and take training related to vendor eligibility also addressing vendor's conduct in relation to Modern Slavery.

### **Safeguarding Officers**

The Charity and its implementing affiliate have assigned officers to whom concerns regarding modern slavery should be addressed, who will then undertake relevant actions.

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This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes International Medical Corps UK's modern slavery and human trafficking statement for the financial year ended 30 June 2025 as approved by the Board on *15 December 2025*.



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Andrew W Géczy  
Chair, Board of Trustees  
International Medical Corps (UK)