

# Mercy Corps Europe

## Modern Slavery Statement – 2024-2025

### Introduction

The Modern Slavery Act 2015 states that UK organisations with a turnover of £36 million or above must publish an annual statement to report on the steps they are taking to ensure that modern slavery and human trafficking are not taking place in the supply chains that provide their goods and services. Mercy Corps Europe has been publishing an annual statement since 2016.

As a global humanitarian and development organisation, Mercy Corps Europe is committed to preventing modern slavery and human trafficking within its organisation, and to ensuring that its operations, supply chain and the programmes which it implements are free from modern slavery and human trafficking. This Statement sets out the steps which Mercy Corps Europe (as part of the global organisation, Mercy Corps) is taking to mitigate against the risks of modern slavery and human trafficking.

### Organisational Structure

Mercy Corps Europe is a registered Scottish charity, structured as a registered company limited by guarantee in the UK. Mercy Corps Europe is part of the world-wide organisation Mercy Corps. Mercy Corps consists of:

- Mercy Corps Global, a US entity registered in Washington State and its country operations, including branches and local organisations (located in approximately 40 countries);
- Mercy Corps Europe, a UK entity with offices in Edinburgh and London;
- Mercy Corps Netherlands, a Dutch entity with offices in The Hague and Brussels; and
- Other affiliated entities of the global organisation.

### Business and Supply Chain

Mercy Corps exists to alleviate suffering, poverty and oppression by helping people build secure, productive and just communities.

As of 27 May 2025, Mercy Corps Europe employs 165 persons and Mercy Corps globally has over 4,200 team members. Mercy Corps defines “team members” to include members of the Board of Directors, officers, management, employees, seconded employees, interns and volunteers.

Mercy Corps’ supply chain comprises subawardees, partner organisations, contractors, vendors, outside experts, consultants, agents, representatives and other organisations or individuals that act on Mercy Corps’ behalf or at Mercy Corps’ direction, known collectively as “partners”.

Mercy Corps works in around 40 countries and procures a wide range of goods and services from suppliers around the world, including based directly or indirectly in countries deemed to be higher risk on the Global Slavery Index. Mercy Corps' main types of procurements include agricultural material and equipment, construction material and services, education and training services and water, sanitation and hygiene materials. The majority of our suppliers are local wholesalers for tangible items and international suppliers for consultancy services. For further information on where Mercy Corps works and what we do, please see our [website](#).

## Policies and Procedures

Mercy Corps has policies and procedures in place to minimise the risk of modern slavery and human trafficking in its operations and supply chain. Mercy Corps' suite of globally applicable Ethics policies includes:

- Anti-Human Trafficking and Exploitation Policy;
- Child Safeguarding Policy;
- Speak Out! Policy;
- Prevention of Sexual Exploitation, Abuse & Harassment (PSEAH) of Program Participants and Community Members Policy (formerly Prevention of Sexual Exploitation and Abuse of Program Participants and Community Members Policy);
- Sexual Misconduct in the Workplace Policy;
- Discrimination, Harassment and Bullying Policy;
- Anti-Fraud and Anti-Corruption Policy;
- Preventing Support for and Transactions with Prohibited Parties Policy;
- Conflict of Interest Policy;
- Safeguarding Core Standards Policy; and
- Community Accountability and Reporting Mechanism (CARM) Policy.

The Ethics policies and accompanying guidance are available publicly on our website: <https://www.mercycorps.org/who-we-are/ethics-policies>. These policies are also available on our internal Digital Library (and signposted through various other internal platforms). All policies are available in English, Arabic, French, Spanish and Russian. Mercy Corps' Ethics policies are reviewed every two years to ensure they meet or exceed all donor requirements, are consistent with evolving best practice and responsive to learnings from our reports and investigations.

**All team members and partners (as defined above and in the policies) must comply with our Ethics policies as a condition of engagement with Mercy Corps. All team members are required to undertake training on the Ethics policies as part of their onboarding and annually thereafter.**

Further information about the Ethics policies relevant for our commitments against modern slavery and human trafficking is provided below.

### **Anti-Human Trafficking and Exploitation Policy**

Mercy Corps is committed to a work environment and operations that are free from human trafficking and exploitation. Mercy Corps does not tolerate human trafficking or slavery in any part of our global organisation or with any of our partners.

Following a comprehensive external review of our safeguarding policies by an expert organisation, including to ensure that our Ethics policies covered all requirements in relation to the UK Modern Slavery Act, the updated Anti-Human Trafficking and Exploitation Policy was approved in March 2023 and subsequently rolled out with mandatory training for all team members. The Policy was updated again in 2025 with minor revisions to reference mandatory prevention requirements from Mercy Corps' Safeguarding Core Standards Policy. The Policy provides detail about our commitment to ensure that our programmes, operations, and supply chains are free from all forms of human trafficking, modern slavery, and exploitative labour, including child labour, as well as ensuring we are compliant with all regulatory requirements and best practices.

The Anti-Human Trafficking and Exploitation Policy includes the following provisions:

- Stating our zero tolerance for any conduct which is abusive or exploitative;
- Requiring adherence to all laws prohibiting exploitation and trafficking in persons;
- Outlining our commitment to the core principles of the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children; and International Labor Organization (ILO) standards, including those on forced labour and child labour;
- Prohibiting any team member or partner from engagement, complicity in, or benefiting from any practice that constitutes human trafficking or exploitation;
- Outlining specific prohibited conduct, including:
  - The use of worker-paid recruitment fees;
  - Child labour (linked to the Child Safeguarding Policy, further outlined below);
  - The confiscation, withholding or destruction of workers' original identification documents;
  - Procuring commercial sex acts;
  - Employing domestic help exploitatively;
  - Forced or exploitative labour; and
  - Fraudulent recruitment practices;
- Procedures required to ensure compliance with the Policy, including in relation to procurement (further outlined below); and
- A reporting requirement that team members, partners and visitors are required to immediately report suspected violations of this Policy. This commitment is also included in the Speak Out! Policy and other Ethics policies.

### **Child Safeguarding Policy**

The Child Safeguarding Policy was substantially reviewed in financial year 2022-2023 and an updated Policy approved in March 2023 and subsequently rolled out. The Policy was updated in 2025 with minor revisions to clarify language and reference mandatory requirements in the Safeguarding Core Standards Policy. The Policy describes the special obligation that all Mercy Corps Team Members and Partners have to ensure the safety, well-being and dignity of all children they come into contact with and articulates zero tolerance for physical, sexual, emotional abuse and neglect. It includes an absolute prohibition on any form of sexual activity with children under 18, including child marriage. The Policy also contains provisions on digital safeguarding, grooming, and mandatory reporting of any suspicions of abuse.

Our Child Safeguarding Policy reinforces our commitment to international standards, including the United Nations Convention on the Rights of the Child and International Labor Organization conventions. The child labour provisions articulate the difference between acceptable work for children under the age of 18 and prohibited child labour: work that is mentally, physically, socially, or morally dangerous or harmful to children, and/or interferes with their schooling.

This Policy states the expectations regarding team member conduct with children, both during and outside of working hours and clearly outlines prohibited conduct. It states the process and procedures that Mercy Corps will maintain to ensure that team members uphold its standards and how cases of misconduct are identified, reported and addressed in an appropriate and timely manner. The Policy applies globally despite local custom, law or age of consent. All team members, partners and visitors are required to report suspected violations of this Policy as soon as possible.

### **Prevention of Sexual Exploitation, Abuse and Harassment of Participants and Community Members Policy**

Mercy Corps is committed to ensuring that all individuals we come into contact with through our work, whether team members, community members, programme participants or others, are treated with respect and dignity. We expect team members, visitors and partners to put the well-being and best interests of our programme participants as the highest priority, and to never engage in conduct that could be perceived as abusive, exploitative or harassing. We expect all team members to foster a culture that supports this standard. We will not tolerate sexual exploitation, abuse, or harassment by our team members, visitors or anyone else receiving Mercy Corps resources. We are committed to the core principles regarding the prevention of sexual exploitation and abuse outlined by the United Nations Secretary General in 2003, as well as the 2019 Inter-Agency Standing Committee (IASC) 6 Core Principles Relating to Sexual Exploitation and Abuse, and Mercy Corps is a signatory to the “Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and non-UN Personnel.”

This Policy applies globally and sets forth our expectations of personal and professional behaviour related to the prohibition of sexual exploitation, abuse or harassment of programme participants and community members and the required procedures to ensure we uphold our commitment to preventing such conduct and respond appropriately and in a survivor-centred way to all allegations of exploitation or abuse. The Prevention of Sexual Exploitation, Abuse and Harassment of Participants and Community Members Policy was updated in April 2025 to expressly include sexual harassment in the title and content of the Policy, and to clarify language prohibiting the making of sexual advances to participants as well as to reference mandatory prevention requirements in the Safeguarding Core Standards Policy.

### **Safeguarding Core Standards Policy**

The Safeguarding Core Standards Policy was launched in January 2024, with the intent to more fully operationalise our safeguarding commitments, clarify responsibilities and ensure every team member at Mercy Corps understands their role and is empowered to prevent and respond to exploitation, abuse, trafficking and harassment, leading to a more safe, diverse and inclusive Mercy Corps. There are ten core standards, which outline specific minimum requirements. Each

standard is accompanied by field-tested tools and guidance to support their implementation. The ten standards are:

1. Safeguarding prevention and response roles are in place at the country level;
2. Safe recruitment processes are in place;
3. All team members receive regular and ongoing safeguarding training;
4. Leadership at all levels demonstrate commitment to safeguarding;
5. Safeguarding is integrated throughout the programme cycle and included in programme budgets;
6. Partners and contractors are vetted, monitored, and supported appropriately on safeguarding;
7. Reporting systems are trusted, operational, accessible and communicated;
8. Survivors are treated with respect and provided with appropriate, dignified support;
9. Safeguarding investigations are survivor-centred, timely and thorough; and
10. Images, stories and personal information are gathered, stored and used safely.

We are continuing to sensitise country teams on the implementation of the Core Standards Policy and aim to monitor progress via a Core Standards Implementation Dashboard. The Dashboard allows us to identify gaps and areas for ongoing support by the global and regional safeguarding teams where possible.

### **Sexual Misconduct in the Workplace Policy**

Mercy Corps is committed to a work environment in which everyone is treated with respect and dignity. We will not tolerate sexual harassment or assault by or of team members anywhere in the world. The Sexual Misconduct in the Workplace Policy sets out Mercy Corps' prohibitions against sexual harassment and sexual assault and the required procedures to ensure Mercy Corps upholds its commitment to preventing sexual harassment and assault by and of team members. It is intended to ensure that all team members around the world are held to a common minimum standard and that all allegations of violations and decisions regarding disciplinary measures are handled in a manner as consistent as possible. The Sexual Misconduct in the Workplace policy was updated in April 2025.

### **Discrimination, Harassment and Bullying Policy**

Mercy Corps does not tolerate discrimination, harassment, or bullying of team members anywhere in the world. The Discrimination, Harassment and Bullying Policy sets out Mercy Corps' prohibitions against discrimination, harassment, and bullying and the required procedures to ensure Mercy Corps upholds its commitment to preventing harassment, discrimination and bullying by and of team members and that all working relationships are free of bias and prejudice. This policy is intended to ensure that all global team members are held to a common minimum standard and that all allegations of violations and decisions regarding disciplinary measures are handled in as consistent a manner as possible.

## **Speak Out! Policy (formerly Ethics Complaint and Whistleblowing Policy)**

The Speak Out! Policy was reviewed and updated in financial year 2023-2024. All team members at Mercy Corps are expected to perform with the highest personal and professional ethical conduct. This policy serves to guide team members who have specific concerns that our commitments to ethical conduct may be at risk. It addresses how team members can report specific concerns and potential policy violations, the protections against retaliation for reporting, and how Mercy Corps will respond to reports. It includes the principle of non-retaliation that no team member or partner who reports a violation will suffer harassment, retaliation, or adverse employment consequences, such as being terminated, demoted, or otherwise discriminated against as a reprisal for reporting a violation. Any team member who is determined to have retaliated against someone for reporting a violation may be subject to discipline up to and including termination of employment.

The Speak Out! Policy also includes details on Mercy Corps' [Integrity Hotline](#), which is intended for reporting Mercy Corps' Code of Conduct violations confidentially and directly to the Global Ethics Department and/or to seek advice. The Integrity Hotline web portal is available in four languages, 24 hours a day. An email address and phone lines in over 50 languages are also available. All team members, partners and visitors are required to report suspected violations of our Ethics policies as soon as possible. Reports may be submitted anonymously.

## **Community Accountability and Reporting Mechanism (CARM) Policy**

CARM was developed as part of Mercy Corps' global commitment to accountability to affected populations and the prevention of all forms of exploitation and abuse. CARM is a channel for community members to provide feedback, suggestions, complaints, and concerns, in a manner that is safe, confidential, transparent, and accessible, enabling Mercy Corps to respond and make any necessary adaptations and to ensure the safety, security, and empowerment of programme participants. Mercy Corps creates and maintains accessible and effective reporting mechanisms so that our participants and the communities in which we work are able to report feedback and complaints in a manner that is safe, confidential, transparent and accessible. This includes reporting any concerning or unlawful situations or behaviours related to our team members, partners or programmes. The Policy includes requirements around CARM for partners. The Policy has an accompanying toolkit and is supported by CARM technical advisors.

## **Anti-Fraud and Anti-Corruption Policy**

Mercy Corps has a zero-tolerance approach to fraud and corruption. Mercy Corps' Anti-Fraud and Anti-Corruption Policy aims to help team members and partners understand prohibited acts of fraud and corruption and ensure that resources are not diverted from intended programme participants, as well as ensuring Mercy Corps' compliance with relevant anti-corruption laws and regulations applicable to Mercy Corps' global activities. The Policy will be reviewed in FY26.

## **Preventing Support for and Transactions with Prohibited Parties Policy**

This Policy sets out Mercy Corps' commitments and mandatory requirements to ensure adherence to humanitarian principles while preventing sanctions violations, diversion of resources to or support for combatants or terrorist organisations, money laundering, or

transactions with entities that are suspended, debarred or otherwise prohibited by Mercy Corps' donors. This includes not violating laws that prohibit providing material support to terrorist organisations, human rights violators (including human trafficking) and engaging in money laundering.

## **Code of Ethics**

Mercy Corps' globally applicable Code of Ethics provides an overarching framework for our Ethics policies and a high-level summary of our ethical policies, standards and expectations, as well as practical examples and questions and answers. The Code of Ethics supports team members to make ethical decisions and handle day-to-day challenges. It provides a high-level summary of many of our policies, standards and expectations and includes a specific chapter on Human Trafficking and Modern Slavery. The Code of Ethics is guided by four core principles which drive Mercy Corps' actions and work: integrity, honesty, respect and accountability. Compliance with Mercy Corps' Code of Ethics is a condition of employment or affiliation with Mercy Corps. Violation may result in disciplinary action, including, if appropriate, termination of employment. The Code of Ethics is available on Mercy Corps' internal Digital Library in English, Spanish, Arabic, French and Russian, and a public version can be found on our website.

## **Due Diligence Processes**

Mercy Corps considers carefully who we engage with as team members, partners and donors. Mercy Corps has in place comprehensive due diligence processes embedded within our functional policies and procedures. A summary of key due diligence processes as they relate to modern slavery and human trafficking is included below.

## **Team members**

Mercy Corps follows best practices in its recruitment and has incorporated a number of steps into the recruitment process to ensure accountability to safeguarding best practices. All national, international and headquarter recruitments include ethics and safeguarding questions at the time of application, interview and reference stage of the process. Mercy Corps conducts criminal background, reference and education checks for headquarters and international team members hired through our UK and Netherlands-based entities, as well as members of the Board of Directors. Reference checks include specific questions about previous ethics issues and/or concerns. Since 2021, Mercy Corps has been a signatory to the Misconduct Disclosure Scheme (MDS)<sup>1</sup> and is now using the MDS process across all country offices. The Safeguarding Prevention Team continues to support sensitisation sessions to HR and other relevant staff where possible.

## **Suppliers**

Mercy Corps' Field Procurement Policy and Procedures 2023 (FP3) requires the highest standards of efficiency and integrity in the procurement of goods, services and works and that Mercy Corps only selects suppliers that uphold basic social rights and working conditions based

---

<sup>1</sup> <https://misconduct-disclosure-scheme.org/>

on international labour standards and that do not engage in human trafficking or child labour. Due diligence includes screening suppliers against restricted party lists using third party software as required by Mercy Corps' Prevention of Support for and Transactions with Prohibited Parties Policy and Ineligibility and Compliance Checking (ICC) Framework. This includes screening against human trafficking related lists. The Procurement Department is responsible for ensuring that Mercy Corps' policies and procedures are followed in the supplier selection process.

For all standard tenders (over USD 25,000), the following due diligence steps are required to mitigate the risk of human trafficking and/or exploitation:

- Supplier reference checks to include minimum two questions related to anti-human trafficking and exploitation;
- Supplier self-questionnaire including questions around worker information and how the supplier assesses and monitors modern slavery related risks;
- Site visits are required for High Value Tenders (over USD 150,000) where the following two criteria are matched:
  - o Responses to self-questionnaire are inconclusive; and
  - o Involving high-risk procurement categories - construction, food supplies, staffing agencies, facilities services (e.g. security, cafeteria, cleaning);
- Site Visit Checklist/questions must be used. In cases where an international supplier is selected, either a remote assessment can be conducted or a third party can be hired.

For any procurement below USD 25,000 for one of the high-risk procurement categories, the potential bidders must submit a completed Supplier self-questionnaire as a minimum.

The enhanced due diligence steps were rolled out to key stakeholders, including through global webinars and facilitated discussions between Regional and Country Procurement Leads and Regional Safeguarding Advisors.

As per FP3, higher value procurements go through an open and fair tender process, therefore avoiding aggressive pricing and short lead times. Mercy Corps' contract terms include an express requirement that suppliers must comply with Mercy Corps' ethics policies. Suppliers agree to have their employees working on the Mercy Corps contract sign our simplified Supplier Code of Conduct which covers ethical labour standards. Suppliers must comply with Mercy Corps' and donors' principles of ethical procurement, including the avoidance of child labour and the respect of basic social rights and working conditions based on international labour standards. Monitoring is tailored based on the nature of the contract; for example, for works or construction contracts, the procurement and/or programmes teams would conduct regular oversight and site visits. Typically, an end of contract review is conducted, linked to our supplier performance management process. Mercy Corps and partner team members must report any violation or suspected violation of the ethics policies in relation to activities under contract with Mercy Corps to Mercy Corps' integrity hotline.

## **Partner Organisations**

Mercy Corps has a globally applicable Subaward Manual, which sets out the policies and procedures for working with partners receiving funds (i.e. subawards). The Subaward Manual sets out the mandatory due diligence process, including assessments of partners' financial and



programmatic capacity, systems and processes. These assessments include sections on safeguarding and ethics, HR and procurement. Partners are also screened in accordance with Mercy Corps' ICC Framework mentioned above.

Mercy Corps' subaward agreements include clauses requiring that partners comply with Mercy Corps' ethics policies (or their own equivalent policies if they are in place and they meet expected standards). All suspected incidents must be reported and appropriately investigated with a survivor-centred approach. Partners who do not have substantially equivalent safeguarding policies must agree to have their team members review and sign our simplified Partner Code of Conduct.

The Safeguarding Core Standards Policy further clarified requirements to ensure that safeguarding is incorporated into all our partnership processes. These include safeguarding assessments at due diligence stage, as well as joint assessment and capacity strengthening processes to identify areas of risk and ensure mitigation as well as build partner safeguarding capacity in longer partnerships where applicable.

## **Risk Assessment and Management**

Mercy Corps works in many contexts where there is an elevated risk of modern slavery and human trafficking. Mercy Corps takes appropriate measures to mitigate against these risks through our recruitment and supply chain procedures, due diligence and through monitoring by country teams, as well as internal audit and external statutory audits. In line with Mercy Corps Europe's risk management framework, the European corporate risk register is reviewed regularly together with risk owners and subject matter experts and shared three times a year with Mercy Corps' Joint Audit and Risk Committee. One of the key enterprise risks is around safeguarding, including in relation to modern slavery, and the mitigations include those highlighted in this Statement. Programmes are required to conduct risk assessments at the design phase, including an assessment of safeguarding risk, as per our Program Management Policy 2.0. Guidance on safeguarding risk assessments at programme level has been published and shared across country programmes with the launch of the Safeguarding Core Standards policy; implementation on the safeguarding risk assessment process is being monitored by the Safeguarding Prevention Team where possible.

Mercy Corps has a Global Ethics and Compliance Department, led by our global Chief Ethics and Compliance Officer (CECO), with a remit including safeguarding prevention, detection and response, as well as reflection and adaptation. The Safeguarding Prevention Team includes a Senior Director, UK Based Director of Safeguarding Support, and Regional Safeguarding Advisors who support the work of in-country Safeguarding roles, as well as trained Safeguarding Focal Points, Champions and Co-Investigators.

Mercy Corps Europe's latest completion of the FCDO Modern Slavery Assessment Tool (MSAT) was in September 2023 when we obtained a result of 84% (improved from the time prior). Recommendations included developing staff awareness on debt bondage and undertaking activities to support supply chain workers with accessing representation.

## Training

Mercy Corps ensures that all team members are aware of and understand our Ethics policies and commitments and their responsibilities through training. All team members are required to complete mandatory training on each of the Ethics policies within 30 days of commencing with Mercy Corps and annually thereafter. In September 2024 Mercy Corps released a new and improved Code of Ethics training, which includes an interactive module on recognising and reporting trafficking and modern slavery. A competition was held to encourage completion rates. By November 2024, 99% of staff had completed the new Code of Ethics training. Training modules are available through Mercy Corps' Learning Site in English, French, Spanish, Arabic and Russian. This training is also able to be provided offline. In addition, the Safeguarding Core Standards Policy requires twice annual face-to-face (where possible) safeguarding training for all team members who engage with participants. We have also created low bandwidth, modular safeguarding training programmes specifically for use with partners. Mercy Corps also hosts regular targeted safeguarding training for the Mercy Corps Board and for country leaders.

Mercy Corps requires trained safeguarding support roles in all country offices. As of January 2025, we had a total of 68 Focal Points, 102 Champions, and 29 Co-Investigators. These individuals serve as in-country safeguarding resources, working with the global Safeguarding Department and their country teams to raise awareness, deliver face-to-face training, and build trust and confidence in our systems and reporting mechanisms. They are trained in survivor-centred principles and assist in liaising with survivors if needed. They are available to receive safeguarding concerns, refer survivors or others to support services, and maintain community resource maps of support services available in each country. Mercy Corps aims to hold global trainings for Safeguarding Focal Points and Co-Investigators annually, supplementing with country and regional trainings where necessary. Our last global training was in November 2024 with 50 participants representing 24 countries. This training included content on the prevention of human trafficking, exploitation and child labour. As a result of USG funding cuts, a workforce reduction at Mercy Corps, and the ongoing review of our programme portfolio, these types of global trainings are currently paused.

Guides on our policies are available for team members and partners. Posters highlighting our requirements on misconduct and how to report must be displayed in all Mercy Corps offices. These posters were updated in April 2025. Mercy Corps provides all team members with updates in relation to ongoing safeguarding initiatives (and reinforcing the zero-tolerance approach) through a range of media and communications, in addition to the annual mandatory training. Topical tailored communications materials are also shared regularly, including a recently released training video for all team members around how to safely receive a safeguarding disclosure.

The Mercy Corps Global Safeguarding Report, which includes information on policies and a summary of safeguarding reports and outcomes, is published annually and is publicly accessible on the Mercy Corps website. The fifth edition was made available on our website this year in English, French, Arabic and Spanish: [Safeguarding Report FY2024](#).

## Key Performance Indicators (KPIs)

In FY2022, Mercy Corps introduced KPIs to track the effectiveness of Mercy Corps' efforts to tackle modern slavery. The updated data at the end of this financial year is below:

KPI	FY2025
1. Percentage of Mercy Corps team members who have completed Mercy Corps Ethics training (including modules on Anti-Trafficking and Child Safeguarding).	99% of global team (as of November 2024)
2. Percentage of Mercy Corps programmes globally which have in place an active CARM, meeting the minimum standards in Mercy Corps' CARM Policy.	All programmes had active CARM channels as of November 2024; current allocation of CARM resource under review following funding cuts
3. Number of reports related to modern slavery and/or human trafficking received through Mercy Corps' Integrity Hotline.	3 (related to MCE-funded programmes)
4. Percentage of suppliers for which due diligence is carried out prior to contracting, including assessment questions in relation to modern slavery risk.	100% of required due diligence

During this financial year, Mercy Corps Europe closed two cases which related to an alleged breach of our Anti-Human Trafficking and Exploitation Policy 2023. These cases were investigated by our Global Safeguarding Department in accordance with our Ethics policies and investigations protocols and one case was found to be substantiated, which resulted in termination of contract for the vendor. Additional measures were recommended, including tailored training and support. If survivors are identified, they are offered supportive resources. For the unsubstantiated case, we determined that the Subject of Complaint was not associated with Mercy Corps in any capacity. Both allegations were separately reported to appropriate local authorities. At the time of this Statement, another one case remains under open investigation.

**This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Mercy Corps Europe's modern slavery and human trafficking statement for the financial year 1 July 2024 to 30 June 2025 and covers all activities of Mercy Corps Europe.**

Final version provided concurrence by Mercy Corps Joint Ethics and Safeguarding Committee on 16 June and approved by Mercy Corps Europe's Board of Directors on 26 June 2025.



Signed on behalf of the Board by Lesley Ndlovu, Chairperson of the Board

July 30, 2025