



# Modern Day Slavery and Anti-Human Trafficking Statement

*February 1, 2026*

## 1.0 POLICY STATEMENT

Onward Resources International Ltd (“ORI”) is a global economic development advisory firm that partners with businesses, investors, global development agencies and the public sector in the design and implementation of impactful investments and strategies that are also sustainable. We passionately deploy our expertise and capabilities to advance Africa’s economic growth and structural transformation.

We recognize that our work entails implementing sustainable development programs, including in fragile states and conflict zones. ORI further recognizes that we all have a critical role and responsibility in combating and defeating modern-slavery and human trafficking in all its forms. We are committed to continually improving our practices to achieve this goal. As a firm, we are opposed to human trafficking and forced labor of any form—and have a zero-tolerance approach to modern slavery and human trafficking. We share this commitment with all our partners and seek to understand, prevent, and respond to all forms of abuse. Guided by the “Do No Harm” principle in all aspects of our work, we are dedicated to a coordinated and holistic approach to preventing and responding to slavery and human trafficking.

While professional services firms are generally regarded as being at relatively low risk for modern slavery and human trafficking, we believe it is essential to have robust risk identification and mitigation processes in place. This is to address reputational and regulatory risks, as well as for humanitarian reasons. As part of these efforts, ORI has implemented robust policies and systems designed to protect and empower our employees, independent consultants, beneficiaries, and those affected by these crimes to report their experiences, to ensure that survivors receive appropriate support that addresses their needs.

## 2.0 OUR BUSINESS

ORI designs and delivers on-the-ground programs in over fifteen African countries. Our work is in the areas of agribusiness and food systems, manufacturing and food processing, transport and mobility, infrastructure and resilient cities, youth economic opportunities, climate change, and broad-based private sector development. We implement innovative solutions in developing nations and in fragile states or regions where there may be conflict. We strive to maintain the highest standards of integrity, professionalism, and efficiency in carrying out our work.

### **3.0 OUR CODE OF CONDUCT AND SAFEGUARDING POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

ORI maintains and consistently applies Codes of Conducts for its employees, independent consultants, and third parties with whom we engage. The Codes of Conduct include specific requirements related to anti-slavery and human trafficking. We ensure that in every contract we enter into, these elements are embedded as part of our standard operating procedures in contracting. In all our contracts with supply chain partners, we require that they commit to abiding by ORI's Code of Conduct alongside our head contracts' safeguarding requirements.

These policies reinforce our commitment to ensuring that there is no modern day slavery or human trafficking in our supply chains or in any part of our business. Our business practices are encoded across key policies and procedures. They require respect, integrity, honor, and protection of the dignity of all with whom ORI conducts business, hires, or delivers services to. We fully endorse and support the principles of the International Labor Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work and the ILO's Forced Labor Convention. ORI further complies with the United States Government (USG) counter-trafficking regulation and FCDO supplier code of conduct declaration regarding safeguarding and trafficking. Our employees are empowered to report suspected cases of trafficking. ORI's Safeguarding Advisor is tasked with assessing the reports and recommending appropriate action, such as conducting further investigation, reporting to government oversight bodies, and making recommendations to the firm's leadership to take disciplinary/contractual action upto and including termination, where a violation has been established.

In addition, ORI policies on safeguarding allow for enhanced Prevention Procedures based on client or donor agency safeguarding and/or Code of Conduct requirements and procedures. Our standard practice is to "flowdown" these requirements to all subcontractors and grantees, as the case may be, for example, in FCDO contracts. In such cases, we require (and assist) subcontractors and grantees to develop compliance plans in accordance with our policies and the head contract. The extent of compliance is evaluated on an annual basis or per the requirements of the head contract.

Overall, our Modern Day Slavery and Anti-Human Trafficking Policy Statement reflects our commitment to act ethically and with integrity in all our business relationships, and to implement and enforce effective systems and controls to ensure modern slavery and human trafficking are not taking place anywhere within ORI and in our supply chains. Our safeguarding policies reinforce our commitment to all vulnerable individuals who may be affected by our work, including those who are at risk of being trafficked and subject to modern day slavery. Moreover, our Third-Party Screening Policy requires that third parties with whom we do business be screened in accordance with outlined procedures that also apply best practices in the sector.

### **4.0 OUTLINE OF POTENTIAL RISK AREAS FOR MODERN DAY SLAVERY AND ANTI-HUMAN TRAFFICKING IN OUR BUSINESS MODEL**

ORI recognizes that prioritizing safeguarding requires the commitment and endorsement of the firm's leadership, is reinforced through training, and backed by accountability and protection measures.

Although the risk of modern day slavery and human trafficking incidences are expected to be low based on our industry sector and business model, ORI has broadly outlined areas in which risks may emerge. These are:

- (a) use of slavery, servitude, and forced or compulsory labor;
- (b) securing services by force, threats, deception, or misrepresentation of facts;
- (c) excessive working hours, poor pay, threats or violence, and even sexual harassment;
- (d) exploitation of vulnerable individuals, including children;
- (e) working in an unsafe operational environment;
- (f) failing to provide a written contract of employment or proof of employment, where the law requires; and failing to pay wages that meet host-country legal requirements;
- (g) procurement of commercial sex;
- (h) acts that support or encourage trafficking in persons, including the following:
  - destroying, concealing, confiscating, or otherwise denying an employee access to that employee's identity or immigration documents;
  - failing to provide return transportation or pay contractually agreed return transportation costs to an employee from a country outside of the country from which the employee was recruited upon the end of employment, unless exempted from the requirement to provide or pay for such return transportation;
  - soliciting a person for employment, or offering employment, by means of materially false or fraudulent pretences, representations, or promises regarding that employment;
  - charging employees recruitment fees; or
  - if an employee or an independent consultant's contract requires the provision of housing, providing housing that fails to meet host-country housing and safety standards.

As elaborated above, the risk of ORI or any members of its supply chain engaging in modern day slavery is expected to be low. Even so, we acknowledge that some parts of our business model may be situated in environments with potentially elevated risks of modern day slavery. In addition to high levels of fragility, these areas often experience high poverty levels, limited awareness, and understanding of human trafficking and modern day slavery. They may also have weak national systems for monitoring and addressing human rights abuses, including modern day slavery incidents.

To mitigate potential risks, ORI has put in place this policy statement, guidance, and due diligence processes, along with steps to mitigate Human Trafficking and Forced Labor. These policies are aligned to and in accordance with section 54(1) of the UK's Modern Slavery Act 2015; the U.S. Trafficking Victims Protection Act (2000), and International Labor Standards on Child Labor and Forced Labor.

## **5.0 TRAFFICKING AND MITIGATION MEASURES, CONSEQUENCES OF POLICY VIOLATION, AND REPORTING ON POLICY VIOLATIONS**

The CEO and Senior Leadership Team are dedicated to leading by example in combating human trafficking and modern day slavery. In advancing this commitment, employees and volunteers are trained and aware of expectations for expected behavior. The firm supports a work environment that is knowledgeable in regards to assessing and managing risk, and a duty in reporting potential violations without fear of retaliation.

Our preventative measures include an explicit requirement that all applicable subcontractors submit a signed certification form laying out the policy and affirming that they will comply with applicable local laws, the U.S. Government counter-trafficking regulation, and/or FCDO supplier code of conduct declaration regarding safeguarding and anti-human trafficking.

Employees, volunteers, independent contractors, sub-grantees, and sub-contractors are allowed access to ORI's resources to report suspected cases of trafficking. ORI has put in place penalties for any and all violations of modern day slavery and anti-human trafficking policies. In addition, if ORI is made aware of any credible information from any source about a suspected trafficking violation, ORI will immediately form a team with a clear mandate to investigate such allegations, take appropriate remedial measures, and immediately notify its prime contractor (if ORI is a subcontractor) or donor agency clients, for example, FCDO per the requirements of safeguarding policies. ORI commits to fully cooperate with the relevant government agencies, including the United States Federal agencies responsible for audits, investigations, or corrective actions related to trafficking in persons, as necessary.

In the event of failure to comply with this policy by sub-contractor, sub-grantee, or independent consultants, employees or volunteers; ORI stands ready to take any and all appropriate actions up to and including immediate termination of contracts.

Employees, volunteers, sub-contractors, sub-grantees, or independent consultants are required to report any possible non-compliance with this policy immediately to their supervisor and/or ORI management, with the assurance that there would be no fear of retaliation of any form whatsoever. In addition, employees may report suspected violations to the 24-hour Global Human Trafficking Hotline by phone at +1-844-888-FREE or by email at email: [help@befree.org](mailto:help@befree.org). Employees and volunteers involved in FCDO funded business, can immediately report all suspicions or allegations of aid diversion, fraud, money laundering, or counter terrorism finance to the FCDO Counter Fraud and Whistleblowing Unit at email: [reportingconcerns@FCDO.gov.uk](mailto:reportingconcerns@FCDO.gov.uk) or on tel: +44 (0) 1355 843747.

## **6.0 TRAINING, COMMUNICATION, AND MONITORING OUR MITIGATION OF ANTI-SLAVERY AND ANTI-HUMAN TRAFFICKING RISKS**

Our safeguarding commitment is grounded in transforming the dynamics that enable slavery and human trafficking. This calls for raising awareness of our strict prohibitions against all forms of exploitation and abuse; assuring survivors that all complaints will be acknowledged, reviewed, and addressed by trained investigators and accountable decision-makers; and facilitating access to safe, context-appropriate reporting channels, assistance, and support.

To ensure a full understanding of the risks of modern day slavery and human trafficking in our industry and business model, we carry out comprehensive in-person orientation and mandatory training via online sessions to all employees, volunteers, independent contractors, and new hires. This incorporates training on our standards of business conduct for all employees across our offices and field programs. The training covers all aspects of ORI's code of ethics and expectations for what is acceptable and unacceptable conduct. We also provide tailored, one-on-one training with new project/engagement leaders to ensure they are aware of country-specific safeguarding risks and their duty to create and reinforce a culture of respect in all our operations. We conduct annual refresher training sessions as part of annual compliance training.

We empower our multi-disciplinary engagement teams to proactively identify, mitigate, and respond to safeguarding risks effectively. We further embed our safeguarding principles and standards into daily operations, thereby reinforcing our organizational capacity and track record in safeguarding

For our supply chain partners, we endeavor to build their capacity through training sessions and workshops. This deepens their understanding of the importance of ensuring that their own workforce and supply chain are free from modern day slavery and human trafficking. Where appropriate, we work with supply chain partners to improve their own policies and processes to mitigate the risks of modern day slavery and human trafficking.

As part of our general safeguarding activities, we maintain an investigations log that records any reports of suspected slavery and human trafficking. Since the formulation of this Policy Statement, however, no such reports have been made.

## 7.0 CONTACTS

If you have any questions about this Policy Statement, please contact us at [policies@theorigroup.com](mailto:policies@theorigroup.com)

A handwritten signature in blue ink that reads "Erastus Kibugu E.K." in a cursive style.

Erastus Kibugu, Managing Partner & CEO

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