

# Modern slavery statement



**Modern slavery is an abhorrent crime and a violation of basic human rights. It is a complex, global issue, which takes many forms and includes human trafficking, forced labour and servitude.**

Wellcome's position remains clear: modern slavery has no place within our organisation and we expect those who work with and for Wellcome to uphold and respect these standards.

Wellcome strives to operate to the highest ethical standards in all our work, in our business dealings and wider relationships. We are very aware that the ongoing Covid-19 global pandemic has created, and continues to create, additional dangers for the victims of modern slavery in the UK and globally. Those who seek to profit from global economic and social disruption utilise this time to seek alternative and new ways to operate and continue their exploitation of the most vulnerable. Wellcome has a responsibility to always be alert to emerging modern slavery and human trafficking risks, both in the UK and globally, and we continue to take steps proactively to further develop our understanding and mitigation of modern slavery risks within our organisation and beyond.

This statement provides some background to our organisation and our supply and funding chains. It also sets out the work that we have taken during the financial year ended 30 September 2021 to ensure that slavery and human trafficking are not taking place, either in our organisation or within our supply and funding chains.

**Julia Gillard, Chair**

**Jeremy Farrar, Director**

## About us

Wellcome is a politically and financially independent global charitable foundation dedicated to supporting science to solve the urgent health challenges facing everyone, as well as supporting a broad programme of discovery research into life, health and wellbeing.

## Our organisation

Wellcome is a charitable trust, registered with the Charity Commission (registered number 210183). Our sole trustee is The Wellcome Trust Limited, a company limited by guarantee. We have two subsidiaries that are also registered charities in England & Wales (Genome Research Limited and Hinxton Hall Limited), one subsidiary that is a s501(c)3 charity registered in the US (Wellcome Leap Inc.), two trading subsidiaries that support our own activities (Wellcome Trust Trading Limited and WT Construction Limited), a number of other subsidiaries that support our investment portfolio and a finance subsidiary (Wellcome Trust Finance plc).

This statement covers: the Wellcome Trust, The Wellcome Trust Limited, Wellcome Trust Trading Limited, WT Construction Limited and Wellcome Trust Finance Plc. Genome Research Limited is preparing a separate modern slavery statement to cover its operations and the activities of its subsidiaries, including Hinxton Hall Limited. We have three investment operating businesses, Urban & Civic plc, Farmcare Trading Limited and Premier Marinas Holdings Limited and their groups, that are independently managed and responsible for managing their own supply chains. Urban & Civic plc is preparing a separate modern slavery statement to cover its operations and the activities of its subsidiaries. Farmcare Trading Limited, Premier Marinas Holdings Limited and Wellcome Leap Inc. are not required to produce Modern Slavery Statements.

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The Wellcome Trust is a charity registered in England and Wales, no. 210183. Its sole trustee is The Wellcome Trust Limited, a company registered in England and Wales, no. 2711000 (whose registered office is at 215 Euston Road, London NW1 2BE, UK). LE-7323.2/01-2022/RK

## Governance

Our activities are overseen by our Board of Governors who have ultimate responsibility for all that we do. Wellcome's day-to-day management is delegated to the Director (supported by the [Executive Leadership Team](#) which reports directly to the [Board of Governors](#)).

More information about our governance framework can be found [here](#).

## Wellcome's approach

Wellcome strives to act responsibly and ethically in the way that we operate. We are explicit that how we do things is as important to us as what we do.

We are a London Living Wage accredited employer and employ over 900 people, operating out of our central London headquarters. We have taken steps to ensure that those who work with us operate to similar standards, for example, by implementing contractual safeguards with our facilities management service partners to ensure that their staff are paid the London Living Wage as a minimum standard.

We are continually looking to challenge and develop our understanding of modern slavery risk within our organisation, and beyond. To strengthen our commitment to identifying and tackling modern slavery risks, we work with Unseen UK, a leading charity that works to end modern slavery. Through this partnership, Wellcome supports Unseen's UK-wide Modern Slavery Helpline which provides a confidential reporting line, and vital support for victims of forced labour, as well as for those who report concerns.

Through this partnership and by listening and learning from Unseen UK's first-hand insights and expertise, Wellcome is shaping and developing its approach to modern slavery. Our collaboration with Unseen UK provides the ongoing opportunity for assessing our current risks, coupled with the support of Unseen UK's analysis of current and emerging trends. This increased awareness will enable our organisation to further increase transparency within our operations and supply chains.

## Our policies and procedures

Wellcome continues to update our framework of policies and procedures on a rolling basis to ensure continuous improvement. Whilst these are key to implementing effective systems and controls, we also believe that, when coupled with useful tools and engaging learning and communications, they are a fundamental ingredient in reinforcing our culture of integrity and transparency. Our policies outline the behaviours and conduct that we should expect of each other at Wellcome and apply to our work externally.

Our policies and procedures are regularly monitored and reviewed and apply to all our employees and to anyone engaged on a temporary basis.

The key policies and procedures that contribute to minimising the risk of modern slavery and human trafficking in our organisation and our supply chains are:

- **Speak Up policy:** Wellcome works hard to create an open and transparent culture. We are listening to our staff, and our Speak Up policy encourages anyone working at Wellcome to report any concerns about suspected, or actual, wrongdoing. Anyone reporting concerns can report through our Speak Up reporting line and web portal and has the option to remain anonymous. We have also partnered with the whistleblowing charity, Protect, to offer an independent, confidential advice line to Wellcome colleagues.
- **Code of Conduct:** our Code of Conduct brings together all our conduct-related policies and underpins our expectations of how we work with each other, as well as with our external partners.
- **Bullying and harassment policy:** this is designed to help ensure that all our staff and anyone that we fund is treated with both dignity and respect.
- **Risk management policy:** this is designed to keep all our activities in line with all applicable laws, regulations and codes of governance (including in relation to slavery and human trafficking).
- **Health, safety and environment policy:** a key aim of this is to ensure the wellbeing of all our employees and anyone else who may be affected by our activities.
- **HR procedures:** we check that all our staff have appropriate right to work documents and ensure that they are paid fairly and enjoy a competitive remuneration package. We have procedures in place to safeguard the interests of young people and any unpaid work experience volunteers at Wellcome.
- **Procurement policy:** this sets out several factors to be considered when selecting our suppliers, including whether the supplier will be a good business partner for Wellcome. This in turn involves considerations of supplier reputation and compliance with laws and ethical procedures.
- **Agreements policy:** our template agreements and standard terms and conditions require suppliers to comply with the law and include specific provisions in relation to modern slavery and human trafficking.
- **Financial Crime policy:** this new policy is a development of our previous fraud and corruption policy, and it reminds our people to take account of any improper or suspicious behaviour or situations, and to report and deal with the risk of fraud and corruption, as well as bribery and the facilitation of tax evasion.

Wellcome's Procurement team continues to review and strengthen our centralised procurement processes and policy, by considering a range of risks, including slavery and human trafficking.

## Our supply chain

We use suppliers to support the operations of our organisation. The key areas in which we engage suppliers are:

- Facilities management
- Information technology
- Finance
- Legal
- Our People team
- Investments

## Our supply chain due diligence

Modern slavery is not tolerated within Wellcome's operations and we expect those who work with us, or on our behalf, to respect and adhere to these values.

We carry out an annual due diligence exercise on our key suppliers to ensure that they have appropriate policies in place to minimise the risk of modern slavery and human trafficking within their business and onward supply chains. We also check for certain 'key performance indicators' such as training and paying the London Living Wage, or the National Living Wage.

Our key suppliers are assessed based on their geographic location and the nature of their business or services. Based on this year's review, we are satisfied that our key suppliers have appropriate policies in place and that these policies are being regularly reviewed and updated.

We have existing supplier due diligence and monitoring processes in place. Our Procurement team, assisted by our Legal team, continue to look for ways to improve our supplier due diligence process, to ensure that we are working with organisation that have controls in place to minimise risks, including the risk of modern slavery and human trafficking. In the coming year, we will be implementing a more advanced third party due diligence screening tool.

Our Procurement team is also looking to foster long-term relationships with suppliers, through which policies aimed at minimising a range of risks (including the risk of modern slavery and human trafficking) can be advanced.

## Our grant and investment activities

We deal with many organisations through our grants and investments activities. We have carried out an assessment of key aspects of these activities to understand the risk of slavery and human trafficking in these areas and how any such risks could be mitigated.

## Grant activities

We believe that the risk of modern slavery occurring within our grant funding activities is low, based on the nature of our funding and the location of our grant recipients. More than 75% of Wellcome's funding is awarded to UK academic and research organisations.

Wellcome is a Living Wage Funder and has made a commitment to ensure that the many thousands of people funded through our UK-based grants are paid at least the real Living Wage. The real Living Wage is an independently calculated, voluntary rate of pay that is based on the actual cost of living. We fund nearly 10,000 people in the UK through our grants. These are mostly research staff working in UK universities, but we also fund people working in the third sector undertaking public engagement and education activities relating to health.

Wellcome recognises its responsibility to ensure that we are providing funding to organisations that uphold similar standards to our own. This year we have undertaken due diligence on the 25 UK organisations that receive the largest proportion of grant funding from Wellcome (representing more than 90% of Wellcome's total grant funding within the UK). This process ensures that these organisations have appropriate policies and procedures to minimise the risk of modern slavery taking place within their own operations, and that these policies and procedures are reviewed and updated annually.

Many international grant-holders do not explicitly consider modern slavery in their policies and procedures, as this is not a legal requirement for them. However, as part of our internal audit process (which applies to both our UK and international grant-holders) our internal audit team:

- Asks our grant-holders what steps they take to minimise the risk of modern slavery and human trafficking.
- Reviews our grant-holders' procurement processes (including supplier due diligence processes).
- Makes best practice recommendations to mitigate the risk of slavery and human trafficking, where appropriate.

We will continue to monitor our grant-holders in this respect through our audit activity.

## Investment activities

Based on our annual review of the directly owned public companies, key directly owned private companies and operational and property-backed businesses in our investment portfolio, we are satisfied that the large majority have appropriate policies and procedures in place to minimise the risk of slavery and human trafficking. Those companies that lacked specific policies on this issue were mostly companies that we consider to be low risk given the nature and location of their employees. Only in a very small number of public companies, where we are a small shareholder, do we consider there to be a potential risk. We continue to engage with the management of these companies on this issue.

The annual review with regards to modern slavery is part of a broader process of continuous monitoring of our investments. As Wellcome is a long-term investor with a time horizon measured in decades, we are able to take the view that the companies and funds in which we invest must have a strong social licence to operate as well as a sound and sustainable business model. We engage closely with them so that we can be confident they take their environmental, social and governance responsibilities seriously. There have been instances where we have sold positions that in our view did not meet this test.

## Training

We try to ensure that adequate information and training is provided to all our employees, contractors or visitors on all relevant matters. Here are some examples of the information and training we provide:

- Everyone working at Wellcome is required to complete our mandatory Code of Conduct digital learning module, which reinforces Wellcome's values and the expected standards of conduct that are outlined in our policies and procedures.
- Managers are provided with a range of leadership training and are assisted by our HR team in HR-related matters including recruitment, remuneration and employee wellbeing.
- Our procurement team, assisted by our legal team, routinely seeks out information and training to help identify and address risks in both our organisation and supply chain (including in relation to slavery and human trafficking) and will continue to do so.
- This year we communicated with all staff about Modern Slavery and Human Trafficking through articles on our intranet. We also ran a well-attended 'virtual' event to which all staff were invited on Modern Slavery as part of our series called 'The Only Way Is Ethics'. In this session the CEO of Unseen UK talked about modern slavery risks globally and within the UK, as well as exploring some of the risks for, and relevance for, Wellcome specifically.

## Looking ahead

Over the next year we expect to:

- Continue to grow our partnership with Unseen UK and to use their knowledge and expertise to further develop Wellcome's thinking around modern slavery and identify the risks that are relevant to our organisation and beyond.
- Implement and embed in our processes our new third-party due diligence screening tool
- Continue to raise awareness of modern slavery risks within Wellcome through further training sessions to key teams within our organisation, and continue to build engagement of all staff on modern slavery more broadly.
- Further progress our work with other major UK funders, through our grant activities, to develop a fit for funding statement that all new grant-holding organisations will need to complete. This statement will require organisations to assure us they can comply with key grant funder conditions and policies, including our requirement that they have implemented appropriate policies and procedures to mitigate the risk of modern slavery within their operations.

**This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Wellcome's modern slavery and human trafficking statement for the financial year 1 October 2020 to 30 September 2021.**