

# DT Global - Modern Slavery and Human Trafficking Statement

For financial year end date 30 September 2024

## 1. Introduction

DT Global is committed to our core values of integrity, collaboration, diversity and inclusion, civility, technical excellence, learning & adaptation, and innovation. As such, we ensure we demonstrate trust, integrity and excellence in our work and the projects we deliver. We have always had a zero-tolerance stance on corruption, bribery, forced work, and other unethical actions. DT Global takes tackling modern slavery worldwide seriously, and we are committed to working towards the Sustainable Development Goals, particularly Goal 8 – Decent Work and Economic Growth.

## 2. Our Business and Organisational Structure

DT Global is an independent consulting company with over 60 years of experience implementing, monitoring and successfully delivering development programmes in over 120 countries across Sub-Saharan Africa, South and South-East Asia, Middle East, the Pacific, the Caribbean, Eastern Europe, and Central Asia.

Built on over 60 years of experience through its legacy companies, DT Global has emerged as a leader in providing innovative, scalable, and responsive solutions to the world's greatest challenges. From early-stage crisis and stabilization assistance to economic development, governance, and environmental work, DT Global provides a continuum of support to communities in five principal development areas: Economic Growth; Environment & Infrastructure; Human Development; Governance; and Conflict Prevention, Stabilization & Transition.

With corporate head offices in Africa, Asia-Pacific, Europe, the United Kingdom, and the United States, our portfolio spans more than 90 countries.

DT Global is committed to ensuring that international labour standards are embedded as normal practice in our regional teams and offices. We have strong relationships with our country teams and are working with them to ensure that we successfully monitor and report on modern slavery in our supply chains.

DT Global financial reporting year was amended in 2022 and now ends on 30 September.

## 3. Supply Chain

Our supply chains consist of partner organisations, located all over the world, and independent consultants. All partners and independent consultants are expected to carry out their work ethically and must sign up and adhere to DT Global's Business Ethics Policy. The Business Ethics Policy covers acts of corruption, modern slavery, human trafficking, and fairness in procurement, as well as a code of conduct. All partners sign up to this policy during our bidding process and sign up to our full suite of policies including our Anti-Slavery and Human Trafficking Policy at contract stage.

The nature of the work DT Global carries out overseas sometimes means that our supply chains are wide and disparate. As such, a great deal of work is being carried out to identify where we, as a management consultancy, have the greatest leverage to influence change and set a standard for best practice.

## **4. Global Policies**

DT Global's global policies governing the conduct of every business, such as the DT Global Anti-Corruption Policy, are supplemented by local policies to ensure compliance with local legislation and each of our client's requirements.

DT Global's Anti-Human Trafficking and Modern Slavery Policy outlines our commitment to preventing modern slavery risks, how we intend to act as a business and how we expect all our staff, independent consultants and partner organisations to act. The policy also outlines our reporting guidelines, and we encourage anyone who suspects a modern slavery incident to come forward and report it. Additionally, details of DT Global's independent whistleblowing service is made available to all our staff, independent consultants, partner organisations and the public.

Other global policies designed to safeguard all individuals include our PSEAH Policy, Child Protection Policy and Security Policy. All policies are reviewed periodically to ensure they remain up-to-date and fit for purpose. DT Global does not support or knowingly deal with any business or individual involved in slavery or human trafficking. We will not work with any party that we suspect is connected in any way with slavery or trafficking.

## **5. Due Diligence, Risk and Mitigation**

DT Global is committed to undertaking due diligence on all our partner organisations, suppliers and individual consultants. We want to ensure that everyone we work with holds the same high standards and policies that we do. We are keen to collaborate with our partners to tackle complex issues surrounding modern slavery and human trafficking, and if one of our partner organisations does not have a specific policy in place, we require them to agree to ours. We aim to stand as an example of best practice and choose to partner with organisations and individuals who wish to do the same.

## **6. Whistleblowing**

DT Global utilises an independent whistleblowing service. Details on how to access this service are readily available on our website, intranet, through posters in our corporate and project offices as well as our contractual agreements to ensure that our employees, suppliers and the public can raise concerns confidentially and anonymously should they witness any wrongdoing. Modern Slavery is also a specific category that can be selected by those using the DT Global Ethics Hotline to make reports enabling DT Global to monitor, identify and report on the effectiveness of key procedures and risk mitigations.

## **7. Looking Forward**

Going forward, we will continue to uphold our zero-tolerance standards and work with our supply chains to do the same, so that together we can help combat modern slavery.

As a company, we are committed to continuous improvement and our target for 2025 will be to continue to map where we have the greatest leverage to influence change in our supply chains.

## **8. UK Specific Statement**

DT Global International Development UK Ltd (DT Global UK) is committed to the Modern Slavery Act of

2015 and the abolition of modern slavery and human trafficking. We are committed to creating a non-discriminatory and respectful working environment, where those that we work with feel confident to expose wrongdoing without risk to themselves. To safeguard employees from the risk of abuse or coercion our recruitment processes ensure that all prospective employees are legally entitled to work in the UK. Prior to contracting, we carry out due diligence on all organisations that we work with and do not engage in business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude, forced or compulsory labour, human rights abuses, or child labour. We will continue to improve our processes and procedures to continuously combat such acts by working towards the principles of the Ethical Trading Initiative (ETI) and the International Labour Organisation (ILO).

## **8.1 UK Specific Policies**

In addition to adherence with DT Global policies, DT Global UK has additional tailored policies including Environmental Policy, Redundancy Policy, Health and Wellbeing Policy, Safeguarding Policy, Whistleblowing Policy and Ethics and Anti-Corruption Policy amongst others, many of which reference UK client specific requirements.

Risks of Modern Slavery are included in DT Global UK's Master Risk Register and as a key word prompt in DT Global UK's standard risk assessment template for all projects.

## **8.2 Progress**

DT Global UK is committed to our zero-tolerance standards and learning from experiences on projects and our supply partners.

DT Global UK has faced various organisational and operational challenges which have presented obstacles to progress in advancing our modern slavery prevention measures.

In 2020, we launched our Modern Slavery training modules to all DT Global UK employees and independent consultants, and we continue to ensure that all staff complete the training and have refresher training every two years. This training covers what the signs of modern slavery are, how to mitigate the risks of modern slavery, and how to report any modern slavery concerns on our overseas projects and in the UK. In 2023, we moved our training to our Learning Management System to improve capability, ease of use and auditing purposes

## **8.3 Looking Forward**

DT Global UK has developed a Modern Slavery Standard Operating Procedure (SOP) that is soon to be launched. The purpose of the Modern Slavery SOP is to:

To build awareness of modern slavery and key modern slavery identifiers among DT Global project staff, DT Global suppliers, and partners.

To direct the design and implementation of best-fit modern slavery risk management procedures for projects.

To improve the protection of human rights in our operations and in doing so ensure DT Global's compliance to the Modern Slavery Act.

The Modern Slavery SOP instructs teams to take a risk-based approach and to design Modern Slavery monitoring activities, reporting protocols, communications plans and training plans according to the

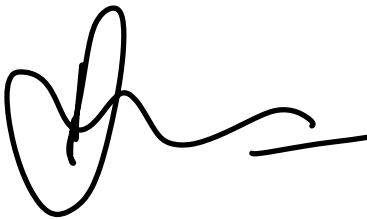
risks prevalent on the particular project.

We will also explore what Key Performance Indicators (KPIs) can assist us in our modern slavery prevention measures. Such KPIs will include:

- Number of staff trained.
- Number of contracted independent consultants trained.
- Roll out and application of our Modern Slavery SOP.
- Risk assessments on projects – highlighting modern slavery risks.
- Internal audits carried out – focusing on modern slavery measures at project level.

#### **8.4 Approval of this UK Specific Statement**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes DT Global UK's modern slavery and human trafficking statement for the financial year to 30 September 2024.



**Mel Dunn**  
Managing Director  
DT Global International Development UK Ltd