



## CEPI's slavery and human trafficking statement

### Introduction from the Chief Executive Officer

At CEPI we oppose modern slavery in all its forms, and we are committed to ensuring that there is no slavery or human trafficking in our operations or our supply chain. We are committed to improving our practices to combat slavery and human trafficking. CEPI was established in 2017 and is a young organisation. We still have steps to take to increase our understanding of the modern slavery risks faced by our operations and to further implement the effective responses to those risks. This statement outlines the responses we have implemented as well as providing a description of our 2020 targets.

Pursuant to Section 54 of the UK Modern Slavery Act 2015 we hereby present CEPI's Modern Slavery Act Transparency Statement to set out the steps we have taken to ensure that there is no slavery or human trafficking in our operations or our supply chain. This Statement was approved by the Executive Investment Committee of the Board of Directors on 17 December 2020 and covers the financial year ending 31 December 2019.

We acknowledge that this statement should normally have been approved and published within six months of our financial year end. Unfortunately this has not been possible for the year ending 31 December 2019 given that CEPI has been at the forefront of organising, co-ordinating and funding global attempts to bring the COVID-19 pandemic under control in an equitable manner (including under the COVAX initiative led by CEPI, Gavi, the Vaccine Alliance and the World Health Organization). This extraordinary effort required (and still requires) CEPI to focus its resources and staff on a large number of time critical projects, which are being undertaken in accordance with our policies and procedures listed below, but which cause certain delays to tasks of a more administrative nature. As a result, CEPI has taken advantage of the extended deadline granted by the UK Home Office in its guidance "Modern slavery reporting during the coronavirus (COVID-19) pandemic", published on 20 April 2020 to publish the current statement.

Richard Hatchett  
Chief Executive Officer CEPI

### Our organisation

We are a global coalition of public, private, philanthropic, and civil society organisations, launched in Davos in 2017, to develop vaccines to stop future epidemics. Our mission is to accelerate the development of vaccines against emerging infectious diseases and enable equitable access to these vaccines for people during outbreaks. We are primarily a grant-giving organisation.

CEPI is a Norwegian non-profit association. The headquarter is in Oslo, Norway, with offices in London, UK and in Washington DC, USA. We had 54 employees as of 31 December 2019.

The primary governing body of CEPI is the Board, which has 12 voting members (four investors and eight independent members representing competencies including industry, global health, science, resource mobilisation, finance) and five observers. All investors are invited to join our Investors

Council, which nominates Investor representatives to the Board and has some rights including approval any single investments over \$100m.

Two additional bodies support and guide CEPI's work: the Scientific Advisory Committee is the principal scientific advisory group to the Board and Secretariat and the Joint Coordination Group works with critical external stakeholders to advance CEPI's portfolio of vaccines.

## Our supply chains

Our supply chains include:

- Sponsored vaccine developers
- Sponsored global health non-profit organisations
- Clinical trials conducted by sponsored vaccine developers and global health non-profit organisations
- Sub-contractors for services relating to vaccine development and manufacturing, including from clinical laboratories, equipment suppliers, and vaccine manufacturers

In addition, 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

## Business integrity and compliance

CEPI has established a dedicated compliance department; the Governance, Risk & Compliance (GRC) department. The responsibility for the design and continuous improvement of our business integrity work lies with the GRC team. The business integrity scope encompasses modern slavery and trafficking. The Head of GRC reports to the Board of CEPI. GRC is responsible for ensuring that CEPI maintains a risk-based and effective compliance programme and supports implementation of the programme. GRC develops and maintains relevant policies, procedures, guidelines and tools, designs and provides training and recommends training requirements, support the integrity due diligence process, prepares and participates in audits and reviews, and manages the whistleblowing channel.

## Our policies and procedures

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our operations. Currently, an own anti-slavery and anti-trafficking policy has not been developed in CEPI. We aim to detail out our anti-slavery and -trafficking principles in our Code of Conduct during 2020 to reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

The following CEPI policies and procedures address anti-slavery and anti-trafficking:

### **Third Party Code of Conduct**

This requires Third Parties to respect and uphold international human rights and should not contribute to any violation of human rights, including in particular laws and regulations prohibiting human trafficking and slavery. Third Parties is defined in the broadest sense as all "contracting parties of CEPI, including individuals, organisations and companies that provide or are intending to provide goods or services, awardees receiving funding, and other business partners to CEPI and any of its affiliates and subsidiaries". All Third Parties must sign the Third-Party Code of Conduct when entering into an agreement with CEPI. Moreover, the Code addresses labour and employment practices in line with the acknowledged human rights, such as freely chosen labour, a prohibition on

child labour and young workers, non-discrimination, fair treatment, and fair wages, benefits and working. Third Parties shall ensure that workers have a healthy and safe working environment in accordance with internationally recognized standards and applicable health and safety laws and regulations.

#### **Code of Conduct**

This outlines CEPI's commitment to respecting all internationally recognised human rights. All employees and hired ins of CEPI and its subsidiaries must adhere to the Code of Conduct.

#### **Anti-Corruption Policy and Procedure**

The fight against corruption is a crucial aspect of the fight against modern slavery and trafficking. Our anti-corruption policy state a zero-tolerance regarding fraud and corruption. Moreover, the anti-corruption framework 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.

#### **Whistleblowing Policy and Procedure**

This ensures that CEPI has a whistleblowing system for the reporting of both internal and external wrongdoings related to CEPI and how to handle whistleblowing cases.

#### **Risk Management Policy and Procedure**

CEPI's risk management approach is designed to keeping CEPI in line with relevant laws and regulations, including modern slavery laws and regulations.

#### **Due Diligence Procedure**

A procedure is currently being drafted and will be published in Q4 2020. The procedure aims to enable CEPI to accurately evaluate and manage risks associated with our third parties.

#### **Human Resources 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.

#### **Procurement process**

For all purchases above GBP 9.300 a media screening is performed to capture any adverse media, including modern slavery and trafficking.

#### **Commitment to tackling racism statement**

A statement on tackling racism has been published on our external website.

### **Risk management and due diligence processes for slavery and human trafficking**

As a voluntary funded organisation, CEPI depends on the confidence of its donors to fulfil its mandate. CEPI operates in a global environment and is exposed to continuously changing factors which could affect CEPI's risk profile. Linking risk management to practical decision making on a day-to-day basis is important to ensure sound judgement.

Risk management in CEPI means dealing with risks in a transparent, consistent and continues manner, providing a better understanding of the nature of the risks and their likely impact, and implementing appropriate mitigations.

The objective of the due diligence processes in CEPI is to enable CEPI to accurately evaluate and manage risks associated with any potential third parties.

We have in place processes to:

- identify and assess potential risk areas in our supply chains.

- mitigate the risk of slavery and human trafficking occurring in our supply chains.
- monitor potential risk areas in our supply chains.
- protect whistle blowers.

CEPI's integrity due diligence process also includes adverse media screening on human rights infringements, modern slavery and trafficking to ensure that we do not engage with entities or individuals with a bad track record.

### Training on modern slavery and trafficking

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we aim to provide training to all our staff by the end of 2020.

### Our 2020 targets

CEPI is endeavouring to meet the following targets during the course of 2020 or, if this is not achievable due to its ongoing efforts to fight the COVID-19 pandemic described at the start of this statement, as soon as possible in 2021:

- develop and implement modern slavery and trafficking training as part of our business integrity training.
- include a specific chapter on modern slavery and trafficking in our Code of Conduct.
- develop the human rights chapter to include more detailed requirements towards our suppliers in our Third-Party Code of Conduct.
- further develop our due diligence process to ensure regular monitoring of our third parties.
- formalise a supplier compliance programme.