



## CEPI's slavery and human trafficking statement: 2021

### 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. CEPI was established in 2017 and is a young organisation. We are committed to continuously improving our practices to combat slavery and human trafficking, and to increasing our understanding of and improving the effectiveness of our responses to any modern slavery risks which our activities may involve.

We acknowledge that 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 is particularly true given that CEPI remains 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 has required (and still requires) CEPI to focus its resources and staff on many time-critical projects, which are being undertaken in accordance with our policies and procedures listed below. We have nonetheless ensured that where appropriate we have implemented measures to combat modern slavery and trafficking in CEPI's activities.

Pursuant to Section 54 of the UK Modern Slavery Act 2015 we hereby present CEPI's Modern Slavery Act Transparency Statement for 2021, 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 outlines the responses we have implemented since our previous statement was issued in December 2020 and describes our 2021 targets. This Statement was approved by the Executive Investment Committee of the Board of Directors on 9 June 2021 and covers the financial year ending 31 December 2020.

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 not-for-profit association. CEPI's headquarters are in Oslo, Norway, with offices in London, UK and in Washington DC, USA. We had 93 employees as of 31 December 2020.

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 CEPI sovereign donors 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; performs integrity due diligence searches; prepares, participates in and manages audits and reviews; and manages the CEPI 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, a free-standing anti-slavery and anti-trafficking

policy has not been developed in CEPI. We aim to set out in detail our anti-slavery and -trafficking principles in our Code of Conduct during 2021. This detailed statement will 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.

Currently the following CEPI policies and procedures address anti-slavery and anti-trafficking:

### **Third Party Code**

The CEPI Third Party Code 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. The Code defines third parties 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” (“Third Parties”). All Third Parties must sign the Third Party Code when entering into an agreement with CEPI.

The Code also 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 consultants 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 includes zero-tolerance of fraud and corruption. Moreover, the anti-corruption framework reminds CEPI staff, consultants and Third Parties 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 procedure ensures that CEPI has a whistleblowing system for the reporting of both internal and external wrongdoings related to CEPI. It also dictates how whistleblowing cases are handled within CEPI.

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

CEPI’s risk management approach is designed to detect and mitigate risks relevant for CEPI, including modern slavery risk, and keeping CEPI in line with relevant laws and regulations, including modern slavery laws and regulations.

### **Due Diligence Procedure**

CEPI has implemented an integrity due diligence process. The detailed the procedure describing all of CEPI’s due diligence processes, including the integrity due diligence process, is being drafted at the time of writing, and will be published later in 2021. The procedure describes how CEPI identifies, evaluate and manage adverse information and risks associated with CEPI’s Third Parties, including modern slavery and human trafficking risks.

### **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. Procurement is in the process of implementing a financial and integrity screening tool to further strengthen their screening process of CEPI's suppliers.

### **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 handling risks in a transparent, consistent and continuous 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 identify, evaluate and manage adverse information and risks associated with any potential Third Parties.

We have in place processes to:

- identify and mitigate potential risk areas in our supply chains
- identify and mitigate adverse information in our supply chains
- identify and mitigate the risk of slavery and human trafficking occurring in our supply chains
- monitor potential risk areas in our supply chains
- protect whistle blowersq

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 offered business integrity training to all employees by the end of 2020.

### **Our 2020 activities and 2021 targets**

Since our last statement dated 31 December 2020, CEPI has carried out the following activities aimed at lowering the risk of modern slavery and human trafficking occurring in CEPI's operations and activities:

1. We have implemented a software tool to perform integrity due diligence and monitoring of our third parties. The tool helps us to detect and mitigate adverse information related to human rights infringements, modern slavery, corruption, fraud and sanctions.
2. We incorporated training on identifying and preventing modern slavery in our internal business integrity training course, offered to all CEPI employees by the end of 2020. All CEPI consultants will be offered this training by the end of Q2 2021. The business integrity course is mandatory.

3. We are in the process of strengthening our program for prevention and detection of possible human rights infringements in our operations. As a first step in this process, we will be hiring a consultancy firm to help us conduct a Human Rights Impact Assessment (HRIA) of CEPI's operations, including our project portfolio, which will include modern slavery-related assessments as appropriate. A request for proposal (RFP) has been launched, and we expect to conclude the RFP process by end of June 2021.
4. We have formalised a compliance programme for our direct suppliers, using the compliance review and monitoring software Compliance Catalyst.

CEPI will continue to work towards the following targets during 2021, or if this is not achievable due to our ongoing efforts to fight the COVID-19 pandemic described at the start of this statement, as soon as possible in 2022:

- provide modern slavery and human rights training to all new employees and to all consultants working more than 50% for CEPI for over a longer period of time
- perform a HRIA of CEPI's operations
- further strengthen CEPI's human rights program, based on the outcome of the HRIA as well as on advice from the consultancy firm that will be selected in the ongoing RFP process
- develop the human rights chapter in our Third Party Code to include more detailed requirements for our suppliers